

# Comments on Santos's Darwin Pipeline Duplication (DPD) Project NT EPA Referral

By Grusha Leeman

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Thank you for taking my comments and recommendations into consideration. This is a serious issue.

I must say to start that I found the endless blatant lies and outrageous spin infesting the Santos proposal to make it hard to stomach and request you advise them in the future to whittle it down to just the facts. I also hope you were not swayed by their repetitive glamour. It is simply not possible for us to have a low-carbon future built around gas. Nor is it feasible that this pipeline project can be exported with "minimal environmental and social impact."

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## No more time for polluting our climate

I'm highly concerned about the climate impacts of new fossil fuel projects. The impacts on the climate from this project are unacceptable and it is inconceivable that in 2022 it is being considered for approval. I won't take you back to basics, but please consider the likes of the IEA.

The International Energy Agency (IEA) is a Paris-based autonomous intergovernmental organization<sup>1</sup> established in the framework of the Organization for Economic Co-operation and Development (OECD) in 1974 in the wake of the 1973 oil crisis.

Today the IEA acts as a policy adviser to support energy security and advance the clean energy transition worldwide.

The IEA produced a roadmap<sup>3</sup> for the global energy sector to reach net zero by 2050 and to prevent global temperatures from rising above 1.5 °C. All IEA member countries have signed the Paris Agreement, and two thirds of IEA member governments have made commitments to emission neutrality in 2050<sup>1</sup>.

This includes the Northern Territory Government, who, in 2020<sup>2</sup>, "committed to reduce net greenhouse gas emissions in the Territory, with the goal of achieving net zero emissions by 2050." I know I am not alone considering this a minimum action: 2050 is too late, (even Santos reports they are planning on net zero by 2040).

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<sup>1</sup> [https://en.wikipedia.org/wiki/International\\_Energy\\_Agency](https://en.wikipedia.org/wiki/International_Energy_Agency)

<sup>2</sup> [Northern Territory Climate Change Response: Towards 2050](#)

But we are considering the conservative IEA, and they are encouraging a goal of net zero by 2050, so let's try that on for size. The IAE roadmap says:

The energy sector is the source of around three-quarters of greenhouse gas emissions today and holds the key to averting the worst effects of climate change, perhaps the greatest challenge humankind has faced. Reducing global carbon dioxide (CO<sub>2</sub>) emissions to net zero by 2050 is consistent with efforts to limit the long-term increase in average global temperatures to 1.5 °C. **There is no need for investment in new fossil fuel supply in our net zero pathway.**

**There are no new oil and gas fields approved for development in our pathway.**

The unwavering policy focus on climate change in the net zero pathway results in a sharp decline in fossil fuel demand, meaning that the focus for oil and gas producers switches entirely to output – and emissions reductions – from the operation of existing assets.<sup>3</sup>

So the way to achieve the shared goal of a safe climate is that we cannot have any new only oil and gas fields opened, or pipelines that enable them. We cannot get a safe climate and grant permission for Santos to do the activities laid out in this proposal.

**Recommendations:** Read the IAE's roadmap<sup>3</sup>: Net Zero by 2050, direct Santos that we cannot have any gas extracted from Barossa so no pipeline is needed, and reject this application to contribute to the destruction of our vital safe climate.

## Barossa is off the chart dirty

With a staggering 16% to 20% carbon dioxide, the Barossa reservoir would concern any Earthling woke on climate risks. That's because it's a carbon-dioxide emissions factory, with an LNG by-product. Instead of minimising waste, if Barossa happens, there is going to be more waste than product.

Barossa's carbon emissions would be about twice the current Australian LNG industry average according to an analysis conducted by Mr Robert for the Institute for Energy Economics and Financial Analysis.<sup>4</sup>

In its submission to the offshore regulator NOPSEMA<sup>5</sup>, Santos estimated the Barossa offshore development would emit an average of 3.38 million tonnes of greenhouse gases a year. The

