



Our ref: OUT21/4776; 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

5 October 2021

Dear Mr Hall

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 Coal Seam Gas Wells and Gathering Lines associated with the Surat Gas Project. The application seeks approval for resource activities: petroleum and gas on 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 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.

Project Wells and Gathering Lines

Site Details

Street address Daandine-Nandi Rd, Ranges Bridge 4405; Moonie Highway, Nandi 4405; 1662 Daandine-Nandi Rd, Nandi 4405; 194 Hoadleys 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.dsdilgp.qld.gov.au
ABN 25 166 523 889

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
Local government area	Western Downs Regional Council
Area of regional interest	PAA and SCA
Proposed area of to be disturbed	49 ha of PAA 47 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.

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.statedevelopment.qld.gov.au/planning-issues-and-interests/areas-of-regional-interest#helpful-information>

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', is centered below the text 'Yours sincerely'.

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>The proposed area of disturbance of the strategic cropping area (SCA) is stated as being:</p> <ul style="list-style-type: none">• 47 ha in the Assessment Application Form• 44 ha at Section 5.3 (page 58) of the report• 46.12 ha in Table 5-1, Section 5.3 of the report during the construction phase. <p>Additionally, numbers in Table 5-1 are not presented with a consistent number of significant figures and contain rounding errors.</p> <p><u>Actions:</u></p> <p>Clarify the proposed total area of disturbance of the SCL for both temporary and permanent impacts and ensure that all areas and percentage values are presented with an accuracy and rounding of two decimal places.</p>
2.	<p><u>Issue:</u></p> <p>The GIS data provided in support of the application is insufficient, and more data is required to facilitate the calculation and checking of the proposed disturbance areas on Property 1 and on Property 2.</p> <p><u>Actions:</u></p> <p>Provide Shapefiles that accurately show the locations and extents of the disturbance areas of all proposed construction and operational activities to be undertaken (including deviated wells as detailed in Section 6 of the Coal Seam Gas (CSG) Wells and Gathering Interests Development Approval (No.1) (report) and Appendix 3). This is to include all temporary and permanent impact areas</p>
3.	<p><u>Issue:</u></p> <p>Appendix 3 of the report details that the field layouts for Property 1 and Property 2 are indicative only at this stage. If the location of activities is to change at a later stage, the assessment of the application might not be relevant or appropriate.</p> <p><u>Actions:</u></p> <p>Confirm the final field layouts for Property 1 and Property 2 (and provide Shapefiles as discussed in the Item 2 above).</p>
4.	<p><u>Issue:</u></p> <p>Section 1.6.3 refers to the Area Wide Planning (AWP) program developed by Arrow. The AWP is also referred to in Section 34.5 Measures to Minimise Impacts to PALU of the report.</p> <p><u>Actions:</u></p> <p>Confirm whether the landowner has been involved in the AWP program, as well as any neighbouring landowners, and if so, advise of the details and outcomes to support coexistence.</p>

5.	<p><u>Issue:</u> Table 3-1 Definition of activities in Section 3.1:</p> <ul style="list-style-type: none"> • excludes any details relating to the drilling of deviated wells, such as the locations and the trajectories and relevant well head installations • includes laydown assessment areas, however there are no laydown areas indicated on any of the maps or schematics, or information provided as to size and duration of these areas. <p>Only activities included in this table of activity and supporting spatial information will be considered as an approved activity should the application be approved</p> <p><u>Actions:</u></p> <ol style="list-style-type: none"> a) Amend Table 3-1 to include details relating to deviated wells and to the size and duration of laydown assessment areas. b) Provide updated plans that show the location and extent to proposed laydown assessment areas.
6.	<p><u>Issue:</u> Section 3.3.2 and Section 4.4.6 of the report refer to approvals under the <i>Environment Protection and Biodiversity Conservation Act 1999</i> (EPBC Act). These are not included in Section 1.7 of the report which outlines the necessary approvals that Arrow already hold.</p> <p><u>Actions:</u></p> <ol style="list-style-type: none"> a) Amend Section 1.7 of the report to include the approvals held under the EPBC Act. b) Provide information relating to approvals granted under the EBPC Act including any relevant conditions.
7.	<p><u>Issue:</u> Section 3.2 of the report includes well pads as one of the proposed activities. The size of each well pad is provided at Appendix 3, which states that '<i>The locations of above ground infrastructure is indicative only at this stage and once an engineering review has been undertaken they will be re-located to more strategic locations to minimise impacts to farming activities.</i>' This suggests that negotiations with the landowner have not progressed to a point where details are agreed. However, final locations and extents are required for assessing and deciding the application.</p> <p><u>Actions:</u> Confirm and demonstrate that the landowner is aware of the proposed location of the activities or detail how the location is to be finalised.</p>
8.	<p><u>Issue:</u> Section 3.3.2 Wells of the report states that '<i>The well sites ...have been located on the fringes of Intensively Farmed Land (IFL), in corners of paddocks, and near access tracks, right of ways, easements and road reserves, in areas that minimise the impact on farming. These well locations were determined following consultation with the landholder ...</i>'(page 21).</p> <p><u>Actions:</u> Confirm the landowner is aware of the proposed location of the activities.</p>

