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Submission on EA Amendment Application – Ironbark (EPPG00968013)

Thank you for the opportunity to comment on this Amendment application for **Environmental Authority EPPG00968013 – Ironbark**. We strongly object to this application.

North West Protection Advocacy (NWPA) is a grassroots environmental advocacy group which is committed to preserving cultural and ecological values particularly in regard to coal seam gas expansion.

NWPA applied for an extension to address this application but were denied despite late notification of its lodgement.

Introduction

This submission is made in relation to the proposed amendment to Environmental Authority EPPG00968013 (Ironbark) (the "EA"), including activities proposed within PL1106. The submission is made under the Environmental Protection Act 1994 (Qld) (EP Act) and is confined to matters relevant to the EA amendment decision, including the adequacy of information provided, the assessment of environmental risk, and the appropriateness of existing and proposed EA conditions.

The submitter objects to the amendment on the grounds set out below and relies on the facts and matters identified in support of those grounds.

Synopsis of amendments

- Application increases the size by 46 hectares and 46 CSG wells (up from 100 wells). The total footprint of existing authorised and proposed gas wells and ancillary infrastructure is approximately 321.5 ha
- Application for waste disposal on site of residual drilling material at 146 sites
- Application to stimulate (hydraulically fracture) 37 wells
- Around 50% of the petroleum lease is strategic cropping land
- Origin will extract a total of 10 billion litres of water from the Ironbark area over the life of the project. These 46 wells will extract 700 million litres of water

This is an unusually large EA, covering 21 Petroleum Leases (“PLs”) and has had 16 amendments since 2021 (a very large amount) – and an increase in Estimated Rehabilitation Costs of $250 million.

Origin has been issued 4 Enforcement Actions – an Enforceable Undertaking – Jan 2020 – water (captured rainfall and resuspended solids and salts) during decommissioning of pilot tanks containing contaminants, was directly or indirectly released to land and waters as a result of a rainfall event. Associated with it are two Clean Up Notice’s for same the EPO.

Origin wants to drill a total of over 700 wells in this petroleum lease. However, it is only applying here for approval for 46 wells. This means that the cumulative impacts of its operations are not being assessed. It is the thin edge of the wedge and community are aware that this piecemeal approach to assessment is misleading of the assessment process.

Statutory Framing – Object and Principles of the Environmental Protection Act 1994

This submission is grounded in the object of the Environmental Protection Act 1994 (Qld), which is to protect Queensland’s environment while allowing for development that improves the total quality of life, both now and in the future, in a way that maintains the ecological processes on which life depends. The Act gives effect to this object through the achievement of ecologically sustainable development, the application of environmental protection principles, and the protection of environmental values.

In considering an application to amend an Environmental Authority, the administering authority is required to be affirmatively satisfied that the amended activity will prevent or minimise environmental harm having regard to:

- the principles of environmental protection, including the precautionary principle and intergenerational equity;
- the need to conserve the productive capacity of land and natural resources;

- the cumulative and long-term impacts of activities on environmental values; and
- the protection of environmental values, including land, ecosystems, and the health and wellbeing of humans who depend upon them.

This submission proceeds from that statutory position. It does not accept, as a starting point, the applicant's characterisation of impacts as minor, temporary, or acceptable by reference to prior authorisations. Rather, it asks whether, on the information before the administering authority, it is possible to be satisfied that the Environmental Authority, as amended, will continue to achieve the object of the Act in a landscape that has experienced progressive intensification of development over time.

For the avoidance of doubt, the matters raised in this submission are confined to environmental values as defined under the Environmental Protection Act 1994, including land, water, ecosystems and human health, and do not rely on economic or commercial impacts outside the statutory decision-making framework.

Why this Amendment is Materially Different and Requires Heightened Scrutiny

This amendment application is materially different from routine EA amendments previously approved by the administering authority, including recent amendments approved for comparable petroleum activities.

First, the amendment is sought under an Environmental Authority that covers a very large spatial and operational footprint, comprising 21 petroleum leases, and which has undergone at least 16 amendments since 2021. This amendment therefore does not occur in isolation, but within an EA that has progressively expanded in scope, intensity and disturbance over time.

