

From: [Jon Thomas](#)
To: [Morag Elliott](#)
Cc: [Warwick Squire](#)
Subject: RE: New RIDA application : RPI21/028 Arrow - Wells and Gathering : UPDATED Appendices 1-7 (email 2 of 2)
Date: Friday, 1 October 2021 4:15:45 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[20211001- Arrow RIDA RPI121_028 CSG Wells_1 requirement response DSDILGP.pdf](#)
Importance: High

Good afternoon Morag,

As discussed in the week, please find attached the GasFields Commission's response to Arrows RIDA application RPI121/028.

Please do not hesitate to contact me should you have any queries.

Regards,

Jon Thomas

GFCQ Director of Policy and Projects

jon.thomas@gfcq.org.au | Sch. 4(4)(6) -
Disclosing personal
information | www.gfcq.org.au

From: Morag Elliott <Morag.Elliott@dsdilgp.qld.gov.au>
Sent: Monday, 27 September 2021 3:07 PM
To: Jon Thomas <Jon.Thomas@gfcq.org.au>
Subject: New RIDA application : RPI21/028 Arrow - Wells and Gathering : UPDATED Appendices 1-7 (email 2 of 2)

Good afternoon

Further to my email below, please see attached UPDATED Appendices 1 -7, as well as the Shapefiles.

Any queries, please give me a call – and please acknowledge receipt of all documents.

Morag Elliott
Manager

Development Assessment Division , Planning Group
Department of State Development,
Infrastructure, Local Government and Planning

P 07 3452 7653

Level 13, 1 William Street, Brisbane QLD 4000
PO Box 15009 CITY EAST QLD 4002

I acknowledge the traditional custodians of the lands and waters of Queensland. I offer my respect to elders past, present and emerging as we work towards a just, equitable and reconciled Australia.

From: Morag Elliott

Sent: Thursday, 23 September 2021 4:40 PM

To: 'DAF RPI Referral' <DAFFRPI@daf.qld.gov.au>; 'DoR Planning' <dorplanning@resources.qld.gov.au>; 'waterservices.toowoomba@rdmw.qld.gov.au' <waterservices.toowoomba@rdmw.qld.gov.au>

Cc: Ross.Savage <Ross.Savage@daf.qld.gov.au>; 'GILMOUR Adam' <Adam.Gilmour@resources.qld.gov.au>; 'MORAN Martin' <Martin.Moran@rdmw.qld.gov.au>

Subject: New RIDA application : RPI21/028 Arrow - Wells and Gathering : assessment report and appendices 8-11

Good afternoon

Further to my previous emails, please find attached updated supporting report and Appendixes 8-11 which supersede previous documents.

The applicant has advised that the specific changes to the document are as follows:

- page 61 - added an additional sentence (last sentence on the page) to provide further clarity and reduce confusion about the deviated well paths;
- page 62 - replaced Figure 6-1 with an updated version showing only those well paths entering the subject properties from neighbouring lots to reduce confusion;
- page 149 - changed the number of well trajectories located on property 2 from 8 to 10 to correct this error and also included the total size of the proposed EWAs located on property 2 for clarity; and
- pages 154- 155 - added two maps to show the proposed infrastructure on the entirety of property 2.

Please base your assessment on the updated supporting report.

If you have any queries please give me a call.

Morag Elliott
Manager

Development Assessment Division , Planning Group
Department of State Development,
Infrastructure, Local Government and Planning

P 07 3452 7653

Level 13, 1 William Street, Brisbane QLD 4000
PO Box 15009 CITY EAST QLD 4002

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RTI RELEASE

11 May 2021

Morag Elliott
Department of State Development, Infrastructure, Local Government and Planning
1 William Street Brisbane
QLD 4000

Via email

Dear Morag,

I am writing to you in relation to the Regional Interest Development Approval application lodged by Arrow Energy (the Applicant), reference "RPI21/028 - Coal Seam Gas (CSG) Wells and Gathering. The GasFields Commission (the Commission) has conducted a preliminary review of the application and supporting documentation.

To enable the Commission to provide advice to the Chief Executive pursuant to section 46 of the *Regional Planning Interest Act 2014* (RPI Act), the Commission is requesting further information from the Applicant. The attached table provides a summary of the requested additional information.

Under the *Gasfields Commission Act 2103*, the Commission has statutory function of advising the Chief Executive under the RPI Act about the ability of landholders, regional communities and the resources industry to coexist in areas of regional interest.

The preliminary review of the application and subsequent request for additional information has been conducted with this function in mind. It is anticipated that the additional information will inform the Commission to enable it to provide fulsome advice to the Chief Executive relating to matters of coexistence.

If you would like any additional information, please contact me on Sch. 4(4)(6) - Disclosing personal information in the first instance.

