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6 December 2024

**RE: Submission on the proposed amendment to the Centurion North EA (P-EA-100658735)
and PRCP Schedule P-PRCP-1006669070**

Thank you for the opportunity to make this submission in response to the application for a major amendment to the Centurion North Environmental Authority (**EA**) ([P-EA-100658735](#)) and Progressive Rehabilitation and Closure Plan (**PRCP**) Schedule (P-PRCP-1006669070) (**the Project**). The proponent of the Project is Centurion Coal Mining Pty Ltd (**the Proponent**) which is a subsidiary of Peabody Energy Australia PCI Pty Ltd.

Environmental Advocacy in Central Queensland

Environmental Advocacy in Central Queensland (**EnvA**) is a Central Queensland association with an interest in ensuring that all land use is sustainable and does not significantly impact on the environment. We are particularly concerned about the risks associated with coal mining, coal seam gas and climate change.

EnvA believes that opening new or expanding existing coal and gas projects:

- is likely to result in irreparable damage to our local landscape and many of Central Queensland's threatened species and communities,
- is contrary to meeting Australia and Queensland's emission targets through the production of greenhouse gas emissions, and
- contributes to accelerated climate change impacts on local communities, threatened species and the region's significant coastal resources.

The Proposed Project

The Proponent has recently secured the rights to further explore resources under a portion of Mining Lease (**ML**) ML 1790 and ML 70495 located immediately adjacent to and directly north of the Centurion Coal Mine (previously North Goonyella Mine), an existing underground longwall mine located on ML 6949 approximately 40km north of Moranbah.

As a result, the Proponent is wanting to undertake exploration activities which consist of a pilot coal seam gas (**CSG**) exploration and extraction program within ML 1790.



Exploration and evaluation of CSG requires the implementation of a network of 13 vertical and 10 lateral wells, extending from the ground surface down to the Goonyella Middle coal seam. These wells will be connected to flare kits and be supported by other surface infrastructure for CSG processing, monitoring, and control. The proposed Project involves the construction and operation of a gas compression facility (**GCF**) and a high-pressure pipeline that links the proposed GCF to the nearby existing North Queensland Gas Pipeline (**NQGP**).

The Project intends to collect fugitive emissions from adjacent coal mines to be processed at the GCF. The gas will then be transported via the proposed pipeline into the NQGP and up to Townsville where it will be distributed by a third party to industrial users.

The GCF has 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.

In addition, the Project will have a disturbance footprint of 12.15 ha including:

- 11.8 ha for the drill pads that are not currently approved for disturbance, and
- 0.35 ha of access tracks.

EnvA's concerns about this Project

Description and justification of the project

The supporting documentation does not appear to include any information about the construction and operation of the GCF or the high-pressure pipeline linking the NQGP. It is unclear where these facilities are to be located or the associated impacts.

There also does not appear to be any information about the collection of fugitive emissions from adjacent coal mines that will be processed at the GCF. EnvA assumes that this collection of fugitive emissions will require further infrastructure and impacts which have not been identified or assessed in the application or the supporting documentation. It appears to be an attempt at 'greenwashing' the project through the collection and use of the waste gas from adjacent coal mines.

The currently approved Environmental authority P-EA-100658735¹ provides for the exploration and assessment of the CSG reserves and ten drill pads and associated access tracks have already been approved. The EA was granted in September 2024 and hence it is unclear why an amendment to the EA is required at this time.

Given the Proponent intends to use flaring of the CSG rather than collecting the 'waste gas' for processing at the GCF, and that no information is provided on the construction and operation of the GCF or the high-pressure pipeline linking, EnvA recommends that:

- the application in respect to the CSF and the high-pressure pipeline should be refused, and
- the application in respect of additional drill pads is not adequately justified and should be refused.

¹ [Environmental authority P-EA-100658735](#)

Based on the information provided, and the information which has not been provided in relation to the extraction of CSG, we conclude that this project is not related to CSG gas extraction, but rather a Project designed to de-gas the mining lease in preparation for the further expansion of the Centurion Coal Mine.

If this is not the case, the Proponent needs to provide details of the reasoning for flaring the CSG rather than capturing and processing the gas for secondary uses. While flaring of CSG is effective at reducing methane emissions, it still results in significant greenhouse gas emissions which have not been justified in the application documents as discussed further below.

