



Our ref: D21/76926; RPI21/025

Department of
**State Development, Infrastructure,
Local Government and Planning**

Mr Andrew Hall
Team Lead Access Approvals
Arrow Energy

e-mail: andrew.hall@arrowenergy.com.au

13 May 2021

Dear Mr Hall

Requirement notice

RPI21/025 Arrow – Surat Low Pressure Header Pipelines (Given under s44 of the *Regional Planning Interests Act 2014 (RPI Act)*)

I refer to your application received on 28 April 2021 for a regional interests development approval (RIDA) under section 29 of the *Regional Planning Interests Act 2014 (RPI Act)* for the Surat Low Pressure Header project. The application seeks approval for resource activities: petroleum and gas on Lot 27 SP253612, Lot 2 RP210387, Lot 2 DER3455, Lot 1 RP181072, Lot 2 RP181072, Lot 3 RP181072, Lot 46 DER34223, Lot 49 DER34223, Lot 50 DY39 and Lot 2 RP71519 within the priority agricultural area (PAA) and the strategic cropping area (SCA).

Application details

Applicant Arrow Energy Pty Ltd – ABN 73 078 521 936
Arrow (Tipton) Pty Ltd – ABN 17 114 927 507
Arrow (Tipton Two) Pty Ltd – ABN 36 117 853 755
Arrow CSG (Australia) Pty Ltd – ABN 54 054 260 650
Arrow (Daandine) Pty Ltd – 99 114 927 481.

Project Surat Low Pressure Header Pipelines project

Site Details

Street address Millmerran Boundary Rd, Grassdale 4405;
Broadwater Rd, Ducklo 4405; Nandi-Tipton Rd,
Nandi 4405; Broadwater Rd, Nandi 4405; Moonie
Hwy, Ducklo 4405; Kupunn-Duleen Rd, Ducklo
4405; 119 Hoadleys Rd, Ducklo 4405; 12 Crofts
Rd, Ducklo 4405

1 William Street
Brisbane Qld 4000
PO Box 15009 City East
Queensland 4002 Australia
Telephone 13 QGOV (13 74 68)
Website www.dsdiilgp.qld.gov.au
ABN 25 166 523 889

Real property description	Lot 27 SP253612, Lot 2 RP210387, Lot 2 DER3455, Lot 1 RP181072, Lot 2 RP181072, Lot 3 RP181072, Lot 46 DER34223, Lot 49 DER34223, Lot 50 DY39 and Lot 2 RP71519
Local government area	Toowoomba Regional Council Western Downs Regional Council
Area of regional interest	PAA and SCA
Proposed area of to be disturbed	54.4 ha of PAA 47.4 ha of SCA

Public notification requirement

Pursuant to section 34(4) of the RPI Act, it has been determined that the application requires notification. The reason for the decision is that the delegate for the chief executive has determined that it is in the public interest for the application to be publicly notified.

In accordance with section 35 of the RPI Act, you are required to publish a notice about the application in the way prescribed in section 13 of the Regional Planning Interests Regulation 2014 (RPI Regulation) and give the owners of the land notice about the application.

Public notification must commence within 10 business days of providing the information required to assist in the assessment of the application, as set out below.

The notification period is 15 business days, with the closing date being the day that is after the end of the notification period. The approved form for public notification is available on the Department of State Development, Infrastructure, Local Government and Planning's website at <https://planning.dsdmip.qld.gov.au/planning/regional-planning-interests-act/rpi-act-forms-and-guidelines>

You are also referred to the RPI Act Statutory Guideline 06/14 Public notification of assessment applications at <https://dsdmipprd.blob.core.windows.net/general/rpi-guideline-06-14-notification-requirements-under-rpi.pdf>, for further information.

Information requirement

Further information is required to assist in the assessment of the application against the assessment criteria contained in the RPI Act and RPI Regulation.

The further information required is detailed in **Attachment A**.

The period in which the information must be provided is a maximum of three months from the date of this notice. An extension to this period may be requested if necessary.

Another requirement notice may be given if, for example, the response to this requirement notice does not provide sufficient information to assess and decide the application.

