

fracking inquiry

From: Richard and Patsy Creswick <campaigns@good.do>
Sent: Friday, 19 January 2018 12:08 PM
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.

It is our contention that, rather than those opposing Fracking having to put a case, it should be up to the proponents of Fracking to demonstrate why Fracking should be permitted in the NT. We contend that proponents of Fracking need to demonstrate three things:

1. That there is a need for this gas
2. That there will be real economic benefits to the Northern Territory, both in financial and employment terms; and
3. That Fracking can be carried out in a way that does not include environmental social, or cultural damage,

In regards to point 1., nowhere has it been demonstrated conclusively that the gas believed to be sequestered in the NT is, in fact, needed for either the Territory or National interests. It is our belief that there is more than sufficient gas reserves already being accessed in both Australia and the NT to meet Australia's needs for at least 100 years and that the perception of a shortage is fostered by politicians who have allowed these reserves to be developed and sold off overseas without ensuring that adequate supplies were guaranteed for domestic markets. It is, or should be, clear from their actions that the international conglomerates responsible for extracting and selling the gas offshore, have no interest in ensuring adequate domestic supplies and are only, apparently, changing their view as a result of intense political pressure resulting from rising electricity prices.

Regarding point 2, demonstrated economic and employment benefits, it has been shown from Queensland's experience with Coal Seam Gas exploitation, that the returns to the Government are minimal, that employment predictions were wildly overstated and the environmental effects, including significant rates of health-related problems, not to mention the degradation or destruction of land, the pollution of rivers from gas seepage, were wilfully ignored.

point 3. The Queensland experience, not to mention experiences from many parts of the United States, demonstrate that the industry is incapable of complying with any regulatory standards which might be imposed. In Queensland it has been reported that the regulatory bodies are not only incapable of adequately monitoring health and environmental impacts, the regulations themselves are proving inadequate to control the problems arising from unconventional gas extraction.

In the Territory there are numerous examples of both failed regulations and failed enforcement of regulations. Decades of overflows of contaminated waters from the Ranger Uranium Mine, the current disaster at McArthur

River, even going back to the Rum Jungle Uranium Mine which still requires (taxpayer funded) rehabilitation. We think it has been demonstrated over decades that while businesses might pay lip service to observation of safety, environmental and health requirements, they are only too willing to avoid regulations, and punishment, by obfuscation and lies, using their significant financial resources to browbeat governments and regulatory authorities, and any group or individual opposing them.

The mining companies have deep pockets and are prepared to dig deep into those pockets to ensure they succeed.

It is well-known that, due to exceedingly favourable tax arrangements, particularly for exploration, most multinational miners operating in Australia pay little or no tax. The Northern Territory could expect to earn very little, if any, taxes, and would only benefit from an resource rental, probably a minimal amount. In return we would expect the taxpayers would be liable for provision of roads and other infrastructure to support these ventures.

We have absolutely no faith in suggestions that the Northern Territory Government will be able to regulate safety requirements adequately for this industry, and on past performances, have no faith that regulatory agencies would be given either the regulations or the resources, to adequately police the industry's adherence to any demands which might be made on it.

We support these other responses to the 19 recommendations made by The Panel 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 put in place 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.

In conclusion we believe there has not been a case put for either the need or any haste with regard to Fracking. There is no urgent shortage of gas so time can be taken to put all of the relevant safeguards in place before there is even exploration.

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

Yours sincerely, Richard and Patsy Creswick

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