Yours sincerely

Jon Thomas
Director Policy and Projects

GasFields Commission

Attachment 1 – Request for information ref RPI21/028

Item	Section and page	Applicant	Request
1	1.6.2 - page 9	Arrow refers to coexistence and the creation of 12 commitments to coexistence in the Surat Basin in 2012.	Can the Applicant provide details to demonstrate how these commitments are being implemented? Can the applicant confirm and detail if these commitments have been updated since 2012 to remain contemporary as almost 10 years have passed since they were created?
2	1.6.2 - page 9	In the Surat Basin, Arrow's innovation support coexistence with land users, optimise gas production, reduce costs and minimise impacts.	Can the Applicant provide details of what these "innovations" are, how they have been implemented and what have been the benefits?
3	1.6.2 - page 10	Arrow has developed a draft Construction and Operations simultaneous operations matrix (SIMOPS).	Can the Applicant provide a copy of the draft SIMOPS? Has the SIMOPS been tested in the field and if so, what were the outcomes?
4	1.6.3 - page 11	Area Wide Planning (AWP)	Can the Applicant demonstrate that the land owner subject to this RIDA application has been involved in the AWP process? Have the neighbouring landholders subject to this RIDA application been involved in the AWP process? What were the outcomes to support coexistence?
5	1.7 - page 12	Existing Authorities	The Applicant makes reference to approvals under the EPBC Act in the RIDA application document (e.g., page 20 and 54). Can the Applicant provide summaries and condition of its approvals granted under the EBPC Act?
6	2.1 - page 13	Parcels and proposed activity: The table lists the details of 12 Lot and Plan parcels, however the maps and Appendix 3 refer to 13 parcels. It appears that 2RP85916 is missing from the table 2.1.	Can the applicant confirm whether parcel 2RP85916 is subject to this RIDA application?
7	2.2 - page 15	Table 2.2 - Property details	Can the applicant confirm that the individual parcels are owned by the same person and who that person is?
8	2.3.6 - page 17	Reference is made to a Traffic Management Plan.	Can the applicant provide of copy of the Traffic Management Plan? Impacts of road users is a hot topic in the community and influences the coexistence of the Applicant with the broader community.
9	3.1 - page 18	Table 3.1 - Definitions of activities. The table does not include any details regarding the drilling of wells or the installation of well heads.	Can the applicant provide details or explain why the drilling of wells and well head installation is not included?
10	3.1 - page 18	Table 3.1 Definition of activities. The table includes laydown assessment areas, however there are no laydown areas indicated on any of the maps or schematics.	Can the Applicant confirm if laydown areas will be required and if so where are the laydown locations? Can the Applicant provide details of size and duration of the laydown areas?

11	3.3.2 - page 20	<p>Sizes of each of the well pads subject to this application is provided at Appendix 3.</p> <p>Appendix 3 states “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.</p>	<p>This suggests that negotiations with the land owner have not progressed to a point where final field layout details are agreed. This impacts the ability of the assessing agencies to complete the assessments with the degree of accuracy required.</p> <p>Further if infrastructure needs to be relocated then that will result in an amendment to the RIDA and further assessment.</p> <p>The uncertain of the infrastructure locations and resulting iterative approach of the assessment/approval process is contrary to the intent of the RIDA process.</p> <p>Can the applicant confirm and demonstrate that it has consulted and agreed with the land owner the locations of infrastructure?</p> <p>Can the Applicant detail how it intends to finalise the location of infrastructure to remove the uncertainty for the land owner and the assessing agencies?</p>
12	3.3.2 - page 21	<p>The well siteshave been located on the fringes of IFL, in corners of paddocks....to minimise impacts on farming. These well locations were determined following consultation with the landholder....”</p>	<p>Can the Applicant confirm that the well site locations have been confirmed and agreed to by the land owner?</p> <p>Can the Applicant confirm that they have engaged with neighbouring land owners in relation to the placement of wells on boundary fence lines?</p> <p>Coexistence extends beyond the relationship between the land owner and the Applicant and needs to consider neighbouring landholders.</p>
13	3.3.3 - page 24	<p>The embedment material surrounding the pipe.....is screened so that the max particle size (is) less than 20mm.</p>	<p>Can the Applicant confirm if there will be a need to import bedding material if the spoil material from the trench can not be screened to the required size?</p>
14	3.3.3 - page 25	<p>Minimising subsidence post construction.</p>	<p>Can the Applicant confirm that this is a condition of the EA?</p>
15	3.4.1 - page 28	<p>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.</p>	<p>Can the Applicant confirm that all buried infrastructure will be subject to “Dial before you Dig” requirements?</p>
16	3.5.1 - page 34	<p>Decommissioning of infrastructure:</p> <p>Following the relinquishment of relevant authority, the Government will assume the liability for the de-commissioned infrastructure</p>	<p>This statement is not technically correct. The EA and PL 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>. The Applicant will need to amend this application to reflect the current legislation framework.</p>

17	3.5.1 - page 34	Decommissioning of infrastructure:	Does the Applicant intend to transfer any of the decommissioned assets pre surrender to the landholder?
18	4.4.6 - page 54	Overland flow and CSG activity induced subsidence.	Can the Applicant confirm that the predicted change in slope as a result of subsidence is not material to the land owner's operations subject to this application? Is the land owner aware of the potential impacts of subsidence on their property and farming operations?
19	4.4.6 - page 54	Overland flow and CSG activity induced subsidence.	What are the mitigation strategies if the modelling is not correct, and subsidence does have a material impact? Has this been considered as part of this application?
20	4.5 - page 56	Measures to minimise impacts to PALU - AWP process.	Can the Applicant provide details of the AWP process that has been undertaken with the land owner and the land owner's immediate neighbours? If the AWP process has been followed what is constraining the land owner from entering into a voluntary agreement?
21	6 - page 61	Deviated Well trajectories are considered preliminary activities...	The statement made by the applicant is contrary to advice from the GasFields Commission. A view that directional drilling is a preliminary activity is not consistent with the land access framework under the 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 landholder's business or land use activities. Can the Applicant demonstrate that it has considered the impacts of each well on the land owner's property on a case by case basis, including land owner consultation?
22	6 - page 61	This is in addition to the trajectories from wells proposed to be located on the subject land.	Can the Applicant demonstrate that directional wells will not have an impact on a case-by-case basis (as referenced above)? Can the Applicant demonstrate that it has consulted with the land owner?
23	12.1 - page 77	Table 12.1 PAA Assessment Criteria - Required Outcome 1 - Part vii (page 84). The activity is not likely to have an impact on land owned by a person other than the applicant or the land owner.....	Can the Applicant demonstrate that it has consulted with neighbouring property owners about the proposed activities subject to this application?
24	12.1 - page 85	Table 12.2 PAA Assessment Criteria - Required Outcome 2 Part (1)(b) page 88. "Information about the selection of the layout is provided in Section 7"	Can the Applicant demonstrate where it has consulted with the land owner and neighbours to consider alternative locations for activities to occur?

