

environment illawarra

80 Farrell Rd
Bulli NSW 2515
15th May 2009

Department of Planning
Attention: Alison O'Reilly
alison.o'reilly@planning.nsw.gov.au

RE: APEX ENERGY EXPLORATION PROJECT - 07_0103

Environment Illawarra represents twelve of the major environmental protection groups working in the Illawarra. Our aim is to advocate for the protection of the natural environment of the Illawarra and provide expertise towards decision-making processes which affect the health of the Illawarra's biodiversity.

We are extremely concerned about the potential for environmental damage to Sydney's water catchment posed by this proposal. We are also aware that there have been major impacts in other areas, as outlined in the attached report by CM Atkinson 2005¹.

Water

There have been failures in the containment of toxic groundwater in other areas, but the level of risk is much increased with this proposal because of its location in the catchments for Sydney's drinking water.

The proposed treatment of toxic drilling fluid and groundwater is weak, with simple, small bund walls and excavated 'sumps' only. This contradicts a further statement that *'all waste drilling fluid will be removed off site by tanker in all cases'*.

In the case of heavy rainfall, these sumps will be covered by tarpaulins to prevent their overfilling. This appears to be ridiculously insufficient given the risks of contaminated water entering the water supplies and catchment rivers and wetlands.

In addition, if there's a failure of the holding systems, the proponent plans to simply take samples and send them off to a lab for analysis. This again, reminds one of 'locking the stable door after the horse has bolted'.

There has been no investigation into the structure of the groundwater systems and how their further breaching may impact on the water supplies for Sydney and Wollongong.

Fauna and Flora

Potential habitat for 23 species listed under the Threatened Species Conservation Act, and 8 species listed under the Environment Protection and Biodiversity Conservation Act, exist within the proposed development area. Therefore, the proposal should be referred for assessment as a Matter of National Environmental Significance.

¹ Atkinson, CM 2005 Coal bed methane hazards in New South Wales, for Tony Davis & Associates
Australian Gas Alliance New South Wales

The permanent clearing and fencing of considerable amount of land around each drill (100m diameter minimum) includes areas of coastal upland wetlands as well as the threatened species' habitat. Any soil removed from the wetlands is likely to be acidic and pose a risk to the wetland and surrounding waterways. It will also permanently damage habitats which are known for their sensitivity to disturbance.

The additional road construction, water-holding construction and associated heavy vehicle movements, will apply a further impact on flora and fauna, including clearing of native vegetation, permanent soil compaction and weed infestation. Although the environmental assessment report claims that impacts will be minimal, the nature of environmental damage is that it is often cumulative. When taken in conjunction with other impacts, such as long-wall mining, development pressures, loss of habitat and climate change, it is necessary to consider this proposal in combination with the many other pressures which lead to ecosystem and species decline.

Fire

It is proposed to flare the gas during operations. This poses a grave risk of fire in these areas of natural bushland in close proximity to two of Australia's largest population centres.

The fire risk management outlined in the environmental assessment report includes fuel reduction and fire breaks, which will increase the impacts on native flora and fauna and ecosystem integrity.

Conclusion

Given the rugged and unstable nature of this landscape, which is already subject to dropping and cracking from long-wall mining, the proximity of the drills to sensitive upland swamps, the presence of habitat for a number of State and Federally listed threatened species, the high rainfall and associated sediment runoff and slippage, and the location within parts of Sydney's drinking water catchment, the proposal's potential environmental impacts are large and unpredictable.

Furthermore, as this is only an exploration proposal, any future gas mining would entail much greater impacts from many more drill sites. Therefore, we believe that this proposal should be refused.

Yours sincerely,

Dr Helen Wilson
For Environment Illawarra