

Hon Tanya Plibersek MP  
Minister for the Environment and Water  
c/- Department of Climate Change, Energy, the Environment and Water

By email: [Minister.Plibersek@dcceew.gov.au](mailto:Minister.Plibersek@dcceew.gov.au)  
[EPBC.Referrals@dcceew.gov.au](mailto:EPBC.Referrals@dcceew.gov.au)

9 April 2025

Dear Minister and the EPBC Referrals Team,

**RE: Blue Energy coal seam gas project - request for assessment under the EPBC Act**

Environmental Advocacy in Central Queensland (**EnvA**) is a Central Queensland association concerned about the risks associated with coal mining, coal seam gas and climate change.

We are writing to you regarding the Blue Energy Ltd (and its wholly owned subsidiary Eureka Petroleum Pty Ltd) (**the Proponent**)'s proposed coal seam gas project (**the Project**) on the Sapphire Petroleum Lease (**PL1034**) in the in the Moranbah/Glenden region of Central Queensland.

This Project was originally granted an Environmental Authority (**EA**) by the Queensland Department of Environment, Tourism, Science and Innovation (**DETSI**) on 23 March 2023 as part of a much larger project covering three Petroleum Lease areas. The approval was challenged by our group in the Queensland Land Court which has resulted in an agreement that the Proponent limit the Project to the Sapphire Lease and withdraw from the Central and Lancewood Petroleum Lease areas (**PL 1038 and PL 1045**). The Land Court handed down its decision on 3 April 2025<sup>1</sup> and therefore the Proponent now holds an EA under the *Queensland Environmental Protection Act 1994*.

It is our view that this Project is required to be referred for assessment under the *Environment Protection and Biodiversity Protection Act 1999* (**EPBC Act**) as a controlled action as it would, if approved, impact on Matters of National Environmental Significance (**MNES**), including but not limited to:

- Listed threatened species and communities (ss 18 and 18A), and
- Protection of water resources from coal seam gas development and large coal mining development (ss 24D and 24E).

In support of our position and our request, we note the following information contained in the supporting documentation<sup>2</sup> submitted with the Proponent's application for an EA:

- The proponent notes that "*An assessment is underway in parallel to the EA process to assess the potential for direct and indirect impacts from the Project on MNES. Where it is identified that a significant impact to MNES is likely a referral under the EPBC Act will be*

<sup>1</sup> [Environmental Advocacy in Central Queensland Inc v Department of Environment, Tourism, Science and Innovation & Ors \[2025\] QLC 7](#)

<sup>2</sup> [Blue Energy site specific environmental authority application supporting information – Oct 2022](#)



*made to the Minister for the Environment for consideration outlining the outcomes of the assessment."*

- Despite the biodiversity assessment being constrained to a desktop analysis and one survey, the following listed species and communities were identified as present, or likely to be present, on the Sapphire Petroleum Lease:

Threatened Ecological Communities

- Brigalow
- Natural Grasslands
- Semi-evergreen Vine Thickets

Threatened plant species

- *Ptilotus uncinellus*
- *Cerbera dumicola*
- *Bertya pedicellate*
- King Bluegrass, *Dichanthium queenslandicum*,

Threatened fauna species

- Squatter pigeon
- Greater glider
- Koala
- Ornamental snake
- Yakka skink

- The Project proposes to drill up to 117 gas wells which will impact on surface and ground water. The information provided to date is inadequate to determine the specific impacts to water quality and quantity. Of note, the supporting documentation notes the following impacts or matters of concern:

Surface water

- Clean water diversions and conveyance channels
- Construction of access tracks, pipelines and wells on the 1% AEP floodplain of the Isaac River
- Accidental releases of contaminated water

Ground water

- No test extraction data was available to estimate future gas and extraction rates
- Modelling provided indicates that there will be significant drawdown in the local aquifers.

Given the above, we respectfully request that you use your powers under section 70 of the EPBC Act to request the Proponent refer the Project for an assessment of whether it is in fact a controlled action.

Kind regards,



Dr Coral Rowston  
Director  
Environmental Advocacy in Central Queensland Inc.