

# Marine pipeline for the Bonaparte Carbon Dumping Project<sup>1</sup>

Comments to NTEPA by Grusha Leeman, Darwin, Feb 10 2026

Thank-you for taking my views into consideration. Darwin Harbour and the sea beyond are precious to me.

I note the question is whether the proposed action requires environmental impact assessment, and if so the required method of assessment. As INPEX are proposing the construction, operation (including transport of carbon dioxide and associated activities), decommissioning and abandonment of a CO<sub>2</sub> transport pipeline and subsea power and fibre optic (SPFO) cable, including the construction of an onshore inlet station, located on the Middle Arm Peninsula within Darwin Harbour. The pipeline is approximately 90 km long, extending from the onshore inlet station to the boundary of the Northern Territory's Coastal Waters.

As these are industrialisation activities in sensitive environs, I request they be subject to maximum scrutiny and therefore full environmental impact assessment.

I assume it is recognised that as this proposal is a subset of the full plan, that the whole project be fully assessed before any works commence, for if it fails permission to dump carbon, or lay yet another pipeline through our once vibrantly living Darwin Harbour, there is no point constructing a terrestrial pipeline.

## Greenwashing is not a justification for more industrialisation

I hope the NTEPA is not duped by often repeated mistruths like: *"INPEX ... is **actively working to decarbonise its operations** and deliver a stable supply of diverse and **clean energy** sources. Carbon capture and storage (CCS) is a **safe and proven emissions reduction technology** that can be applied to liquefied natural gas (LNG) production to capture naturally occurring carbon dioxide (CO<sub>2</sub>) from the hydrocarbon reservoir stream."*

If the goal is to decarbonise then it is not helpful to pursue this planned project. CCS is carbon dumping which remains experimental and is not a proven safe and successful emissions reduction technology. It simply is not. By design, carbon dumping projects can only ever capture a small fraction of the climate emissions produced by opening new gas fields. The combined scope 1, 2 and 3 emissions are nearly an order of magnitude more than the planned storage, making this project insignificant. That's not including all the emissions for all the years when there is no CCS. That's also assuming that they can successfully inject the promised gas and it stays there forever. These are both untested claims. This technology is not proven to be safe. Instead the deafening seismic blasting alone is known to be unsafe for marine life, pipelines do burst and a 300Mt dump could become a carbon bomb after an earthquake. The evidence elsewhere<sup>2</sup> is that as CCS is unsuccessful in its goals, it is unproven. There is nothing to stop the carbon from migrating to seepage points. Carbon has never been dumped in these pristine waters so it is not proven. The sea should never be used as a dump.

The only proven and safe way to limit carbon dioxide is to desist with releasing it.

This proposal along with its suite of accompanying projects amounts to permission to increase the carbonisation of our one and only safe climate. They hope to dump even more carbon on our over-burden polluted climate. Perversely, this proposal seeks permission for even more industrialisation of our over-burden Darwin Harbour coastal environment so that there might be some decarbonisation, when in truth it seeks to gain acceptance of dramatic increases in greenhouse gases in an era when world authorities know we must actually decarbonise. Pretending that attempting to dump a small component of the emissions from expanding filthy fuel gas projects is actually helping our dire climate situation is simply unacceptable. Naming the product a natural gas does not make it clean.

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<sup>1</sup> <https://ntepa.nt.gov.au/consultation/bonaparte-carbon-capture-and-storage-project>

<sup>2</sup> <https://reneweconomy.com.au/expensive-failure-flagship-qorqon-ccs-collects-less-co2-in-worst-year/>

## Carbon capture and “storage” cannot save the climate

Whether or not the current government has the sense to pursue the net zero goal, the rest of Australia expects us to do our bit . Also, besides it being a Project goal, there remains a listing to “Minimise greenhouse gas emissions so as to contribute to the NT Government’s goal of achieving net zero greenhouse gas emissions by 2050.” in the NTEPA objectives<sup>3</sup>. Consequently, full environmental assessment is necessary to consider whether indeed this proposal contributes to expanding our already globally atrocious climate pollution, or if it does a bit to improve it.

