

Draft Surat Basin Regional Planning Framework
Submission

Provided to the Department of Infrastructure and Planning
Prepared by p&e Law
17 December 2010

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1 ABOUT p&e LAW

- 1.1 p&e Law is one of the few and largest specialist planning, environment and native title law practices in Queensland and to seek that further studies be undertaken by government and key stakeholders prior to
- 1.2 p&e Law acts for a range of clients from the rural, development, government and community sectors and its solicitors are experienced in the specialised areas of Planning & Environment and Native Title law. Core areas of practice include:
 - (a) planning & development assessment
 - (b) native title & cultural heritage
 - (c) environmental compliance
 - (d) governance
 - (e) coastal management
 - (f) water
 - (g) infrastructure development and Environmental Impact Statements
 - (h) vegetation and wildlife

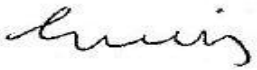
2 INTRODUCTION

Purpose

- 2.1 The purpose of this submission is to recommend some amendments to the draft Surat Basin Regional Planning Framework; and to seek the provision of further studies prior to release or amendment of regional plans for the Surat Basin to enable the community to more fully understand all the potential impacts the expanding resource industries will have on lifestyle, farming interests and businesses.

Submitters

- 2.2 This submission has been prepared by p&e Law in consultation with community stakeholders.

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Scope

- 2.3 This submission is provided with reference to:
- (a) the draft Surat Basin Regional Planning Framework; and
 - (b) current regulatory provisions of relevant Federal, State and local laws and legislation, polices and planning instruments.

Sources and methods

- 2.4 Information was obtained from the Queensland Government Department of Infrastructure and Planning website at www.dip.qld.gov.au.

Limitations

- 2.5 While all reasonable care has been taken by the authors in preparing this submission, to ensure that all information in this submission is accurate and complete, p&e Law does not accept liability where this is found not to be the case.

Purpose of the draft Framework

- 2.6 The draft Surat Basin Regional Planning Framework (SBRPF) states it is a non-statutory document that will have effect upon statutory documents including regional plans and local government planning schemes. At section 1.3, page 7, the draft SBRPF states:
- The SBRPF, whilst a non-statutory document, will influence local government planning schemes, under the *Sustainable Planning Act 2009*, and community plans, under the *Local Government Act 2009*. The *Local Government (Finance, Plans and Reporting) Regulation 2009* stipulates that a local government must identify local and regional issues that effect, or may in the future effect, a local government area. Consequently a strong link is required between regional planning, local government planning schemes and community plans.
- 2.7 The *Sustainable Planning Act 2009* (Qld) (SPA) through sections 88, 89 and 90 identifies matters that a local government must appropriately reflect in the planning scheme including strategic outcomes for the planning scheme area and the integration of core matters including any State and regional dimensions of those matters. We anticipate the draft SBRPF being relied upon under those sections of the SPA during the government's review to ensure that the State's strategy in respect of the Surat Basin is adopted. That is, the draft SBRPF will be used by the State to ensure that future land uses, infrastructure and development will facilitate coal seam gas extraction, underground gasification and coal mining in the area to which the draft SBRPF applies.
- 2.8 Ecologically sustainable development requires balancing economic, social and environmental factors. Outcomes depend upon which of those factors is given the greatest weight. It is evident from the draft SBRPF that the State has determined that the greatest weight will be given to supporting coal seam gas extraction, underground gasification and coal mining. To suggest that this primary decision will be part of an 'engaged governance' or 'facilitate a culture of communication with all levels of government' is disingenuous. The State draft SBRPF simply affirms that the State has made its decision.
- 2.9 Private economic, social and environmental factors are left to be mitigated. That is not to say that there will be no private economic, social or environmental benefits but unfortunately the State's current position offers no assurance that the submissions to the draft SBRPF are likely to change the initial consideration by the State.

3 INTRODUCTION – PART A

Summary

- 3.1 Part A broadly discusses the geographic extent of the Surat Basin, the natural environment including the extent of coal resources, potential primary commercial hubs and the provision of infrastructure. It introduces the purpose of the draft SBRPF.

