



Comments of the Queensland Murray-Darling Committee Inc. on the Condamine and Balonne Draft Resource Operations Plan Amendment

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Submission to:

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These comments are presented by the Acting Chief Executive Officer, Lisa Yorkston, on behalf of the Queensland Murray-Darling Committee Inc. (QMDC). QMDC is a regional natural resource management (NRM) group that supports communities in the Queensland Murray-Darling Basin (QMDB) to sustainably manage their natural resources.

1.0 Background

QMDC has made submissions and deputations to the Australian and Queensland Governments seeking improvement to legislation, policies, and planning to both, prevent or manage impacts, on regional water resources in the Queensland Murray-Darling Basin. These submissions and deputations have raised issues integral to the implementation of the Regional NRM Plan, and the protection of water quality and quantity in local catchments.

2.0 General comments

QMDC supports amending the Condamine and Balonne Resource Operations Plan in order to protect the region's water resources.

Increasing the powers of the Queensland Government to protect water resources at a strategic level rather than by a case by case project level will provide at a State and regional level greater certainty with regards the sustainable use of water resources. It will also illustrate to regional communities a commitment by the Queensland Government to protect natural resource assets. Local coal and coal seam gas mining industry operations (exploration and production) to take and use large quantities of water must therefore, in QMDC's opinion, be included in the Condamine and Balonne Resource Operations Plan Amendment and any associated water planning legislation.





QMDC has consistently argued that a petroleum tenure holder's as of right to take underground water as part of their authorised petroleum activities in accordance with the *Petroleum Act 1923* and *Petroleum & Gas (Production and Safety) Act 2004* (Petroleum Legislation) is inherently flawed because that right has no limit placed on it. The tenet that water is consequential to the extraction of petroleum or gas allows for unsustainable practices that should not be perpetuated in light of this region's current water resource plans including the Great Artesian Basin (GAB) water resource plans.

Any use of surface water or extraction of groundwater must be managed (allocated) to not only protect bore owners, surface waters and natural spring ecosystems, which are comparatively vulnerable in these circumstances, but also to protect the Queensland Murray-Darling Basin, and GAB.

QMDC asserts that the Condamine and Balonne Resource Operations Plan Amendment should promote and encourage sustainable use of the Queensland Murray-Darling Basin and GAB and ensure that practices relating to the exercise of water "rights" by petroleum projects will ensure high-quality stewardship of all surface and groundwater; minimise disturbances to surface and ground water resources; and protect those resources for future human and environmental purposes. The exercise of water "rights" must be tenable in terms of the long term sustainability of the region's natural resource assets.

When allocating water licenses to petroleum tenure holders, environmental, social, economic and cultural values will need to be considered, upheld and assessed according to well considered threshold limits and cumulative impacts on local, regional and national scales.

Consequentially environmental, social, cultural and economic values need to be upheld by the Condamine and Balonne Resource Operations Plan Amendment in order to provide for the needs and aspirations of current and future generations.

QMDC recommends a broad definition of cumulative impacts that includes the successive, incremental and combined impacts of an activity on community, environment and the economy. QMDC asserts that owing to the complex nature of cumulative impacts, the Condamine and Balonne Resource Operations Plan Amendment must provide a clear direction on how cumulative impacts should be defined and measured.

A simple typology used in the below named 2008 study and *Cumulative Impacts. A good practice guide for the Australian coal mining industry* that distinguishes between spatial, temporal and linked impacts recognises that there is no one way in which impacts are cumulative and that a more differentiated approach is needed for both the measurement and management of such impacts (See *Assessing the cumulative impacts of mining on regional communities: an exploratory study of coal mining in the Muswellbrook area of NSW* (2008) at pp. xvi, xvii for discussion on definitional issues; and *Cumulative Impacts A good practice guide for the Australian coal mining industry* by Franks et al.).



QMDC believes the Condamine and Balonne Resource Operations Plan Amendment needs to consider cumulative impacts associated with, for example:

- leachate pollution
- aquifer contamination
- increasing the number of regional contaminated sites
- degradation of groundwater
- disturbance of farming land
- land subsidence
- thermal pollution
- water consumption
- water quality.

Cumulative impacts need to be evaluated at an industry level and must include the impact of past and ongoing exploration activities which do not have the same management safeguards as the development works.

3.0 Specific comments

3.1 The proposed Stage 3 New Hope Coal Mine Project in Acland poses a new threat to water resources and needs to be considered

Since the adoption of the Condamine and Balonne Resource Operations Plan a new threat posed by the proposed Stage 3 New Hope Coal Mine Project in Acland has been realised. Any amendment should consider these issues as well as the issues that have actually triggered the amendment.

QMDC submitted comments, dated 04 February 2013, to the Coordinator-General on the New Hope Acland Coal Mine Stage 3 Draft terms of reference for an environmental impact statement November 2012. Refer to publications section under the heading *Policy Submissions* at www.qmdc.org.au.

