



Our ref: D21/211609; RPI21/028

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

27 October 2021

Dear Mr Hall

Further requirement notice

RPI21/028 Arrow – Wells and Gathering Lines

(Given under s44 of the Regional Planning Interests Act 2014 (RPI Act))

I refer to your application received on 20 September 2021 for a regional interests development approval (RIDA) under section 29 of the *Regional Planning Interests Act 2014* (RPI Act) for the Wells and Gathering Lines project associated with the Surat Gas Project.

I also refer to the requirement notice dated 5 October 2021, which advised that further information and public notification of the application is required.

You are advised that further information is required in order to assess the application against the assessment criteria contained in Schedule 2, Part 2 and Part 4 of the Regional Planning Interests Regulation 2014 (RPI Regulation).

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

Project Arrow – Wells and Gathering Lines project

Site Details

Real property description Lot 57 SP193329, Lot 36 DY45, Lot 1 RL2451, Lot 1 DY931, Lot 70 DY138, Lot 1 RP154777, Lot 1 DY787, Lot 60 DY802, Lot 2 RP106958, Lot 12 SP193328, Lot 2 RP99387 and Lot 2 DY787

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ABN 25 166 523 889

Street address	Daandine-Nandi Rd, Ranges Bridge 4405; Moonie Highway, Nandi 4405; 1662 Daandine-Nandi Rd, Nandi 4405; 194 Hoadleys Rd, Ducklo 4405
Local government area	Western Downs Regional Council
Area of regional interest	Priority agricultural area (PAA) Strategic cropping area (SCA)
Proposed area to be disturbed	49 ha of PAA 47 ha of SCA

Public notification requirement

As advised in the requirement notice of 5 October 2021, the application requires notification.

Public notification must commence within 10 business days of providing the further information, as set out below, or within 10 business days of providing the information requested in the requirement notice dated 5 October 2021, whichever is the later.

Information requirement

Further information is required to assist in the assessment of the application against the assessment criteria, including the assessment criteria at Schedule 2 Part 2 Priority agricultural area of the RPI Regulation.

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

The period in which the further 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 responses to the requirement notices do not provide sufficient information to assess and decide the application or in response to a submission received about the application.

If you have any queries, 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 RPIAct@dSDLGP.qld.gov.au who will be pleased to assist.

Yours sincerely



Phil Joyce
Director
Development Assessment Division
Planning Group

Enc Attachment A

ATTACHMENT A

Further information required for assessment against PAA criteria

In relation to Schedule 2, Part 2 of the RPI Regulation

1.	<p><u>Issue:</u></p> <p>Section 1.2 of the Coal Seam Gas (CSG) Wells and Gathering Regional Interests Development Approval (No.1) report (report):</p> <ul style="list-style-type: none"> • does not refer to the 12 deviated wells shown on Figure 6-1 and Appendix 3. • advises that the proposed activities are authorised under Environmental Authority (EA) EPPG00972513, but a copy of the EA was not provided as an attachment to the application <p><u>Actions:</u></p> <p>(a) Update Section 1.2 to include the 12 deviated wells detailed in Figure 6-1 and Appendix 3.</p> <p>(b) Provide an extract copy of the EA to confirm the currency and coverage of activities over the land the subject of the RIDA application</p>
2.	<p><u>Issue:</u></p> <p>Section 1.6.1 of the report does not refer to the 12 deviated wells shown on Figure 6-1 and Appendix 3.</p> <p><u>Actions:</u></p> <p>Update section 1.6.1 to include the 12 deviated wells detailed in Figure 6-1 and Appendix 3.</p>
3.	<p><u>Issue:</u></p> <p>Section 1.6.2 of the report advises that Arrow has ‘innovations’ to support coexistence. However, no information is provided regarding these innovations or how they maximise opportunities for co-existence of resource and agricultural land uses within PAA, as required by Regional policy 2 in the Darling Downs Regional Plan 2013, and hence how the application meets Prescribed solution (PS) (1)(a) of Required outcome (RO) 2.</p> <p><u>Actions:</u></p> <p>Demonstrate how the innovations to support co-existence maximise the opportunities for co-existence of resource and agricultural land uses within PAA, as sought by Regional policy 2 of the Darling Downs Regional Plan 2013, and how the application meets PS(1)(a) of RO2.</p>
4.	<p><u>Issue:</u></p> <p>Table 2-2 of the report:</p> <ul style="list-style-type: none"> • provides a note concerning Lot 2 on RP85916 as being a parcel that comprises Property 1, but this lot is excluded from the parcel column. A title search provided in Appendix 2 confirms that this lot is owned by Warakirri Assets Management Pty Ltd, hence it should be included in Table 2-2 as a separate lot that makes up Property 1 • details that there is an overlapping resource tenure on some parts of the land the subject of the application but does not discuss what the implications are for either the landholder, the applicant or New Emerald Energy Pty Ltd (the holder of EPC

