

BRISBANE • MELBOURNE • SYDNEY



30 January 2012

Queensland Floods Commission of Inquiry  
Level 30, 400 George Street  
**BRISBANE QLD 4000**

Partner  
Direct Line  
Email  
Our Ref

Toby Boys

TZB:11800005

Attention: Ms Susan Hedge

**By hand**

Dear Ms Hedge

**Queensland Floods Commission of Inquiry**

We refer to the Requirement to Provide Statement (**the Requirement**) dated 25 January 2012 sent to Kim Hang (your reference Doc 1835053).

Please find **enclosed** Kim Hang's statement in response to the Requirement.

Yours sincerely

**HOLDING REDLICH**

Enclosures: 1

## **QUEENSLAND TO WIT**

I, **KIM HANG**, of c/- SunWater Limited (**SunWater**), Level 10, 179 Turbot Street, Brisbane in the State of Queensland on 30 January 2012 do solemnly and sincerely declare as follows:

### **INTRODUCTION**

- 1 This statement is given in response to a notice dated 25 January 2012 ("**notice**") requiring me to give a statement for the purpose of the Queensland Floods Commission of Inquiry. Exhibited to this statement and marked "**KH-1**" is a copy of the notice.
- 2 This statement has been provided without any knowledge of the contents of other evidence that will or may be adduced, or the submissions that have or will be made to the Commission of Inquiry. I will supplement this statement with addendum statements if it is necessary.
- 3 I will provide any further information or explanation required by the Commission of Inquiry.

### **QUALIFICATIONS, EXPERIENCE AND CURRENT POSITION**

#### ***Qualifications and experience***

- 4 In 1999 I completed a Bachelor of Civil Engineering from the University of Queensland.
- 5 In about 2000 I commenced work with SunWater Limited (**SunWater**).
- 6 I left my employment with SunWater to undertake a Masters of IT in 2001, which I completed in 2003. I recommenced employment with SunWater shortly afterwards.

#### ***Current position***

- 7 My current position at SunWater is as a Senior Engineer/Hydrologist in the Headworks Design division of SunWater. I have been in this current position for approximately 2 years.
- 8 In addition to my role as a Senior Engineer/Hydrologist, I also worked as a flood officer in the Flood Operations Centre (**FOC**) during flood events. I started in this role in 2004 and ended this role in mid-2011 when SunWater's contract to provide flood operations services expired.

### **DATES AND TIMES PRESENT IN THE FLOOD OPERATIONS CENTRE**

- 9 I worked as a flood officer in the FOC during the January 2011 flood event in the following shifts, with the following flood engineers on shift:

- (a) From about 7pm, Saturday 8 January to 7am, Sunday 9 2011 with John Tibaldi on shift;
- (b) From about 7am to 7pm, Tuesday 11 January 2011 with Terry Malone and John Tibaldi on shift;
- (c) From about 7am to 7pm, Wednesday 12 January 2011 with Terry Malone and John Tibaldi on shift;
- (d) From about 7pm, Friday 14 January to 7am, Saturday 15 January 2011 with John Tibaldi on shift;
- (e) From about 7am to about 2pm on Wednesday 19 January 2011 with Terry Malone on shift.

#### **RELEVANT EVENT LOG ENTRIES**

10 The notice requires me to provide a statement which gives an account of the entries in the flood event log (exhibit 23) that were made by me between 12am 7 January and 12am 12 January on the following topics:

- (a) The transition from strategy W1 to W2 or W3;
- (b) The transition to strategy W2;
- (c) The transition to strategy W3;
- (d) The transition to strategy W4;
- (e) The primary consideration in operating the dam and choosing release rates at any time,

(which I have called the “**relevant event log entries**” for convenience).

11 The two shifts that I worked within that period were:

- (a) 7pm, Saturday 8 January to 7am, Sunday 9 2011; and
- (b) 7am to 7pm on Tuesday 11 January 2011.

12 I did not make any entries in the event log during those shifts, so there are no relevant event log entries for me to provide an account of.