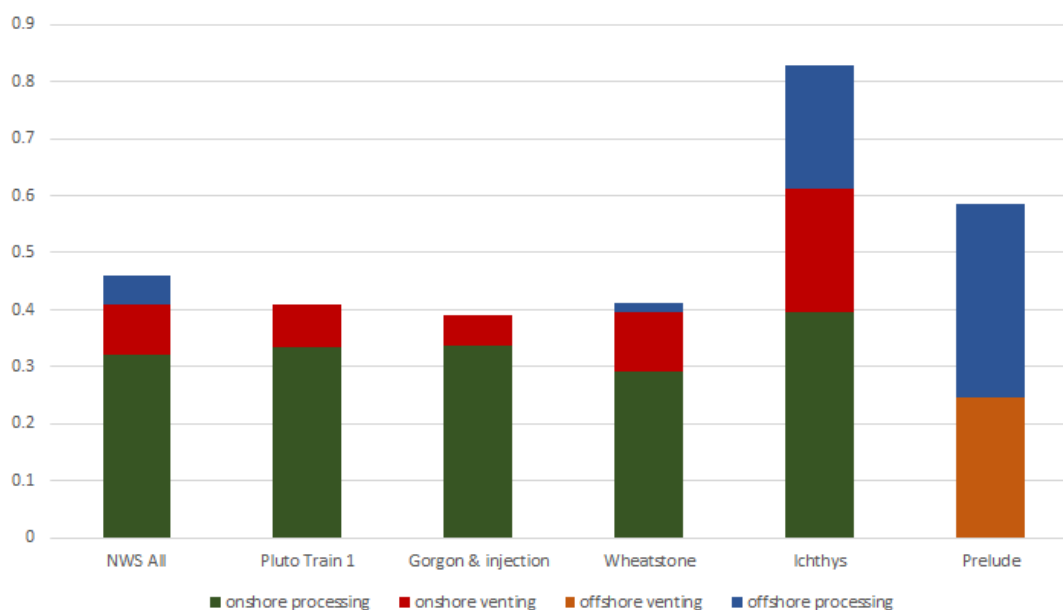
INPEX states “The Project would result in an overall reduction in greenhouse gas emissions in the Northern Territory resulting from the sequestration of CO<sub>2</sub> from Ichthys LNG facility operations, which is currently vented to atmosphere.” That is assuming it works, little is vented and there are no ruptures. But surely there can be modelling for how many emissions are saved, I could not find figures to demonstrate the justification for this project. I note also that the above quote is qualified in that it only counts this jurisdiction and it does not count potential sequestration from other sources. I read somewhere that venting might reach as much as 3Mtpa, and I see no addition of climate consequences of requiring a gas plant to liquify the CO<sub>2</sub>.

There can be no justification for not counting the benefits of a project besides if it were likely minimal. Are the total scope 1 and 2 emissions really less than what can be dumped?

Anyways, although we all know the Scope 3 emissions are ginormous, and only count in this narrow assessment if they are exported, the climate will still be torched. But what if the NTG needs that gas to power the grid? Then the scope 3’s are domestic and would quickly outpollute the savings from any gases hidden under the carpet of the sea. Please insist on a full assessment so it all is accounted for.

And further there are plenty of us who are not duped by this carbon dumping as a way to decarbonise. If we really want to save the only livable climate in the universe we will desist from all fossil fuel activities. This project is an excuse to dig up every last molecule of filthy gas currently kept safe deep underground.

**Carbon Intensity of Australian offshore LNG**  
(t CO<sub>2</sub>eq / t LNG)



Source: Boiling Cold<sup>4</sup> from project environmental approval submissions showing that INPEX was by far the filthiest project in Australia in 2021. It had considerable offshore emissions which are expected to increase.