Secondly, the existing EA framework authorises a wide range of activities as "incidental activities" without quantified limits on disturbance extent, density or cumulative footprint. As a result, the amendment relies on an EA structure that does not provide a defined or enforceable disturbance envelope against which new impacts can be meaningfully assessed.

Thirdly, the amendment proposes additional and intensified activities within PL1106, a lease that is already subject to substantial existing development and infrastructure. The environmental risks associated with this amendment therefore arise not merely from the proposed activities in isolation, but from their interaction with existing authorised disturbance within an already developed gasfield landscape.

Finally, the EA to which this amendment relates has been subject to multiple enforcement actions arising from a single contamination event, including an enforceable undertaking, clean-up notices and an environmental protection order. This compliance history is directly relevant to the administering authority's assessment of whether environmental risks associated with

further expansion are known, quantifiable and capable of being effectively managed under existing EA conditions.

For these reasons, this amendment application raises materially different considerations to those addressed in recent amendment decisions, and warrants careful scrutiny of whether the information provided is sufficient and whether the existing EA conditions remain appropriate to prevent environmental harm, consistent with the objects of the Environmental Protection Act.

Where an amendment alters the density, intensity or spatial concentration of activities within an already developed petroleum lease, the administering authority is required to reassess whether environmental risks remain known, quantifiable and capable of being effectively managed under existing Environmental Authority conditions.

Ground 1 – Unquantified and Unconstrained Disturbance

Ground of objection

The amendment should not be approved because it relies on an EA framework that authorises extensive categories of disturbance without quantified limits, spatial bounds or enforceable caps, such that the administering authority cannot be satisfied that the environmental risks of the amended activity are known, quantifiable or manageable through the existing EA conditions.

Facts relied on

1. The current EA authorises only a limited subset of activities as “specified relevant activities”, while a broad range of infrastructure and operational activities are authorised as “incidental activities”.
2. The Supporting Information Report confirms that incidental activities are not quantified or limited by the EA and are undertaken, where reasonably necessary, to carry out petroleum activities.
3. As a result, the extent of authorised disturbance for key infrastructure types (including access tracks, pipelines, gathering lines and associated infrastructure) cannot be meaningfully reported or bounded, including for disturbance that is authorised but not yet constructed.
4. The amendment proposes additional wells, well pads and ancillary infrastructure within PL1106 without introducing enforceable limits on the cumulative extent or density of disturbance.
5. The amendment therefore relies on an EA framework that does not provide a defined disturbance envelope against which the environmental impacts of the amendment can be assessed.

Why this is a material Environmental Protection Act issue

The administering authority, the Director-General of the Department of Environment, Science & Innovation, must be satisfied that the environmental risks associated with the amended activity are known, quantifiable and capable of being effectively managed through EA conditions. Where the EA itself does not impose enforceable limits on disturbance extent, the administering authority cannot reasonably be satisfied that the full scale of potential environmental harm has been identified, that cumulative impacts are capable of being meaningfully assessed, or that existing EA conditions remain appropriate to manage the intensified activity.

Where the Environmental Authority framework itself does not impose enforceable limits on disturbance extent or density, the administering authority cannot be affirmatively satisfied that the environmental risks of the amended activity are capable of being quantified or effectively managed.

Ground 2 – Inadequate Assessment of Cumulative Impacts

Ground of objection

The amendment should not be approved because cumulative environmental impacts have not been adequately or transparently assessed, particularly in light of the scale of the EA, its amendment history, and the existing level of development within PL1106.

Facts relied on

1. The EA covers 21 petroleum leases and has been amended repeatedly over a short period, resulting in progressive expansion of authorised disturbance.
2. The Supporting Information Report acknowledges complexities in cumulative impact reporting, including double-reporting of infrastructure types and reliance on post-2014 authorisations only.
3. The EA structure prevents meaningful quantification of authorised-but-unconstructed disturbance, limiting the ability to assess cumulative impacts across the life of the EA.
4. The amendment assessment focuses on proposed activities in isolation, while treating many existing impacts as out of scope on the basis that they have been previously authorised.
5. PL1106 is already subject to significant existing disturbance, meaning the environmental risks associated with the amendment arise from intensified activity within an already modified environment.

