



APPENDIX A PRE-LODGEMENT MEETING ADVICE



From: [Camilla Scott](#)
To: [Emily Maddison](#)
Cc: [Forough Ghasemi](#); [Simon Garnett](#); [Tony Papinczak](#); [Romin Nejad](#)
Subject: RE: Mahalo North coal seam gas project pre-lodgement
Date: Thursday, 18 May 2023 5:07:27 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.jpg](#)
[image004.png](#)

Hi Emily,

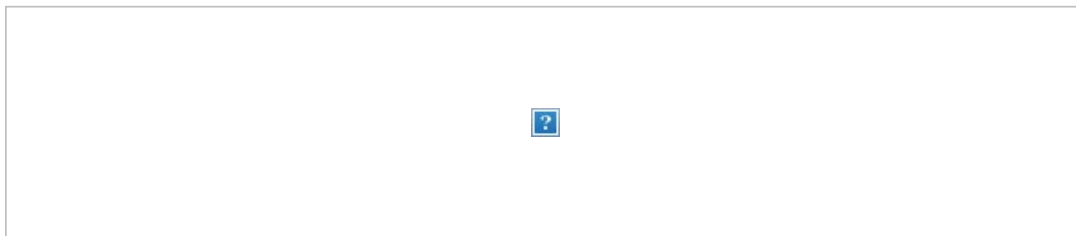
Thanks for the updates. We would be happy to receive you for another pre-lodgement meeting in future. Please submit the request through to the Department's Permits and Licencing team at PALM@des.qld.gov.au and cc the Energy and Extractive Resources team at energyandextractive@des.qld.gov.au when you are ready to arrange the next pre-lodgement meeting, and we will get back to you then.

Kind regards,



Camilla Scott
Senior Environmental Officer
Energy and Extractive Resources | Environmental Services and Regulation
Department of Environment and Science

P 07 3516 0420
GPO Box 2454 Brisbane QLD



From: Emily Maddison <emaddison@epicenvironmental.com.au>
Sent: Thursday, 18 May 2023 11:44 AM
To: Camilla Scott
Cc: Forough Ghasemi; Simon Garnett; Tony Papinczak; Romin Nejad
Subject: RE: Mahalo North coal seam gas project pre-lodgement

Hi Camilla,

Thank you for sending through the pre-lodgement advice and thank you to yourself and Forough for your time last week to discuss the project. We really appreciate your questions and feedback.

I just wanted to clarify a couple of points in your email below which I've marked up in red text.

If you have any questions, please feel free to contact me on the phone numbers provided below.

We would like to take the opportunity to meet with you again for a subsequent pre-lodgement meeting once the findings from the technical studies have been finalised and closer to lodging the EA application. This will be around August this year.

Many thanks,

Emily Maddison
Senior Environmental Scientist

Phone: 1800 779 363
Mobile: 0407 611 133
Email: emaddison@epicenvironmental.com.au
L17, 95 North Quay, Brisbane, Q, 4000



From: Camilla Scott <Camilla.Scott@des.qld.gov.au>
Sent: Tuesday, May 16, 2023 12:29 PM
To: Emily Maddison <emaddison@epicenvironmental.com.au>
Cc: Forough Ghasemi <Forough.Ghasemi@des.qld.gov.au>
Subject: Mahalo North coal seam gas project pre-lodgement

Good morning Emily,

Thank-you for EPIC and Comet Ridge attending the pre-lodgement meeting last Thursday 11th May to discuss the Mahalo North coal seam gas project pre-lodgement.

Mahalo North coal seam gas project will include a production licence over part of ATP2048 for 68 wells, which will include a number of lateral perforation wells and vertical recovery wells.