If you require any further information, please contact Ms Morag Elliott, Manager, Planning Group, Department of State Development, Infrastructure, Local Government and Planning, by telephone on (07) 3452 7653 or by email at morag.elliott@dsdilgp.qld.gov.au who will be pleased to assist.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Phil Joyce', with a horizontal line extending from the end of the signature.

Phil Joyce
Director
Development Assessment Division
Planning Group

Enc Attachment A

ATTACHMENT A

Information required for assessment against PAA and SCA criteria

In relation to the Schedule 2, Part 1 and Part 4 of the RPI Regulation

1.	<p><u>Issue:</u></p> <p>Section 10 Declaration of the Assessment Application Form requires signatures, names and positions of the applicants/authorised persons. The positions of the applicant's/authorised persons have not been provided.</p> <p><u>Actions:</u></p> <p>Provide the positions of the applicants/ authorised persons, Marit Eshuis and Junzai Yu.</p>
2.	<p><u>Issue:</u></p> <p>Section 1.2 and Table 1.5 of the Surat Low Pressure Header Pipelines Regional Interests Development Approval report prepared by Arrow Energy (the report) refers to various resource tenures and Environmental Authorities but does not provide any further information.</p> <p><u>Actions:</u></p> <p>Provide extract copies of the resource tenures and environment authorities detailed in the report.</p>
3.	<p><u>Issue:</u></p> <p>Section 1.5 of the report references the Arrow Glenelg regional interests development approval (RIDA) on Lot 12 SP134957 and Table 1.3 details the lots on plan (land parcels) that are in the scope of the application, however it does not detail the property or area requirements as detailed in the applicable assessment criteria in Section 11 of the report.</p> <p><u>Actions:</u></p> <p>(a) Confirm the extent of the properties and areas subject to the application, consistent with the Prescribed Solutions for Required Outcome 2</p> <p>(b) Provide a map detailing the extent of the properties and area that are subject to this application.</p> <p>(c) Provide details to confirm that the existing RIDA for the Arrow – Glenelg project (Ref RPI18/011) considers the construction of the Low Pressure Header.</p>
5.	<p><u>Issue:</u></p> <p>Section 1.6.2 refers to Arrow's 12 commitments to coexistence. RPI Statutory Guideline 02/14 Carrying out resource activities in a Priority Agricultural Area details how coexistence can be achieved between resource activities and agricultural land uses within priority agricultural areas.</p> <p><u>Actions:</u></p> <p>Provide an updated report that demonstrates how coexistence is to be achieved, consistent with Table 3, Prescribed Solution (a) for Required Outcome 2 on page 13 of RPI Statutory Guideline 02/14.</p>
6.	<p><u>Issue:</u></p>

	<p>Table 2.1 does not detail the extent of 'properties' as defined in Schedule 1 of the RPI Act, and as per Required Outcome 2 of the assessment criteria for PAA.</p> <p><u>Actions:</u></p> <p>Amend Table 2.1 to include all activities proposed for each respective parcel of land as well the extent of properties subject to the application. This should include all activities detailed in sections 2.1, 3.3 and 4.4, including the extent and duration (temporary and or permanent) of such.</p>
7.	<p><u>Issue:</u></p> <p>Section 2.2.1 – This section does not detail all of the priority agricultural land use (PALU) classes detailed in the Darling Downs Regional Plan 2013 (regional plan).</p> <p><u>Actions:</u></p> <p>Provide details of all of the PALU classes as detailed in Schedule 2 of the regional plan.</p>
8.	<p><u>Issue:</u></p> <p>Section 2.2.3 Table 2-2 details Lot 2 RP79536 as within the scope of the application. This is inconsistent with advice provided in Tables 1.3, 1.4 and 2-1, and in the Assessment Application Form.</p> <p><u>Actions:</u></p> <p>Confirm whether Lot 2 RP79536 is included in the application, and if so, amend the application to include all pertinent information on this lot including in responses to the PAA assessment criteria detailed in Table 11-1.</p>
9.	<p><u>Issue:</u></p> <p>Section 2.2.5 states that it holds a SCL Compliance certificate with no further information provided.</p> <p><u>Actions:</u></p> <p>Provide extract copies of the certificate.</p>
10.	<p><u>Issue:</u></p> <p>Section 2.2.6 (and Appendix 1) details only the land parcels subject to proposed activities.</p> <p><u>Actions:</u></p> <p>(a) Update this section to include all land parcels that make up the 'properties' subject to this application.</p> <p>(b) Provide copies of title searches for all land parcels that make up the 'properties' subject to this application in Appendix 1.</p>
11.	<p><u>Issue:</u></p> <p>Section 2.2.7 states that it will make agreements for road crossings, with no further information provided.</p> <p><u>Actions:</u></p> <p>Provide details of how the local community's use of the road network will not be disrupted during construction.</p>
12.	<p><u>Issue:</u></p> <p>Section 3 does not provide a timeline for the construction and operation of all proposed activities, nor indicative timeframes of impacts to agricultural production.</p> <p><u>Actions:</u></p>

