

Queensland Resources Legislation and Regulations require Resource companies to submit raw survey data to the Queensland Government. However, the current practice direction for submission of survey data does not include any surface level survey data. This means that all of the survey data is in the control at all times of Arrow Energy, who has a vested interest in making sure that data reflects an environmental outcome to the sole benefit of itself. Any subsidence data analysis is performed in-house by Arrow Energy, using data they have collected (and refuse to release in full to us for independent analysis), they have processed, and they have analyzed. Arrow Energy has a conflict of interest therefore any analysis by them lacks credibility.

We believe that Arrow Energy will never present any finding of harm to our land use for our property (even though it has in fact occurred) as to do so would result in financial liability for them to us, consequences to themselves with regard to their Federal approved conditions and State environmental authority, and potential penalties and prison term under the priority agricultural area (which we are in) provisions of the Queensland Regional Planning Interests Act 2014.

We reported to Arrow Energy new areas of subsidence to our property in April 2021 yet we still have received no analysis of that from Arrow Energy. Queensland Resources legislation and regulations contain a clear requirement for Arrow Energy to provide Notice of Entry for aerial survey, with aerial survey being specifically listed in the legislation as an example of a preliminary resource activity. Example 1 on the Qld Resources Department own notice of entry to private land which must be used by resource approval holders lists aerial survey. Despite this and our complaints that notice of entry was not provided to us, the Qld Resources Department has not required Arrow Energy to provide us with notice. This means we have not been able to record in field conditions on the day the most recent LiDAR survey was recorded. We understand that the type of LiDAR survey being used cannot penetrate water. This means that had any water been standing in the subsidence depressions on the date the survey was flown, the "ground" level recorded will be the level of the surface of the water not the level of the surface of the ground. If we were irrigating at the time of the survey, the ground level recorded will be level of the surface of the water, not the level of the ground. Similarly, any earlier survey may also be invalid, meaning Arrow Energy does not have any suitable baseline as required by EPBC 2010/5344 for any of the "ploughed field" areas of Surat Gas Project for which it is relying on LiDAR data.

We provide for your consideration a copy of our member briefing on CSG practical implications for users of MNES water to our representative organization Central Downs Irrigators Limited on 17 July 2021. This briefing is a good summary of the practical impacts of the failure in oversight by Federal and State regulators for Arrow Energy resource activities.

We request that the Minister revoke the EPBC 2010/5343 and EPBC 2010/5344 approvals under EPBC Act section 145(2A) on the basis that the impacts were not accurately assessed because the information provided by the proponent did not accurately identify risks due to negligence or deliberate omission; and under section 145(1) on the basis of non-compliance with conditions.

We further request that the EPBC 2010/5343 and EPBC 2010/5344 approval holder be investigated for providing misleading information under EPBC Act section 489 and, if proven, that this impact any future consideration of the approval holders environmental history.

Yours faithfully

s. 47F(1)