Why this is a material Environmental Protection Act issue

The EP Act requires consideration of cumulative impacts of the activity as amended, not merely incremental impacts considered in isolation. Where cumulative impacts are constrained by the structure of the EA or by an artificially narrow assessment scope, the administering authority

cannot be satisfied that environmental risks are fully understood or that existing conditions are sufficient to manage cumulative pressure on environmental values.

The cumulative impact assessment required under the EP Act is not limited to incremental change, but extends to whether the amended activity, when combined with existing authorised disturbance, results in cumulative pressure on environmental values that cannot be meaningfully constrained or mitigated through existing conditions.

Ground 3 – Reliance on Prior Authorisation

The amendment improperly relies on the existence of prior authorisations as a substitute for reassessing environmental risk and the adequacy of existing EA conditions, contrary to the purpose of the EA amendment process.

Ground of objection

The amendment should not be approved because it relies on the existence of prior authorisations under the current EA as a substitute for reassessing environmental risk and the adequacy of existing EA conditions in light of the proposed expansion and intensification of activities within PL1106.

Facts relied on

1. The Supporting Information Report repeatedly asserts that potential impacts associated with the proposed amendment are acceptable because they are already authorised under the existing EA.
2. These assertions relate to land disturbance, sediment mobilisation, watercourse crossings, activities within ESA buffers, and noise exceedances.
3. The amendment proposes additional wells and infrastructure that increase the intensity and spatial distribution of activities within PL1106.
4. The amendment does not include a systematic review of whether existing EA conditions remain appropriate to manage the environmental risks associated with this increased activity.

Why this is a material Environmental Protection Act issue

The purpose of the EA amendment process is to reassess whether the EA, as amended, will continue to prevent or minimise environmental harm. Prior authorisation does not absolve the administering authority of the obligation to reassess risk where the scale or intensity of activities changes. Reliance on prior approval as a proxy for adequacy undermines the precautionary principle and the integrity of the EA framework.

Reliance on prior authorisation does not discharge the obligation to reassess environmental risk where an amendment increases the intensity, frequency or spatial concentration of activities, or where existing conditions have not been tested against cumulative or repeated disturbance.

Ground 4 – Insufficiency of Existing EA Conditions

Existing EA conditions are not sufficient to manage the intensified and cumulative impacts of the amended activity.

Ground of objection

The amendment should not be approved because existing EA conditions are not sufficient to manage the intensified and cumulative environmental impacts arising from the amended activity.

Facts relied on

1. The amendment increases the density and intensity of authorised activities within PL1106.
2. The Supporting Information Report relies primarily on existing EA conditions, without proposing substantive amendments proportionate to the increased activity.
3. Risk management is frequently deferred to future management plans or private arrangements.
4. The EA has previously been subject to enforcement action, indicating limitations in the effectiveness of existing conditions.

Why this is a material EP Act issue

The administering authority must be satisfied that EA conditions are appropriate to prevent or minimise environmental harm. Where conditions were developed for earlier stages of development and are not reviewed or strengthened in light of expansion, that satisfaction cannot reasonably be reached.

The absence of substantive condition review or strengthening in response to intensified activity indicates that existing Environmental Authority conditions have been assumed, rather than demonstrated, to remain effective.

Ground 5 – Noise and Environmental Nuisance

Rather than regulate the impacts of this application through enforceable EA conditions, it is proposed to transfer responsibility for monitoring and enforcement of noise and other environmental nuisances such as odour, dust, light and other such pollution, to individual land owners and occupiers. This is a regressive step that rewinds environmental policy to days before there were environmental laws, leaving individuals with the burden of gathering scientific data and entering into common law nuisance actions in the Courts. Predicted noise and other nuisance impacts associated with the amended activity are not appropriately regulated through enforceable Environmental Authority conditions, but are instead displaced to

private “alternative arrangements” with affected receptors. This appears to contradict both the intent and wording of the legislation which requires the Director-General to be satisfied both that impacts are acceptable and controlled by enforceable conditions.

In the context of PL1106, this reliance is particularly problematic given the more closely settled pattern of landholdings and smaller property sizes relative to other parts of the broader EA footprint. Reduced separation distances and higher receptor density diminish the effectiveness of assumed buffers and increase the likelihood that noise and nuisance impacts will be experienced as cumulative and persistent rather than isolated or short-term.

