

Notice

Environmental Protection Act 1994

Information request

This information request is issued by the administering authority under section 140 of the Environmental Protection Act 1994 to request further information needed to assess an amendment application for a site-specific environmental authority and PRCP schedule.

To: Centurion Coal Mining Pty Ltd
Level 14, 31 Duncan Street,
Fortitude Valley, QLD, 4006
By email transmission only

ATTN: Marianne Gibbons

Email: MGibbons@peabodyenergy.com

Our reference: P-EA-100658735 and P-PRCP-100669070_V1

Further information is required to assess an amendment application for an environmental authority

1. Application details

The amendment application for a site-specific environmental authority and PRCP schedule was received by the administering authority on 13 September 2024. The application fee was paid 23 September 2024 (invoice#7037096).

The application reference number is: **A-EA-AMD-100735492, Zendesk#184524**

Land description: ML1790 and ML70495

2. Information request

The administering authority has considered the abovementioned application and is writing to inform you that further information is required to assess the application (an information request).

The information requested is provided below in Appendix A: Information Requested.



3. Actions

The abovementioned application will lapse unless you respond by giving the administering authority -

- (a) all of the information requested; or
- (b) part of the information requested together with a written notice asking the authority to proceed with the assessment of the application; or
- (c) a written notice –
 - i. stating that you do not intend to supply any of the information requested; and
 - ii. asking the administering authority to proceed with the assessment of the application.

Should the information request require an EIS process or applicant to submit a progressive rehabilitation and closure (PRC) plan then it must be completed and submitted.

A response to the information requested must be provided by 1 May 2025 (the information response period). If you wish to extend the information response period, a request to extend the period must be made at least 10 business days before the last day of the information response period.

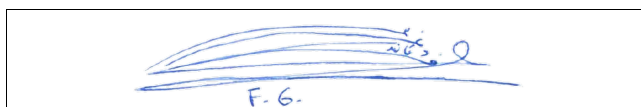
The response to this information request or a request to extend the information response period can be submitted to the administering authority by email to CRMining@des.qld.gov.au.

If the information provided in response to this information request is still not adequate for the administering authority to make a decision, your application may be refused as a result of section 176 of the *Environmental Protection Act 1994*, where the administering authority must have regard to any response given for an information request.

4. Human rights

A human rights assessment was carried out in relation to this decision/action and it was determined that **the decision is compatible with human rights.**

If you require more information, please contact Business Centre Coal using the details listed below.



Signature

Forough Ghasemi
Department of Environment, Science and Innovation
Delegate of the administering authority
Environmental Protection Act 1994

1/11/2024

Date

Enquiries:
Business Centre Coal
PO Box 3028, Emerald QLD 4720
Phone: 07 4987 3200
Email: CRMining@des.qld.gov.au

Appendix A: Information Requested

Please note:

Reference to the 'GHG Abatement Plan' refers to the report 'Greenhouse Gas Abatement Plan' prepared by SLR Consulting, Project Number 620.040594.00001, provided as Appendix C of the application.

Reference to the GHG Guideline or Departmental GHG Guideline refers to the Guideline 'Greenhouse gas emissions (ESR/2024/6819) Version 1.00.

Item #	Matter of Interest	Information Sought	Requested Actions
1.	Greenhouse Gas Abatement Plan – Appendix C Table 2.1	<p>Table 2.1 presents a summary of Peabody's Greenhouse Gas Abatement Plan (GHG Abatement Plan).</p> <p>This Table indicates that the reference point for emissions for this project is the Centurion Coal Mine. The following statement is made <i>'Emission reduction will be measured based on the site- specific emission intensity approved by the Clean Energy Regulator for the Centurion Coal Mine.'</i></p> <p>The current EA amendment relates to activities proposed to occur at the Centurion North project. The Centurion Coal Mine reference above, and in Table 2.1 is a distinctly different operation, occurring in a different location and authorised under a different Environmental Authority.</p> <p>The GHG Abatement plan does not explain why a neighbouring project has been used as the emissions reference point for the project or justify the appropriateness of this approach.</p>	<ol style="list-style-type: none"> 1. Provide an explanation as to why the neighbouring project Centurion Coal Mine has been used as the emissions reference point for the Centurion North Project. 2. Justify the use of the Centurion Coal Mine as the emissions reference point for the Centurion North project with consideration of the fact that the current EA amendment being assessed for the Centurion North project, occurs on an unrelated tenement under an unrelated environmental authority to that the Centurion Coal Mine. 3. If part of the explanation relies on the two projects being operated as a singular Safeguard Facility under the Commonwealths Safeguard Mechanism, provide details of the appropriateness of this approach.