QMDC asserted that the Stage 3 project runs the risk of alienating 500ha of Strategic Cropping Land in the development area through, for example, the potential risk of contamination, roading and infrastructure impacts, and water allocations being given to the mining company instead of local producers and irrigators.

The State Government's proposed policy direction which aims to define Strategic Cropping Land by its ability to be irrigated highlights that prioritising water allocation to the mine over the agriculture industry is preventing the ability of the region to improve intensification of agriculture as per the State's plan. The development area is ideal for the intensification of agriculture, but is compromised particularly because of the water being taken away from potential Gowrie Creek irrigators. Acland has over 4000mgL water allocation for the area and over 500ha is currently Strategic Cropping Land. This area therefore has a high potential to be highly valued as irrigated Strategic Cropping Land. In QMDC's opinion, the loss of productivity is substantially greater than may otherwise be portrayed by New Hope's project proposal.

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QMDC asserts a balance is needed to rectify current unacceptable water impacts and hazards and deal with current operations rather than adding more impacts and issues which this coal mine Stage 3 project may present.

1. An underlying issue is that there does not seem to be a total water balance and total salt (pollutants) balance approach to management of water from mining activities within the Queensland Murray-Darling Basin. There are very real implications with an increase in salt additions to Basin streams for Basin salinity targets, environmental watering plans and Sustainable Diversion Limits in the event that dilution flows are required.

The New Hope Coal Mine Project overview states: “The Walloon Coal Measures aquifer outcrops over much of the revised Project site” and “The Walloon Coal Measures is the major groundwater aquifer intersected by the revised Project”. The current evidence suggests that there is vertical discharge from the measure into the overlying alluvium of Oakey Creek (that intersects Jondaryan) where the stream meets the Walloon strata. (Hillier Report, 2010) The concentration of salts in the area from the Walloon coal measures may be quite high. The ‘liberation’ of these salts and their storage has to be monitored. The salinity risk assessment done by DERM (2007) (in conjunction with Condamine Alliance) has shown that the mine site region is prone to salinity outbreaks.

It is also worth noting here that Oakey Creek, which confluences with Lagoon at Jondaryan, may be moderately groundwater dependant (is listed in the federal database of ground water dependant ecosystems).

The information required as part of the draft TOR did not require details on how local communities, landholders, farmers and irrigators are impacted by the proponent sourcing water e.g. from bores, municipal water supplies etc. Water supply and demand for the New Hope project will potentially deny its availability to other businesses and industry. What short and long term impact this may have on the sustainable economic development of the region and liveability for local communities is not yet understood fully.

QMDC therefore asserts the risk New Hope’s project poses to both water quantity and quality needs to be considered as part of the Condamine and Balonne Resource Operations Plan Amendment.

3.2 Environmental water values need to be considered

Condamine Alliance has been working with the Condamine catchment community in drafting a set of environmental water values for the ground and surface water in the catchment. These two documents represent a number of years of consultation with key stakeholders and community members.

 [Consultation Report Draft Surface Water Environmental Values for the Condamine Catchment](#) (Full report) (2973 KB)

 [Consultation Report Draft Groundwater Environmental Values for the Condamine Catchment](#) (Full report) (2851 KB)



4.0 Recommendations

QMDC offers the following recommendations:

4.1 That the Condamine and Balonne Resource Operations Plan include a clause to protect the catchment's resources requiring all water to be metered and accounted for on extraction and measured and accounted for either as a beneficial use or as a waste product.

4.2 That a definition for cumulative impacts be included, for example:

For this Plan, the term is taken to mean the combined impact of mining exploration and operations and all associated infrastructure (onsite and offsite) on the Condamine and Balonne water resources over time:

- ***Spatial extent impacts*** – those which occur over an area e.g. wetland and riparian vegetation impacted and the immediate and cumulative effect on riparian function in the catchment.
- ***Spatial intensity impacts*** – when a location is impacted on by the activities of multiple sites e.g. where the extraction of coal or coal seam gas by several mining sites contributes to a reduction of hydraulic pressure in particular areas.
- ***Simple temporal impacts*** have a specific time of commencement and a measured form over time e.g. the amount of riparian land rehabilitated over time as a reflection of the stage of development of the mine life and of cumulative mining industry impacts on Ramsar listed wetlands or in catchment areas.
- ***Offset temporal impacts*** occur when multiple simple temporal impacts are superimposed upon one-another over time e.g. materials moving through rivers.
- ***Linked triggered impacts*** are those that occur when one impact, either by its occurrence or by reaching a threshold level, triggers another impact that would not otherwise have occurred. The second impact is the triggered impact.

4.3 That the Condamine and Balonne Resource Operations Plan seriously considers the risks New Hope's Coal Mine current and future operations poses to both water quantity and quality.

4.4 That the Condamine and Balonne Resource Operations Plan upholds the community identified environmental values for surface and ground waters in the Condamine catchment when allocating water resources.

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