		Section 7 provides an overview of the process of Landholder Consultation not activity location selection.	<p>Can the Applicant demonstrate that it considered other locations for activity to occur?</p> <p>What are the factors that led the Applicant to select the locations subject to this application being considered as the most favourable?</p>
25	12.2 - page 97	<p>Table 12.5 - SCA Assessment criteria - Required outcomes 3.</p> <p>“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.”</p> <p>Section 7 provides an overview of the process of Landholder Consultation not activity location selection.</p>	<p>Can the Applicant demonstrate where it has consulted with the land owner and neighbours to consider alternative locations for activities to occur?</p> <p>Can the Applicant demonstrate that it considered other locations for activity to occur?</p> <p>What are the factors that led the Applicant to select the locations subject to this application being considered as the most favourable?</p>

RTI RELEASE - DSDILGP

From: [Jon Thomas](#)
To: [Morag ELLIOTT](#)
Cc: [Regional Planning Interests Act](#); [GFCO Enquiries](#); [Caitlin Barraclough](#); [Janet Brown](#)
Subject: RPI22/004 Arrow – Kupunn Springvale CSG Deviated Well Paths
Date: Thursday, 16 March 2023 4:04:30 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
Importance: High

Good afternoon Morag,

With respect to a recent conversation we had and following review of the initial application and supporting documentation related to RPI22/004 Arrow – Kupunn Springvale CSG Deviated Well Paths, the GasFields Commission strongly recommends that the Department of State Development Infrastructure Local Government and Planning (DSDILGP) seek the advice from the Office of Groundwater Impact Assessment (OGIA) in relation to the information supplied by the Applicant of RPI22/004 regarding farm scale CSG-induced subsidence as a matter of priority.

The applicant, Arrow Energy, refers to work undertaken by OGIA in their application, including statements in their response to the requirement notice such as:

“Predictive modelling done by OGIA indicates that subsidence is expected to result in relatively uniform changes in elevation and slope – and not in potholing or sink holes. The model indicates that the maximum all-time change in ground slope from coal-seam gas activity in most areas of the Condamine Alluvium region is less than 0.001% (10 mm/km) but can be up to 0.004% (4mm/km) in some areas.”

“As almost all the existing slope in this area is greater than 0.03% (300mm/km), a change of up to 0.004% from coal seam gas production is not expected to significantly impact prime agricultural land use. Natural or “background” ground movement is in the order of ±25 mm/year (UWIR 2021, p12).”

The GasFields Commission acknowledges that OGIA are best placed to verify whether the use of their research findings are fit for purpose in terms of responding the requirements of the RIDA assessment process. Additionally, OGIA’s resources include suitably qualified individuals whom have the technical capability to reliably interpret the CSG-induced subsidence related information contained within the application and response to the requirement notice.

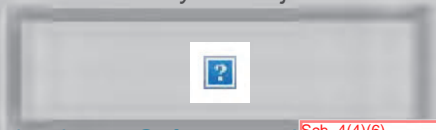
The matter of CSG-induced subsidence is a significant concern for landholders and has definite coexistence implications. In response to these concerns, the GasFields Commission has made recommendations to the State Government to enhance the regulatory framework that manages the impacts of CSG-induced subsidence. Further, the GasFields Commission has been leading a research project into the economic impacts on farming operations as a consequence of CSG-induced subsidence. As a result of this work, GasFields Commission has formed the view that it recommends DSDILGP seek additional information from OGIA to valid the supporting statements that Arrow Energy has made in its RPI22/004 application. The GasFields Commission makes the recommendation to DSDILGP under its functions as an advice agency under the *Regional Planning Interest Act 2014* and the *Gasfields Commission Act 2013*.

Please do not hesitate to contact me should you require any additional information.


Regards

Jon Thomas

Director - Policy and Projects



jon.thomas@gfcq.org.au | Sch. 4(4)(6) - Disclosing personal information | www.gfcq.org.au



Managing and improving the sustainable coexistence of landholders, regional communities and the onshore gas industry in Queensland

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RTI RELEASE - DSDILGP

From: [Jon Thomas](#)
To: [Morag ELLIOTT](#)
Cc: [Caitlin Barraclough](#); [Janet Brown](#)
Subject: SOURCE: RE: DRAFT Further requirement notice : RPI22/004 Arrow - Kupunn Springvale
Date: Monday, 20 February 2023 4:12:12 PM
Attachments: [image003.png](#)
[image004.png](#)

Good afternoon Morag,

As discussed this morning and again this afternoon, the Commission does not have anything to add to the further requirement notice (as attached in your previous email).

There were some items that the Commission was seeking some additional information on, however on reading of the further requirement notice it would appear that the content will be picked up in requests made by either Resources and or DAF.

Thanks for the opportunity to provide input.

Regards

Jon Thomas

GFCQ Director - Policy and Projects

jon.thomas@gfcq.org.au | Sch. 4(4)(6) -
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From: Morag ELLIOTT <Morag.Elliott@dsdilgp.qld.gov.au>

Sent: Thursday, 16 February 2023 3:16 PM

To: Jon Thomas <Jon.Thomas@gfcq.org.au>

Subject: DRAFT Further requirement notice : RPI22/004 Arrow - Kupunn Springvale

Hi Jon

As discussed earlier, please see attached DRAFT further requirement notice for the above mentioned application.

Morag Elliott
Manager

Development Assessment Division , Planning Group
Department of State Development,
Infrastructure, Local Government and Planning

P 07 3452 7653

Level 13, 1 William Street, Brisbane QLD 4000
PO Box 15009 CITY EAST QLD 4002

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From: [Jon Thomas](#)
To: [Morag ELLIOTT](#)
Subject: SOURCE: RE: DRAFT Further requirement notice : RPI22/004 Arrow - Kupunn Springvale
Date: Friday, 17 February 2023 12:25:28 PM
Attachments: [image003.png](#)
[image004.png](#)

Hello Morag,

Thank you for sending this through. Having gone through the requirement notice I am of the view that the additional information that we were looking for may be directly or indirectly covered off in your document. I will however defer to the team on Monday (I am flying solo today) to double check and then come back to you.

I hope that is okay, however if you have any issues or require any further information please sing out.

Happy Friday and thanks again.

Regards.