<sup>3</sup> [NT EPA Environmental factors and objectives](#)

<sup>4</sup> <https://www.boilingcold.com.au/ichthys-lng-emissions-to-soar-as-inpex-chases-more-gas/>

## INPEX mines filthy gas

Besides methane being a highly potent greenhouse gas, the carbon dioxide from the INPEX gas fields makes it one of Australia's most carbon intensive projects. That means filthy. The next fields that INPEX plans to drill will be worse<sup>5</sup>: *"When production from Plover peaks in the 2030s, emissions will be more than 30% higher than current rates."*

It is interesting to ponder the efficacy of Australia's posturing towards net zero's impacts on INPEX's activities compared to what happened when Japan joined<sup>6</sup> the club: *"Inpex's aversion to CCS for Ichthys was before Japan's Government committed to net-zero emissions by 2050 in 2020."* If CCS was too expensive to consider before there was pressure, do the financial burdens pressure the push for even more filthy bottom of the barrel fields?

So please resist being duped by repeated claims of "clean" energy and actual plans to decarbonise the planet.

Perhaps I missed it, but a methane monitoring device to determine seepage from tanks and pipelines would be useful to highlight areas that need attention.

## Death by a thousand cuts

This proposal is piecemealed so that the big picture of both broad and cumulative impacts are entirely ignored. I anticipate that as usual the relevant government departments will have spent minimal time to expertly rubber stamp this proposal ensuring a minimum of green tape is needed. Please take a moment to consider the cumulation of all the industry and the whole of the projects proposed and how together their impacts may well create damages that are missed when focusing too narrowly. This is another reason why full environmental assessment is critical.

## Air quality not the only threat

Unlike much of the planet, the NT is internationally known as a place of pristine air quality, yet proposals like this one undoubtedly threaten this status. I am concerned that the upgraded acid gas incinerators will not be used until the filthier Plover field gas flows. My understanding is it is frequent that the current use of the acid gas incinerators is inadequate, so surely upgraded facilities should be used as soon as possible.

CO<sub>2</sub> pipelines require extremely high pressures which require energy-gobbling compressors in order to liquify the carbon dioxide. This industrial process emits even more pollution, worsening air quality in the vicinity of family homes.

We are yet to see our local fossil fuel industry chip in for the resourcing of the necessary pediatric cancer centre and other hospital and palliative care units as well as extension of the cemetery as a local consequence of their activities.

Air quality sensors for all the pollutants fully reported would be a valuable service as well.

## Dangerous noxious gases

But in addition, have these geological formations been studied for CO<sub>2</sub> along with VOC behavior? CCS has been studied elsewhere for solely carbon dioxide dumping, as other gases may not be stable or safe to dump. Volatile organic compounds (VOCs) and H<sub>2</sub>S have different solubility, reactivity, and mobility to CO<sub>2</sub>, which could lead to unpredictable behavior when tossed undersea and may increase the risk of chemical reactions.

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<sup>5</sup> <https://www.boilingcold.com.au/ichthys-lng-emissions-to-soar-as-inpex-chases-more-gas/>

<sup>6</sup> <https://www.boilingcold.com.au/japan-net-zero-by-2050/>

Planning to dump VOCs like benzene and corrosive, highly toxic gases such as hydrogen sulfide alongside CO<sub>2</sub> via pipelines under the seabed has significant safety and environmental concerns. They may degrade the integrity of infrastructure, and pose a higher risk when leakage occurs, threatening marine life and human health. Clearly this is an unsafe plan and I hope the assessment is not a rubber stamp approval.

## Rupturing pipelines

Because CO<sub>2</sub> is corrosive and will eat through the steel pipelines if contaminated with even small amounts of water, CO<sub>2</sub> pipelines have to be manufactured to a higher standard and the purity of the gas carefully monitored. When highly pressurised CO<sub>2</sub> pipelines rupture, they can open up like a zipper and hurl shards of metal and release huge amounts of heavy gas. Impurities like water or other gases in the CO<sub>2</sub> or the pipeline itself can cause such a reaction, leading to a potentially violent pipeline rupture.