Contribution to climate change through GHG emissions

The Project will negatively contribute to climate change and global warming through greenhouse gas (GHG) emissions resulting from the proposed activities.

The Proponent provides a projection of GHG emissions over the two-year project at 706,770 – 811,360 tonnes of CO₂-e for Scope 1 emissions. Scope 2 emissions have been excluded as the Project electricity requirements will be locally generated using diesel generators and not consumed from the national grid. There is no assessment of Scope 3 emissions, again indicating that there is no intention of creating downstream emissions from this Project.

The accretion of GHGs in the atmosphere due to human activities has already caused changes in the climate system with tangible impacts, including in Queensland which is increasingly experiencing extreme weather patterns and climate related disasters.²

Of particular concern to EnvA, Central Queensland is already experiencing adverse climate change impacts including:

- increased frequency and severity of coral bleaching,
- severe storms,
- prolonged and extreme heat waves,
- increased frequency and severity of wildfires, and
- an increase in the number of endangered species and ecosystems.

Again, the Project application contains no detail on the GCF, gas pipeline or details of the adjacent coal mines from which waste gas will be captured, or the infrastructure required to transfer coal mine methane to the GCF.

The Proponent has not provided any realistic GHG abatement plan consistent with the Queensland's greenhouse gas emissions guideline.³ The proposed GHG abatement plan provided at Appendix C of the supporting documentation outline mitigation measures such as using fuel-efficient plant and equipment, monitoring of diesel use, training staff and flaring GSG methane emissions. It is EnvA's submission that these actions do not represent meaningful abatement measures, particularly given our concerns about the justification of this Project outlined above.

We conclude that there is no adequate justification for the amendment of the EA which already provides for the exploration and assessment of the CSG reserves on the mining lease. The Project will increase GHG emissions for no justifiable purpose and will only cause further social and environmental impacts. Environmental impacts are further discussed below.

² [Ian Cresswell, Terri Janke and Emma Johnston \(2021\), Australia State of the Environment Report](#)

³ [Guideline: Greenhouse gas emissions, Environmental Protection Act 1994](#)

Impacts on listed threatened species and communities

A total of 21 threatened fauna species, five threatened flora species, and four threatened ecological communities were identified over a desktop study of the project area.

Appendix B of the supporting documentation outlines the direct impact on Matters of State Environmental Significance (MSES) including (but not limited to):

- 5.98 ha of koala habitat,
- 6.45ha of ornamental snake habitat,
- 6.45ha of short-beaked echidna habitat,
- 5.98ha of squatter pigeon habitat,
- 1.53ha of *Dichanthium sericeum* grassland (RE 11.8.11), and
- 0.46 ha of Semi-evergreen vine thickets of the Brigalow Belt (RE 11.8.11)

EnvA appreciates that it is challenging to determine how many small impacts to these species and communities can be tolerated before the conservation status is impacted. We do note that in this region, there have been many species placed on the endangered species list due to cumulative impacts.

However, EnvA considers the impacts to these species need to be considered in the assessment of whether the project 'stacks up' in relation to the social, economic and environmental costs and benefits. We again submit that this Project has not demonstrated that the loss of threatened species and habitat and ecological communities can be justified.

Impacts on ground water

The Project will require groundwater extraction at the proposed vertical and lateral wells that will impact on groundwater levels in the area. The Proponent estimates that 20KL per day will be extracted per day over the life of each well. With 23 proposed wells, this equates to 460KL of water required to be extracted every day for up to 800 days (section 6.7.2 of the Supporting Information). Logically, this must have a significant impact on the hydrology of the catchments

The modelling used has limitations, but there is an articulated risk to at least seven water supply bores due to the reduction of the water quantity and quality of available groundwater. The proponent cites a landholder census conducted in 2012 which indicated that these bores were used for stock watering. The reduced availability of a suitable water supply for impacted graziers must be considered as a further social/economic impact on the local community.

Thank you again for the opportunity to make comment on the proposed amendment to the Centurion North Environmental Authority

Kind regards,



Dr Coral Rowston
Director
Environmental Advocacy in Central Queensland