Why this is a material Environmental Protection Act issue

Noise is an environmental nuisance that affects environmental values, including human health and wellbeing. The Environmental Protection Act requires such impacts to be managed through enforceable conditions, not private negotiation.

In any case, the company has not described adequately what the noise, light and other such impacts will be to the extent that they are measurable and assessable by the Director-General.

The Environmental Protection Act does not contemplate the management of environmental nuisance through private negotiation as a substitute for enforceable regulatory control, particularly where predicted exceedances are acknowledged and the exposure is cumulative rather than temporary.

Ground 6 – Rehabilitation Uncertainty

Rehabilitation outcomes are uncertain and insufficiently regulated, preventing satisfaction that environmental harm can be effectively remedied.

In addition to the matters set out above, the amendment relies on rehabilitation assumptions that do not adequately account for long-term land functionality in a landscape characterised by productive agricultural use and relatively small, closely managed landholdings.

While the Environmental Authority framework focuses on landform stability and revegetation, it does not demonstrate how disturbed areas within PL1106 can be rehabilitated in a manner that restores practical land usability, avoids ongoing fragmentation, and maintains the long-term productive capacity of land as an environmental value.

The amendment does not assess whether repeated disturbance, linear infrastructure, and cumulative fragmentation compromise the ability of rehabilitated land to support viable agricultural operations over time. In the absence of site-specific rehabilitation performance criteria that address these functional outcomes, rehabilitation commitments remain largely theoretical.

This misalignment between assumed rehabilitation outcomes and realistic long-term land use outcomes reinforces the uncertainty identified in this ground and prevents the administering

authority from being satisfied that environmental harm can be effectively remedied in accordance with the object and principles of the Environmental Protection Act 1994.

Why this is a material EP Act issue

Under the EP Act, the administering authority must be satisfied that environmental harm can be effectively rehabilitated. Where rehabilitation outcomes are uncertain, deferred, or not tied to enforceable performance criteria, that satisfaction cannot be reached, particularly in a productive agricultural landscape subject to cumulative disturbance.

Rehabilitation that restores landform stability without addressing fragmentation, ongoing access constraints and functional land usability does not demonstrate that environmental harm can be effectively remedied in a productive agricultural landscape.

Ground 7 – Compliance and Enforcement History

This operational activity relies upon a previously existing Environmental Approval. This activity should not have been approved as it cannot be controlled to a standard required by the Environmental Protection Act. The End of Waste (EOW) code it is based upon lacks standards that will protect the environment from harm.

Chemicals in residual drilling materials are not defined or assessed for. Below is a table used as an example of some of the chemicals that can be present during and after drilling.

Table 1 Summary of Vendor Chemicals In Residual Drilling Materials

Constituent Name	CAS No.	Estimated Vendor Chemical Concentration In Drilling Muds (mg/kg)	Exposure Point Concentration in Residual Drilling Materials (10% of mud concentration) (mg/kg)
Copolymer of acrylamide and sodium acrylate	25085-02-3	702	70
Ethylene oxide/propylene oxide copolymer	9003-11-6	24	2.4
Glyoxal	107-22-2	31	3.1
Methanol	67-56-1	3	0.30
Methylisothiocyanate (MITC)	556-61-6	30	3.0
Pentanedial / Glutaraldehyde	111-30-8	300	30
Polyalkylene	9038-95-3	22,260	2,226
Polypropylene glycol	25322-69-4	48	4.8
Potassium chloride	7447-40-7	41,520	4,152
Silicic acid, potassium salt	1312-76-1	22,200	2,220

EHS Support RDM Memo Released by the NSW Environment Protection Authority under the GIPA Act. Ref: EPA750

RDM includes cuttings coming from all drilled rocks in the borehole, and drilling mud. Drill cuttings include biocides used to combat well corrosion, a risk to groundwater through potential leakage of drilling fluids as well as heavy metals and naturally occurring radioactive materials.