<p>2.</p>	<p>Greenhouse Gas Abatement Plan – Appendix C Table 2.2 Environmental Authority Amendment Application Supporting Report – Section 3.7 Equipment</p>	<p>Table 2.2 of the GHG abatement plan states 'operation of flares at >95% availability and the response time are generally 20 minutes to restart flaring.' Table 3.2 in Section 3.7 'Equipment' indicates that venting systems will also be installed, presumably to facilitate direct venting when flaring is not in operation.</p> <p>Given the large volume of methane to be extracted over the life of the proposed project, the resulting GHG emissions from direct venting into the atmosphere when flaring is not available, during re-start of flaring, and/or leaking could be significant.</p> <p>The GHG emissions produced in these instances must be estimated.</p>	<ol style="list-style-type: none"> 1. Provide a detailed discussion in the GHG Abatement Plan of any direct venting that is proposed as part of the project. This must include more specific information about any venting systems required, the expected frequency of venting and any safety or technical considerations that have been contemplated in the development of the project. Any further regulatory requirements that have been considered must also be detailed. 2. Provide an estimate of the Scope 1 emissions that is inclusive of GHG emitted during direct venting and during restart of flaring. 3. Consider the impact that any leakage could have of the GHG emissions estimates, and if required includes the estimated emissions from any leakages in the Scope 1 estimate. Identify and discuss the implementation of mitigation measures in order to reduce the leakage of GHG emissions as a result of direct venting and during restart of flaring.
<p>3</p>	<p>Environmental Authority Amendment Application Supporting Report – Section 6.2 Greenhouse Gas</p>	<p>Table 6.7 of the supporting report 'Environmental Authority Amendment Application Supporting Report' outlines the emissions factors that have been considered in the Greenhouse Gas Assessment, based on the National Greenhouse Account Factors. It is noted that one of the emissions factors referred to is for</p>	<ol style="list-style-type: none"> 1. Confirm whether the National Greenhouse Account Factor for 'coal seam waste gas' was considered in developing the GHG assessment. 2. If the 'coal seam waste gas' factor was considered, provide details on how

	Greenhouse Gas Abatement Plan – Appendix C	<p>‘coal seam methane that is captured for combustion’. The National Greenhouse Account Factors Table also provide a factor for ‘coal mine waste gas’, which has not been considered in Table 6.7.</p> <p>It is not clear whether using the coal mine waste gas factor has been considered in preparing the GHG assessment or the justification for ultimately using the coal seam methane factor.</p> <p>It may be appropriate to use the coal mine waste gas factor given one of the objectives of the project is to inform environmentally conscious management plans for eventual extraction of coal from ML1790.</p>	<p>each of the National Greenhouse Account Factors for ‘coal seam methane’ and ‘coal seam waste gas’ were considered and why the ‘coal seam methane’ factor was used in the development of the assessment.</p> <p>3. Alternatively, if the ‘coal seam waste gas’ factor was not considered, provide an assessment on it’s applicability to the project and revise the GHG assessment as required.</p>
4	Environmental Authority Amendment Application Supporting Report – Section 6.2 Greenhouse Gas Greenhouse Gas Abatement Plan – Appendix C	<p>Sections 6.2.2.3 and 6.2.2.4 discuss the operation of the vertical and lateral wells, and the summary of GHG emissions estimates. From these sections, it appears that the operation of 13 vertical wells has been included in estimating the scope 1 emissions, however it is not clear that the operation of 10 lateral wells has been accounted for.</p> <p>Further information is requested to explain how the operation of the 10 lateral wells contributes to the emissions profile of the project.</p>	<p>1. Provide further details on how the 10 lateral wells will operate in conjunction with the vertical wells, and whether any emissions will be produced through their operations.</p> <p>2. If the operation of the 10 lateral wells will contribute to the scope 1 emissions for the project, revise the GHG assessment to make clear what these emissions are estimated to be and how they have been incorporated.</p>
5.	Greenhouse Gas Abatement Plan – Appendix C	<p>The GHG abatement plan presented in Table 2.2 ‘Project Specific Greenhouse Gas Abatement Plan’ generally lacks the detail required as specified in Appendix A of the GHG Guideline.</p> <p>Matters that are required to be addressed in accordance with Appendix A, which are currently considered absent from the GHG abatement plan include the following:</p>	<p>1. Revise and update the GHG abatement plan to address sections (d), (e), (f) and (g) in accordance with Appendix A of the GHG guideline. Note that part (e) must be addressed in accordance with Appendix B of the GHG Guideline.</p> <p>2. Revise and update the GHG abatement plan to</p>

		<ul style="list-style-type: none"> • Emission Reduction Targets • A GHG emissions reduction program • A discussion of advancing technologies and opportunities • Details on monitoring and auditing. <p>It must also be noted that the GHG emissions reduction program is required to provide detailed information as outlined in Appendix B of the GHG Guideline.</p> <p>Further, the information that has been supplied in Table 2.2 to meet the Appendix A requirements lacks the detail and specificity required to allow the department to understand the effectiveness of the proposed mitigation measures, emissions reduction measures and abatement opportunities.</p>	<p>provide further details on parts (b), (c) and (h).</p> <p>It must be noted that the requirements outlined in Appendix A are a majority of the content requirements needed for the GHG abatement plan. The current approach to address these requirements in table and dot point formation does not meet the level of detail expected.</p>
6.	Environmental Authority Amendment Application Supporting Report – Section 6.5 Terrestrial Ecology	<p>Section 6.5.2.1 of the supporting document identifies that the project will intercept an area of regulated vegetation that is classified as ‘Of Concern’ RE 11.8.11.</p> <p>However, the application indicates that the RE is not classified as MSES in accordance with the definition of prescribed regional ecosystem given in the <i>Environmental Offset Regulation 2014</i>, which refers to section 8(b) of the <i>Vegetation Management Act 1999</i>.</p> <p>The VM REDD referred to in the <i>Vegetation Management Act 1999</i> classifies ‘grassland’ and woody grassland’ separately and section 8b refers only to the grassland structural category. RE 11.8.11 has a structural category of woody grassland. Thus the exclusion provided in the prescribed regional ecosystem</p>	<ol style="list-style-type: none"> 1. Revise the supporting document to identify RE 11.8.11 as MSES regulated vegetation and address any significant residual impact to this regulated vegetation.

		<p>definition does not apply to RE 11.8.11.</p> <p>The supporting information must identify the impact to RE 11.8.11 as an impact to MSES and undertake a significant residual impact assessment accordingly.</p>	
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