Comment

- 3.2 Our submissions are largely confined to comment on subsequent sections of the draft SBRPF, however, it is our view that the consultation period does not provide sufficient time to fully review the draft SBRPF and its source documentation. In addition, any material relied upon by the authors of the draft SBRPF including material identified in the bibliography to the draft SBRPF should have been available by a direct link to the document from the State's website. The limited review we have made of the material relied up by the draft SBRPF indicates a selective application of the various supporting reports' findings. It is only upon examination of the supporting material that this becomes apparent.

4 REGIONAL VISION – PART B

Summary

- 4.1 The SBRPF regional vision foresees 'unprecedented resource sector growth leading to major changes in demands on the region's infrastructure and services'.

Comment

- 4.2 The demands on the region's infrastructure and services will, according to the draft SBRPF require a balance between social values will be balanced against opportunities for strong economic growth. As part of that 'balance' the draft SBRPF seeks to ensure only 'adequate' levels of health, education and other community services. It is unreasonable and incongruous not to allocate resources towards achieving a high level of health and education when the expectation is for strong economic growth. High rather than adequate levels of health, education and community services should receive priority funding out of the financial benefits created as a consequence of economic growth in the Surat Basin.

5 STRATEGIC DIRECTIONS– PART C

Summary

- 5.1 Part C seeks, amongst other things, to ensure quality of life, local and regional prosperity balanced with high levels of environmental protection and minimisation of greenhouse gas emissions and the affects of climate change.
- 5.2 The section identifies environmental elements that may be susceptible to damage as a consequence of development including:
- (a) areas of remnant native vegetation which provide habitat for native flora and fauna;
 - (b) major inland water catchments;
 - (c) wetlands;
 - (d) wetland springs from the Great Artesian Basin; and
 - (e) groundwater resources comprised of aquifers of the Great Artesian Basin as well as fractured and alluvial systems.
- 5.3 The section recognises there will be enormous changes within existing communities in the Surat Basin and accepts that planning for that growth must be guided by the communities and seeks to provide affordable housing to the growing communities.

Comment

- 5.4 The approach proposed in the draft SBRPF in relation to the effects on growth in the Surat Basin on water quality and flows is an 'adaptive management environmental approval regime'.
- 5.5 The difficulty with this approach is that it fails to recognise that the water cycle of the Great Artesian Basin is not short-term but is measured in centuries. Therefore, the consequences of excessive extraction may not become apparent until there is irremediable depletion. The other significant difficulty with this approach is that the consequences of polluting artesian waters cannot practically be remedied.
- 5.6 The draft SBRPF recognises that the 'protection of the natural water and catchments from degradation and inappropriate use is a key challenge, particularly as water extraction from coal seams is essential for CSG production'.
- 5.7 The draft SBRPF, which was released on 8 October 2010, recognises the interconnectedness between the Surat Basin, the Great Artesian Basin and the Murray-Darling Basin, and raises the Commonwealth jurisdiction under the *Water Act 2007* (Cth).
- 5.8 On 22 October 2010, the Honourable Tony Burke MP, Minister for Sustainability, Environment, Water, Population and Communities approved two coal seam gas projects at Gladstone subject to conditions. In the media release of 22 October 2010 (Australian Government 2010), the Minister is quoted as having said:

I also considered potential impacts on agricultural land and the Great Artesian Basin, among other economic and social matters.

I have imposed more than 300 strict conditions each on the Santos and Queensland Gas Company coal seam gas projects to help protect groundwater-dependent species and minimise other environmental impacts.

I have received expert advice from my Department and Geoscience Australia on the groundwater issues related to coal seam gas activity.

The companies must carry out detailed planning and monitoring to protect groundwater resources, and submit management plans for aquifers, groundwater and surface water for approval.

Water pressure must be maintained above conservative thresholds. If those thresholds are exceeded, the companies must have plans ready to re-establish pressure.

This may involve reinjection or other suitable methods of replacing groundwater to restore water pressure.

