

7 April 2021

Department of Environment and Science
Energy and Extractive Resources
GPO Box 2454
BRISBANE QLD 4001
Submitted by email: EnergyandExtractive@des.qld.gov.au

Dear Madam/Sir,

Hopeland EA amendment (EA0001401)

Thank you for providing Cotton Australia with a copy of RDM Hydro Pty Ltd's review of the Arrow Energy Hopeland proposal. The potential risk of contaminant migration from the former Linc Energy site remains a keen concern of our members, and Cotton Australia appreciates the Department seeking this third-party scrutiny.

To that end, Cotton Australia notes the reviewer's findings:

- The groundwater system is highly complex, any attempt at modelling would be simple in comparison;
- It cannot be conclusively stated that contaminants will not migrate beyond the site boundaries;
- Arrow Energy failed to provide details about mitigation;
- Implementing a containment system 'would be feasible' but require additional regulatory approval;
- Specific to the Groundwater Characteristics Monitoring Program (GCMP) RDM Hydro Pty Ltd has listed what it considers the additional requirements should include:
 - o a combined monitoring-modelling-management approach;
 - o an early warning trigger system;
 - o identification and evaluation of potential mitigation measures.

Presumably in drafting these, RDM Hydro Pty Ltd has taken into account the proposed well and gathering locations as per the marked-up images in Arrow's proposal. However, RDM Hydro Pty Ltd has stated 'should' in its statement: 'This approach should ensure that the risk of future off-site contaminant migration from Arrow's proposal can be managed.'

As it is imperative that there is no further loss of agricultural land, Cotton Australia welcomes the suggestion of these or any other additional requirements. At the same time, we ask the Department is it, on behalf of the State, prepared to accept the level or risk implied by the statement 'should ensure'?

Thank you,



Jennifer Brown
Policy Officer
Cotton Australia

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