

## **Attachment F: Public Comment register**

Item	Consideration Area	Summary of Consideration Area and Public Comment	Consideration
1	Water	Risk that large-scale groundwater extraction will impact the Dawson River and broader catchment, including baseflows and floodplain function.	<p><b>No amendment to the Preliminary Documentation is proposed.</b></p> <p>Consideration for groundwater extraction outside of what has already been prepared as part of the Preliminary Documentation (PD) is not proposed. The comment generally pertains to the controlling provisions for water resources relevant to coal seam gas development and large coal mining development, this controlling provision was not applied to the controlled action decision for the Project. The water and groundwater impacts were assessed by reports submitted with the original <i>Environment Protection and Biodiversity Conservation Act 1999</i> (EPBC Act) referral.</p> <p>The Groundwater Assessment Report submitted with the original EPBC Act referral (Section 7.8, pp. 83–84) confirms that groundwater–surface water interactions within the Project Area are limited, particularly with the Dawson River. Monitoring bore data (e.g. RN13030385) consistently shows that river elevation exceeds groundwater levels, indicating minimal baseflow contribution and limited hydraulic connectivity. This is supported by surface water gauge data from the Dawson River at Woodleigh (130317B), which shows perennial flow driven by upstream baseflow, not local groundwater discharge. Some applicable conclusions are as follows:</p> <p>“...the elevation of the Dawson River at Woodleigh is higher than the groundwater level at 13030385... this highlights that there is limited connection between groundwater and surface water within the vicinity of the Project Area.” — Section 7.8, pp. 83</p> <p>“...limited hydraulic connection across the laterally extensive Rewan Group aquitard, between the Permian Baralaba Coal Measures and the shallow Cenozoic aquifer...” — Section 7.8, pp. 83</p> <p>Additionally, Westside has a currently approved Underground Water Impact Report for PL94 (UWIR) (<a href="#">KCB 2023</a>). An updated version of the UWIR is currently undergoing the approval process with the Department of Environment, Tourism, Science and Innovation. The UWIR (KCB 2023, Section 5.8 pp. 54) for PL94 identifies the Rewan Group as a laterally extensive aquitard that hydraulically separates the Baralaba Coal Measures (target formation) from shallow aquifers such as the Quaternary alluvium. This structural</p>

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			<p>and hydraulic separation significantly reduces the risk of vertical connectivity and potential impacts to surface water systems, including the Dawson River.</p> <p>The Produced Water Management Plan (PWMP) (Attachment C to the submitted PD) (Section 3.2.2, pp. 15–16) outlines that produced water will be managed entirely through beneficial reuse, with no discharge to surface water systems, thereby eliminating direct interaction risks.</p> <p>Further to this, the Environmental Management Plan (Attachment C to the PD), includes information on produced water management (Section 4.7, pp 22), consideration of potential impacts to altered surface and groundwater environments (Section 6.3.4, pp. 53) and water impacts more broadly (Section 6.6, pp. 66-74).</p> <p>Given these findings, the risk of large-scale groundwater extraction impacting the Dawson River or broader catchment is considered low. Therefore, further expansion on groundwater–surface water interaction is not necessary in the context of MNES. As such, further expansion on these points is not considered necessary in relation to the context of MNES.</p>
2	Water and Bores	<p>Commenter expresses concern about the potential impact of predicted groundwater drawdown (3–5 metres) on five bores used for domestic and stock water, particularly during drought conditions. They highlight the importance of these bores to their cattle operations and question the adequacy of Westside’s modelling, especially in relation to cumulative impacts from existing and proposed development.</p>	<p><b>No amendment to the Preliminary Documentation is proposed.</b></p> <p>As noted above, the comment generally pertains to the controlling provisions for water resources relevant to coal seam gas development and large coal mining development, this controlling provision was not applied to the controlled action decision for the Project. Water and groundwater impacts were assessed by reports submitted with the original EPBC Act referral.</p> <p>No significant impacts on groundwater are anticipated as a result of the Project given the significant extent of dewatering that has already occurred due to active mining in the local area. Westside has an approved UWIR for the PL94 tenure. As mentioned in Item 1 response, the UWIR and its current iteration is currently undergoing the approval process with the Department of Environment, tourism, Science and Innovation. The modelled drawdown is confined to the Rewan Group, Baralaba Coal Measures, and Undivided Basement, and does not propagate into the overlying Quaternary alluvium or Tertiary</p>