	<p>1770) given that the proposed activities are likely to exceed the threshold of 2% detailed in the PS (3)(a)(ii)(A) for RO1 (Refer to Table 4-2 and Table 4-3).</p> <p><u>Actions:</u></p> <p>(a) Update Table 2-2 to include Lot 2 on RP89516 in Property 1. (b) Confirm that there is a Joint Action Management Plan for areas where resource tenures overlap, and what strategies are in place to ensure that the cumulative impacts of all activities will not exceed those detailed in PS (3)(a)(ii)(A) for RO1.</p>
5.	<p><u>Issue:</u></p> <p>Section 2.3.6 of the report does not discuss if a crossing of a railway on Lot 2 on DY169 is required.</p> <p><u>Actions:</u></p> <p>Confirm if a crossing of a railway on Lot 2 on DY169 is required.</p>
6.	<p><u>Issue:</u></p> <p>Table 3-1 of the report:</p> <ul style="list-style-type: none"> • does not include standard wells, subterranean deviated wells, tie-ins or access points • details valves and extra workspaces, however it is not certain if this is intended to mean isolation valves and extra work areas, both of which are detailed in Appendix 3 • details future service connections, however, the discussion on the use and purpose of such is unclear. It is uncertain if future service connections could provide for the connection of other wells and gathering lines in the future as the proposed activities are decommissioned. <p><u>Actions:</u></p> <p>(a) Update Table 3-1 to include all activities proposed on land the subject of the application. (b) Update Table 3-1 to confirm the nature of all activities and to ensure a consistent use of terminology in the application. (c) Clarify the use and purpose of future service connections, including any intention for future use for activities that are not included in this application.</p>
7.	<p><u>Issue:</u></p> <p>Section 3.2 of the report:</p> <ul style="list-style-type: none"> • at the second dot point, details seven extra workspaces, however, a review of maps provided in Appendix 3 identifies eight extra work areas • at the fourth dot point, concerns the installation of three gas and water gathering lines, however, it is not detailed if the lines will be buried in separate trenches or if they will be vertically stacked on top of each other in one trench. • at the fifth dot point, details 14 high point vents, 10 pairs of isolation valves and 22 future service connections, amongst other activities. However, a review of the maps provided in Appendix 3 identified 13 high point vents, 15 individual isolation valves and 19 future service connections • does not detail the number of subterranean deviated wells as shown on Figure 6-1. <p><u>Actions:</u></p> <p>(a) Confirm the number of extra work areas and amend the narrative and/or mapping as required. (b) Confirm how the gathering lines will be installed and located.</p>

