

Susan Lodge
Senior Environmental Scientist (on behalf of QPM Energy Pty Ltd)
slodge@emmconsulting.com.au

CC. EPBC.Referrals@dcceew.gov.au

14 September 2023

Dear Susan

RE: Clarification request - Queensland Pacific Metals (QPM) Energy Project - EPBC 2022/09329

I refer to our submission in response to the referral of Queensland Pacific Metals (**QPM**) Energy Project (**the Project**) by QPM Energy Pty Ltd under the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) and your response to our submission. Both our submission and your response are attached for reference.

I start by thanking you for providing your detailed response to the matters that Environmental Advocacy in Central Queensland (**EnvA**) raised in our submission. However, we would appreciate some clarification on the true intent of the Proposed Action.

Our concerns related to the Project

We understand that QPM proposes to develop a high-pressure gas pipeline and gas compression facility (**GCF**) approximately 43km north of Moranbah. The proposed action involves the construction and operation of a gas compression facility and a high-pressure pipeline that links the proposed GCF to the nearby existing North Queensland Gas Pipeline.

The Proposed Action would have a disturbance area of 65 ha including:

- 6 ha for the GCF,
- 51 ha for the 16.8km pipeline, and
- 8 h for the provision of a road access to the GCF.

As outlined in our original submission, EnvA commended QPM's actions in respect of the capture and use of fugitive emissions from coal mines rather than opening further fossil fuel projects, and QPM's TECH Project in the production of battery nickel and cobalt, but we also articulated our concerns in and requested additional detail in respect of:

- The proposed sources of the coal mine methane;
- The longevity of the mines and the volumes of the coal mine methane to be extracted from each of the coal mines;



- An assessment of the environmental impacts of the additional infrastructure required that are not covered in the current assessments;
- Confirmation that the facility is only for the collection of coal mine methane and not part of a staged expansion of the coal seam gas development in the Bowen Basin;
- Identifying and securing the tenure of the proposed land-based offset habitats to provide certainty that the loss and fragmentation of threatened species and communities can be justified;
- A Rehabilitation Management Plan before project commencement and not leave this until 12 months prior to decommissioning; and
- A commitment to the progressive restoration of existing vegetation communities in all areas of the pipeline easement that can be rehabilitated as soon as possible after construction is completed.

Again, we appreciate your detailed response to our concerns, but we would appreciate clarification on some of the information that you provided as detailed below.

Issues for which we seek clarification

EnvA raised concerns about the lack of information on the source of the coal mine methane (**CMM**) and the lack of clarity that the purpose of the gas pipeline is solely for the purposes of capturing coal mine methane and not a staged component of further coal seam gas projects in the region.

In your response, you stated that:

QPM Energy has identified the following as potential supply locations for waste coal mine gas:

- Wards Well Coal Mine (Stanmore SMC)
- North Goonyella/Eaglesfield Mine (Peabody)
- Arrow – Potential Commercial Area (PCA) 258 Exploration Wells overlying Wards Well Southeast Mine (Stanmore SMC)
- Arrow – Northern end of Petroleum Lease (PL) 486 (overlying Red Hill Coal Mine, held by BHP Coal).

Additional pre-mine drainage opportunities exist in locations further afield; however, the above are being investigated owing to co-location opportunities, existing approvals, established operations, and potential for commercial agreements.

Infrastructure that will supply waste coal seam gas to the GCF, from any of the above sites, will be the responsibility of the supplier and does not form part of the Project.

We note that:

Wards Well Coal Mine is a proposed coal mine and we are unaware of any past or current applications related to progressing this project. You also note that Arrow Energy (overlying Wards Well) is one of the potential supplies of waste coal mine methane, but from what we can ascertain, this project is focussed on coal seam gas extraction and has no relevance to a coal mine or coal mine methane at this time.

Arrow Energy's coal seam gas project overlying the proposed BHP Red Hill Coal Mine, also appears to be related to a coal seam gas project rather than a coal mine methane source. We note that the Red Hill Coal Mine was approved in 2015, but there has been no advancement of this mine since the final approval was granted.

Further to this, we note that your application for Environmental Authority stated specifically that your application did not relate to coal seam gas activities (Q16 of the [Site-specific application for a new environmental authority for a resource activity](#)).

We are also aware of QPM's [purchase of the Moranbah gas](#) project and the [memorandum of understanding with Blue Energy](#) to capture waste coal seam gas and potentially future coal seam gas to fuel QPM's TECH project.

These observations have triggered concerns that your current approval process is an attempt to 'greenwash' the project as a coal mine methane collection facility when in reality, it is forming part of a staged component of further coal seam gas projects in the region.

We would appreciate clarification that you have not provided false and misleading information in this application, and that the proposed sources of CMM you have listed (listed above) are indeed approved and producing coal mines.

Kind regards,

A handwritten signature in blue ink, appearing to read 'Coral Rowston', is positioned above the printed name.

Dr Coral Rowston

Director

Environmental Advocacy in Central Queensland Inc.