Other components can include oil products, corrosion inhibitors, chemicals used for drilling and hydrocarbon production, reservoir fluids in the form of brine and oil.
Rocks in and around certain oil- and gas-bearing formations may contain natural radioactivity. Drilling through these rocks or bringing them to the surface can generate waste materials that contain radioactivity.
Given that this application covers strategic cropping land more detail needs to be provided by the proponent on what the RDM is likely to contain. There is no detail on storage protocol, application rates, mixing ratios, burial depth and if the RDM will be cleaned up with silica gel.
Sampling frequency and density is inadequate to acquire a comprehensive data set on RDM ingredients. It is not sufficient to ascertain if environmental harm is occurring or not.
It is worth noting that the examination of drill cuttings is not a one-time event. As drilling progresses and the depth of the well increases, the lithology and formation characteristics can change. Therefore, it is crucial to examine the cuttings at regular intervals throughout the entire drilling process.

Ground of objection

The amendment should not be approved because in our opinion, the application to land of residual drilling material poses elevated environmental risks that have not been sufficiently addressed by Origin in the support info document. Conversely, the existing EA and the EOW Code which underpins this activity are flawed. No further approval should be granted.

Facts relied on

The department defines RDM as waste drilling materials including muds and cuttings or cement returns from well holes and which have been left behind after the drilling fluids are pumped out.

Schedule G of the existing EA states:

> (G12) Residual drilling material or drilling by-products can only be disposed of on-site:
>
> > a) by mix-bury-cover method if the residual drilling material meets the approved quality criteria; or
> >
> > b) if it is certified by a suitably qualified third party as being of acceptable quality for disposal to land by the proposed method and that environmental harm will not result from the proposed disposal.

Section 5 of the existing EA describes the current method of RDM application.

The EA must contain information from:

> **EP Act Section 126(1):** *(ii) protection of the environmental values affected by each relevant CSG activity; (iii) the disposal of waste, including, for example, salt, generated from the management of the water;*

Note that the Environmental Protection Act, s226A(1)(f) states the information required relating to impacts on environmental values which include:

> (i) a description of the environmental values likely to be affected by the proposed amendment; and
>
> (ii) details of any emissions or releases likely to be generated by the proposed amendment; and
>
> (iii) a description of the risk and likely magnitude of impacts on the environmental values; and
>
> (iv) details of the management practices proposed to be implemented to prevent or minimise adverse impacts; and
>
> (v) if a PRCP schedule does not apply for each relevant activity—details of how the land the subject of the application will be rehabilitated after each relevant activity ends; and
>
> (g) include a description of the proposed measures for minimising and managing waste generated by amendments to the relevant activity; and

Missing from the End of Waste Code governing RDM, the current Environmental Approval and this application are the following substances known to be present in excessive proportions:
Aluminium
Chloride
Strontium
Uranium,
Aldehydes
Radionuclides (TENORM/NORMs) including thorium, radium and polonium.

Manganese is covered in the EOW Code, but not the application or the current Environmental Approval.

It is internationally recognised that the chloride ion "can be defined as a contaminant in land operations, with the potential to inhibit the growth of vegetation, and it can also be considered a potential pollutant to aquifers". Chloride is one of the main ingredients of drilling mud as potassium chloride (KCl).

Why this is a material Environmental Protection Act issue

This ground does not rely on agricultural productivity as an economic value, but on land, soil, water and human health as environmental values under the EP Act. The administering authority must be satisfied that EA conditions are appropriate to prevent or minimise environmental harm. The purpose of the EA amendment process is to reassess whether the EA, as amended, will continue to prevent or minimise environmental harm. Prior authorisation does not absolve the administering authority of the obligation to reassess risk where the scale or intensity of activities changes. Reliance on prior approval as a proxy for adequacy undermines the precautionary principle and the integrity of the EA framework.

The images below show differing drill cuttings stored at well-pads in Australia and the USA

RDM stored on a wellpad in the Pilliga Forest, image by Johanna Evans

Drill cuttings on a well pad in the US (https://www.frackcheckwv.net/2014/03/11/wv-legislature-will-need-a-special-session-to-complete-marcellus-landfill-regulations/)

Ground 9 – Stimulation ((Hydraulic Fracturing (HF) aka Fracking))

Why this is a material Environmental Protection Act issue

The administering authority must be satisfied that EA conditions are appropriate to prevent or minimise environmental harm and impact upon air quality, soils, groundwater and waterways. The purpose of the EA amendment process is to reassess whether the EA, as amended, will continue to prevent or minimise environmental harm.