	Provide a timeline detailing the scheduling for the construction of all proposed activities as well as indicative timeframe for impacted land being returned to agricultural production.
13.	<p><u>Issue:</u> Section 3.3 refers to the nature and extent of Extra Work Areas (EWA).</p> <p><u>Actions:</u> Provide details of:</p> <ul style="list-style-type: none"> (a) how these areas were selected and the alternative areas that were considered but rejected (b) discussions held with landholders regarding the selection of EWA's.
14.	<p><u>Issue:</u> Section 3.3.2 refers to boring activities under roads, but the location of these activities is not identified.</p> <p><u>Actions:</u> Provide the locations of where boring may occur, for the purpose of minimising the impact of local road users.</p>
15.	<p><u>Issue:</u> Section 4.2 does not detail all priority agricultural land use (PALU) classes as per the Darling Downs Regional Plan 2013.</p> <p><u>Actions:</u> Describe all of the PALU classes as detailed in the regional plan.</p>
16.	<p><u>Issue:</u> Table 4.1 does not identify the occurrence and extent of all classes of PALU as detailed in the regional plan classes.</p> <p><u>Actions:</u> Update Table 4.1 to confirm the occurrence and extent of all PALU classes for each land parcel where an activity is proposed, and to include the extent (both in area and percentage of land used for a PALU on the land parcel and the property).</p>
17.	<p><u>Issue:</u> Section 4.3 details that up to 6% of a land parcel might be temporarily impacted by construction activities and that high point vents and low point drains will be required to be installed on landholder properties.</p> <p><u>Actions:</u> Provide:</p> <ul style="list-style-type: none"> (a) justification for the extent and duration of such an impact, noting that such an impact might be inconsistent with the requirements of Prescribed Solution (3)(a)(ii) for Required Outcome 1. (b) details of how it is proposed to minimise the impact and inconvenience to farming operations for the duration of construction (c) details of negotiations with landholders regarding the locations of high point vents and low point drains.

18.	<p><u>Issue:</u></p> <p>Section 4.3.1 discusses past examples of where pervious pipeline projects on intensively farmed land have been restored after construction to enable existing cropping to occur. No evidence is provided to support this statement.</p> <p><u>Actions:</u></p> <p>Provide evidence of where pervious pipeline projects on intensively farmed land have been restored after construction to enable existing cropping to occur.</p>
19.	<p><u>Issue:</u></p> <p>Table 4.2 –This table does not list all of the proposed activities per land parcel, nor does it detail the duration of land use impacts.</p> <p><u>Actions:</u></p> <p>update the table to include all the PALU disturbance areas for all proposed activities during the construction and operation periods as well as the duration of impacts per for each stage.</p>
20.	<p><u>Issue:</u></p> <p>Section 4.3.2 – This section provides general information on the construction timeframe, however, it does not provide detail on the project’s overall proposed timeframe including construction activity, operation and decommissioning.</p> <p><u>Actions:</u></p> <p>provide an indicative schedule and operational timeframes for the construction of all proposed activities? This should include discussion on the potential timeframes to restore and return impacted land back to agricultural production.</p>
21.	<p><u>Issue:</u></p> <p>Although Section 4.3.3 discusses a range of management measures to be implemented during construction to minimise the extent of impacts and duration of recovery of the productivity capacity, as well as how other impacted areas have been returned to full productive capacity within 12 months, no details or examples are provided.</p> <p><u>Actions:</u></p> <p>Provide:</p> <ul style="list-style-type: none"> (a) further detail on the proposed management measures, including commitments and oversight arrangements, to ensure that impacted land is returned back to its pre activity use and condition as quickly as possible (b) examples of where this was done and how it was determined (citing assumptions, methodology and data) that capacity was returned in full.
22.	<p><u>Issue:</u></p> <p>Section 4.3.4 includes that area of the application is extensively used for dryland cropping that is dependent on overland water flow events, and that slope could exceed 3% in some areas.</p> <p><u>Actions:</u></p> <ul style="list-style-type: none"> (a) Detail all mitigation measures and strategies to account for any disruption of overland flow to downstream areas used for PALU that could result from the construction of proposed activities during weather events. (b) Identify areas that could exceed 3%.
23.	<p><u>Issue:</u></p>

