

Jessie Giblett - Submission Details for Lindsay Tuggle (object)

From: Lindsay Tuggle <latuggle@gmail.com>
To: <clay.preshaw@planning.nsw.gov.au>
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Subject: Submission Details for Lindsay Tuggle (object)
CC: <assessments@planning.nsw.gov.au>

 Department of Planning

Confidentiality Requested: no

Disclosable Political Donation: no

Name: Lindsay Tuggle
 Email: latuggle@gmail.com

Address:
 6 Wigram Road

Austinmer, NSW
 2515

Content:

I oppose granting the extension of activities to APEX Energy, and furthermore oppose any future CSG mining in the Illawarra, for the following reasons:

1. The area of the Illawarra upper escarpment is completely unsuited to CSG mining (both exploration and production) for a variety of dangerous reasons. The proposed mining areas consist almost entirely of SWA drinking water catchment "Special Areas" and dams, National Parks and other environmental preservation or conservation areas. It is also a high risk bush fire area which is exacerbated by its highly combustible peat base. The recent August 2012 bush fire ran through and burnt out APEX drill sites 9 and 10. If the wells had been in exploration or production phases, this would have been a catastrophic disaster. Even if you exclude the grave risks that CSG poses to our water catchment, it is obvious from this incident that the risk of fire renders this area entirely unsuitable for CSG mining (whether exploratory or production). CSG is usually methane, a highly explosive and flammable gas. This can leak from pipelines, wellheads, waste water and processing plants. It can even escape from underground systems due to CSG drilling disturbance. Researchers from the US National Oceanic and Atmospheric Administration said air sampling of unconventional gas fields in Colorado showed leakage rates of 4% on average, and up to 7.7%.

Fire threatens water quality. The NSW Office of Water report said: "Bushfires can have devastating effects on catchment health, destroying native vegetation, farmland and infrastructure. Areas burnt by bushfires are prone to accelerated soil erosion, resulting in enhanced sediment and nutrient export to the surface water bodies downstream. Removal of vegetation by fire also reduces the ability of catchment areas to retain rainfall."

This area is an environmentally unique and highly sensitive upland swamp ecosystem, upon which the purity of our drinking water depends. Production CSG mining is an extensive and environmentally invasive industrial activity that will result in 150+ well pads and associated above ground infrastructure on the escarpment. This activity will undoubtedly permanently damage and or alter the ecology.

2. As a professional academic researcher currently undertaking a research fellowship at the Library of Congress in Washington DC, I have found an overwhelming volume of research that documents the grave risks of CSG mining (especially those relating to water contamination). Current NSW CSG control legislation is acknowledged by the premier himself as inadequate for managing this grave risk. The NSW Premier reconfirmed this in his recent interview with Alan Jones. The revised NSW Government regulatory framework has yet to be released and it would be unethical and improper to proceed prior to APEX being assessed against these requirements.

Aside from the risks CSG poses for both fire hazards and water contamination, the industry always uses massive quantities of water, and often depletes groundwater. Australia is a country that experiences frequent drought. Water is our most precious natural resource. We cannot afford to squander it on the CSG industry when we so desperately need it for drinking water and irrigation. Is Barry O'Farrell's government willing to throw away our clean drinking water and ability to produce and irrigate crops? The National Water Commission estimate that the Australian CSG industry will extract around 7,500 gigalitres (GL) of produced water from ground water systems over the next 25 years. To put this in perspective, that's more than 13 times the capacity of Sydney Harbour. They also note that the potential impacts of CSG development on water systems, particularly the cumulative effects of multiple projects, are not well understood.

4. The Illawarra is already under threat from massive coal mine expansion using long wall mining technologies. I understand that in the case of the Gujarat mine at Bulli the scale is 10x and at the Helensburgh Colliery 3x. The Warratah rivulet near Helensburgh that feeds the Woronora dam has already subsided and gone underground, as a result of Long Wall mining at the Metropolitan coal mine and 18 months of remedial work has failed to resolve the problem. Therefore the risks associated with CSG mining are being layered on top of the existing impact of extensive coal mining in the area - with no combined impact study yet undertaken!

4. The applicants (APEX Energy) have already shown their incompetence and unsuitability by allowing a PEL to lapse through default, as a result of an "administrative over-site" What if the result of the next "oversight" is contamination or fire in our catchment, or environmental conservation areas? APEX's 'administrative oversight' offers this government a unique opportunity to cancel all CSG licences granted under the previous Labour government (which Barry O'Farrell himself acknowledged to be inappropriate) without financial compensation, since the error is on the part of APEX. In a December 1 interview, Premier O'Farrell told 2GB's Alan Jones: "I don't intend to allow -- particularly after the drought we went through over a decade -- mining or any other activity to threaten water resources." He also said: "[CSG] exploration licenses have been granted, in some cases permission to mine has been granted, in areas, frankly, that should never ever have been on the list."

5. There is widespread public opposition to CSG mining in the Illawarra and across the state. This includes a public petition of around 20,000 signatures delivered to the Premier, formal votes against CSG mining by 4 local councils (Wollongong, Wollondilly, Campbelltown and Sutherland), and at least 2 local state MP (Lee Evans and Ryan Park). Major concerns exist around the original approvals forced through by the previous Labour government under part 3A of the NSW planning Act, which bypasses many of the usual and expected environmental and public consultation processes. I am very concerned by the absence of independent research into the environmental impact of CSG in such a vital area of water supply (let alone the combined impact of CSG and mining) and the lack of public consultation: Specifically APEX Energy did not enter into public consultation before its initial drilling at Darkes Forest, nor earlier this year before drilling within the Warragamba water catchment at Oakdale - this shows total a lack of respect for due process and public opinion.

6. Any decision to extend, renew, or otherwise approve new activities in and around the water catchments flies in the face of commitments made by The Premier of NSW Barry O'Farrell: "The next Liberal/National Government will ensure that mining cannot occur ... in any water catchment area, and will ensure that mining leases and mining exploration permits reflect that common sense; no ifs, no buts, a guarantee."

The question remains, will Barry O'Farrell keep his promise? If he does not, the electorate will abandon him as swiftly as he abandons their right to clean drinking water.

Sincerely,

Dr Lindsay Tuggle
Kluge Research Fellow, Library of Congress,
Illawarra Resident and Australian Citizen:
6 Wigram Road, Austinmer NSW 2515

IP Address: webproxy2.loc.gov - 140.147.236.195
Submission: Online Submission from Lindsay Tuggle (object)
https://majorprojects.affinitylive.com?action=view_diary&id=40989

Submission for Job: #5550 Apex Gas Exploration Project Mod 2
https://majorprojects.affinitylive.com?action=view_job&id=5550

Site: #877 Illawarra Coal Seam Gas
https://majorprojects.affinitylive.com?action=view_site&id=877

Lindsay Tuggle

E : latuggle@gmail.com

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