

Submission Writing Guide on Santos' Beetaloo Fracking Plans

Summary:

Public submissions on Santos' Beetaloo Basin Appraisal Pilot Environment Management Plan (EMP) are due Friday 19th December.

Read through this guide to help you write an informed, personalised submission, then send your submission to the Northern Territory Government Portal [here](#) and send a copy to the Environment Minister, Josh Burgoyne, by the 19th December 2025.

The proposed Environmental Management Plan and related documents submitted by Santos are available at the bottom of this [page](#).

Public consultation on the EMP is an opportunity to call for this project to be held to a high level of scrutiny. In making a submission, the public has the opportunity to make recommendations such as:

1. Requiring the project undertake a full Environmental Impact Statement under the Environment Protection Act 2019 (NT); and
2. Requiring the project be referred to the Federal Environment Minister under the Environment Protection and Biodiversity Conservation Act 1999 because it is likely to have a significant impact on water resources and matters of national environmental significance (like vulnerable and endangered species).

Ensuring that fracking proposals are held to a high level of scrutiny is essential in protecting the NT's nature, water, and climate and ensuring that risks are appropriately assessed and managed.

Purpose of EMP:

Santos holds an exploration permit (EP) within the Beetaloo Sub-Basin, referred to as EP161, located approximately 160 kilometres east of Daly Waters on a perpetual pastoral lease.

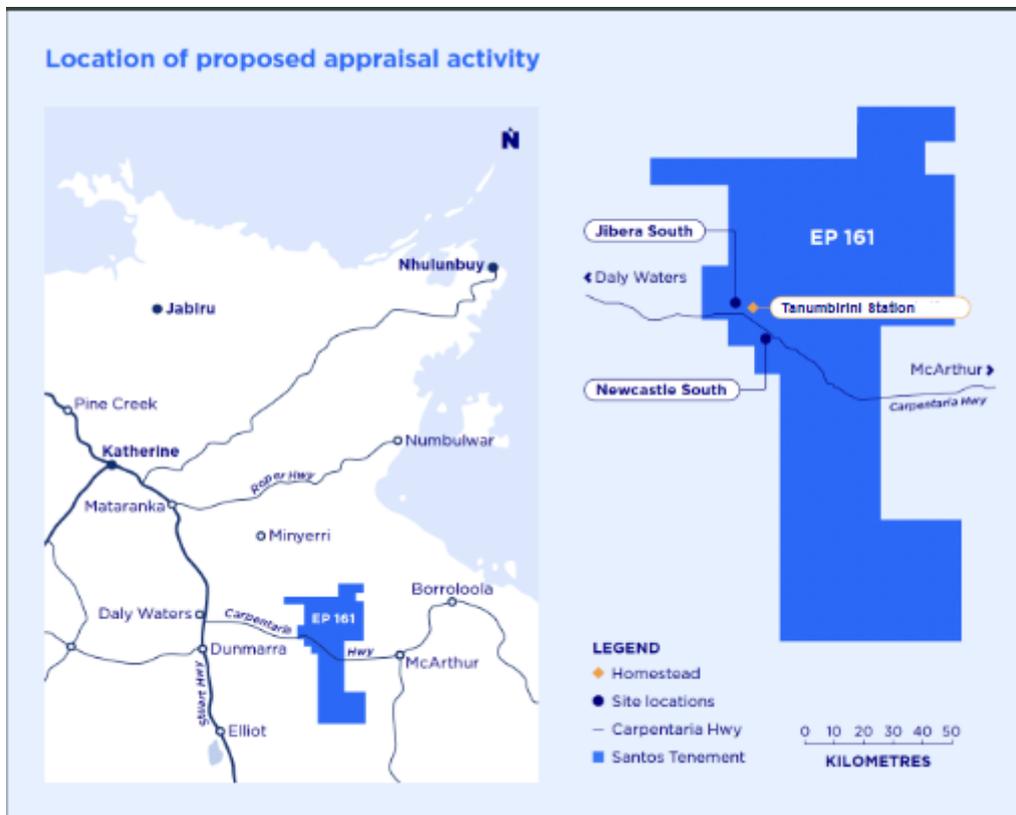
The purpose of the EP161 Environmental Management Plan is to support Santos' development of shale gas extraction within the Beetaloo Sub-Basin. Santos's goal in the Beetaloo Sub-Basin is to extract gas for delivery via pipeline to the Middle Arm Gas hub or Darwin LNG or to the East Coast for export and east coast use.

Summary of proposed activity:



- Clearing and earthworks for 2 new well pad locations at Jibera South and Newcastle South.
- Drilling – Up to 12 appraisal wells
- Hydraulic fracture stimulation (HFS) – Up to 12 appraisal wells with an average of 60 stages of HFS for horizontal wells and four stages for verticals.
- Operating, testing, maintenance and decommissioning of wells
- Wastewater management – evaporation ponds, storage tanks, drilling sumps, cutting pits and any transfer infrastructure within the well pad.
- Extraction of 750 ML/year of water.

The EP 161 project area straddles the Carpentaria Hwy, as shown in the map below.



What are some key concerns with this proposal?

Water

This project could have a profound impact on both surface and groundwater in the region. With regards to groundwater, the project will drill through the Cambrian Limestone Aquifer (CLA), an enormous underground water system that flows from Queensland all the way to the Daly River, feeding important ecological and cultural sites including the Roper River, Bitter Springs, and Flora River National Park. **Any**



contamination of this aquifer from fracking activities could have severe consequences.