	<p>Section 4.4 discusses a simultaneous operations approach, including relating to pipeline engineering to accommodate 14 tonne axle weight, to minimise potential impacts.</p> <p><u>Actions:</u></p> <p>(a) Confirm whether or not this approach will not cause agricultural activity to pause then restart in order to fit in with proposed development schedules. This should include how impacts to land used for PALU and related farming activities can be avoided or minimised, particularly during construction</p> <p>(b) Advise whether the potential that farming equipment may increase in size and weight over the life of the project has been considered, and what are the strategies to future proof engineering and changes in farming operations.</p>
24.	<p><u>Issue:</u> Section 7.1 discusses the investigation of the low pressure header alignment but does not include how impacts on agricultural land use were considered in the process.</p> <p><u>Actions:</u></p> <p>(a) Confirm how impacts to agricultural land uses were considered in this process</p> <p>(b) Provide details of the alternative routes, the rationale for why they were rejected, and any suggested alternatives from landholders.</p>
25.	<p><u>Issue:</u> Section 7.2 discusses biosecurity measures but does not include reference to either general biosecurity obligations or local government biosecurity plans.</p> <p><u>Actions:</u> Provide information on Arrow's biosecurity obligations including its policies and processes and steps to minimise identified biosecurity risks, as well as local government biosecurity plans.</p>
26.	<p><u>Issue:</u> Section 7.3.1. references the Arrow Specification for PE Gathering Systems (ORG-ARW-PPL-SPR-00005) document.</p> <p><u>Actions:</u> Advise if this document has been provided to by the Department of Environment and Science for technical review and consideration, and whether it forms part of the Environmental Authority requirements for reinstatement and rehabilitation.</p>
27.	<p><u>Issue:</u> Section 7.4 details inspections for soil stability but does not provide proposed responses to instances of subsidence, compaction, ponding and erosion.</p> <p><u>Actions:</u> Detail responses to instances of subsidence, compaction, ponding and erosion in the project area during the life of the project. This should include further discussion on management actions should such matters be required.</p>
28.	<p><u>Issue:</u> Section 7.5.1 discusses briefly the proposed decommissioning strategy for the pipeline and associated infrastructure, including leaving buried infrastructure in place.</p> <p><u>Actions:</u></p>