9.	<p><u>Issue:</u></p> <p>Section 3.3 .3 Gathering Lines of the report states that ‘<i>The embedment material surrounding the pipe.....is screened so that the max particle size (is) less than 20mm.</i>’ (page 24).</p> <p><u>Actions:</u></p> <p>Confirm if there will be a need to import bedding material if the spoil material from the trench cannot be screened to the required size.</p>
10.	<p><u>Issue:</u></p> <p>Section 3.4.1 Operational activities states that ‘<i>Given that the pipelines and associated cables of the gathering infrastructure will be buried to a minimum depth of 900mm, land users are able to resume previous land use activities on top of the gathering lines provided that the use does not include excavation activities</i>’ (page 28).</p> <p><u>Actions:</u></p> <p>Confirm that all buried infrastructure:</p> <ul style="list-style-type: none"> a) will be subject to ‘Dial before you Dig’ requirements b) will not constrain, restrict or prevent the ongoing conduct on the property including the future location of infrastructure including but not limited to bores and ring tanks.
11.	<p><u>Issue:</u></p> <p>The information provided in support of the application regarding remediation, restoration, erosion, sediment control and subsidence monitoring is of limited detail. Section 3.5.1 of the report states that:</p> <ul style="list-style-type: none"> • the decommissioning of the pipeline will include ‘<i>Backfill, compaction and rehabilitation of all excavations in accordance with the Environmental Authority and the Environmental Management Plan.</i>’ (page 34 • ‘Following relinquishment of the relevant authority, the Government will assume the liability for the de-commissioned infrastructure.’ <p>Section 8.3 Reinstatement and rehabilitation of the report references the Environmental Authority as the guideline for reinstatement and rehabilitation measures.</p> <p>The measures in these sections as well as those referenced under the Soils Report at Appendix 8 are not considered adequately detailed to meet the relevant criteria detailed under the <i>Regional Planning Interests Act 2014</i> (RPI Act) and the RPI Regulation 2014.</p> <p><u>Actions:</u></p> <p>Provide the following detailed plans in a stand-alone format to cover all proposed works:</p> <ul style="list-style-type: none"> a) Erosion and sediment control plan (ESCP), including details of how stripped/excavated soils will be managed during excavation, stockpiling and replacement/stabilisation b) Subsidence management plan (SMP) – including plans/actions to monitor/remediate subsidence in both pipeline and void areas c) Restoration Management Plan (RMP) that demonstrates that any disturbance considered temporary is in accordance with RPI Act Statutory Guideline 09/14 How to determine if an activity has a permanent impact on Strategic Cropping Land (RPI Guideline 09/14).

12.	<p><u>Issue:</u></p> <p>Section 3.5.1 of the report refers to the decommissioning of the infrastructure and states that ‘<i>Following relinquishment of the relevant authority, the Government will assume the liability for the de-commissioned infrastructure</i>’ (page 34).</p> <p>This statement is not technically correct. The Environmental Authority and the Petroleum Lease will be surrendered not relinquished. Further, buried pipelines that remain in the ground, despite the surrender, remain the property of the previous authority holder (see section 540 of the <i>Petroleum and Gas (Production and Safety) Act 2004</i>).</p> <p><u>Actions:</u></p> <ul style="list-style-type: none"> a) Amend the report to reflect the current legislation framework. b) Confirm whether it is intended to transfer any of the decommissioned assets pre surrender to the landowner.
13.	<p><u>Issue:</u></p> <p>Section 4.4.6 of the report refers to overland flow and CSG activity induced subsidence but does not provide information relating to potential mitigation measures or discussions with the landowner regarding potential impacts of subsidence.</p> <p><u>Actions:</u></p> <ul style="list-style-type: none"> a) Confirm that any change in slope, as a result of subsidence, is not material to the landowner’s operations. b) Advise whether the landowner has been advised of the potential impacts of subsidence on their property and farming operations.
14.	<p><u>Issue:</u></p> <p>Section 5.3 of the report includes the statement ‘<i>The majority of impacts to SCL are temporary in nature, (particularly) the wellpads ...</i>’ (page 60). This statement appears to suggest that there will be areas of permanent SCL impact, but there is no discussion of areas of permanent impact on SCL in the report.</p> <p><u>Actions:</u></p> <p>Clarify any areas of permanent impact on SCL</p>
15.	<p><u>Issue:</u></p> <p>Section 6 of the report and Appendix 3 indicate that deviated wells the subject of the application extend beyond the boundaries of Property 1 and Property 2 into land not the subject of this application. It is not clear if these are considered to be exempt resource activities.</p> <p><u>Actions:</u></p> <ul style="list-style-type: none"> a) Confirm if the resource activities that are shown beyond the boundaries of Property 1 and Property 2 are considered to be exempt resource activities and if so, the basis of any exemptions. b) If these are considered to be exempt resource activities (under section 22 of the <i>Regional Planning Act 2014</i>), confirm that conduct and compensation agreements or voluntary written agreements apply with the landholders of the properties on which the well pads and in-part the location of the subject deviated wells are located and provide relevant extracts of such agreements (To be identified as Confidential).