Santos acknowledges in the EMP that there are several Groundwater Dependent Ecosystems (GDEs) within 5 km of the project site that are assumed to rely on shallow perched groundwater systems. More robust studies should be conducted into the nature of these GDEs and how susceptible they are to planned activities at the site before any works go ahead.

This EMP also notes that surface water from the two proposed sites flows directly into the catchment for the Limmen River and Limmen National Park, which lies only 80 km downstream. This National Park is a relatively undisturbed system that could be significantly impacted in the event of any surface water contamination, particularly given the nature of the chemicals, naturally-occurring radioactive materials (NORMS) and heavy metals generated or used in the fracking process. This would be especially relevant in the event of failure of on-site wastewater facilities (e.g. in a cyclone, which are known to occur in this region).

The NT Government should adopt the precautionary principle and not authorise any activities with the potential to irreparably damage the surface and groundwater on which Territorians rely. Any such contamination could have consequences lasting decades or centuries with complex and expensive remediation processes that may not be able to fully address the nature of the harm caused.

Greenhouse gas emissions/climate

This project is completely incompatible with Australia's commitment to net zero emissions by 2050, its recent signing on to the Belém Declaration, and with recommendation 9.8 from the Pepper Inquiry which states that "*the NT and Australian governments [should] seek to ensure that there is no net increase in the life cycle GHG emissions emitted in Australia from any onshore shale gas produced in the NT.*" This project is designed to appraise the commercial viability of onshore gas reserves in the NT and if successful could form part of a network of hundreds or even thousands of wells.

Additionally, the EMP states that the project will only generate 27,741 tCO₂-e of scope 1 greenhouse gas emissions over the next 5 years. The methodology used to reach this figure should be examined closely, as projects of a similar size (e.g. Beetaloo Energy's Carpentaria Project) projects an estimated 180,000 tCO₂-e of scope 1 greenhouse gas emissions with only 9 wells over the same period, 3 wells less than the 12 proposed as part of this project.

Biodiversity

There is a strong argument to be made that this project could have a profoundly damaging effect on the local environment, including threatened fauna listed under the EPBC Act.



Firstly, the Environmental Assessment Report conducted by AECOM notes that the northern blue-tongue skink (*Tiliqua scincoides intermedia*), which is listed as Critically Endangered under the EPBC Act, is possibly present in the impacted area, with recent records within 40 km of the site and observations indicating suitable habitat for their dispersal. Despite this, the methodology employed only included active searches, and did not include drift fences, funnel traps and pitfall traps, methods that are at the very least complementary and likely more effective at establishing the presence of the species. These survey methods have also been deployed at other similar operations in the region (e.g. Shenandoah South). More robust surveys for northern blue-tongued skinks should be carried out before any works.

Secondly, the EMP notes that there is unlikely to be stygofauna present in the project's disturbance footprint, while also acknowledging that no targeted stygofauna surveys were conducted at nearby bores as part of surveys for this EMP. Instead, the EMP relies on historical surveys conducted from 2019-2022, which cover 4 bores within a 50 km radius. Two of these bores had records of stygofauna, including one bore only 17 km from the site. The report states it is unlikely there is "suitable habitat" for stygofauna, by referencing certain conditions including "stable water chemistry" and "suitable pore spaces" that are generally good indicators for the presence of stygofauna habitat, however makes no assertion that the project area actually lacks these indicators. A more robust assessment would require new, targeted surveys at bores immediately nearby to ascertain the presence/absence of stygofauna.

Lastly, Santos have applied for permission under this EMP to newly clear 87 hectares of savanna woodland and floodplain, in an area where there are few weeds and a diverse array of relatively undisturbed habitat. The NT has some of the last remaining large swathes of undisturbed savanna anywhere in the world and we cannot afford to clear more for short-sighted ventures like this gas development project.

Additional animals likely to be found at the project location per the Protected Matters Of National Significance tool include:

- Gouldian finch
- Red goshawk
- Grey falcon
- Northern shrike-tit
- Plains death adder
- Yellow-spotted monitor

Submission Template

Reply to: Your name
Your email

XX Dec 2025

Submission: **STO8-1: EP161 Beetaloo Basin Appraisal Pilot EMP**

Thank you for the opportunity to make a submission on this referral.

My name is ____ and I live in _____. I am writing to you to share my strong belief that (this project should not proceed/requires extra oversight/should be assessed more thoroughly/etc.)

My connection to this issue is: (e.g., *I'm a Territory resident concerned about water, I work with endangered species, I'm worried about our climate, etc.*)

My primary concerns regarding the contents of this EMP are that XXX, XXX and XXX (see above)

I recommend that (The Minister reject this version of the proposed EMP unless.../refer this project for assessment under the Environment Protection Act/whatever you'd like to call for here).

Yours sincerely,

Your name



Tips

1. Make it personal, and speak from your own unique perspective. Say who you are and why you care about the issue.
2. Your submission will hold more weight if you highlight specific elements of the EMP that you think are under-done or inadequate, and/or if you can make specific recommendations that target these areas.
2. Submit the letter to:
<https://haveyoursay.nt.gov.au/emps-under-assessment/surveys/tam1-emp1>
3. Make sure you lodge your submission by the deadline, **Friday 19th December 2025**.