From our discussions, the following environmentally relevant activities may apply to this project:

- Schedule 3, Item 8: a petroleum activity or GHG storage activity, other than an activity mentioned in any of items 1 to 7, that includes 1 or more activities mentioned in schedule 2 for which an AES is stated;
- Schedule 2: 64 Water treatment (relevant threshold to be explored by Comet Ridge);
- Should there be *release* of treated sewage during the construction phase, Schedule 2: 63 Sewage Treatment: operating sewage treatment works, other than no-release works, with a total daily peak design capacity of— (a) 21 to 100EP; and
- ERA15 Fuel Burning equipment: using fuel burning equipment that is *capable* of burning at least 500kg of fuel in an hour. This ERA may apply if the compressor station combustion engines are capable of burning 500kg of fuel in an hour.

Other key points clarified during the meeting are listed below:

- It was identified during the pre-lodgement meeting that no well stimulation is planned at this stage for the project, but may be required in later stages of the project. It was recommended that, should well stimulation be required in future, an amendment to the environmental authority is sought.
- It was acknowledged by Comet Ridge that lateral wells must remain within the boundary of the Petroleum Lease.
- The project proposes to impact ~10ha of Strategic Cropping Land. A Regional interests development approvals (RIDA) may be required under the *Regional Planning Interests Act 2014* to authorise this impact. **Noted, thank you. The project may impact SCL.**
- The project area is within the Surat Cumulative Management area. Contact with the Office for Groundwater Impact Assessment for projected groundwater use has been made.
- The project has been registered with the Department of Climate Change, Energy, the Environment and Water under the 'water trigger' provisions of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). **The project has not been referred to DCCEEW as yet, but will be referred under the water trigger once the groundwater assessment is progressed further.**

Other additional information:

- It was recommended that Comet Ridge provide information on the Scope 1, 2 and 3 emissions relating to this project, as predicted over the lifespan of the project. Information should include the volume of emissions including greenhouse gas emissions, and reference the contribution of the project to the Queensland emission reduction target limit- 30% emissions reduction below 2005 levels by 2030.

Tenure information

- The PL application must include the disturbance and infrastructure from the underlying Authority to Prospect, ATP2048.
- Public notification will apply for the new, site-specific resource activity.
- Once the new, site-specific resource activity environmental authority has been issued, Comet Ridge must apply for a partial surrender of the overlapping ATP2048 subblocks on EA0002076.

If you have any further questions relating to our pre-lodgement meeting, please don't hesitate to contact me using my below details.

Kind regards,



Camilla Scott

Senior Environmental Officer

Energy and Extractive Resources | Environmental Services and Regulation

Department of Environment and Science

P 07 3516 0420

GPO Box 2454 Brisbane QLD



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The below advice captures the record of pre-lodgement held between an applicant and the Department of Environment and Science in relation to a resource project.

Pre-lodgement meeting details

Project description	Site-specific EA for a production licence over part of ATP2048 for 68 wells, which will include a number of lateral perforation wells and vertical recovery wells.
Client name/ organisation	Mahalo North coal seam gas project
Client representatives	Epic Environmental Consulting; Comet Ridge Mahalo North Pty Ltd
DES representatives	Forough Ghasemi, Camilla Scott
Date and location	29 September 2023; Microsoft Teams

Application process

ERA/s for the proposed application	Non-Scheduled Petroleum Activity
Application type	Site-specific EA

Agenda summary

- Previous pre-lodgement advice was provided 16 May 2023.
- The meeting discussed the pre-lodgement 'draft application' material provided.

Critical matters

High risk / concerning areas	Actions
Engagement of ERA63/ERA64	<ul style="list-style-type: none"> • DES requested Comet Ridge provide further information on the sewage/water treatment activities. • DES will review the further information and respond to whether these ERAs will be engaged by the project.
Green house gas emissions	<ul style="list-style-type: none"> • It was recommended that GHG emission estimates are included in the application information. • It was noted that it is currently not an application information requirement, however DES has been receiving growing public interest on this matter as it pertains to the Human Rights Act 2019, and the standard criteria under the Environmental Protection Regulation 2019. It is therefore anticipated that the project's contribution to CO2 equivalent emissions will likely need to be

