

Dear Justice Pepper,

I have been studying the draft Final Report and am extremely concerned by the Inquiry's conclusion that fracking can be safely carried out in the NT, especially considering the evidence of irreversible damage caused by the gas industry elsewhere, the NT's inability to competently regulate other forms of mining, and the lack of Territory specific information available to reach such a conclusion.

One hundred and fifteen risks were identified in the draft Final Report. This includes 16 risks to the Territory's surface water and groundwater¹. The Northern Territory is reliant on groundwater for drinking water supplies. The Panel has made 19 recommendations² specifically relating to the NT's water resources but acknowledge that risks remain even with these recommendations. The report summary concludes that "No industry is completely without risk. And the development of any onshore shale gas industry in the NT is no exception³." I find any risk created by the gas industry, especially to people's drinking water, totally unacceptable.

The draft Final Report repeatedly states that vital data and knowledge required for accurate risk assessments is lacking in the Northern Territory. The report contains many statements such as, "The panel has found that there is a paucity of information available on the performance of abandoned onshore shale wells"⁴; the "Northern Territory's petroleum bearing basins are relatively underexplored, and as a result, the level of geological knowledge of the basins is incomplete and highly variable"⁵; "there still remains considerable uncertainty about the likely scale and rate of development of any onshore shale gas industry in the Northern Territory."⁶, and "With all potential onshore shale gas areas in the NT, there is very little information about the nature of the deeper groundwater systems, and moreover, there is limited understanding (based on deep exploration drilling to date) of the deeper

¹ The Scientific Inquiry into Hydraulic Fracturing in the Northern Territory 2017, *Draft Final Report Appendices*, Appendix 2 Final list of issues, p. 7 <https://frackinginquiry.nt.gov.au/inquiry-reports?a=465920>

² The Scientific Inquiry into Hydraulic Fracturing in the Northern Territory 2017, *draft Final Report of the Scientific Inquiry into Hydraulic Fracturing in the Northern Territory*, Chapter 7 Water <https://frackinginquiry.nt.gov.au/inquiry-reports?a=465903>

³ The Scientific Inquiry into Hydraulic Fracturing in the Northern Territory 2017, *Summary of the Draft Final Report*, p. 50 <https://frackinginquiry.nt.gov.au/inquiry-reports?a=465893>

⁴ The Scientific Inquiry into Hydraulic Fracturing in the Northern Territory 2017, *draft Final Report of the Scientific Inquiry into Hydraulic Fracturing in the Northern Territory*, p. 47 <https://frackinginquiry.nt.gov.au/inquiry-reports?a=465896>

⁵ The Scientific Inquiry into Hydraulic Fracturing in the Northern Territory 2017, *draft Final Report of the Scientific Inquiry into Hydraulic Fracturing in the Northern Territory*, p. 76 <https://frackinginquiry.nt.gov.au/inquiry-reports?a=465896>

⁶ The Scientific Inquiry into Hydraulic Fracturing in the Northern Territory 2017, *draft Final Report of the Scientific Inquiry into Hydraulic Fracturing in the Northern Territory*, p. 88 <https://frackinginquiry.nt.gov.au/inquiry-reports?a=465896>

geological systems in these basins”⁷. It is unacceptable, considering the lack of essential information, for the Panel to declare that “the conclusion of this Inquiry is that the challenges and risks associated with any onshore shale gas industry in the NT are manageable”⁸.

Many of the recommendations made in the report attempt to reduce the 115 poorly understood but undeniable risks, though as the Inquiry says, “nothing is guaranteed”⁹. These recommendations do not go far enough as they only apply to the production phase, not the exploration phase of the onshore gas industry. Many exploration activities are virtually identical to production activities, so any regulatory changes should apply to all stages of gas development. There are two recommendations that should be added to the report: 1) That landholders have the right to veto and stop gas activities on their properties, and 2) That onshore gas activities be banned until we fully understand all the implications of ‘fracking’ in the NT and can reduce the risks to zero.

The draft Final Report states that two of the purposes of the Inquiry was to “assess and determine:

- the nature and extent of the risks associated with hydraulic fracturing of onshore unconventional shale reservoirs and its associated activities on the environmental (aquatic, terrestrial and atmospheric), social, cultural, and economic conditions of the Northern Territory; (and)
- whether these risks can be mitigated to an acceptable level¹⁰”

These objectives have not been satisfactorily achieved in the draft report.

The risks to the NT described in the draft Final Report, and the lack of information available to make informed decisions highlights the fact that the onshore shale gas industry should not be able to proceed in the Northern Territory.

Yours Sincerely,

Steve Vidler

⁷ The Scientific Inquiry into Hydraulic Fracturing in the Northern Territory 2017, *draft Final Report of the Scientific Inquiry into Hydraulic Fracturing in the Northern Territory*, p. 100 <https://frackinginquiry.nt.gov.au/inquiry-reports?a=465896>

⁸ The Scientific Inquiry into Hydraulic Fracturing in the Northern Territory 2017, *Summary of the Draft Final Report*, p. 50 <https://frackinginquiry.nt.gov.au/inquiry-reports?a=465893>

⁹ The Scientific Inquiry into Hydraulic Fracturing in the Northern Territory 2017, *Summary of the Draft Final Report*, p. 50 <https://frackinginquiry.nt.gov.au/inquiry-reports?a=465893>

¹⁰ Draft Final Report, p. 10 <https://frackinginquiry.nt.gov.au/inquiry-reports?a=465896>