Pilots for aquifer reinjection must be carried out and suitable water treatment (sic) programs must be in place to ensure that any water to be reinjected is of suitable quality.

The companies will have to rehabilitate a significant area of land and conserve other areas in perpetuity.

They will also be required to cooperate with other coal seam gas proponents and the Queensland Water Commission in the development of a regional model for the ongoing assessment of the impacts of this new industry on groundwater-related matters.

- 5.9 The requirement for the assessment arose in response to section 255AA of the *Water Act 2007* (Cth) and an independent expert study was called for to determine the impacts of the proposed coal seam gas operations on the connectivity of groundwater systems, surface water and groundwater flows and water quality in the Murray-Darling Basin.
- 5.10 On 10 December 2010, the Minister released an *Assessment of impacts of the proposed coal seam gas operations on surface and groundwater in the Murray-Darling Basin* (Moran and Vink, 2010).
- 5.11 The Minister also relied upon Geoscience Australia and its report dated 29 September 2010 (Geoscience Australia and Habermehl, 2010). Despite the report being replete with statements concerning the insufficiency of information available to fully understand the effects of CSG developments on groundwater, approvals were granted.
- 5.12 Examples of references in the report to sufficiency of information are set out below:

The modelling results reported require further work to fully establish the uncertainties and sensitivity of the models to the large variability in the possible range of hydraulic characteristics of aquifers and aquitards, and to demonstrate the appropriate level of confidence that can be placed in the model outputs and the conclusions drawn from them.

A 'cumulative' model presented by one of the proponents represents a useful preliminary assessment of potential regional hydrogeological impacts resulting from a range of groundwater extraction activities and provides a good starting point for the development of a regional cumulative effects model to underpin groundwater impact prediction and management.

...

There is insufficient information to assess the impacts of these changes on artesian pressure, although it is not likely to be evident in bores within the immediate surrounds of the CSG tenements, as most groundwater here is subartesian.

...

There is insufficient information currently to understand the relative significance of the proposed CSG activities in proportion to recharge to individual GAB aquifers. We consider that the total proposed annual extraction volumes may represent a moderate proportion of annual recharge to the GAB in the project areas, but that this represents a relatively small proportion of total recharge to the GAB. Detailed water balance modelling is required to quantify these relative volumes.

...

While the potential for fracturing activities to impact on the structural integrity of other aquifers and aquitards, and on existing groundwater flow processes, can never be completely eliminated, the competent application of industry-standard technologies, techniques, and monitoring/mitigation measures proposed by each proponent are considered appropriate for minimising the risk.

...

However we consider that additional data from drilling and pumping tests is critical for confirming the potential for GAB aquifers to be connected with MDB groundwater or river systems.

...

We consider that the cumulative impact assessments are unavoidably inadequate because of the inability of individual proponents to access commercial-in-confidence data from a number of sources. We do not consider that individual components can be in a position to develop regional scale models which incorporate confidential drilling and production data from other sources.

We consider that accessible long-term monitoring and management of groundwater resources and groundwater-dependent EPBC Act communities dependent on natural discharge of groundwater from the GAB requires a comprehensive regional groundwater simulation model developed using all available data.

- 5.13 Having recognised these inadequacies in the material upon which decisions have been based, the Geoscience Australia report then recommends:

We have noted that the current groundwater modelling is inadequate in terms of scale and detail to identify the impacts of multiple CSG developments on groundwater interactions in the GAB and hence on the [Environment Protection and Biodiversity Conservation] Act listed discharge springs communities in the GAB. However, if the following recommendations are implemented, it should be possible to manage the potential groundwater impacts proposed and potential future CSG extraction activities in the Surat and Bowen Basins and minimise the risk of unintentional outcomes for the EPBC Act communities dependent on natural discharge from the GAB.

- 5.14 The report does not address the affects upon the quantity of water available for other users or the rural community generally.

- 5.15 The 'Assessment of impacts of the proposed coal seam gas operations on surface and ground water systems in the Murray-Darling Basin' upon which the Minister also relied was a desktop study, commenced on 14 October 2010 and completed on 29 November 2010.