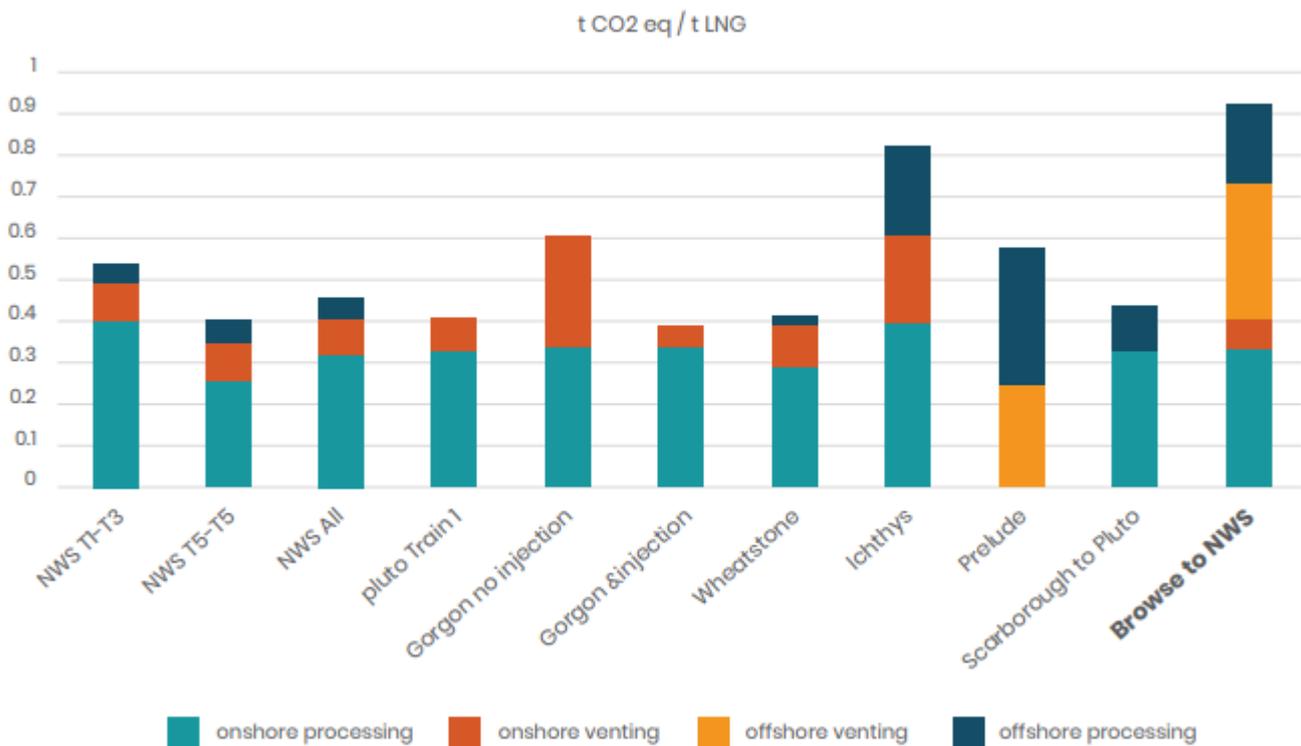
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<sup>3</sup> [Net Zero by 2050 - A Roadmap for the Global Energy Sector](#)

<sup>4</sup> <https://www.abc.net.au/news/rural/2021-06-24/santos-barossa-gas-carbon-emissions-twiggy-forrest/100224254>

<sup>5</sup> <https://www.nopsema.gov.au/environmental-management/assessment-process/offshore-project-proposals/offshore-project-proposals-public-comment/barossa-area-development-offshore-project-proposal/>

Darwin LNG plant emits about 1.66 mtpa of CO<sub>2</sub>, as reported to the Clean Energy Regulator. This means<sup>6</sup> each tonne of Barossa LNG from the 3.7 million tonnes a year Darwin LNG plant would send about 1.36 tonnes of carbon dioxide into the atmosphere. The carbon intensity of LNG from Barossa is literally off the chart produced by the Conservation Council of WA<sup>7</sup> for its campaign against the Browse project. They thought the Burrup Hub was Australia's most polluting fossil fuel project when actually Santos' proposed Barossa project could be one of the dirtiest gas projects in the world.



Source: Conservation Council of WA

If the Barossa LNG is released it would be an incredible three times<sup>8</sup> more carbon-intensive than LNG from Pluto, Wheatstone, or Gorgon (if its CO<sub>2</sub> injection works).

**Recommendation:** If we are going to have energy sources, they must be the cleanest we can fathom. We must leave the dirty sources safe in the ground.

"It needs to be called for what it is. It is an atrocious project, an atrocious project."<sup>9</sup>

<sup>6</sup> Santos' dirty big \$2B Barossa bet

<sup>7</sup> Burrup Hub: Australia's most polluting fossil fuel project

<sup>8</sup> Santos' dirty big \$2B Barossa bet

<sup>9</sup> Twiggy hits the mark: Santos' new Barossa gas field is a 'carbon emissions factory with an LNG by-product'

# Carbon “storage” is a downright dangerous pipedream

Carbon capture and storage (CCS) is simply a licence to pollute and is an excuse to ramp up emissions. Santos is pushing to duplicate this pipeline and is spinning the line it has plans to produce clean energy so it has a licence to keep its polluting projects going, not because it wants to cut emissions. Don't be duped. CCS is a temporary dump, at best.