Jon Thomas

GFCQ Director - Policy and Projects

jon.thomas@gfcq.org.au | Sch. 4(4)(6) - Disclosing personal information | www.gfcq.org.au

From: Morag ELLIOTT <Morag.Elliott@dsdilgp.qld.gov.au>

Sent: Thursday, 16 February 2023 3:16 PM

To: Jon Thomas <Jon.Thomas@gfcq.org.au>

Subject: DRAFT Further requirement notice : RPI22/004 Arrow - Kupunn Springvale

Hi Jon

As discussed earlier, please see attached DRAFT further requirement notice for the above mentioned application.

Morag Elliott
Manager

Development Assessment Division , Planning Group
Department of State Development,
Infrastructure, Local Government and Planning

P 07 3452 7653

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From: [Jon Thomas](#)
To: [Morag ELLIOTT](#); [Ross.Savage](#); [Imogen Healy](#); [Taylor Edwards](#); [Martin Moran](#)
Subject: HPE CM: RE: Attachment 1 - Requirement notice
Date: Friday, 5 August 2022 11:04:03 AM
Attachments: [image001.png](#)
[image005.png](#)
[image002.png](#)
[Attachment 1 - Requirement notice GFCQ edits.docx](#)
Importance: High

Hello Morag,

As discussed this morning please find attached edits and comments. It's looking really good.

Please do not hesitate to contact me if you require anything further.

Regards,

Jon Thomas

GFCQ Director - Policy and Projects

jon.thomas@gfcq.org.au | Sch. 4(4)(6) -
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information | www.gfcq.org.au

From: Morag ELLIOTT <Morag.Elliott@dasilgp.qld.gov.au>

Sent: Friday, 5 August 2022 9:13 AM

To: Ross.Savage <Ross.Savage@daf.qld.gov.au>; Imogen Healy <Imogen.Healy@resources.qld.gov.au>; Taylor Edwards <Taylor.Edwards@resources.qld.gov.au>; Martin Moran <Martin.Moran@rdmw.qld.gov.au>; Jon Thomas <Jon.Thomas@gfcq.org.au>

Subject: Attachment 1 - Requirement notice

Importance: High

Hi all

Further to my email last night, please see tidier/more collated version for your review – queries in document.

Thanks.

I need to get this to the delegate this morning.

Morag Elliott
Manager

Development Assessment Division , Planning Group
Department of State Development,
Infrastructure, Local Government and Planning

P 07 3452 7653

Level 13, 1 William Street, Brisbane QLD 4000
PO Box 15009 CITY EAST QLD 4002

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Queensland
Government

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

Our ref: OUT22/3245

Sch. 4(4)(6) - Disclosing
personal information

Team Lead Access Approvals

Arrow Energy

e-mail: [Sch. 4\(4\)\(6\) -
Disclosing personal
information@arrowenergy.com.au](mailto:Sch. 4(4)(6) - Disclosing personal information@arrowenergy.com.au)

5 August 2022

Dear Sch. 4(4)(6) -
Disclosing personal
information

Requirement notice

RPI22/004 Arrow – Kapunn Springvale CSG Deviated Well Paths (Given under s44 of the *Regional Planning Interests Act 2014* (RPI Act))

I refer to your application received on 22 July 2022 September 2021 for a regional interests development approval (RIDA) under section 29 of the *Regional Planning Interests Act 2014* (RPI Act) for the Kapunn Springvale Coal Seam Gas (CSG) Deviated Well Paths project. The application seeks approval for resource activities: petroleum and gas on Lot 11 SP191489, Lot 141 AG4261, Lot 1 RP78475, Lot 1 RP83755, Lot 55 DY592 and Lot 56 DY592 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
65.

Project Kapunn Springvale CSG Deviated Well Paths

Site Details

Street address Springvale Road, Springvale 4405
110 Prenzlars Road, St Ruth 4405
455 Hennings Road, Springvale 4405
Kupunn Duleen Road, Ducklo 4405
584 Springvale Road, Springvale 4405
445 Springvale Road, Springvale 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 11 SP191489, Lot 141 AG4261, Lot 1 RP78475, Lot 1 RP83755, Lot 55DY592 and Lot 56 DY592
Area of regional interest	PAA and SCA
Proposed PAA disturbance area	0 ha
Proposed SCA disturbance area	0 ha
Local government area	Western Downs Regional Council

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@dasilgp.qld.gov.au who will be pleased to assist.

Yours sincerely

Phil Joyce
Director
Development Assessment Division
Planning Group

Enc Attachment A

RTI RELEASE - DSDILGP

ATTACHMENT A

Information required for assessment against PAA and SCA criteria - Schedule 2, Part 1 and Part 4 of the Regional Planning Interests Regulation 2014

1.	<p><u>Issue:</u></p> <p>It is not clear if Figure 1-1 on page 6 of the Report to accompany an assessment application for a RIDA (Supporting report) is the same as referred to in Table 1-1 at s1.3, s1.7.2 and on page 64.</p> <p><u>Actions:</u></p> <p>Confirm that the figure on page 6 is Figure 1-1 and update the Supporting report accordingly.</p>
2.	<p><u>Issue:</u></p> <p>s1.6.3 of the Supporting report:</p> <ul style="list-style-type: none"> • refers to Table 3, however, no Table 3 is provided • refers to coexistence and the creation of 12 commitments to coexistence in the Surat Basin in 2012, and refers to the establishment of community reference groups • states that a draft Construction and Operations simultaneous operations matrix (SIMOPS) has been developed. <p><u>Actions:</u></p> <p>(a) Update the Supporting report (including Table of contents) to include Table 3 as referenced in s1.6.3.</p> <p>(b) To demonstrate compliance with Prescribed solution (1) (a) of Required outcome (RO) 2:</p> <ol style="list-style-type: none"> (i) Provide details to demonstrate how these commitments are being implemented. (ii) Confirm and detail if these commitments have been updated since 2012 to remain contemporary (iii) Confirm that the community reference groups (including the IFL Committee) still meet and if so, how often. (iv) Provide a copy of the draft SIMOPS. (v) Advise whether the SIMOPS has been tested in the field and if so, provide the outcomes.
3.	<p><u>Issue:</u></p> <p>s1.6.4 on page 11 of the Supporting report refers to Area Wide Planning (AWP).</p> <p><u>Actions:</u></p> <p>To demonstrate compliance with Prescribed solution (1) (a) of Required outcome 2:</p> <ol style="list-style-type: none"> (a) Advise whether the owners of the lots subject to this application and neighbouring landholders have been involved in the AWP process. (b) Provide information regarding the outcomes to support coexistence.
4.	<p><u>Issue:</u></p> <p>The Wayleave agreement (and crossing agreement) referred to in s1.7.4 of the Supporting report concerns Lot 1 RP83755. However, there is no rail line on that lot and there are no rail interests detailed on the lot's title deed. This agreement may concern the adjacent Lot 92 SP129747.</p>