16.	<p><u>Issue:</u></p> <p>Section 6 of the report states that ‘<i>Deviated Well trajectories are considered preliminary activities ...</i>’ (page 61).</p> <p>A view that directional drilling is a preliminary activity is not consistent with the land access framework under the <i>Mineral and Energy Resources (Common Provisions) Act 2014</i> (MERC Act,) as any consideration of whether directional drilling is an advanced activity or a preliminary activity must be determined on a case-by-case basis and must have regard to the impact (if any) of the activity on the landowner’s business or land use activities.</p> <p>The report further states that ‘<i>... wells will enter the land at a subterranean point and be drilled from neighbouring properties ... This is in addition to the trajectories from wells proposed to be located on the subject land</i>’ (page 61).</p> <p><u>Actions:</u></p> <ul style="list-style-type: none"> a) Amend the report to exclude reference to directional well trajectories as being preliminary activities. b) Demonstrate that the impacts of each well on the landowner’s property has been considered on a case-by-case basis and that the landowner has been consulted and is aware of the impacts to current and future farming operations.
17.	<p><u>Issue:</u></p> <p>Section 8.3 of the report states ‘<i>The construction footprint of the land will be returned to its previous general state and use once construction is completed ...</i>’ (page 67). However, other sections of the report suggest all impacts will be temporary in nature and disturbed areas will be rehabilitated to mirror their pre-disturbance condition.</p> <p><u>Actions:</u></p> <p>Clarify what is meant by ‘<i>previous general state</i>’, with reference to RPI Guideline 09/14 for guidance on the requirements for returning land to its pre-activity condition and productive capacity.</p>
18.	<p><u>Issue:</u></p> <p>The Soils Report at Appendix 8 of the report is a desktop study, based on broad scale soil mapping information and does not contain detailed information to inform the above management plans or to accurately inform soil disturbance/management that may be required e.g. sodic soils. Additionally, not all available desktop information has been considered by this assessment e.g. publicly available departmental soil sites/descriptions.</p> <p>An appropriately detailed soil survey is required to inform the above management plans.</p> <p><u>Actions:</u></p> <p>Undertake a detailed soil survey of appropriate detail and scale as per:</p> <ul style="list-style-type: none"> i) Guidelines for Soil Survey along Linear Features (Soil Science Australia 2015) ii) Queensland Soil and Land Resource Survey Information Guideline (Department of Resources 2021).
19.	<p><u>Issue:</u></p> <p>Section 2.4.3 Soils of the Arrow CSG Water Management Plan at Appendix 10 of the report states that ‘<i>Soil types across the SGP area have been classified under the Australian Soil Classification System.</i>’ However, none of the descriptions following this statement contain an Australian Soil Classification (ASC) e.g.</p>

	<p>'Cracking Clays and Gilgai Clays' would be Vertosols and 'Uniform Non-cracking Clays' would be Dermosols. This is especially relevant where 'Texture Contrast Soils' could be any one of three distinctly different Australian Soil Classifications.</p> <p><u>Actions:</u></p> <p>Include a full ASC in any soil description listed/discussed.</p>
20.	<p><u>Issue:</u></p> <p>The Example Baseline Report at Appendix 11 of the report contains an example of a baseline survey to monitor (among other things) subsidence over Lot 1 DY931 and Lot 1 RL2451. It is unclear whether this will be undertaken across all other disturbed lots.</p> <p><u>Actions:</u></p> <p>a) Clarify whether a baseline survey will be undertaken on all affected lots prior to any proposed disturbance, including any dewatered/void areas that extend outside the boundaries of subject lots that require monitoring for subsidence.</p> <p>b) Include details of this survey and its methodology in an SMP.</p>
21.	<p><u>Issue:</u></p> <p>In response to Required Outcome 2 Part (1)(b), Table 12-1 at Section 12.1 of the report states that '<i>Information about the selection of the layout is provided in Section 7</i>' (page 88).</p> <p>In response to Required Outcome 3, Table 12-5 at Section 12.5 of the report states that '<i>As discussed in Section 7.1, the current layout provides for the least impacts to landholders in the region and reduces the operational footprint as much as possible.</i>' (page 97)</p> <p>Section 7 provides an overview of the process of Landholder Consultation not activity location selection.</p> <p><u>Actions:</u></p> <p>Provide information to demonstrate:</p> <p>a) that other locations for the activities have been considered</p> <p>b) the factors that led to the locations being considered the preferred locations</p> <p>c) that the landowner has been consulted regarding alternative locations for the activities.</p>