

6 January 2011

Ms Frances Finucan  
Senior Adviser, Listings (Brisbane)  
ASX Compliance Pty Limited  
Level 5, Riverside Centre  
123 Eagle Street  
Brisbane Qld 4000

Dear Ms Finucan

**Re: Price Query Australian Pacific Coal Limited (the “Company”)**

Our responses to your questions using your numbering:

1. The Company is not aware of any information concerning it that has not been announced which, if known, could be an explanation for recent trading in the securities of the Company.
2. Not Applicable
3. There is no reason to think that there may be a change in the Company’s result so that the figure for the half year ending 31 December 2010 would vary from the previous corresponding period by more than 15%.
4. There is no reason to think that the Company may record any material abnormal or extraordinary profit for the half year ending 31 December 2010.
5. At the Company’s AGM held on 30 November 2010 shareholders approved the change of company name to Australian Pacific Coal Limited to better reflect the activities of the company as a coal explorer in the Bowen Basin of Queensland..

At the AGM, the Company has presented a review of the exploration potential of its coal tenements. This review identified a number of prospective metallurgical coal exploration targets which will be further evaluated over the coming year. Exploration results will be announced to the market when available..

The inaugural Resource Statement announcement to the ASX on 29 November 2010 for the Cooroora Project, has generated interest from investors and brokers. The Company is currently evaluating all of its options in relation to all of its Queensland coal projects.

On 24 December 2010 the Company completed a placement raising \$1,020,000, The placement enables the Company put in place a program for 2011 to advance the data collection and evaluation of the Company’s Queensland coal licences.

The Company believes that with the resource statement for the Cooroora project, coupled with the change of company name and completion of the placement, investors recognise the Company holds valuable coal resources. The recent share price movement recognises this value.

6. The Company is in compliance with the listing rules and, in particular, listing rule 3.1

Yours faithfully

A handwritten signature in black ink, appearing to read "K. Mischewski". The signature is written in a cursive style with a prominent initial "K" and a long, sweeping underline.

Kevin Mischewski  
Company Secretary



6 January 2011

Mr Kevin Mischewski  
Company Secretary  
Level 7, 10 Felix Street  
BRISBANE QLD 4000

By email: [kevin@pevlt.com](mailto:kevin@pevlt.com)

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Dear Mr Mischewski

**Australian Pacific Coal Limited (the "Company")**

**PRICE QUERY**

We have noted an increase in the price of the Company's securities from a close of 4.2 cents on Friday, 31 December 2010 to an intraday high of 7 cents today, at the time of writing. We have also noted an increase in the volume of trading in the securities over this period.

In light of the price change and increase in volume, please respond to each of the following questions.

1. Is the Company aware of any information concerning it that has not been announced which, if known, could be an explanation for recent trading in the securities of the Company?

Please note that as recent trading in the Company's securities could indicate that information has ceased to be confidential, the Company is unable to rely on the exceptions to listing rule 3.1 contained in listing rule 3.1A when answering this question.

2. If the answer to question 1 is yes, can an announcement be made immediately? If not, why not and when is it expected that an announcement will be made?

Please note, if the answer to question 1 is yes and an announcement cannot be made immediately, you need to contact us to discuss this and you need to consider a trading halt (see below).

3. Is there any reason to think that there may be a change in the Company's result so that the figure for the half year period ending 31 December 2010 would vary from the previous corresponding period by more than 15%? If so, please provide details as to the extent of the likely variation.
4. Is there any reason to think that the Company may record any material abnormal or extraordinary profit for the half year period ending 31 December 2010? If so, please provide details.
5. Is there any other explanation that the Company may have for the price change in the securities of the Company?
6. Please confirm that the Company is in compliance with the listing rules and, in particular, listing rule 3.1.

Your response should be sent to me by email at [frances.finucan@asx.com.au](mailto:frances.finucan@asx.com.au). It should not be sent to the Company Announcements Office.

Unless the information is required immediately under listing rule 3.1, a response is requested as soon as possible and, in any event, by **12.00pm (Brisbane time) today, Thursday, 6 January 2011**.

Under listing rule 18.7A, a copy of this query and your response **will** be released to the market, so your response should be in a suitable form and separately address each of the questions asked. If you have any queries or concerns, please contact me immediately.

### **Listing rule 3.1**

Listing rule 3.1 requires an entity to give ASX immediately any information concerning it that a reasonable person would expect to have a material effect on the price or value of the entity's securities. The exceptions to this requirement are set out in listing rule 3.1A.

In responding to this letter you should consult listing rule 3.1 and Guidance Note 8 – Continuous Disclosure: listing rule 3.1.

If the information requested by this letter is information required to be given to ASX under listing rule 3.1 your obligation is to disclose the information immediately.

Your responsibility under listing rule 3.1 is not confined to, or necessarily satisfied by, answering the questions set out in this letter.

### **Trading halt**

If you are unable to respond by the time requested, or if the answer to question 1 is yes and an announcement cannot be made immediately, you should consider a request for a trading halt in the Company's securities. As set out in listing rule 17.1 and Guidance Note 16 – Trading Halts we may grant a trading halt at your request. We may require the request to be in writing. We are not required to act on your request. You must tell us each of the following.

- The reasons for the trading halt.
- How long you want the trading halt to last.
- The event you expect to happen that will end the trading halt.
- That you are not aware of any reason why the trading halt should not be granted.
- Any other information necessary to inform the market about the trading halt, or that we ask for.

The trading halt cannot extend past the commencement of normal trading on the second day after the day on which it is granted. If a trading halt is requested and granted and you are still unable to reply to this letter before the commencement of trading, suspension from quotation would normally be imposed by us from the commencement of trading if not previously requested by you. The same applies if you have requested a trading halt because you are unable to release information to the market, and are still unable to do so before the commencement of trading.

If you have any queries regarding any of the above, please let me know.

Yours sincerely

**Sent electronically without signature**

Frances Finucan  
**Senior Adviser, Listings (Brisbane)**