	<p><u>Actions:</u></p> <p>Update the Supporting report as required. If the agreement concerns Lot 1 RP83755, provide summaries and conditions of these agreements, including details on anticipated surface impacts associated with the authorised works including scope, extent, location, and timing.</p>
5.	<p><u>Issue:</u></p> <p>s2.1, s3 or s4 of the Supporting report do not detail the depths of well paths entry and terminal points (i.e., the end point of the well path), the well path trajectories and surface area subject to dial before you dig requirements and latitude and longitude coordinates for these matters.</p> <p><u>Actions:</u></p> <p>Update the Supporting report to include these details in both a table format and accompanying 3D maps for each lots subject to the proposed activity.</p>
6.	<p><u>Issue:</u></p> <p>Table 2-2 and Appendix 2 of the Supporting report details the properties subject of the application. However, the application does not provide the title deeds of the other lots that comprise these properties.</p> <p><u>Actions:</u></p> <p>Update the Supporting report by providing:</p> <ul style="list-style-type: none"> (a) Title deeds for all lots that make up properties subject to the RIDA application; and (b) A map of the surrounding areas to those properties detailing the extent of the properties as well as the lot on plan and ownership details for all neighbouring and adjacent lots.
7.	<p><u>Issue:</u></p> <p>It is unclear whether Figure 2-1 on page 16 of the Supporting report is the same as referred to in s1.2 on page 4, Table 1-1 on page 5, s2.2 and s2.3 on page 14 and s3.2.1 on page 19.</p> <p><u>Actions:</u></p> <ul style="list-style-type: none"> (a) Confirm that the figure on page 16 is Figure 2-1 and update the Supporting report accordingly. (b) Update the legend on the figure on page 16 to include the referred to s2.3.1 on page 14.
8.	<p><u>Issue:</u></p> <p>s2.3.3 of the Supporting report details overlapping resource authorities. However, the narrative is not clear on the implications for any (future) proposed activity under that resource tenure if the proposed activity subject to this RIDA application is approved.</p> <p><u>Actions:</u></p> <p>Update the Supporting report to note the consequences of the area available for permitted impacts to priority agricultural land uses (PALUs) resulting from other proposed, and cumulative, impacts.</p>
9.	<p><u>Issue:</u></p> <p>s3.2.1 of the Supporting report does not detail the water and gas extraction area for each well.</p>

	<p><u>Actions:</u></p> <p>Update the Supporting report to provide indicative locations of gas and water extraction areas for each deviated well.</p>
10.	<p><u>Issue:</u></p> <p>Insufficient information is provided in s3.2.1 (and s4.4.1 and Appendix 3) of the Supporting report to determine if the dial before you dig requirement areas will constrain, prevent, or restrict the use of those areas for PALU or everyday farming practices or infrastructure essential to the operation of a PALU on the respective properties.</p> <p><u>Actions:</u></p> <p>(a) Update the Supporting report to discuss any implications of the dial before you dig requirements.</p> <p>(b) Provide updated figures to include these surface areas.</p>
11.	<p><u>Issue:</u></p> <p>s3.2.1 of the Supporting report states that operational activities will be undertaken remotely.</p> <p><u>Actions:</u></p> <p>Confirm whether operational activities include workovers and whether workover activities will require access to the sub-terranean land as a preliminary activity and the likely impacts to landholders.</p>
12.	<p><u>Issue:</u></p> <p>s3.3 of the Supporting report does not discuss what the likely impacts are on landowners who undertake irrigation activities if water table and/or water pressure drops because of the proposed activity.</p> <p><u>Actions:</u></p> <p>Update the Supporting report to include and discuss how adverse impacts to irrigators will be managed, mitigated, or avoided.</p>
13.	<p><u>Issue:</u></p> <p>s4.1 of the Supporting report does not detail the Regional Outcomes and Policies concerning PAAs as detailed in the Darling Downs Regional Plan.</p> <p><u>Actions:</u></p> <p>Update the Supporting report to include and discuss the Regional Outcomes and Policies concerning PAAs as detailed in the Darling Downs Regional Plan with regards to agriculture having the primacy land use.</p>
14.	<p><u>Issue:</u></p> <p>s4.2.2 and Table 4-1 and s4-2 of the Supporting report detail PALUs on lots subject to proposed activity. However, insufficient information is provided on how the non-cropping PALUs were considered. For example, there are areas on Lot 11 SP191489 and Lot 141 AG4261 that might have been used for grazing irrigated modified pastures, but no information is provided on how this was considered, or the methodology, assumptions and data used.</p> <p><u>Actions:</u></p> <p>Update the Supporting report to detail how PALUs in classes 3.4, 4.1, 4.2, 4.4, 4.5 and 5.1 were considered e.g. detailed methodology, assumptions and data used,</p>