Ground of objection

The amendment should not be approved because the impact of hydraulic fracturing has not been adequately or transparently assessed by any body, organisation, department or proponent Queensland. Hydraulic fracturing remains a significant risk to groundwater. Greater detail is required for the Director-General to assess this application particularly in light of the scale of expansion that the proponent will require in the coming years. The proponent has a history of enforcement action against them and has not been transparent or thorough in its application to amend the EA.

Facts relied on

The latest reports on hydraulic fracturing from the Gas Industry Social and Environmental Research Alliance (GISERA) are a collaboration between CSIRO, Commonwealth, State governments and industry established to undertake publicly-reported independent research.

The media release from GISERA states: “A comprehensive three-year scientific study into the air, water and soil impacts of hydraulic fracturing in Queensland has found little to no impacts on air quality, soils, groundwater and waterways.”

NWPA assert that six to ten hand-picked wells from one company in one location out of approximately 6,000 in the State of Queensland is not comprehensive.

The media release stated “little to no impact of hydraulic fracturing” but two of the three reports focused on water and soil and only investigated the effects of hydraulic fracturing chemical inputs into the process, NOT the entire process of hydraulic fracturing and the produced water outputs.

The introduction to the “soil impact” GISERA report refers to a study in US stating “spills of hydraulic fracturing (HF) fluids and produced water are among the most polluting and plausible pathways affecting unconventional gas operations”. However, the authors of the GISERA report stated that since spills are unpredictable and are very site and event-specific, they chose to “mimic” spills in the lab instead of a field-based investigation.

NWPA assert that in contrast to the GISERA research approach, which we condemn, this referenced US report investigated and assessed actual spills and reported incidents. The GISERA report assiduously provides no data on whether there are any reports available in Australia relating to actual spills and incidents in the field.

A fracking operation in Gloucester NSW, image supplied.

Further comment 10 – Historical issues

Ironbark was originally ATP788 and was drilled by Pangea in 2007-2008. It was known as "The Deeps". The wells known as "Duke" and "Jake" were drilled.

ABOUT PANGAEA • OUR APPROACH • OPERATING AREAS • CONTACT US

Surat Basin

The "Deeps" (Queensland)

The "Deeps" tenements are located in the eastern Surat Basin in south-eastern Queensland. The "Deeps" describes the stratigraphic sequences 100 feet below the base of the highly prospective Walloon Coal Measures of ATP (Authority to Prospect) 610P, 620P, 648P and 788P and associated Production Licences (PL).

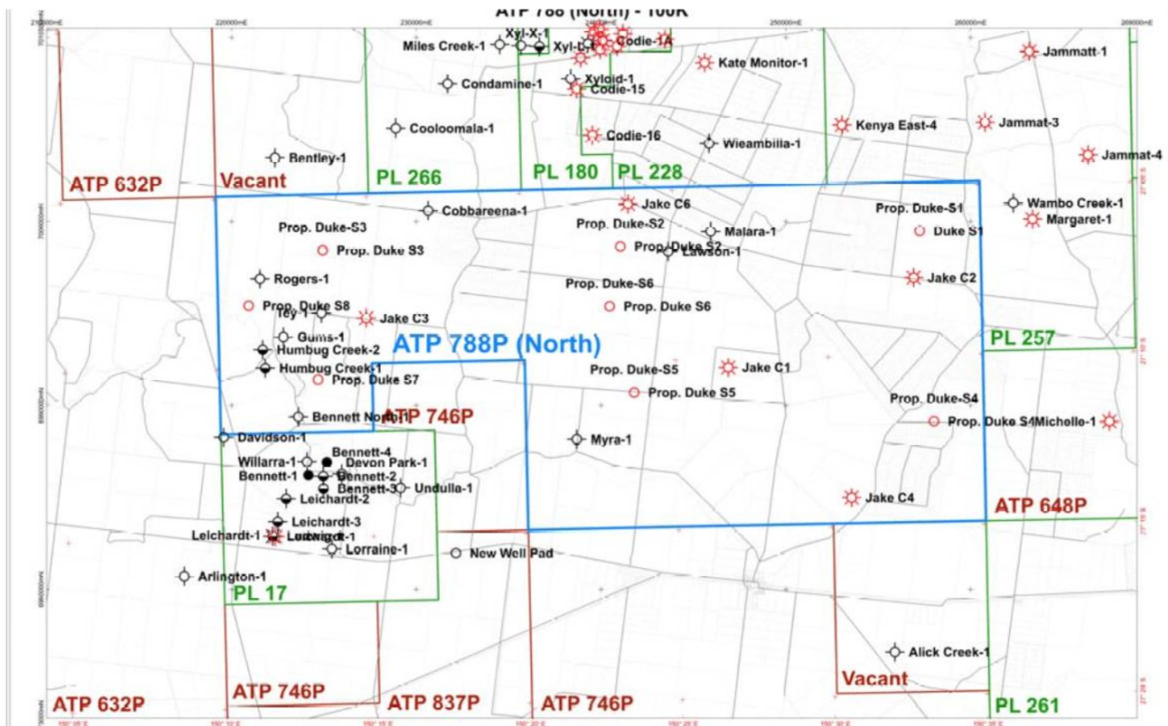
Pangaea is in joint venture with Origin Energy and Queensland Gas Company Limited (QGC, a BG Group business), to explore and develop the oil and natural gas potential of the "Deeps".