	<p>(a) Confirm that all buried infrastructure will be removed at decommissioning if so desired by the landowner, and if infrastructure is to remain on site, provide detail on how ongoing insurance matters will be managed to ensure there is no future cost or liability to the landowner.</p> <p>(b) Provide details of how the residual risk to the environment and the enduring latent liability of the buried infrastructure will be addressed.</p>
29.	<p><u>Issue:</u> The extent of current title searches at Appendix 1 is limited to land parcels subject to proposed activities and does not include all other land parcels that make up the respective properties subject to this application.</p> <p><u>Actions:</u> Provide the current title searches for all land parcels that make up the properties subject to the application.</p>
30.	<p><u>Issue:</u> Appendix 2 - The maps provided do not cover the extent of the properties subject to the RIDA application.</p> <p><u>Actions:</u> Provide maps detailing the extent of each property subject to the RIDA application.</p>
31.	<p><u>Issue:</u> Appendix 2 – The map legends refer to Landuse 2017.</p> <p><u>Actions:</u> Detail the data source of the Landuse 2017 referred to in each map legend.</p>
32.	<p><u>Issue:</u> Appendix 2 – The overview maps provided in the insert boxes include an additional four land parcels located near the David IPF.</p> <p><u>Actions:</u> Confirm that these land parcels are not subject to the RIDA application.</p>
33.	<p><u>Issue:</u> Appendix 2 – The overview maps provided in the insert boxes include an additional four land parcels located near the David IPF.</p> <p><u>Actions:</u> Confirm that these land parcels are not subject to the application.</p>
34.	<p><u>Issue:</u> Appendix 2 – The supporting text on each map does not detail the extent of each property subject to the RIDA application</p> <p><u>Actions:</u> Detail the full extent of each property subject to the application.</p>
35.	<p><u>Issue:</u> Appendix 2 – The supporting text to each map does not detail all of the proposed activities detailed in sections 2.1, 3.3 and 4.4, nor the extent and duration (temporary or permanent) of such.</p> <p><u>Actions:</u> Detail the extent and duration of all proposed activities for each land parcel, consistent with the dot point aforementioned for Table 2.1.</p>

36.	<p><u>Issue:</u> Appendix 3 –Queensland Land Use Mapping Program (QLUMP) mapping for Darling Downs area is derived from 2012 data which was based on ALUM version 7 and consistent with the definition of PALUs in the regional plan.</p> <p><u>Actions:</u> Confirm that the reference to ALUM version 8 (as per legend on each map) is correct.</p>
37.	<p><u>Issue:</u> Appendix 3 – The maps provided do not cover the extent of properties subject to the application.</p> <p><u>Actions:</u> Provide QLUMP maps for each property subject to the application.</p>
38.	<p><u>Issue:</u> Appendix 4 – The Crop Frequency reports provided do not cover the extent of the properties subject to the RIDA application.</p> <p><u>Actions:</u> Provide Crop Frequency reports for each property subject to the application.</p>
39.	<p><u>Issue:</u> Appendix 6 provides Topography Maps which do not detail contour heights or cover the extent of the properties subject to the application.</p> <p><u>Actions:</u> Provide amended Topography Maps that detail contour heights and cover the extent of the properties subject of the application.</p>
40.	<p><u>Issue:</u> The Shapefiles provided do not detail the locations and impact areas of all proposed activities.</p> <p><u>Actions:</u> Provide updated Shapefiles detailing all proposed activities, including location, duration (construction or operation) and area of impacts. This should include all activities detailed in sections 2.1, 3.3 and 4.4.</p>
41.	<p><u>Issue:</u> The application states that no permanent impact will occur to mapped strategic cropping land (SCL) and that all impacted SCL will be rehabilitated to the pre disturbance values of the SCL. However, a Restoration Plan detailing the pre disturbance values of the proposed disturbance areas, mitigation strategies, completion criteria and restoration practices proposed is provided to support the statement that no permanent impact will occur as per the requirements of Required Outcome 3 for the SCA.</p> <p><u>Actions:</u> Provide a Restoration Plan as per RPI Statutory Guideline 09/14 How to determine if an activity has a permanent impact on Strategic Cropping Land and include at a minimum the following information:</p> <p>(a) information on the nature of impact on the land and methods used to determine impact</p>