	<p>(c) Confirm the number of high point vents, isolation valves and future service connections and amend the narrative and/or mapping changes as required.</p> <p>(d) Include the number of subterranean deviated wells intended for the land the subject of the application.</p>
8.	<p><u>Issue:</u></p> <p>Section 3.3.2 of the report provides no detail on subterranean deviated wells and the potential for any future restrictions placed on farming land located above these.</p> <p><u>Actions:</u></p> <p>(a) Provide details on the proposed subterranean deviated wells, including locations, trajectories, widths, depths and lengths.</p> <p>(b) Provide updated Shapefiles that include the matters discussed in (a) above.</p> <p>(c) Demonstrate that the proposed subterranean deviated wells comply with PS (3)(d) for RO1.</p>
9.	<p><u>Issue:</u></p> <p>The fourth dot point under Gathering Line Construction in Section 3.3.3 of the report concerning ROWs is not consistent with the areas marked on maps provided in Appendix 3.</p> <p><u>Actions:</u></p> <p>Update relevant maps to show the area of impact for all proposed ROWs, not just as a line but as a defined volumetric area.</p>
10.	<p><u>Issue:</u></p> <p>Section 3.4.2 of the report:</p> <ul style="list-style-type: none"> • indicates that infrastructure is stated to remain in place for the life of the gas fields which is 10 years whereas Section 3.3.2 of the report details that wells are designed for a 30-year life. This includes future service connections. There is a significant difference in these timeframes. This might lead to a degree of uncertainty to how long the proposed activities are intended to be operational, as well as if there are future activities planned for the properties after the proposed activities are decommissioned • does not provide any details concerning the operation of the 12 subterranean deviated wells. <p><u>Actions:</u></p> <p>(a) Confirm the timeframes of all proposed activities to avoid any uncertainty to the length of timeframes of activities impacting the land the subject of the application, and if the Applicant has any future activities planned for both properties further to those the detailed in the application.</p> <p>(b) Provide narrative on the operation of the subterranean deviated wells.</p>
11.	<p><u>Issue:</u></p> <p>Section 3.5.2 of the report mentions the establishment of vegetation for grazing post rehabilitation, however, no grazing activities have been identified on either property.</p> <p><u>Actions:</u></p> <p>Confirm areas proposed for the establishment of vegetation for grazing, and detail how this is consistent with returning the land the subject of the application back to its former use as land used for dryland cropping.</p>
12.	<p><u>Issue:</u></p>

	<p>Table 4-2 in Section 4.4 of the report details that the percentage of priority agricultural land use (PALU) on parcels impacted during construction on Property 1 is 2.7%. This exceeds the threshold of 2% detailed in PS (3)(a)(ii)(A) for RO1.</p> <p>Note that the area of impact includes land used during both construction and operation.</p> <p><u>Actions:</u></p> <p>Confirm how the extent of land impacted, as advised at 2.7%, is consistent with, and satisfies PS (3)(a)(ii)(A) of RO1.</p>
13.	<p><u>Issue:</u></p> <p>Table 4-36 in Section 4.4 of the report details that the percentage of PALU on parcels impacted during construction on Property 2 is 2.23%. This exceeds the threshold of 2% detailed in PS (3)(a)(ii)(A) for RO1. Note that the area of impact includes land used during both construction and operation.</p> <p><u>Actions:</u></p> <p>Confirm how the extent of land impacted, as advised at 2.23%, is consistent with, and meets PS (3)(a)(ii)(A) for RO1.</p>
14.	<p><u>Issue:</u></p> <p>Table 4-3 in Section 4.4 details a number of high point vents, low point drains, extra work areas, valves and future service connections that is not consistent with Section 3.2 or with maps provided in Appendix 3.</p> <p><u>Actions:</u></p> <p>Update Table 4-3 to be consistent with Section 3.2 and the maps provided in Appendix 3.</p>
15.	<p><u>Issue:</u></p> <p>Section 4.4.1 of the report details that there will be an interruption of PALU activities during the construction period.</p> <p><u>Actions:</u></p> <p>(a) Confirm how the interruption of PALU is consistent with the guidance material provided on page 13 of in the RPI Act Statutory Guideline 02/14 Carrying out resource activities in a Priority Agricultural Area which states that coexistence may be achieved where the outcome '<i>will not cause agricultural activity to pause then restart in order to fit in with resource development schedules</i>' (Page 13).</p> <p>(b) Confirm that the development schedule aligns with periods of fallow to avoid interruptions to PALU.</p>
16.	<p><u>Issue:</u></p> <p>Section 4.4.2 of the report details that impacts to land used for a PALU due to construction activities can last five years with yields reduced by the order of 10-15% initially, to nil% by year five. No detailed modelling is provided to substantiate that the extent of the reduction in yields will not exceed the threshold of 2% detailed in PS (3)(a)(ii)(B) for RO1.</p> <p><u>Actions:</u></p> <p>(a) Detail those areas of lots that are likely to be affected by losses in yields for the five years after construction activities. This should detail the baseline yield per</p>