#### **FURTHER INFORMATION ABOUT RELEVANT CONVERSATIONS**

13 The notice further requires me to provide any further information or details, including accounts, if possible of all conversations (in person or telephone) that I took part in with, or overheard between, the flood operations engineers and/or the

flood officers and/or other persons during the period 7am, 7 January 2011 to 12am, 12 January 2011 in respect to the following topics:

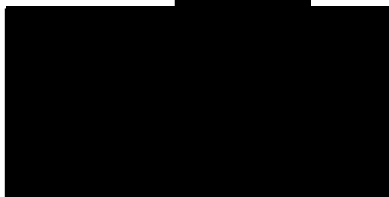
- (a) The transition from strategy W1 to W2 or W3;
- (b) The transition to strategy W2;
- (c) The transition to strategy W3;
- (d) The transition to strategy W4;
- (e) The primary consideration in operating the dam and choosing release rates at any time,

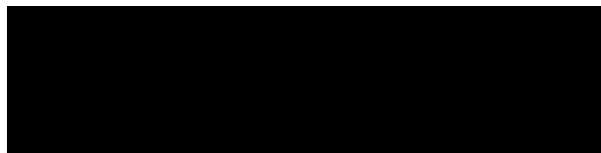
14 I cannot recall any conversations during my shifts in relation to those topics.

AND I MAKE this solemn declaration conscientiously believing the same to be true and by virtue of the provisions of the *Oaths Act 1867*.

Affirmed and Declared at Brisbane )

this 30<sup>th</sup> day of January 2012 in the )  
presence of: )



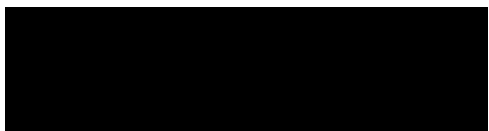


Signature of the declarant

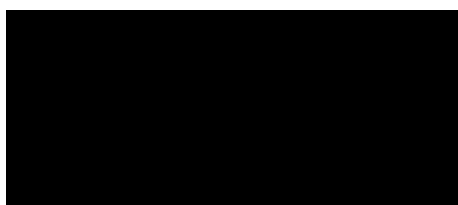
~~Justice of the Peace/ Solicitor/  
Commissioner for Declarations~~

## CERTIFICATE OF EXHIBIT

Exhibit marked "KH-1" is the exhibit to the statement of **KIM HANG** sworn 30 January 2012.



Deponent



Solicitor

B:1377523\_1 NMW

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**CERTIFICATE OF EXHIBIT**

**Holding Redlich**  
Level 1, 300 Queen Street  
Brisbane Q 4000  
Tel: (07) 3135 0500  
Fax: (07) 3135 0599  
Ref: TZB:11800005

Our ref: Doc 1835053

25 January 2012

Kim Hang  
Flood Officer  
SunWater  
Level 10/179 Turbot Street  
BRISBANE QLD 4000

**REQUIREMENT TO PROVIDE STATEMENT TO COMMISSION OF INQUIRY**

I, Justice Catherine E Holmes, Commissioner of Inquiry, pursuant to section 5(1)(d) of the *Commissions of Inquiry Act 1950* (Qld), require Kim Hang to provide a written statement, under oath or affirmation, to the Queensland Floods Commission of Inquiry, in which the said Kim Hang gives an account of:

1. the dates and times when he was present at the flood operations centre during the 6 to 19 January 2011 flood event
2. the flood operations engineer or engineers who were at the flood operations centre at those dates and times
3. entries in the flood event log that is Exhibit 23 before the Commission that were made by him between 12.00 am, 7 January and 12.00 am, 12 January 2011 on the following topics:
  - a. the transition from strategy W1 to W2 or W3
  - b. the transition to strategy W2
  - c. the transition to strategy W3
  - d. the transition to strategy W4
  - e. the primary consideration in operating the dam and choosing release rates at any time
4. any errors or omissions in the entries in the flood event log that is Exhibit 23 before the Commission that were made by him between 12.00 am, 7 January and 12.00 am, 12 January 2011 on the topics listed as 3(a) to (e), above.
5. any information or details that he is able to add to the account given in the entries in the flood event log that is Exhibit 23 before the Commission that were made by him between 12.00 am, 7 January and 12.00 am, 12 January 2011 on the topics listed as 3(a) to (e), above.
6. Any further information or details, including accounts, if possible, of all conversations (in person or telephone) he took part in with, or overheard between:

- a. the flood operations engineers and/or
- b. the flood officers and/or
- c. other persons

between 12.00 am, 7 January and 12.00 am, 12 January 2011 on the topics listed as 3(a) to (e), above.


In addressing these matters, Kim Hang is to:

- provide all information in their possession and identify the source or sources of that information;
- make commentary and provide opinions they are qualified to give as to the appropriateness of particular actions or decisions and the basis of that commentary or opinion.

Kim Hang may also address other topics relevant to the Terms of Reference of the Commission in the statement, if they wish.

The statement is to be provided to the Queensland Floods Commission of Inquiry by 12pm, Monday 30 January 2012.

The statement can be provided by post, email or by arranging delivery to the Commission by emailing [info@floodcommission.qld.gov.au](mailto:info@floodcommission.qld.gov.au).



Commissioner  
Justice C E Holmes