	<ul style="list-style-type: none"> (b) characterisation of the pre-activity (current) condition of the land and soils (c) evaluation of the nature and risk of any predicted impacts on the land (d) evidence that scientifically proven and practical methods do exist for restoring the land (e) detail on the application of the restoration methods including timeframes (f) a monitoring program including benchmarking and progress milestones (g) a fully costed estimate of identified restoration works (h) restoration criteria against which successful restoration can be demonstrated. (i) maps at an appropriate scale, identifying the location of impacts, survey sites and any other relevant information in support of the application (j) alternate mitigation strategies if the proposed impacts to SCL are permanent. <p><i>Note: Additional information to include in the Restoration Plan is further detailed in Issue 45.</i></p>
42.	<p><u>Issue:</u> In Section 3.3.3 Extra work areas and section 3.3.4 Access tracks of the report mention is made of additional ancillary areas that will be used for associated works for the Low Pressure Header. It is noted that Appendix 8 shows the location of the Extra work areas that will be used during construction however it does not show the route and access tracks that will be used for the project</p> <p><u>Actions:</u> Provide mapping of the intended routes to be used to access the pipeline during the construction, maintenance and operational phases.</p>
43.	<p><u>Issue:</u> The desk-top soil survey provided contains insufficient information to assess whether the subject land can be restored to its pre-activity condition.</p> <p>The desk-top soil survey identified sodic soils that are prone to soil erosion. Accelerated soil erosion of these soils can diminish agricultural productivity and may impact on water quality (particularly in and around watercourse crossings). There is a prevalence of shrink-well soils and pH inversion soils along the corridor (as identified in the land management manual (Harris et al 1999, quoted in the desk-top soil survey) that will warrant more tailored management solutions. Soil compaction, ponding/waterlogging and subsidence are other issues that will also warrant management, and there are insufficient measures to identify and remedy these issues in the current application. Removal of the infrastructure and subsequent restoration may also be required at the end of the project.</p> <p>Further information is required to assess whether the predicted impacts on SCL will have a permanent impact and can be restored to their pre-activity condition.</p> <p><u>Actions:</u></p> <ul style="list-style-type: none"> (a) Provide shapefiles outlining the dimensions of disturbance (including the construction right of way), inspection pits, valves, drains, vents and access tracks etc. (b) Provide a LiDAR DEM covering all areas of the proposal to establish a baseline terrain condition. This will be used to facilitate and monitor the terrain and return it to its pre-activity terrain condition. (c) To establish the baseline condition of the land's soils, conduct a soil survey at 1:10 000 scale to reflect differences in parent material, landform, drainage and other soil/land attributes to provide the basis of determining the baseline productive capacity of the SCL. The soil survey can identify soil management units that should be identified and used during construction and restoration activities. The scale, site intensity and maximum distance delineated should be

consistent with Table 1 of the Guidelines for Soil Survey along Linear Features (SSA 2015) or later edition.

The soil survey and soil profile descriptions collected are to follow the standards/terminology described in the Australian Soil survey and land survey field handbook (NCST 2009). Additional guidance is provided in the Queensland Soil and Land Resource Survey Information Guideline (Department of Resources 2021).

The acceptable minimum data to be collected for each observation is identified in Table 3 of Queensland Soil and Land Resource Survey Information Guideline (Department of Resources 2021). Greater than 10% of the observations require sampling for laboratory analysis, with at least each 'typical' soil along the route being analysed. Soils which pose a higher risk (e.g. Sodosols with a shallow surface A horizon (<20 cm) may require a higher intensity of survey and laboratory analysis. Standard analytes for each observation include:

- pH, EC, Cl (all on 1:5 soil water suspension)
- exchangeable cations, CEC, ECEC, ESP (calculated)
- particle size analysis (clay, silt, fine sand, coarse sand)
- air dry moisture content (ADMC), moisture characteristic (1/3, 15 bar)
- fertility suite (macro and micronutrients)
- organic carbon, total nitrogen, available phosphorus
- phosphorus buffering index and Colwell P
- for strongly acid soils with pH <5.5, exchangeable aluminium and exchange acidity should also be considered.

- (d) Prepare a restoration plan, based on the results of the soil survey highlighting how the impacts on SCL will be restored to their pre-activity condition. This will require a site-specific management plan that manages and mitigates the impacts during the developmental, operational and decommissioning stages of the activity for all identified soil management units to restore the productive capacity of the land. The plan must focus on eliminating impacts from erosion, soil compaction, subsidence, ponding and wetness/drainage. Soil characteristics that will also warrant specific management include pH inversion soils, shrink/swell soils, gilgai and rockiness (where relevant). Measures to minimise erosion in and around watercourse crossings should also be addressed. The restoration plan will need to include a monitoring program for the life of the project and for a set time frame after, until the lease is relinquished. Restoration criteria need to be established, against which successful restoration can be demonstrated and signed off.

Further guidance is available in the RPI Act Statutory Guideline 03/14 Carrying out resource activities in the Strategic Cropping Area and RPI Act Statutory Guideline 08/14 How to demonstrate that land in the strategic cropping area does not meet the criteria for strategic cropping land.