Yet to be proven, the most advanced Aussie project is Gorgon. As of July 2021, the Gorgon experiment has reached a milestone with five years of failure<sup>10</sup>, falling millions of tonnes short of its emissions capture promises. If Chevron is required to make good on its failed promises using carbon credits, this will cost the company nearly \$100 million<sup>11</sup>.

CCS is incapable of tackling the pollution needed to diminish our climate crisis. When attached to fossil fuel developments, especially like those of the really dirty Barossa field, carbon storage is not a climate solution, as digging up and burning fossil fuels only adds to the problem. Global temperatures do not stop increasing until emissions reach or go beyond net zero<sup>12</sup>. To achieve that we must stop digging up and burning fossil fuels. CCS is extremely expensive and cannot deliver zero emissions. The only solution is to stop mining and burning fossil fuels.

Pumping dangerous concentrations of carbon dioxide into crevices under the sea as in this project's associated projected plan, has no guarantee it will stay there. Any crack may see it seep out: we've all seen the CO<sub>2</sub> bubbles. But also there are such things as earthquakes that will render such deposits free to rise and pollute our planet's precious climate.

**Recommendation:** It is far better and cheaper to avoid carbon emissions in the first place, rather than try to capture them after they've been released. Rather than wasting money on something that's expensive, ineffective, and likely downright dangerous, Australia should be investing in the things we know can cut emissions quickly and bring down power prices, like renewables backed by storage.

## Smashing another pipeline through our Harbour and sea

Darwin was once, not long ago, the envy of the world, a happy city with a LIVING HARBOUR. Since then it has been smashed and dredged by fossil fools. We want our dolphins whales back. Plans for sonar to identify seafloor debris and seabed profile with pulses at high frequencies are an anathema to our saltwater friends who depend on their senses.

In shallower waters, the Project pipeline may require stabilisation due to exposure to waves, currents and tidal movement. Surely anchoring devices will suffice and trenching along with the associated blasting and dredging can be abandoned. These activities are severely detrimental to

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<sup>10</sup> <https://www.boilingcold.com.au/times-up-on-gorgons-five-years-of-carbon-storage-failure/>

<sup>11</sup> <https://www.climatecouncil.org.au/resources/what-is-carbon-capture-and-storage/>

<sup>12</sup> <https://www.climatecouncil.org.au/resources/what-does-net-zero-emissions-mean/>

the environs under the sea and should never be condoned. Dumping sludge in a six kilometre area back of Lee Point is a huge ruination of seagrass and other vital seabed biodiversity.

The project's proximity to the near pristine Tiwi Islands and the Oceanic Shoals Marine Park is a concern as if this project is given the go ahead, it will have devastating impacts on biodiversity in the region, including on critical habitat for the threatened Flatback and Olive Ridley turtles<sup>13</sup>.

**Recommendation:** Adding yet another destructive development to the seafloor is unnecessary and detrimental to the environment so reject the plan. It's a duplication, if they must, use the pipeline that is there.

## Gas is not even safe to use in our kitchens

Although Santos likes to inform us all that gas is safe it is not.

Beyond contributing to global warming, gas stoves emit unhealthy levels of nitrogen oxide<sup>14</sup>, which can trigger breathing problems for people with asthma or chronic obstructive pulmonary disease, even in low concentrations.

**Recommendation:** As the gases from Barossa are not safe, not in the kitchen, not in production and not in our atmosphere, ensure the wells are plugged and the gases left in situ.

## Accepted Accepted Accepted Accepted Accepted...

Wonder if any proposals<sup>15</sup> are ever rejected or is the Government just a rubber stamper?

Does the \$1.8 million in donations that Santos has handed over to the Coalition in the last 20 years make a difference?<sup>16</sup>

As we do not seem to have a mechanism to deny outrageous proposals like this one from the outset, it is vital that the NT EPA decides the proposed action requires the maximum environmental impact assessment.

**Recommendation:** Reject this plan.

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<sup>13</sup> [Santos and partners investing \\$4.7 billion to develop Barossa offshore gas field near Darwin - ABC News](#)

<sup>14</sup> [https://www.popularmechanics.com/science/health/a39036270/gas-stoves-leak-methane/?fbclid=IwAR3dL3l0rwk2H\\_kYhzRxiiI4caVKKvuPIYE39e8jP\\_2DCx1hSc8j7iwdYok](https://www.popularmechanics.com/science/health/a39036270/gas-stoves-leak-methane/?fbclid=IwAR3dL3l0rwk2H_kYhzRxiiI4caVKKvuPIYE39e8jP_2DCx1hSc8j7iwdYok)

<sup>15</sup> [Offshore project proposals | NOPSEMA](#)

<sup>16</sup> [Twiggy hits the mark: Santos' new Barossa gas field is a 'carbon emissions factory with an LNG by-product'](#)