

## Coal Exploration on Bimblebox

Around May 2008, Waratah Coal began drilling on Bimblebox Nature Refuge as part of their coal exploration of tenement 1040. Waratah was required to submit an environmental management plan to the Environmental Protection Authority, responding to the nature refuge provisions and comments by the Bimblebox leaseholders, so as to limit damage to the property.

In direct contrast to the claims of the CEO of Waratah Coal PL in the EPBC application, Waratah Coal has clearly and unambiguously breached a number of conditions in regard to their exploration permit for EPC1040 (Permit Number MIC200415706), within which the proposed mining operations are to take place.

The permit conditions which were known to be breached are discussed primarily with respect to our property within the permit area and include the following:

***Condition B1-6 (in regards to Drill Sites) – “The environmental holder must minimise disturbance and no clearing mature trees is allowed”***

Whilst minimal disturbance occurred at some sites, most suffered from excessive disturbance of ground cover vegetation. This ranged from unnecessary and excessive driving of machinery over intact ground vegetation rather than using identified tracks (eg photos entitled WAR 40-11 drill site\_p3; WAR 40-11 drill site\_p6) to the complete removal of the groundcover vegetation across entire sites with topsoil piled up all around the drill site area (eg photos WAR 34-05 drill site\_p1; WAR 34-05 drill site\_p3).



WAR 40-11 drill site\_p3



WAR 40-11 drill site\_p6



WAR 34-05 drill site\_p1



WAR 34-05 drill site\_p3

***Condition B2-3 (in regards to Tracks) – “Track construction involving blade clearing of established ground cover vegetation and/or clearing of mature trees is to be minimised”***

Prior to the commencement of exploration work, we had communicated various concerns to Waratah about a range of potential deleterious effects that such works would, or potentially would, have on the environmental attributes of the property, especially given its status as a perpetual Nature Refuge under Queensland legislation. An Environmental Management Plan was agreed between us and Waratah which included systems to minimise disturbance of ground cover for access to drill sites, including no blade clearing of such routes. This was not routinely followed, especially in the second half of the drilling program. As a consequence, it is estimated that some 6km of previously low-impact “bush tracks” were completely blade-cleared (eg photo WAR 34-05 Corella track\_p4; many others available on request). Access tracks to some drill sites were similarly cleared, against both the Environmental Management Plan and the Exploration permit conditions.

In addition, topsoil removed during this track construction was simply left in piles besides the tracks, with more blade-clearing occurring during this ‘piling’ process (eg photo WAR 34-05 access track\_p5). The future erosion damage from such complete removal of ground cover on these blade-cleared tracks, particularly on the slopes, is likely to be significant. It will also assist the spread of environmental weeds through ease of seed movement.



WAR 34-05 Corella track\_p4;



WAR 34-05 access track\_p5

***Condition B3-2 (in regards to Other Land Disturbance) – “All equipment such as earthmoving and drilling equipment must be used in a manner which prevents the spread of weeds, minimises unnecessary disturbance of topsoil and groundcover vegetation”***

Within the Environmental Management Plan with Waratah, it was agreed to minimise disturbance of and into existing infestations of buffel grass during access track and drill site selection and formation. Again, this plan was not routinely followed. As a consequence some drill sites and associated access tracks were placed in, through and/or adjacent to buffel grass infestations. The attached photo entitled WAR 38-05 drill site\_machinery shows machinery parked up within a buffel infestation at drill site WAR 38-05, a very poorly selected site given the significant extent of buffel at this location. There is no doubt that these activities will lead to further spread of buffel grass and other environmental weeds.



***Condition B4-5 (in regards to Other Land Disturbance) – “All waste must be removed and disposed offsite”***

Regrettably, rubbish was left at nearly all of the drill sites after drilling ceased and we have so far collected nearly a garbage bag full of rubbish. This includes, but is not limited to, rags, drink containers, grease gun cartridges, tin food cans, confectionary packets, cigarette butts and packets. Three photos of rubbish at two drill sites are attached (see attached photos entitled WAR 34-11 drill site\_p4; WAR 36-07 drill site\_p2; WAR 36-07 drill site\_p4) with others available on request. It is our understanding that at least one other landholder within the permit area has suffered similar rubbish issues.



WAR 34-11 drill site\_p4



WAR 36-07 drill site\_p2



WAR 36-07 drill site\_p4

**Extract from the diary of the volunteer manager of Bimblebox Nature Refuge**

29/11/09

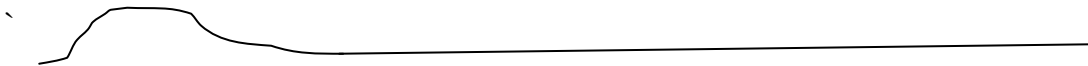
... someone has wrecked the roads at Glen Innes. The one thing we treated so carefully and agonised over most has been damaged beyond what we are capable of repairing.

It's very distressing to see in a place where erosion of any sort can only be caused through a total disregard for decent bush practise. The land gradient being slight and soil so porous that all anyone needs to do is stay off in the wet. A matter of hours after storms, and days or a week following prolonged rainfall.

.... Could they imagine we actually clear the roads, grubbing out anthills and cutting the trees by hand to avoid denuding the ground.

Maybe they don't realise all our roads came through the massive flood rains intact precisely because of all this attention to detail.

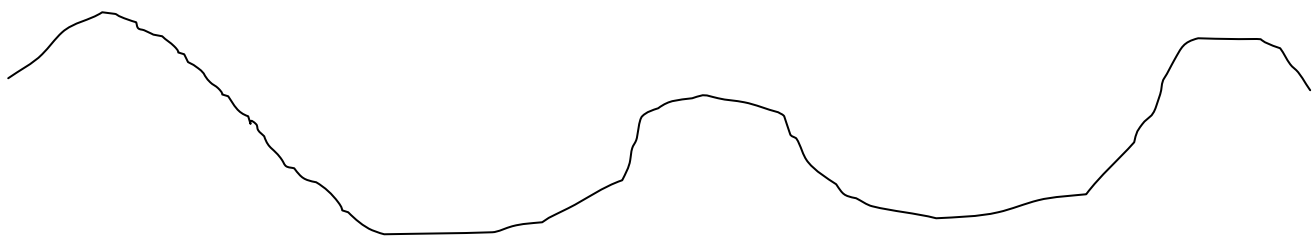
Six months ago their basic profile was such: flat with a rill graded to one side:



Whereas now they sunken wheel ruts, thus:



And after the next heavy rains will be washed deeper:



The mess they have made at each drill site is trivial in comparison and rehabilitation can be undertaken in due course..... however to rebuild these roads, to haul in sufficient material to raise them back to ground level is a huge task and quite beyond our capacity.

Maybe the whole place is just 'overburden' a burden over the bounty below and we who defend it as a beautiful, living, breathing vital complexity are a burden to the nation's prosperity.

Perhaps we'll all be so much better off once that momentous sod is turned and all the big money that's being touted starts pouring in. Then we can buy a big plasma screen and switch the very best of nature on and off at whim in comfort and angst free.....