Thing is, there is a deferral of plans for swift emergency response to handle any incidents. Currently rupturing of carbon dioxide pipelines may be rare, but they have happened<sup>7</sup> and sent dozens to hospital. Add in a bunch of flammable noxious gases like H<sub>2</sub>S and that safety record would become extremely hazardous<sup>8</sup>. It's not possible to be comfortable without details of conscientious emergency response capacity and merely mentions of diversions and vents being closed. Where are the evacuation plans and rapid response emergency services?

## There are birds out there

I know the birds fly around, but they also come down, and some have a tradition of using the Middle Arm peninsula as a place to rest and feed and such. Migratory birds are being decimated by human industrialisation and how dare we contribute even further to that pressure. Please remember that extinction is forever and this project does impact many species that live there.

I see there is a note to keep lights to the minimum required for personnel safety. Yet any day it's possible to see the lights of INPEX as if it were Tokyo. Please set light levels that are cognizant that other creatures live nearby and are very disturbed by 24/7 sunshine.

## Soils are slippery

I would like there to be greater care taken when bulldozing my country. The erosion from rain is fully avoidable in Darwin as there are many months with fuck all rain, and it's pretty predictable. Yet INPEX has the audacity to plan to do "Clearing to be undertaken preferentially in dry season conditions to avoid erosion risk associated with monsoon rains in the wet season." I mean if it's only a preference that means it may not happen that way. Please ensure full respect is taken and qualifying terms like "preferentially" be removed.

When we studied environmental management at NTU they went on and on about the horrors of acid sulfate soils and again I do not see the respect required to manage such features of my country properly. Was there consideration of avoidance of soil disturbance? Even small clearings can be detrimental. This is well known:<sup>9</sup> *"mismanagement of coastal acid sulfate soils have and will continue to cause environmental, social and economic damage."*

I am not convinced it is advisable to dig it up and dump it elsewhere. Please what are the impacts of all the dredge spoils being turfed off Lee Point? I'm not convinced the Casuarina seagrass meadows can tolerate near perpetual pollution. Acid sulfide soils besides the obvious acidic impacts may elevate bioaccumulable arsenic and spread PFAS.

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<sup>7</sup> <https://climateinvestigations.org/co2-pipelines-and-carbon-capture-the-satartia-mississippi-accident-investigation/>

<sup>8</sup> [Study of the consequences of CO<sub>2</sub> released from high-pressure pipelines - University of Wollongong](#)

<sup>9</sup> <https://territorystories.nt.gov.au/10070/673022/0/0>

## Dreadful dredging

Stripping what could be an alarming 900,000 cubic metres from a 100 metre highway through Darwin Harbour's seabeds will be detrimental to the health of the marine environment. Similarly turving the spoils off Lee Point won't be good. Besides the elevated turbidity and reduced pH, the sediment sludge on everything, the increases in arsenic and PFAS are unwanted. We used to have a harbour that was so pristine it drew negligible levels of all pollutants so that it was boring to study. It used to have several whale species visiting as well as more dolphins and turtles. Yes, we were told we could no longer be perhaps the only city in the world with a quiet and living harbour, that it needed to work as well. Or instead. There are now not so many reports of the larger creatures, and perhaps this big pipelaying exercise will be the final straw for more. It will definitely be detrimental to the corals and benthic environs. Such consequences require full environmental assessments.

I'm sure the pipelaying beyond the harbour will also have benthic impacts.

## Slack decommissioning

Once again as is frequent with the fossil fuel industry we see a lazy attitude to fixing up messes that are out of sight. I do not think it is acceptable to plan to leave infrastructure after a project has been finalised just because it may be difficult. There are plenty of ways that all the stuff they leave will be degrading and polluting to the coastal and marine environs and should not be tolerated.

Please ensure a full environmental assessment that incorporates full dismantling, recycling and otherwise dealing with all the infrastructure and pollutants and then has a full rehabilitation of all the areas. Make sure this is done in conjunction with local scientists and traditional owners so that it's all best as can be.