	and how it was determined that these PALUs did not occur on land subject to the proposed activities.
15.	<p>Issue:</p> <p>s4.3 of the Supporting report includes Table 4.1 – Outcome of Identification of PALU on Lots (subject to RIDA application) and associated properties, and lists 'properties' as defined in the RPI Act.</p> <p>Actions:</p> <p>Rename Table 4-1 to 'Outcome of Identification of PALU on properties (subject to RIDA application)'.</p>
16.	<p>Issue: COMBINE WITH RESOURCES ISSUE or is Note below adequate?</p> <p>Table 4-2 in s4.4.1 of the Supporting report indicates that the proposed area of disturbance of the PAA is 0 ha. This assumes that there will be no permanent impacts to areas of PALU through the impacts of CSG-induced subsidence.</p> <p>The information provided in the application indicates that the risk of impacts to land used for any PALU is being assessed through modelling and baseline monitoring to date. Consequently, appropriate monitoring and management should be established at the property scale for all properties in this RIDA (e.g., via a property scale subsidence management plan (SMP)).</p> <p><i>Note - The RPI Act Statutory Guideline 02/14 Carrying out resource activities in a Priority Agricultural Area at RPI Act - Statutory Guideline 02/14 (windows.net) discusses options for avoiding impacts on the PAA, for example 'To demonstrate compliance, the applicant may provide an explanation of how the everyday farm practices, or an activity or infrastructure that is essential to the operation of a PALU can continue. For example ... there is no change to the overland flow characteristics where it is relied upon for the PALU', and the 'To demonstrate compliance, the applicant may provide information about how the activity on the property does not have a significant impact on the PAA in which it is located. For example: ... evidence detailing how overland flows will be restored to pre-activity capacity in the PAA'.</i></p> <p>Actions:</p> <ul style="list-style-type: none"> (a) Demonstrate how subsidence impacts will be avoided in accordance with the RPI Statutory Guidelines 02/14. (b) Provide details of how a baseline has been determined and the monitoring techniques used to measure subsidence. (c) Provide: <ul style="list-style-type: none"> (i) Property scale subsidence management plan (SMP) – including plans/actions to monitor/manage CSG-induced subsidence and resulting changes in overland flow (ii) Restoration Plan where overland flow is impacted by CSG induced subsidence. <p>Note: Refer also to Item 25.</p>
17.	<p>Issue:</p> <p>There is an inconsistent use of depths to detail minimum depths of well trajectories. For example, one metre is referenced in s4.4.1 of the Supporting report whereas 189 metres in s4.4.2 and 190 metres in s4.4.3.</p> <p>Actions:</p> <p>Update the Supporting report to detail consistent minimum depths of the well trajectories.</p>
18.	<p>Issue:</p>

	<p>s4.4.4 of the Supporting report discusses:</p> <ul style="list-style-type: none"> • Office of Groundwater Impact Assessment's (OGIA) predicted change in slope for land subject to the proposed activity. However, the figures provided in Appendix 8 are physically too small to thoroughly investigate. • Figure 7-5 in OGIA 2021 Underground Water Impact Report (UWIR), but does not provide this figure; • that Coffey's subsidence modelling (2021) '<i>indicates that any subsidence that occurs will be relatively widespread and even</i>'. The application, however, excludes those lots that are not subject to the proposed activity but that are likely to be impacted by coal seam gas (CSG) induced subsidence and where voluntary agreements have not been entered into. <p>Actions:</p> <p>Update the Supporting report to:</p> <ol style="list-style-type: none"> (a) show each of the four maps provided per lot subject to the proposed activity at the A3 scale (b) include Figure 7-5 (c) discuss why land that is likely to experience CSG induced subsidence because of the proposed activity, and where there is no voluntary agreement, has not been addressed.
19.	<p>Issue:</p> <p>s4.4.5 of the Supporting report does not detail the production and productive capacity of the lots the subject to the proposed activity.</p> <p>Actions:</p> <p>Update the Supporting report to detail the production and productive capacity of the lots subject to the proposed activity.</p>
20.	<p>Issue:</p> <p>s4.5 of the Supporting report does not discuss any measures to minimise impacts to PALU associated with the risk to landowners to secure new or refinance existing debt, insurance and other financial products resulting from the undertaking of the proposed activity on their properties.</p> <p>Actions:</p> <p>Update the Supporting report, specifically in addressing Prescribed Solution for (1)(e) for RO2 and Prescribed Solution (3)(d) for RO1 in Tables 12-1 and 12-2 respectively, to include discussion on the risks for affected landholders to secure and or refinance debt, insurance and other financial services and products and include commitments to provide a management strategy and actions that seeks to avoid, minimise, and mitigate such instances at pre-activity rates, premiums, and excesses, as well as relative terms and conditions.</p>
21.	<p>Issue:</p> <p>s7.2 of the Supporting report:</p> <ul style="list-style-type: none"> • discusses that a CSG Water Monitoring and Management Plan (WMMP) includes a three-tiered subsidence management framework. However, insufficient information is provided in this section to determine how this approach, including trigger thresholds and management/mitigation actions, may apply to lots subject to the proposed activity. • refers to the amendments to the Stage 1 WMMP and states that '<i>additional monitoring method, including bi-annual collection of LiDAR...</i>' <p>Actions:</p>

	<p>(a) Update the Supporting report to discuss the response, should CSG induced subsidence exceed the trigger thresholds.</p> <p>(b) Confirm that the proposed amendments to the WMMP will not have a material impact of the decision-making process associated with the application.</p> <p>(c) Clarify whether bi-annual means twice yearly or every other year.</p>
22.	<p>Issue:</p> <p>s8 of the Supporting report discusses that the most recent modelling presented in OGIA's 2021 UWIR indicates that the '<i>maximum impact to the Condamine Alluvium as a result of CSG production is expected to be less than 0.3 metres for most of the area...</i>' This includes discussion on how the Substitution Scheme has been designed to supply water to the area as a mitigation measure to potential impacts to the Condamine Alluvium.</p> <p>Actions:</p> <p>Update the Supporting report to discuss how offsetting impacts to the Condamine Alluvium by purchasing allocations will not adversely impact the undertaking of current PALU within the affected area.</p> <p><i>Note: If water allocation purchases are progressed, a separate application for a RIDA to manage the expected regional impacts to the PAA maybe required.</i></p>
23.	<p>Issue: Should this be linked with Issue and action in Item 24 below, as discussed with Imogen or kept separate</p> <p>Table 5.1 in s5 of the Supporting report indicates that the proposed area of disturbance of strategic cropping area (SCA) is 0 ha. This assumes that there will be no permanent impacts to areas of strategic cropping land (SCL) through the impacts of CSG-induced subsidence.</p> <p>The information provided in the application indicates that the risk of temporary and permanent impact to SCL is being assessed through modelling and baseline monitoring to date. Consequently, appropriate monitoring and management should be established at the property scale for all properties in this RIDA (e.g. via a property scale subsidence management plan (SMP)).</p> <p>The RPI Act Statutory Guideline 03/14 Carrying out resource activities in the Strategic Cropping Area at RPI Act - Statutory Guideline 03/14 (windows.net) discusses options for avoiding permanent impacts on the mapped SCA and includes that: '<i>For land to be restored to pre-activity condition, it will require an adequate restoration to the former or original condition of the land, including the productive capacity of the land.</i></p> <p><i>It does not simply mean 'revegetated', 'rehabilitated' or 'reclaimed' which are all commonly used terms under other state government permit and approval processes.</i></p> <p><i>Restoring the land means that the land is not only returned to its pre-activity use but that it is also returned to its pre-activity productive capacity or potential productive capacity . . .</i></p> <p><i>In the context of SCL, the productive capacity refers to the intrinsic capability of the land and soil to store and supply the water and nutrients required to sustain crops in the future'.</i></p> <p>The RPI Act Statutory Guideline 09/14 How to determine if an activity has a permanent impact on Strategic Cropping Land at RPI Act - Statutory Guideline 09/14 (windows.net) provides guidance on how applicants can demonstrate that a proposed activity does not have a permanent impact on SCL. A restoration plan and a subsidence management plan could also be used to help demonstrate this</p>