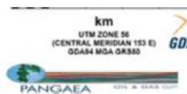
Pangaea holds interests of up to 75% in the "Deeps". Origin Energy and QGC are respective operators of ATP788P, and 610P, 620P & 648P and associated PLs.

Operating Areas

- Surat Basin
- New South Wales
- McArthur/Beetaloo Basins
- Victoria River/Birrindudu Basins

http://www.pangaea.net.au/operating-areas/surat-basin

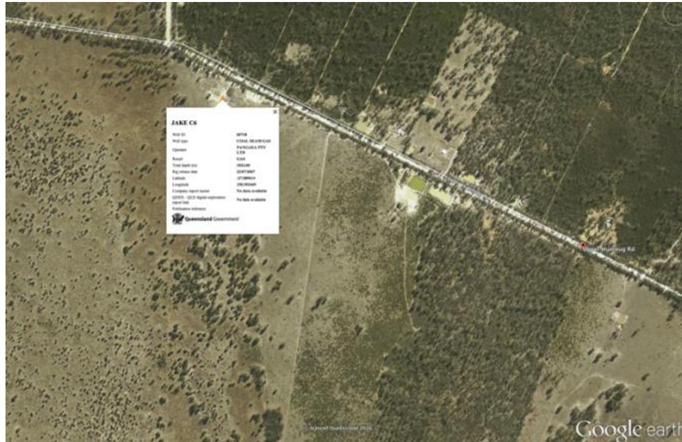




ATP 788P (NORTH)
PROPOSED WELL LOCATIONS
SHOWING REVISED LOCATIONS OF PETROLEUM AND COAL SEAM GAS WELLS

AFTER CORRECTION OF CLICK97 LINE LOCATIONS

The well known as “Jake 6” was reported by community to be leaking unknown gases that made them feel unwell and appears to have not been plugged and abandoned. The area south-west of ATP 788 has reported oil shows.



A series of whistle-blowers have provided insight into what appears to be a cover-up culture at Origin Energy.[1] We briefly describe this below.

2012 - One whistle-blower, allegedly a field, health, safety operations and maintenance officer, told McDow she had reported on November 5, 2012 to senior executives a culture of cover-up at APLNG sites and a lack of compliance with mandatory standards, rules, legislative obligations relating to safety.[2]

Mid-2013 - Another whistle-blower, allegedly a pipelines supervisor on the APLNG project, lodged a whistle-blower report in mid-2013, outlining a series of concerns that the pipelines were *"continuing to be operated, despite a lack of preventative maintenance which should have been reported to regulators and which could result in an increased risk of pipeline asset failure".*