- 5.16 It also indicates a lack of material identified in the following quotes taken from the executive summary:

No data have been made available to examine the possible implications of hydrocarbons, eg, BTEX, in associated water. Engineering solutions for surface water storage, water treatment facilities and consequential brine management were not examined.

...

If more than one proponent discharges to the Condamine River, an assessment will (sic) required to determine the cumulative impact of discharges from multiple proponents. This assessment will need to consider the physical and ecological implications of changes to water quantity and quality and account for the timing of discharge.

...

Loss of water availability from the Central Condamine Alluvium due to direct or indirect induced leakage caused by dewatering of the coal seams could not be separately assessed due to lack of sufficiently detailed numerical model outputs and measurements from current operations.

...

A significant amount of further technical work is required to determine appropriate reinjection targets, timing and water quality/treatment needs.

...

Current predicted drawdown of the Condamine Alluvium by CSG proponents suggest that the drawdown of the alluvial aquifer due to CSG activity is likely to be considerably smaller than the drawdown that has occurred over recent decades due to water extraction for agricultural purposes. None-the-less there are significant gaps in knowledge of the system and the numerical models currently being used to assess likely impacts.

...

Localised drawdown effects are likely to be significantly different to the predicted regional average drawdown owing to the spatial variability in hydraulic connectivity between the coal measures and aquifers, rates of water movement, depth of the coal seam and the thickness confining layers. No proponents have considered the effect of faulting or fractures in their models. These preferential flow features can alter local drawdown. Data on hydraulic properties is scarce. More spatially explicit hydraulic data should be collected and incorporated into models on an on-going basis.

- 5.17 The adaptive management regime proposed is being adopted in circumstances where there are significant gaps in knowledge, the consequences of which could be significant for rural communities.
- 5.18 These studies appear to have been prepared at a time when the draft SBRPF had only considered coal seam gas extraction at a preliminary level. The Australian Government 'Guide to the proposed Basin Plan', states:

Coal seam gas extraction is an emerging industry in and outside the Basin, and is a potential use of water in some regions of the Basin. While direct consumptive use of water is relatively small, mining activities can have large, localised incidental water use and quality impacts associated with ore production or oil and gas extraction, although precise quantities are difficult to determine.

The Basin Plan will incorporate a Water Quality and Salinity Management Plan to provide a framework for the maintenance of appropriate water quality, including salinity levels, for environmental, cultural and economic activity in the Basin. The framework (see chapter 12 of this volume) will encompass any water quality impacts of mining activities.

Water Act 2007 (Cth) Section 255 A

Prior to licences being granted for subsidence mining operations on floodplains that have underlying groundwater systems forming part of the Murray-Darling system inflows, an independent expert study must be undertaken to determine the impacts of the proposed mining operation on the connectivity of groundwater systems, surface and groundwater flows, and water quality.

The Authority is aware of the growing concern in relation to the potential impact of mining on water resources in particular regions of the Basin. Section 255A of the Water Act provides a mechanism to ensure that the water impact of any future mining activity is considered prior to approval.

- 5.19 In the table attached to this submission, the Sustainable Diversion Limit Proposals Condamine-Balonne Region taken from the summary of that region by the Murray Darling Basin Authority, indicates that there is a proposed reduction in surface water take and at best no reduction, or in some areas a proposed reduction, of groundwater take. We note that under the *Petroleum and Gas (Production and Safety) Act 2004* (Qld) section 185 (3), 'There is no limit to the volume of water that may be taken under the underground water rights'.
- 5.20 It is apparent that there is to be an intended reduction in the sustainable diversion limit of surface water and at best a maintenance of the status quo in relation to underground water in the Condamine Balonne region of the Great Artesian Basin.
- 5.21 In the circumstances, there will likely be added pressure on the rural communities with existing water entitlements or use to reduce those existing entitlements or use.
- 5.22 The studies previously mentioned also identified potential difficulties with hydraulic fracturing allowing cross flows between different aquifers and the potential for subsidence as a result of the CSG activities.
- 5.23 There is a real concern that the endeavours by government to facilitate CSG are occurring without sufficient knowledge, and without understanding the short- or long-term effects upon rural communities. The State government appears to have made a decision that the CSG industry will be promoted but the consequences will be dealt with later.