	<p>requirement, e.g. for monitoring and managing temporary impacts, and then restoration at the end of the activity, if required.</p> <p>Independent third-party review by a suitably qualified and experienced person/panel of the property scale subsidence monitoring and management plan is recommended as a further means of ensuring or confirming that there will be no permanent impacts on mapped SCA.</p> <p>Actions:</p> <ul style="list-style-type: none"> (a) Demonstrate how permanent impacts will be avoided in accordance with the RPI Statutory Guidelines 03/14 and 09/14. (b) Provide the following detailed plans in a stand-alone format: <ul style="list-style-type: none"> (i) Property scale subsidence management plan (SMP) – including plans/actions to monitor/manage CSG-induced subsidence and resulting changes in soil erosion (if relevant). (ii) Restoration Plan. <p><i>Note: It is recommended that the SMP is subject to third-party independent review by a suitably qualified and experienced person/panel prior to lodgement. This would need to include an independent review of property specific CSG-induced subsidence triggers.</i></p> <p><i>Supporting information to the SMP that would be useful for identifying the pre-activity condition would include a suitably scaled soil survey – see Queensland Soil and Land Resource Survey Information Guideline (Department of Resources 2020) and RPI Act Statutory Guideline 08/14 for further guidance.</i></p>
24.	<p>Issue: Link to Issue above or keep separate?</p> <p>The CSG-induced subsidence management discussions in the Supporting report (s7.4) are not tailored to the specific properties within this RIDA, nor reflected in a stand-alone subsidence management plan. While some of this detail required may be found in separate documentation (e.g. the WMMP), these should be specifically adapted for subsidence monitoring and management purposes at the property scale – for the properties associated with this RIDA.</p> <p>There is a concern that the Tier one screening referred to on page 99 using a 1km x 1km grid is insufficiently scaled to identify changes in slope and ponding (of more than 8mm per year) at the property scale. Specific exceedance triggers requiring action (at the property scale) for the properties within this application have not been included.</p> <p>Analysis of ground movement was completed using a Sentinel InSAR dataset. Due to the limitations (e.g., vertical accuracy) of InSAR, the conclusions regarding the differences in elevation that have been observed since 2015 are difficult to substantiate. For example, it is unclear how InSAR can be used to accurately report on ground movement in ‘mm’ to form a baseline for a property scale monitoring program.</p> <p>It is conceded that the movement of shrink/swell soils is cyclical and will be different during periods of drought or high rainfall, which makes it extremely difficult to establish a baseline elevation. Cultivation adds another complexity, as does the specifics of the cropping system. Even airborne LiDAR with a vertical accuracy of ± 50 mm may not be sufficiently accurate to detect critical changes in slope or depressions resulting from ponding that may temporarily and/or permanently impact the SCA and farming operations at the property scale – particularly in landscapes of very low relief.</p> <p>Property scale monitoring of CSG-induced subsidence may require more accurate technology (e.g. RTK Drone LiDAR) to establish a baseline and monitor against this baseline for the properties associated with this RIDA.</p>

There is no analysis of the DEM provided in Appendix 6. For example, there are no Figures demonstrating change in slope over 2012, 2014 and 2020 at the property scale. There has been no discussion of climatic variables which may explain changes in elevation due to changes in soil moisture.

Actions:

All issues described below should be addressed in a Subsidence Management Plan at the property scale, for the specific properties associated with this RIDA. Details to be included: proposed monitoring, appropriate exceedance action triggers if CSG-induced subsidence is detected at the property scale, reporting, and appropriate actions for management if CSG-induced subsidence is detected at the property scale:

- (a) provide the vertical accuracy of the Sentinel InSAR data and discuss any post capture processing required to achieve that vertical accuracy
- (b) confirm the metadata for the Sentinel InSAR and whether it was collected to Australian Standards
- (c) provide detailed metadata of the LiDAR DEMs.
Note: the metadata for all the LiDAR generated Digital Elevation Models must be collected to the relevant Australian Standard ([link](#)).
- (d) Confirm the difference in accuracy and precision between the LiDAR and InSAR
- (e) Clarify whether all LiDAR monitoring has been aligned to permanent survey markers of a known and recorded location (e.g., the network of geodetic permanent survey markers, and based on a common geodetic datum – e.g., GDA2020). All current and future surveys should reference these permanent survey markers to ensure accurate comparisons can be made between surveys.
- (f) Conduct spatial analysis to compare change of elevation and slope between different years of LiDAR capture (Example DEM of difference). Surveys should be captured at the same time of the year to minimise seasonal differences due to soil moisture variability. Any changes in soil moisture (e.g., drought or un-seasonally high rainfall) should be accounted for in the analysis
- (g) Confirm with a suitably qualified and experienced agronomist, the exceedance triggers where critical changes in slope or the development of depressions result in ponding that may 1. temporarily and 2. permanently impact the SCA and farming operations at the property scale – this may be different for each property. *Note. Department of Agriculture and Fisheries may need to be consulted to confirm the critical changes in slope and depressions resulting in ponding at the property scale (i.e., exceedance triggers). These will need to be unique to the cropping systems in the application area. These should also be verified by an independent third-party.*
- (h) Once the critical changes in slope or depressions that may result in ponding (exceedance triggers) have been identified, investigate using suitably accurate monitoring measurement techniques (e.g., RTK Drone LiDAR) to accurately identify the baseline DEM, monitor against the triggers, and focus any management to ensure there is no permanent impact.

