



Bridgeport Energy Limited
Level 7, 111 Pacific Highway North Sydney NSW 2060
P: +61 2 89608 419 W: www.bridgeport.net.au

7 October 2016

**Research Director
Parliament House
BRISBANE Q 4000**

Dear Director

**Re: Environmental Protection (Underground Water Management) and Other Legislation
Amendment Bill 2016**

I write in regard to the captioned Environmental Protection (Underground Water Management) Amendment Bill 2016 which is currently under debate and consideration in the Queensland State Parliament.

Bridgeport Energy Limited is a wholly owned subsidiary of New Hope Corporation Limited a company which also operates coal tenements, including the controversial Acland mine, in the state. I am the Chief Executive Officer and a Founding Director of Bridgeport Energy.

Since commencing operations with Bridgeport Energy in Queensland in 2009, I am bemused by the haphazard and inconsistent approach which the state takes to managing its resources. Included in resources, are not just mineral and fossil fuel resources but also water resources. During the past seven years and three state leaders, there have been numerous attempts to have the mining and fossil fuel industry (administered by DNRM) be controlled by the water resource industry (administered by DEHP). Neither side of the state regulators work together well, in fact they both are often at loggerheads on the best and most efficient way to manage a mining project with associated water production. I see this bill as a further attempt by the water resource industry to take control of projects in the mining industry and my company and staff do not support further piecemeal legislation such as this amending bill. The bill should therefore be blocked and not passed through state parliament as it is biased, unscientific and unfair in respect of the controls it attempts to impose on the mining industry. A more appropriate management scheme and bill to cover both these critical resource areas in a manner that ensures continuing revenue for the state must be formulated and passed before the state of Queensland is bypassed by the mining industry in favour of better places to work.

Here is a consideration of the appropriate blueprint for resource management (both water and mining) which can lead to a harmonious outcome for the state and its residents.

Firstly, in regard to fossil fuels the state needs to have an Act which differentiates between Pit Coal Mining, Underground Coal Mining, Coal Bed Methane Gas and Conventional Oil and Gas at both DNRM and DEHP. Each type of activity impacts a different level of strata in the earth and therefore extracts a different resource (both water and the mined resource).

- A. Pit Coal Mining ("PCM"), which is a mechanical extraction method by shovel and bulldozer (like any quarry) extracts coal from ground level to 80m. Coal extraction from this level receives water which is pumped out of the pit from the local shallow aquifer down to say 150m. This water is completely reusable as irrigation or potable water supply and therefore the DEHP water resource management for this should be around approving beneficial reuse, not monitoring water bores in the area. There is nothing done in an open pit mine that affects the ground water in any way, in fact the ground water hydraulics are such that the water drains into the pit and has to be pumped out from the pit sump area. Basic science tells us that the water bore monitoring and other similar activities proposed under the current Bill Amendment before the parliament is an absolute waste of time. This Bill and its implementation will impact Acland Phase 3 approval for example and will affect the life of what is clearly a clean open pit coal mining operation. All of this has already been aired in the Land Court around Acland Phase 3 approval and the imposition of this bill on open pit coal mining is simply illogical. More logical would be a monitoring system (for clay solids entrained in the pit water discharge) under the new EA for water pumped out of the pit sump area, but this is already in place and would progress in any new phase of the mine in any event. Simply put the proposed new Underground Water Bill does not fit the bill for pit mining and is poorly considered in this context.
- B. Underground Coal Mining ("UCM"), also a mechanical extraction method but utilising underground tunnelling, is similarly a receiver of water through drainage from the local shallow aquifer down to 150m. Because these mines are typically deep a fair volume of water has to be pumped out so that mining can occur. Again there is absolutely no impact on any local aquifer and the pumped water can simply be returned to the aquifer or beneficially used for town water supply or irrigation. The proposed bill does not fit for this type of operation either.
- C. Coals Bed Methane Gas (CBM"), is also a mechanical extraction process that does produce problematic water discharges. Here the DEHP would typically require the operator to monitor salt levels which can get quite high as underground water in contact with coal at these depths is salty. Solutions are desalination gathering areas and then discharge back into the aquifer for recharge or for use as irrigation or stock watering. CBM being a relatively shallow extraction process which pumps and produces material volumes of water with the associated gas is a candidate for the form of water bore monitoring proposed under the Water Bill, not because it may

contaminate that water bore but because the volume of water being pumped will eventually impact the aquifer and cause it to dry up. This is why DEHP must work to have the operators reinject this water if not used for beneficial reuse in the local community. Using evaporation ponds as presently done is simply poor water resource management and must be discouraged.

- D. Conventional Oil & Gas occurs from much deeper strata which produce below the Great Artesian Basin. The Great Artesian Basin is a massive basin which is charged regularly by every rain storm that occurs along the Australian Divide. The gigaliters of water that finds its way into this aquifer each year ensures a continuous recharge outcome throughout Queensland, not dissimilar to that in a hydro power dam scheme, but on a much larger scale. Monitoring of well bores in this scenario is ludicrous as well bores for local community use never are drilled this deep. The oil and gas business manages its business quite well in this regard and the imposition of yet another level of monitoring on well bores that are thousands of meter shallower simply makes no sense.

For the reasons in this letter, we feel the Water Bill as proposed needs amendment and application but ONLY to the CBM industry where salty water and material volumes of water are removed to the potential detriment of local community water bores.

Regards

Bridgeport Energy Limited



Chief Executive Officer