



Blue Mountains Conservation Society Inc

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Nature Conservation Saves for Tomorrow

24 September 2011

The Hon Chris Hartcher
Minister for Resources and Energy
Parliament House
Macquarie St
Sydney NSW 2000

Dear Minister Hartcher

Re: Full Moratorium Required for Coal Seam Gas (CSG) Extraction

The Blue Mountains Conservation Society has asked our local member, Mrs Roza Sage MP, to present this letter to you in person so as to underline the seriousness with which we regard the CSG issue. The Society believes that a major, if not the foremost, goal of government should be to foster the well being of both human communities and the natural environment. Evidence to date shows that CSG extraction is not consistent with this goal.

Known, and well documented, physical problems associated with CSG extraction include: a voracious demand for water, pollution of water above and below ground with toxins from drilling and fracking fluids and leachates from coal seams, inability to safely manage this polluted water (so called “produced water”), irreparable structural damage to aquifers due to fracking and/or inappropriate drilling processes, significant fugitive methane emissions resulting in a Green House Gas (GHG) footprint for CSG that in total life-cycle terms is greater than that of coal. Further, the fragmentation and disturbance of the land surface due to the web work of well-heads, pipes, evaporation ponds, and access roads have direct impacts on the agricultural use of the land (in both operational and economic terms) and very importantly on the natural flora and fauna of the area.

The result of all the above is an undermining of the well being of local communities, individual farmers, and the natural ecosystems on which we all ultimately depend.

We acknowledge the steps the O'Farrell government has taken to date on CSG, but much more needs to be done. The Society believes the following to be a minimal starting framework:

- ^ a policy, enforceable through clear regulations, that can determine and classify

- land of strategic/significant importance (be it for agricultural, environmental, or cultural heritage reasons) - exploration licences must not be issued over any such strategically classified lands;
- ⤴ buffers zones, measured in kilometres (not metres), must be declared between CSG operations and any aquifer recharge or discharge sites, rivers or significant water courses, natural ecosystems of acknowledged conservation value, farm homesteads, and local towns;
 - ⤴ a complete ban on lateral drilling under declared buffer zones from outside these zones;
 - ⤴ a complete ban on the use of any chemicals that have not been assessed and officially declared safe for release into the environment, taking into account both the amounts released and the resultant concentration levels;
 - ⤴ a complete ban on the process of forced fracturing of strata (aka “fracking”) or drilling techniques that have a similar impact;
 - ⤴ assessment of fuel/energy sources on a complete life cycle GHG emission basis; hence recognising that CSG is neither a “clean” fuel nor a worthwhile “transition” fuel, and that extensive CSG exploitation would detrimentally divert resources away from the development of clean renewable energy alternatives;
 - ⤴ recognition that communities and landholders are legitimate stakeholders, and that there must be a well defined dispute resolution process in place which can either award full compensation if livelihoods and/or amenity are significantly disrupted, or completely rule out CSG operations where the case against them is sufficiently strong. Communities and landholders should not just be offered token consultation processes.

Until the above measures can be enshrined in effective and enforceable legislation and regulations there must be a complete moratorium on both CSG exploration and production. Further, as much of the state is already covered by exploration licences it will be necessary to retrospectively cancel or amend some of these existing licences to ensure compliance with new policy.

Your sincerely

Lachlan Garland
President
Blue Mountains Conservation Society

cc. Mrs Roza Sage Member for the Blue Mountains