

Department of Environment, Tourism Science and Innovation
Energy and Extractive Resources Business Centre
GPO Box 2454
Brisbane QLD 4001
Attention: Manager (Assessment)

By email: EnergyandExtractive@detsi.qld.gov.au

6 July 2026

RE: Submission - Proposed LNG Production Facility for Coal Mine Waste Gas (A-EA-AMD-100973471)

Thank you for the opportunity to make this submission in response to the application for an Environmental Authority (EA): A-EA-NEW-101041729 under the *Environmental Protection Act 1994* (EP Act).

Clean Energy Fuels Australia Marketing Pty Ltd (**the Proponent**) proposes to construct, own, and operate a micro-LNG plant, referred to as the Centurion LNG facility (**the Facility**).

Environmental Advocacy in Central Queensland

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

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

- is contrary to meeting Australia's emission targets and Queensland's emission targets,
- is likely to result in irreparable damage to our local landscape and result in stranded assets,
- will put our local community at further risk of extreme weather such as increasing the intensity and frequency of storms, floods, droughts and bushfires,
- will damage our significant coastal resources including our beaches and the Great Barrier Reef through storm surge and increased coral bleaching events, and
- will further degrade wildlife habitats of state and national significance through both habitat loss and climate change.

The Project

The Proponent is proposing to collect incidental coal seam gas (**ICSG**) from the Centurion Coal Mine at Goonyella, Central Queensland. The gas will be pre-compressed, filtered, dehydrated, purified, and liquefied in the modular micro-LNG plant using cryogenic processes, to produce an estimated 70 tonnes per day of Liquefied Natural Gas (**LNG**) which will be supplied to remote customers and/or distributed for use as a substitute for diesel or re-gasified for supply to the east coast natural gas grid.



A Petroleum Facility Licence (PFL) application for the project has been submitted in accordance with the *Petroleum and Gas (Production and Safety) Act 2004*.

The proposed Facility is a small-scale, modular plant that will receive incidental coal seam gas (ICSG) generated by the Centurion Coal Mine via pipeline. It will not extract coal seam gas itself but will process waste gas that would otherwise be flared by compressing, purifying and liquefying it into LNG for commercial sale.

The Facility would be located on ML1790 and would cover 197.41ha. 13.2ha of this disturbance has previously been provided draft approved (P-EA-100658735).

ENVA'S SUBMISSION

EnvA submits that:

1. The proposed Environmental Authority application should be refused because the Facility is dependent upon the proposed Centurion North Coal Development, which has not yet been approved under either State or Commonwealth assessment processes.
2. Alternatively, the application should not be determined until all approvals relating to the Centurion North Coal Development have been finalised.
3. Approval of this EA would effectively pre-empt the outcome of the ongoing environmental assessment of the associated mining project and undermine the integrity of those assessment processes.

Further background to our submission is provided below.

GROUNDINGS FOR SUBMISSION

Prematurity of the application

The proposed LNG Facility is justified on the basis that it will process incidental coal seam gas generated by both the existing Centurion Coal Mine and the proposed Centurion North Coal Development.

We acknowledge that a draft EA has been granted for the exploratory component of the Centurion North extension, but this draft has not received final approval.¹ This draft approval provides for the flaring of CSG rather than the collection of gas.

Approval for the Centurion North extension under the EPBC Act has progressed, with a decision that the project is a controlled action and would require an approval with controlling provisions of:

- listed threatened species and communities (sections 18 and 18A)
- a water resource, in relation to unconventional gas development and large coal mining development (sections 24D and 24E).

The Centurion North Coal Development extension is currently being assessed under a bilateral agreement with the Queensland Government but has only progressed to the Terms of Reference for an Environmental Impact Statement.² The Coordinator-General has not received a draft EIS for the project and hence has not assessed the impacts of the Centurion North Coal Development project. Consequently, key issues—including impacts on groundwater, biodiversity, greenhouse gas emissions and cumulative impacts—remain unresolved. It is therefore premature to approve infrastructure whose primary purpose is to service that development.

The proposed LNG Facility is not an independent development. It relies upon gas generated by the

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

² [Queensland Government - Office of the Coordinator-General \(July 2026\). Centurion North Development project](#)

approved Centurion Coal Mine and, more significantly, the proposed Centurion North Coal Development, which remains subject to comprehensive State and Commonwealth assessment.

The environmental justification for the Facility—including greenhouse gas reductions—is premised on future gas production from a mine extension that has not yet received approval.

Granting an EA now would effectively assume that the mine extension will proceed, despite that proposal remaining under assessment. In effect, the proposed Facility seeks approval for infrastructure whose need and environmental justification depend upon a development that may ultimately not proceed.

Greenhouse Gas (GHG) emissions

EnvA generally supports the capture and reuse of waste methane gas, which is a highly potent greenhouse pollutant, but the proposed source of the ICSG from the Centurion North extension mine has not yet been approved. Likewise, the Centurion Coal mine has been operating since 1994 – originally as the North Goonyella Coal Mine, with production suspended from 2018 to 2023 due to a severe underground fire. It is unclear how much ICSG is currently available from the original approved coal mine.

The proponent notes that Centurion Coal routinely flares large volumes of methane gas from its pre-mine gas drainage activities. The engagement with a third party to capture this ICSG is a component of the *Centurion Coal Mining Greenhouse Gas Abatement Plan*.

The Proponent emphasises the benefits of the proposed Facility in reducing GHG emissions from the Centurion Coal Mine and the proposed extension to the mine. However, the original supporting information accompanying the application did not provide any detail of the GHG emissions from the proposed Facility.

In response to a request for further information, the Proponent provided estimates in Table 22 of the EA application which note that the Facility will itself generate operational greenhouse gas emissions through electricity consumption, processing activities and transport.

The estimates of GHG emissions are summarised as:

- Scope 1 emissions at 615.3 t CO₂-e,
- Scope 2 emissions at 16,433.76 t CO₂-e, and
- Scope 3 emissions at 4,546.12 t CO₂-e.

The project does not eliminate greenhouse gas emissions; rather, it changes where and when those emissions occur. These estimated emissions presented still contribute to Australia's GHG emission contributions.

While these emissions may be offset by reductions in methane flaring, the application does not demonstrate the overall net climate benefit under a range of operating scenarios.

For the reasons outlined above, EnvA submits that the proposed LNG Facility is premature and should not be approved independently of the Centurion North Coal Development.

The justification for the Facility depends upon a mine extension that has not yet been approved and remains subject to ongoing State and Commonwealth assessment.

Approving the Facility now would effectively predetermine the outcome of those assessment processes and undermine confidence that the environmental impacts of the broader project have been properly considered.

Accordingly, EnvA recommends that the application be refused or, at a minimum, deferred until all approvals relating to the Centurion North Coal Development have been finalised.

Thank you again for the opportunity to make comments on the application for an environmental authority for the proposed Centurion LNG Facility.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Coral', with a stylized flourish at the end.

Dr Coral Rowston

Director

Environmental Advocacy in Central Queensland