- 5.24 A plan managing water in the Surat Basin must be developed and implemented that will eliminate the risk of contamination to vulnerable groundwater resources prior to the granting of authorities. Contamination threats need to be identified to avoid the need to rely on remediation. Potential contamination point sources such as drilling wells, contamination from untreated water used in the mining industry or re-injection of treated groundwater must be monitored to avoid impairment of groundwater quality.
- 5.25 Because of the effect groundwater quality can have on agricultural and horticultural productivity and importantly on human health, salinisation and contamination through the inappropriate disposal of wastewater and untreated water must be prevented.
- 5.26 Contamination of environmentally significant areas, sensitive uses and land used for primary industry purposes must be avoided. Practices such as the discharge or disposal of untreated water from the mining and CSG industries on land or roads must be prohibited.
- 5.27 The limited water resources in the Surat Basin require management, measuring and monitoring to ensure that over-allocation to the resource industry, to the detriment of the urban and existing rural communities, is avoided. Extraction of groundwater must be metered and allocations strictly enforced.
- 5.28 Noise emissions from the resource industry whether temporary or permanent, must be regulated where it can potentially affect sensitive uses, particularly where the operations occur continually throughout a 24 hour period near sensitive uses. Regulation must be enforceable at a local government level and enforcement carried out consistently, expeditiously and effectively.
- 5.29 The draft SBRPF seeks to protect, manage and enhance the natural environment to support the Surat Basin's biodiversity and natural ecosystems through management of urban development. Commercial and industrial development should not be located within areas of ecological significance. Any proposed offset policies that apply when development might unavoidably be located within areas of ecological significance should be subject to public consultation and comment prior to implementation.
- 5.30 The draft SBRPF must ensure that not only does the community have an opportunity to voice its interests and concerns about growth in the community and effects of that growth on the community but that those concerns and interests are considered and taken into account in planning decisions including the preparation of regional and local planning instruments.
- 5.31 The effects of the mining industry on the health and well being of members of the community must be recognised and any ill effects avoided if there is to be any prospect of developing the strong communities the draft SBRPF envisages. By avoiding negative effects from the resource industry on existing communities, there will be a great likelihood that new residents, workers and their families will be accepted and incorporated into the communities.
- 5.32 As well as providing affordable housing for new residents, it is also important that the values of properties held by existing residents are not negatively impacted. The land values of rural properties should be protected against value decreases as a consequence of mining and CSG practices (e.g. increased noise and air emissions) that diminish the liveability and amenity of existing allotments.
- 5.33 There is a clear recognition in the draft SBRPF for a need to monitor infrastructure such as roads, rail, schools and hospitals. The juxtaposition of these facilities to newly expanding residential areas will require significant funding.

- 5.34 The need for the facilities brought about as a result of existing and rapidly expanding mining and gas industries in the Surat Basin will typically proceed through two phases, establishment and operation. During the establishment phase the number of people required will be greater than during the established operation phase. Consequently there will be population peaks immediately increasing demands upon services and infrastructure, and the peaks are then likely to recede.
- 5.35 In addition, consideration has to be given to the time when the finite natural resources are depleted and the impacts that is likely to have on rural communities.
- 5.36 The methodology adopted for infrastructure contributions for development involving the beneficial title of land has been well established and is clearly understood. If a development of the beneficial title of land creates an increased demand upon infrastructure then, in simplistic terms, the developer pays a contribution towards the cost of the infrastructure based upon the percentage of its use of that infrastructure. If the development of the beneficial title of land creates the need for new infrastructure the developer may be asked to pay for the whole of that infrastructure irrespective of the percentage of its use of that infrastructure, or pay a bring-forward cost to compensate the community for putting pressure on the community to provide that infrastructure at an earlier time.
- 5.37 The typical formula for infrastructure is:

$$\frac{\text{Total users of this development}}{\text{Total users}} \times \text{Cost of infrastructure} = \text{Contribution required}$$