	<p>addressed during the assessment phase of the application.</p> <ul style="list-style-type: none"> • DES to supply further guidance on the suggested information to include.
Matter	Advice
ERA63	<p>The proposed works trigger ERA63 sewage treatment.</p> <p>The EP Regulation 2019 does not include any minimum time periods for the carrying out of ERA 63 Sewage treatment. Comet Ridge noted that during drilling and construction activities the peak workforce is estimated to be up to 35 people. This exceeds the minimum equivalent person threshold of 21 for ERA63. Comet Ridge state that the treated sewerage effluent or greywater would be released to land. This application of treated sewage to land is not consistent with the 'no release works' exemption under 63(2)(c) of the EP Reg.</p> <p>Should effluent be removed offsite and disposed at a licenced facility, eg use of port-a-loos, the ERA63 would be exempt. Comet Ridge may apply in future to amend the EA after the construction and drilling activities when sewage treatment services for over 21EP are not required.</p>
ERA64	<p>DES is awaiting internal advice on whether ERA64 would be engaged by the proposed activities. DES will confirm via email separate to this pre-lodgement advice.</p>
Recommended information to demonstrate the contribution of the project to GHG emissions and hierarchy of management.	<p>DES refers to the Air-EIS Information Guideline for guidance on suggested information to include in the application surrounding the project's contribution to GHG emissions:</p> <p>“ Provide an inventory of projected annual Scope 1 and Scope 2 (described below) emissions for each relevant greenhouse gas (GHG), with emissions expressed in carbon dioxide equivalent terms (described below). Briefly describe the methods used to make the estimates. The Australian Department of Climate Change and Energy Efficiency's National Greenhouse Accounts (NGA) Factors can be used as a reference source for emission estimates, supplemented by other sources. Also, if sufficient information is available, estimate the Scope 3 GHG emissions.”</p> <p>Carbon dioxide equivalent (CO2e) is a measure used to compare the emissions of a particular greenhouse gas to carbon dioxide based on its global warming potential over a specified timescale.</p>

	<p>For example, the global warming potential for methane compared to carbon dioxide over 100 years is 21, so the carbon dioxide equivalent of 1 tonne of methane is 21 tonnes (CO₂e).</p> <p>Scope 1 greenhouse gas emissions are emissions from sources that are owned or directly controlled by the organisation. Scope 1 emissions for coal mining projects will include fugitive coal seam methane vented or released during mining, as well as emissions directly resulting from the project's activities such as transportation of products and consumables.</p> <p>Scope 2 greenhouse gas emissions are emissions from the consumption of purchased electricity, steam, or other sources of energy (e.g. chilled water) generated upstream from the organisation. Scope 2 emissions for any type of project will include energy (e.g. electricity) used by the project but generated by other entities.</p> <p>Scope 3 greenhouse gas emissions are a consequence of the operations of an organisation, but are not directly owned or controlled by the organization. Scope 3 emissions will include indirect sources such as employee commuting, business travel, third-party distribution and logistics, and the production of purchased goods.</p> <p>The application material should also include:</p> <ul style="list-style-type: none"> • assess the potential impacts of the proposed project on the state and national GHG inventories and propose GHG abatement measures • describe the proposed measures (preferred and alternatives) to avoid and/or minimise Scope 1 and Scope 2 GHG emissions of the proposed project (and Scope 3, if possible) • assess how the preferred mitigation measures minimise emissions and achieve energy efficiency
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Next steps

	Yes	No
Application deemed suitable for lodgement	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sufficient supporting information provided with pre lodgement application	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Recommend further pre-lodgement meeting	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Other

Disclaimer

This record of pre-lodgement is relevant based on the information that was available prior to and during the meeting. While every effort has been made to identify and capture the key discussions

and critical matters it does not preclude any determination on the application when formally lodged. The advice provided is based on legislation and policy understanding at the time of the meeting and may be subject to change. The department will endeavour to inform you of any substantial changes that may impact on your application.

Feedback

Please take the time to provide us with some feedback on your pre-lodgement meeting by clicking on this [link](#) and completing the short 5 minute survey.