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			<p>sediments, where domestic and stock bores are located (UWIR Section 6.2.1 pp. 75 and Section 7.5.1 pp. 85-86). The UWIR details the groundwater monitoring requirements for Project operation, being:</p> <ul style="list-style-type: none"> <li>• Groundwater monitoring will be conducted Biannually for all test except water level monitoring, which will be conducted each quarter.</li> <li>• 18 different water parameters will be measured with each biannual test. These tests will identify the following: Electrical conductivity, dissolved solids, Temperature, Dissolved Oxygen, Alkalinity, Sodium adsorption ratio, Anions, Silica, Dissolved metals, phosphorus, Ammonia, petroleum hydrocarbons, BTEX, Polycyclic aromatic hydrocarbons and radioactivity by gamma spectroscopy. This is in line with the EA conditions.</li> </ul> <p>The UWIR includes further information on Scenario Results (Section 6.2.1, pp. 75) and Impacts on Groundwater Resources (Section 7.5.1, pp. 85-86).</p> <p>Section 3.1.5 (pp. 35) and 3.2.3 (pp. 38-39) of the PD includes a brief summary on Water Management and also directing the reader to the PWMP (Attachment C of the PD). Incidents involving surface and/or groundwater will be managed according to Westside's incident management system and regulatory requirements.</p> <p>Section 5.1 and 5.2 of the PWMP (Attachment C to the PD) detail groundwater chemistry and recharge rates, showing that drawdown effects are confined to the Rewan Group and will not propagate into the alluvium where domestic and stock bores are located. The PWMP also includes details of the Mitigation and Management Measures designed to protect the water resources (Section 3), groundwater (Section 5) and monitoring (Section 9). Further to this, the Environmental Management Plan (Attachment C to the Preliminary Documentation) includes information on Produced Water Management (Section 4.7, pp. 22) and Water Impacts (Section 6.6, pp. 66-74).</p> <p>The PD does not require further amendment in response to the commenter's concern because the potential groundwater impacts have already been thoroughly assessed and addressed through existing regulatory frameworks and technical studies. The predicted</p>

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			drawdown is confined to deeper geological formations (Rewan Group, Baralaba Coal Measures, and Undivided Basement) and does not extend into the shallower aquifers (Quaternary alluvium and Tertiary sediments) where the domestic and stock bores are located. This conclusion is supported by the approved UWIR, which includes detailed modelling, monitoring commitments, and mitigation measures. Furthermore, the project is not subject to the water resources controlling provision under the EPBC Act, and cumulative impacts have been considered through the UWIR process. Therefore, the concern is acknowledged but effectively addressed within the existing documentation and regulatory oversight.
3	Subsidence	Concerns that the assessment, citing the Santos 2014 study in the UWIR relies on outdated studies and does not adequately address cumulative subsidence risks in strategic cropping land.	<p><b>No amendment to the Preliminary Documentation is proposed.</b></p> <p>As noted above, the comment generally pertains to water resources relevant to coal seam gas development and associated land surface impacts. However, water was not applied as a controlling provision in the controlled action decision for the Project. Subsidence impacts were assessed through reports submitted with the original EPBC Act referral, including the Greater Meridian Field Groundwater Assessment (GMFGA). Subsidence is also considered in the updated UWIR (2025).</p> <p>No significant subsidence impacts are anticipated as a result of the Project. The UWIR considers prior modelling by Santos GLNG (2014), which estimated subsidence of approximately 0.05 m for coal seams and 0.1 m for the full formation thickness, based on a drawdown of ~1,000 m. For PL94, the predicted drawdown in the Baralaba Coal Measures is approximately 725 m—significantly less than the Santos study. Based on this comparison, the UWIR concludes that subsidence risk is negligible. This assessment aligns with current regulatory standards under the <i>Environmental Protection Act 1994</i> and the model conditions issued by the Department of Environment, Science, Tourism and Innovation, which require conservative assumptions and consideration of cumulative impacts.</p> <p>The UWIR includes further information on subsidence risk and modelling assumptions (Section 7.5.6, pp. 87-88), confirming that subsidence resulting from groundwater</p>

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			<p>extraction is negligible. While the PD does not directly address subsidence, relevant references are included in:</p> <ul style="list-style-type: none"> <li>Section 1.1 (pp. 8) – Overview of controlling provisions, noting water was not applied</li> <li>Environmental Management Plan (Attachment C of the PD) (Section 6.6.4, pp. 204). This considers potential impacts of groundwater.</li> </ul> <p>Therefore, the concern is acknowledged but considered to be effectively addressed through existing documentation and regulatory oversight.</p>
4	Greenhouse Gas	Concern that the Project did not involve a GHG assessment claims the project appears inconsistent with national/net-zero objectives and IEA advice to stop approving new gas projects.	<p><b>No amendment to the Preliminary Documentation is proposed.</b></p> <p>The comment relates to climate change and greenhouse gas emissions, which are regulated under existing national and state frameworks. Greenhouse gas emissions from the Project are reported in full compliance with the <i>National Greenhouse and Energy Reporting Act 2007</i>. Westside submits annual reports to the Clean Energy Regulator under the National Greenhouse and Energy Reporting Scheme, and these are publicly available. Emissions are also managed under the <i>Environmental Protection Act 1994</i> (Qld) through the Project’s Environmental Authority, which governs operational performance and environmental safeguards.</p> <p>While the PD does not include a standalone GHG management plan, Section 6.1 of the Environmental Management Plan (Attachment C to the PD, pp. 38) provides baseline climate data for the Project area. This data supports future environmental comparisons and monitoring. The Project’s emissions are transparently reported and regulated under national standards, and no additional documentation is required within the PD.</p> <p>Therefore, the concern is acknowledged but considered to be effectively addressed through existing regulatory mechanisms and reporting obligations.</p> <p>The PD does not require amendment in response to the commenter’s concern because greenhouse gas emissions are already subject to robust national and state regulatory frameworks. Westside reports emissions annually under the National Greenhouse and</p>