	<p>the lots impacted for both properties, the percentage of area affected, and percentage of yield lost per lot for each year through to year five.</p> <p>(b) Detail any strategy to use additional inputs on the balance of cropped areas to offset the losses as per the item above (for example, use of fertiliser on the balance of cropped areas during the rehabilitation time).</p>
17.	<p><u>Issue:</u></p> <p>Section 4.4.3 of the report details that crops have been re-established on the Theten property following the rehabilitation of land used for a ROW.</p> <p><u>Actions:</u></p> <p>Confirm the area in Plate 4-1 that has undergone rehabilitation and is also used for cropping, including any baseline study concerning the return of this land back to the equivalent cropping yields of land cropped that was not included in the rehabilitation area.</p>
18.	<p><u>Issue:</u></p> <p>Table 4-4 of the report does not include the subterranean deviated wells as detailed in Figure 6-1 and Appendix 3.</p> <p><u>Actions:</u></p> <p>Update Table 4-4 to include the 12 subterranean deviated wells as detailed in Figure 6-1 and Appendix 3.</p>
19.	<p><u>Issue:</u></p> <p>Section 4.4.5 of the report details that a range of management strategies including the use of fertilizers will be implemented.</p> <p><u>Actions:</u></p> <p>Confirm whether the use of additional inputs will be required to maintain the pre-development productive capacity of impacted land.</p>
20.	<p><u>Issue:</u></p> <p>Section 4.4.6 of the report does not cover the impacts of proposed activities on overland flow to adjacent properties during rainfall and flood conditions.</p> <p><u>Actions:</u></p> <p>Confirm how impacts to overland flow will be managed to prevent diminished volumes of water from accessing areas used for a PALU, particular those on downstream properties that are dependent on the flow of water from rainfall and flood conditions.</p>
21.	<p><u>Issue:</u></p> <p>Section 8.4 of the report details the monitoring and management of subsidence.</p> <p><u>Actions:</u></p> <p>Confirm that the data sources detailed provide the most frequent, accurate and scalable data currently available. If not, discuss why such data is not proposed to inform the monitoring and management of subsidence.</p>
22.	<p><u>Issue:</u></p> <p>The maps provided in Appendix 3 to the report do not:</p> <ul style="list-style-type: none"> • do not identify the proposed laydown assessment areas • identify the proposed locations of buried gathering lines.

	<p><u>Actions:</u></p> <p>Update maps in Appendix 3 to identify</p> <p>(a) those areas proposed to be utilised as laydown assessment areas</p> <p>(b) the proposed locations of buried gathering lines.</p>
23.	<p><u>Issue:</u></p> <p>Appendix 9 (Commercial in Confidence) to the report details discussions on restricted land constraints, however this is not raised elsewhere in the application.</p> <p><u>Actions:</u></p> <p>(a) Provide mapping to show that the proposed activities will not overlay any areas of restricted land.</p> <p>(b) Confirm that the impact of the proposed activities will not overlay any areas of restricted land.</p>