- 5.38 The same methodology should be applied to development of the radical title of land, being the reserves to the Crown, in relation to the mineral resources contained within the land. If a mining venture creates an increased demand upon infrastructure, it should pay a contribution towards the cost of infrastructure based upon the percentage of its use of that infrastructure. However, unlike the development industry dealing with beneficial title, the nature of the development which will only continue for a period of time, up to when the resource is exhausted. This means that other members of the community should not have to pay for the infrastructure required for the use of the changes brought about by the resource development of the radical title.
- 5.39 Unless the resource industries pay for the use of infrastructure that they use, that infrastructure will be effectively subsidised by other members of the community. One issue that has arisen of which we are aware is road damage caused by resource industry heavy vehicles using local government roads. These inequities must be addressed to balance the community's interests and resource operations activities.
- 5.40 Local government should consider how it is able to recoup fairly the cost of the infrastructure required by the resource industry.
- 5.41 By way of example, some local governments previously sought contribution for the local road network from quarries through a local law dealing with extraordinary traffic.

6 SETTLEMENT PATTERN – PART D

Summary

- 6.1 Part D sets out the intention of SBRPF to ensure that local governments plan and provide for the anticipated growth.

Comment

- 6.2 The draft SBRPF recognises that Dalby is experiencing rapid growth in response to the growing resource sector and can expect 1.6 percent annual growth through to 2031. The draft SBRPF recognises that Dalby, along with Chinchilla, functions as a regional centre and that land will be required to accommodate projected demand.
- 6.3 Land dedicated for uses servicing the mining and CSG industry should be located close to adequate road infrastructure such as the Warrego Highway and serviced, or should be able to be serviced, by collectors or local roads. It should be sufficiently buffered or set back from sensitive uses and located so that industry traffic accessing the land is not required to travel through town centres. For example, in Dalby development should be located on the western side of the town. Development of good quality agricultural land for residential or commercial purposes should be avoided. Given the likelihood of increased flood events, development should also be located on land that is not prone to flooding.
- 6.4 Although growth in the resource industry is inevitable, it is important that in the fervour to promote and support that growth, property rights are not degraded. Residents of existing rural residential blocks, such as the Tara rural residential estates, have previously sought to have a petroleum tenure exclusion area imposed around these estates. To date, this has been unsuccessful with some areas experiencing dire adverse impacts from coal seam gas extraction activities. It is submitted that a prohibition should be placed on the siting of gas wells within rural residential estates, for a number of reasons such as traffic, noise, dust and amenity, but most importantly for human health reasons as the impacts of new technologies in coal seam gas extraction have not yet been properly assessed or understood.
- 6.5 Some large-lot rural residential estates may be used as in-fill residential development for the expected population influx resulting from the expanding resource industries. Allowing subdivision of larger rural residential blocks into smaller lots of, say, 10 hectares may enhance the community amenity of the estates, and at the same time provide much needed accommodation in an established residential area.
- 6.6 These amendments would enhance the social and liveability aspects of the existing residential estates, may provide financial opportunities for existing residents which would not otherwise have been available, and may allow for greater community integration of existing and new residents.

7 IMPLEMENTATION – PART E

Summary

- 7.1 Part E seeks to ensure community and stakeholder consultation.

Comment

- 7.2 The most recent reports released at Commonwealth level confirm that there is still a significant gap in knowledge and understanding of the potential and likely impacts of the mining and rapidly expanding coal seam gas industry upon surface and groundwater quantity and quality in the Surat Basin.
- 7.3 Members of the community have expressed the view that they must be fully informed of all potential impacts upon their rural lifestyle and farming interests before they can have meaningful input into the town planning outcomes which should be implemented for their district. It is expected that further reports and studies will be undertaken in relation to potential impacts, especially transportation and water quality and quantity, prior to release of a draft Regional Plan for the area or any amendment to the existing Maranoa-Balonne Regional Plan, to allow more specific input into the regional planning objectives.
- 7.4 In order for the community and stakeholders to be more meaningfully involved and prepared to comment on activities or planning initiatives, source information must be available and easily accessible online in concurrence with the release of the proposal for action.
- 7.5 Further, there must be sufficient time provided during the consultation period for community and stakeholders to review and consider the proposal and the resource material. The consultation period for the draft SBRPF is inadequate and does not permit the community and stakeholders to fully familiarise themselves with the issues and provide a meaningful response.