December 2013 - An internal audit report was completed. "Numerous issues" were identified. The audit report gave the company's upstream gas and oil division the second worst grade possible. The report found the division failed to comply with half of the 12 requirements of the Australian Standard governing compliance and seven out of nine of Origin's internal regulatory compliance rules. As a result, Origin failed to record regulatory breaches at oil and gas fields across Australia and New Zealand in its database system or to report them to regulators, Ms McDow alleges. Allegedly unrecorded issues included the "failure to maintain, or to properly maintain, the integrity of Origin gas wells", causing leaks, "including discharge of oil into aquifers "at the company's wells in Queensland's Surat Basin - a formation that is part of the crucial Great Artesian Basin that supplies fresh water to farmers across vast areas of

[1] http://www.whistleblowingwomen.com/originenergy.htm (way back machine)
[2] http://www.smh.com.au/business/energy/chilling-tale-of-origin-energy-whistleblower-20170124-gtxuhz.html

Queensland, NSW and the Northern Territory. [Riverslea 2 – oil in water, details with-held due to privacy issues].

The story of McDow continues for several years. Numerous sources exist detailing evidence including:

- http://www.afr.com/business/energy/gas/origin-energy-employees-offer-evidence-to-support-whistleblower-case-20160125-gmdpnr#ixzz4hKipjq2f
- http://www.afr.com/news/policy/industrial-relations/how-to-tackle-poor-performers-and-minimise-bullying-claims-20141007-k2dnl
- http://www.whistleblowingwomen.com/originenergy.htm
- http://www.afr.com/leadership/workplace/origin-energy-case-spurs-discussion-of-whistleblower-protections-20160214-gmtr7h

The well known as “Jake 6” was reported by community to be leaking unknown gases that made them feel unwell and appears to have not been plugged and abandoned. The area south-west of ATP 788 has reported oil shows.

Ironbark has had historical issues relating to a “Black Rain” event in 2013. This event was alleged to have caused environmental nuisance via an airborne residue from their Ironbark pilot to the surrounding landholders, several of whom were later bought out by Origin.

We've seen a number of posts enquiring about our Ironbark operations. Origin has looked into the complaints and responded to those concerned.

There is no evidence to suggest there is any airborne residue coming from our Ironbark pilot well. There is also no residue on our wells or surrounding infrastructure. This can be clearly seen in these pictures from our site.

The small amount of natural gas currently being produced is methane which is flared or burnt with up to 99.9% efficiency. In other words the gas burns cleanly to nothing.

Further comment 11 – What is understated/missing from this EA application

- High point vent and low point drain details
- Flaring and venting details
- Human health impact which is the explicit objective of the EP Act: the protection of environmental values, including land, ecosystems, and the health and wellbeing of humans who depend upon them– to date there has been no independent human health impact assessment of unconventional gas in Australia.

Anticipated Department Reasoning and Response

NWPA anticipate that the administering authority may form the view that the environmental risks associated with the amended activity are known, quantifiable and manageable through existing EA conditions, and that the issues raised do not constitute material new relevant matters. For the reasons set out in Grounds 1–7, that conclusion would not be supported on the information before the administering authority.

Comparative decision-making context

Recent decisions of the administering authority and the Land Court demonstrate that where environmental impacts cannot be meaningfully constrained, quantified or mitigated through enforceable Environmental Authority conditions, approval cannot lawfully proceed. In those circumstances, the issue is not whether the impacts are controversial, but whether the decision-maker can be satisfied that the statutory tests under the Environmental Protection Act 1994 are met.

While the factual circumstances of those decisions differ from the present application, the underlying principle is the same: where the regulatory framework is structurally incapable of managing the risk, reliance on general assurances, prior authorisation or future planning is insufficient to support approval.

In the present case, the deficiencies identified in Grounds 1–10 raise that concern.

Anticipated findings that environmental risks are known, quantifiable and manageable under existing Environmental Authority conditions would not be supported where the scale of authorised disturbance remains unbounded, cumulative impacts cannot be transparently assessed, and prior compliance history demonstrates limitations in condition effectiveness.

Conclusion

For the reasons set out above, NWPA respectfully requests that the administering authority:

1. Refuse the amendment application; or
2. In the alternative, require further information; or
3. In the further alternative, substantially strengthen EA conditions prior to any approval.

North West Protection Advocacy
9th February 2026