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			Energy Reporting Scheme and complies with the <i>Environmental Protection Act 1994</i> (Qld) through its Environmental Authority. Although the PD does not include a standalone GHG plan, relevant climate data is provided in the Environmental Management Plan. The Project's emissions are transparently reported and regulated, and the concern is therefore addressed within existing oversight mechanisms.
5	Water and Aquatic Ecosystems	Groundwater extraction may affect sensitive aquatic ecosystems and MNES (e.g. Fitzroy River turtle) and the modelling does not include cumulative impacts.	<p><b>No amendment to the Preliminary Documentation is proposed.</b></p> <p>The comment relates to potential impacts on water resources and aquatic ecosystems. However, no direct impacts to the Dawson River or its riparian corridor are proposed. Westside has committed to a maximum disturbance limit of 0.0 ha within this sensitive area. Any infrastructure crossing the river will be installed using directional drilling, with launch and receipt points located outside the riparian protection zone, ensuring no surface disturbance.</p> <p>The Groundwater Assessment Report submitted with the original EPBC Act referral and the UWIR conclude that the Project will not have a significant impact on water resources. Groundwater extraction has been assessed in the context of existing land use, historical clearing, and hydrological modifications. The PWMP (Attachment C to the PD) includes a detailed assessment of groundwater-surface water interactions (Section 5), which confirms that the Dawson River is hydraulically disconnected from the groundwater systems affected by the Project. Monitoring data shows that river elevations consistently exceed groundwater levels, indicating limited potential for baseflow contributions or drawdown impacts on aquatic ecosystems.</p> <p>Section 5.3.1 of the PWMP notes that spring complexes and groundwater-dependent ecosystems are located over 30–50 km from the Project Area. Drawdown is confined to the Rewan Group and does not propagate into the alluvium or Cenozoic sediments that support sensitive ecosystems.</p> <p>Environmental Values and Water Quality Objectives for aquatic ecosystems in the Dawson River sub-basin are identified under the Environmental Protection Policy (EPP Water). The</p>

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			<p>PWMP aligns with these objectives and includes monitoring programs (Section 9) to ensure water quality remains within acceptable limits.</p> <p>Cumulative impacts have been considered through conservative modelling and infrastructure planning. The Project avoids new fragmentation of aquatic habitats and prioritises beneficial reuse of produced water (Section 4), reducing the likelihood of indirect impacts such as erosion or water quality degradation. Potential indirect impacts such as sedimentation or erosion will be managed through established procedures in the Environmental Management Plan.</p> <p>The PD does not require amendment in response to the commenter's concern because potential impacts to aquatic ecosystems and MNES have been thoroughly assessed. The Dawson River is hydraulically disconnected from the affected groundwater systems, and no surface disturbance is proposed within the riparian corridor. Sensitive ecosystems and spring complexes are located well outside the Project Area, and drawdown is confined to deeper geological formations. Cumulative impacts have been considered through conservative modelling and infrastructure planning. The PWMP and Environmental Management Plan include detailed mitigation, monitoring, and management measures to protect aquatic ecosystems. Therefore, the concern is addressed within the existing regulatory framework and supporting documentation.</p>
6	Biosecurity Compliance	Allegations that vehicles are not washed down properly, wash-down certificates incorrectly completed, and risk of weed spread	<p><b>No amendment to the Preliminary Documentation is proposed.</b></p> <p>Westside has established and implements biosecurity management procedures consistent with the relevant regulatory requirements, including under the <i>Biosecurity Act 2014</i> (Qld) and the <i>Mineral and Energy Resources (Common Provisions) Act 2014</i> (Qld).</p> <p>Biosecurity obligations are regulated under Queensland legislation and conduct and compensation agreements (CCAs). The matters raised do not relate to potential impacts on MNES under the EPBC Act. No change to the PD is required.</p>

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7	Notice periods and operational conduct	Concerns regarding short notice of activities, traffic volumes, seismic testing near residence, and rehabilitation practices.	<p><b>No amendment to the Preliminary Documentation is proposed.</b></p> <p>Westside provides notices to landholders in accordance with the terms of CCAs and Queensland law. Rehabilitation is managed under state regulatory requirements and monitored by the relevant authorities.</p> <p>These matters relate to land access, compensation, and operational management under state law. They are outside the scope of the EPBC Act assessment, which is limited to potential impacts on MNES. No change to the PD is required.</p>
8	Annual compensation and negotiation conduct	Concerns about transparency of compensation offers, negotiation practices, and complaint handling.	<p><b>No amendment to the Preliminary Documentation is proposed.</b></p> <p>Compensation negotiations are undertaken in accordance with the <i>Mineral and Energy Resources (Common Provisions) Act 2014</i> (Qld). Disputes are addressed through CCAs, the Land Court or other state mechanisms.</p> <p>Compensation issues are not relevant to the assessment of MNES under the EPBC Act. No change to the PD is required.</p>