

## fracking inquiry

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**From:** Jan Archibald <campaigns@good.do>  
**Sent:** Monday, 12 February 2018 8:33 AM  
**To:** fracking inquiry  
**Cc:** Chief Minister; Minister Fyles; Minister Vowles; Minister Moss  
**Subject:** Written submission on the NT Fracking Inquiry draft Final Report

Dear Justice Pepper and Panel,

Thank you for the opportunity to provide written feedback on the draft Final Report of the NT Fracking Inquiry.

I appreciate that the Panel's report makes many important recommendations in the face of the 115 risks identified.

The Panel has made 19 recommendations relating to the NT's water resources. The draft report acknowledges that risks remain, even with these recommendations.

Groundwater is critical in the Northern Territory. It is allocated for our residential needs, existing industries and environmental flows. Many high yielding aquifers within the NT are close to their full allocation already. Many are under pressure from resource development (page 105).

The draft Final Report outlines significant knowledge gaps for groundwater, biodiversity, landscape and health impacts. These gaps need to be rectified and baseline studies completed. Appropriate no go areas must be legislated and in place before exploration fracking should be considered.

Many exploration activities are virtually identical to production activities. Chemical use, high pressure hydraulic fracturing through aquifers, water use and associated risks are involved. Any regulatory changes should apply to all stages of gas development.

The draft Final Report shows Origin energy identified exploration and appraisal could include 8-16 wells and 24-48 wells for delineation (page 167).

Origin alone could drill and frack up to 64 wells across their tenement, all before critical improvements are made to the regulations.

With fracking companies combined, we could have a situation in the NT where there are over a hundred fracked gas wells across the landscape. That's all before production, without key law changes or baseline studies complete.

Critical studies identifying no go zones will difficult to achieve in an area already littered with fracked gas exploration wells.

I support the swath of new regulations and legislation required to try and protect landholders and water. However, that work needs to happen before the oil and gas industry is permitted to start fracking in the Northern Territory again.

The below critical recommendations must be improved and work completed BEFORE EXPLORATION fracking takes place.

Recommendation 5.1 (Enforceable code of practice for abandonment of onshore gas wells)

Recommendation 5.6 (Wastewater management framework)

Recommendation 7.1 (Water Act amended for shale extraction licence and payment for water)

Recommendation 7.4 (Strategic regional environmental and baseline assessment (SREBA), including a regional groundwater model, be developed and undertaken)

Recommendation 8.4 (Fire management plan and 10 year baseline assessment)

Recommendation 9.2 (Code of practice be developed and implemented for monitoring, detection and reporting of methane emissions)

Recommendation 10.1 (Human Health Risk Assessment prepared and approved)

Recommendation 12.11 (Social impact management plan) This recommendation should also be extended to allow for the legal right to say ‘no’ to fracking.

Recommendation 14.1 (Design and implement a full cost recovery system for fracking regulation)

Recommendation 14.16 (Legislation to regulate seismic surveys, drilling, hydraulic fracturing, and well abandonment)

Recommendation 14.18 (Fit and proper person test)

Recommendation 15.1 (Strategic regional environmental and baseline assessment (SREBA) undertaken and no go zones implemented)

In the NT there is a saying, “Once you frack you can’t go back.” Exploration fracking is no different. The studies, legal improvements and no-go zones suggested by the panel are critical. They must be actioned before any further fracking exploration.

Let’s not wait until the production phase to put in place critical new regulations and laws. We must avoid delays to the protection of the Northern Territory’s water, landscapes and people.

Thank you for considering my feedback on this critical matter for the future of the Northern Territory.

Yours sincerely, Jan Archibald

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