8 WORKS CITED

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ATTACHMENT

Sustainable Diversion Limit Proposals Condamine-Balonne Region (Government 2010)

SUSTAINABLE DIVERSION LIMIT PROPOSALS CONDAMINE–BALONNE REGION

SURFACE WATER	GROUNDWATER	
<p>There are two surface water SDL areas in the Condamine-Balonne region.</p> <p>1) Condamine–Balonne</p> <p>Current diversion limit 971 GL/y</p> <p>SDL proposal from 768 GL/y to 699 GL/y</p> <p>Reduction from 203 GL/y (21%) to 272 GL/y (28%)</p> <p>2) Nebine</p> <p>Current diversion limit 31 GL/y</p> <p>SDL proposal from 28.9 GL/y to 28.6 GL/y</p> <p>Reduction from 2.4 GL/y (8%) to 2.7 GL/y (9%)</p>	<p>There are ten groundwater SDL areas wholly or partly contained within the Condamine–Balonne region.</p> <p>1) Condamine Fractured Rock</p> <p>Current diversion limit 2.1 GL/y</p> <p>SDL proposal 2.1 GL/y</p> <p>Reduction Nil</p> <p>2) NSW Alluvium above the Great Artesian Basin</p> <p>Current diversion limit 1.2 GL/y</p> <p>SDL proposal 1.2 GL/y</p> <p>Reduction Nil - potential for unassigned water</p> <p>3) NSW Sediments above the Great Artesian Basin</p> <p>Current diversion limit 1 GL/y</p> <p>SDL proposal 1 GL/y</p> <p>Reduction Nil - potential for unassigned water</p> <p>4) Sediments above the Great Artesian Basin: Condamine–Balonne</p> <p>Current diversion limit 0.3 GL/y</p> <p>SDL proposal 0.3 GL/y</p> <p>Reduction Nil - potential for unassigned water</p> <p>5) Sediments above the Great Artesian Basin: Warrego–Paroo–Nebine</p> <p>Current diversion limit 1.1 GL/y</p> <p>SDL proposal 1.1 GL/y</p> <p>Reduction Nil - potential for unassigned water</p>	
	<p>6a) St George Alluvium: Condamine–Balonne deep</p> <p>Current diversion limit 7.5 GL/y</p> <p>SDL proposal 7.5 GL/y</p> <p>Reduction Nil - potential for unassigned water</p> <p>6b) St George Alluvium: Condamine–Balonne shallow</p> <p>Current diversion limit 2.5 GL/y</p> <p>SDL proposal 2.5 GL/y</p> <p>Reduction Nil - potential for unassigned water</p> <p>7) St George Alluvium: Warrego–Paroo–Nebine</p> <p>Current diversion limit 0.3 GL/y</p> <p>SDL proposal 0.3 GL/y</p> <p>Reduction Nil - potential for unassigned water</p> <p>8) Upper Condamine Alluvium</p> <p>Current diversion limit 117.1 GL</p> <p>SDL proposal 76.8 GL</p> <p>Reduction 40.3 GL/y, or 34%</p> <p>9) Upper Condamine Basalt</p> <p>Current diversion limit 76.1 GL/y</p> <p>SDL proposal 61.1 GL/y</p> <p>Reduction 15 GL/y, or 20%</p> <p>10) Upper Darling Alluvium</p> <p>Current diversion limit 2.4 GL/y</p> <p>SDL proposal 2.4 GL/y</p> <p>Reduction Nil - potential for unassigned water</p>	