Note: Changes in slope of approximately 25 mm per kilometre as derived from Sentinel InSAR are unlikely to reflect subsidence at the property scale. Any triggers should be based on the properties applicable to this RIDA – even minor changes to slope in self- mulching, black Vertosol soils can significantly increase the erosion risk.

25.

Issue:

Impacts on SCL due to salinity associated with any irrigation from treated CSG water has not been addressed or acknowledged.

	<p><i>Note: If irrigation is to occur using treated CSG water from wells on these properties, a salinity risk assessment may be required. This may require further discussion with Department of Resources Land Resource Officers.</i></p> <p><u>Actions:</u></p> <p>Consider consulting with Department of Resources Land Resource Officers in relation to developing a salinity risk assessment where treated CSG water may be used for irrigation (if applicable).</p>
26.	<p><u>Issue:</u></p> <p>The figures provided in Appendix 3 of the Supporting report do not clearly identify the Australian Land Use Mapping (ALUM) classes of PALUs detailed in the Darling Downs Regional Plan.</p> <p><u>Actions:</u></p> <p>Update the figures including legends to clear identify the ALUM Classes of PALUs detailed in the Darling Downs Regional Plan.</p>
27.	<p><u>Issue:</u></p> <p>The figures provided in Appendix 4 of the Supporting report do not clearly identify the ALUM classes of PALUs detailed in the Darling Downs Regional Plan.</p> <p><u>Actions:</u></p> <p>Update the figures including legends to clear identify the ALUM Classes of PALUs detailed in the Darling Downs Regional Plan.</p>
28.	<p><u>Issue:</u></p> <p>Appendix K, containing details on asset specific thresholds and investigation methods of subsidence, is referenced in Appendix 9 but is not provided as an attachment to the Supporting report.</p> <p><u>Actions:</u></p> <p>Provide Appendix K.</p>

Lauren Holden

From: Morag ELLIOTT
Sent: Thursday, 4 August 2022 8:04 PM
To: Ross Savage; Imogen Healy; Martin Moran; Jon Thomas
Cc: Taylor Edwards
Subject: RPI22/004 Arrow : Attachment 1 - Requirement notice
Attachments: Attachment 1 - Requirement notice.DOCX

Hi all

Please see attached DRAFT requirement notice.

I have combined similar /same items and have a number of queries in the document (mainly for Resources as I have gone through it with Ross earlier this evening)..

Please review and send back any comments/edits. I will give you all call in the morning.

Thanks, again, for all your help. It is really appreciated..

Morag Elliott
Manager
Development Assessment Division , Planning Group
Department of State Development,
Infrastructure, Local Government and Planning

P 07 3452 7653



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*I acknowledge the traditional custodians of the lands and waters of Queensland.
I offer my respect to elders past, present and emerging as we work towards a just,
equitable and reconciled Australia.*





Our ref: OUT22/3245

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

Sch. 4(4)(6) - Disclosing personal information

Team Lead Access Approvals

Arrow Energy

e-mail: [Sch. 4\(4\)\(6\) - Disclosing personal information@arrowenergy.com.au](mailto:Sch. 4(4)(6) - Disclosing personal information@arrowenergy.com.au)

5 August 2022

Dear [Sch. 4\(4\)\(6\) - Disclosing personal information](mailto:Sch. 4(4)(6) - Disclosing personal information)

Requirement notice

RPI22/004 Arrow – Kapunn Springvale CSG Deviated Well Paths (Given under s44 of the Regional Planning Interests Act 2014 (RPI Act))

I refer to your application received on 22 July 2022 September 2021 for a regional interests development approval (RIDA) under section 29 of the *Regional Planning Interests Act 2014* (RPI Act) for the Kapunn Springvale Coal Seam Gas (CSG) Deviated Well Paths. The application seeks approval for resource activities: petroleum and gas on Lot 11 SP191489, Lot 141 AG4261, Lot 1 RP78475, Lot 1 RP83755, Lot 55 DY592 and Lot 56 DY592 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 65.

Project

Kapunn Springvale Coal Seam Gas (CSG) Deviated Well Paths

Site Details

Street address

Springvale Road, Springvale 4405
110 Prenzlars Road, St Ruth 4405
455 Hennings Road, Springvale 4405
Kupunn Duleen Road, Ducklo 4405
584 Springvale Road, Springvale 4405
445 Springvale Road, Springvale 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 11 SP191489, Lot 141 AG4261, Lot 1 RP78475, Lot 1 RP83755, Lot 55DY592 and Lot 56 DY592
Area of regional interest	PAA and SCA
Proposed PAA disturbance area	0 ha
Proposed SCA disturbance area	0 ha
Local government area	Western Downs Regional Council

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@dasilgp.qld.gov.au who will be pleased to assist.

Yours sincerely

Phil Joyce
Director
Development Assessment Division
Planning Group

Enc Attachment A

RTI RELEASE - DSDILGP

ATTACHMENT A

Information required for assessment against PAA and SCA criteria - Schedule 2, Part 1 and Part 4 of the Regional Planning Interests Regulation 2014

1.	<p><u>Issue:</u></p> <p>It is not clear if Figure 1-1 on page 6 of the Report to accompany an assessment application for a RIDA (Supporting report) is the same as referred to in Table 1-1 at s1.3, s1.7.2 and on page 64.</p> <p><u>Actions:</u></p> <p>Confirm that the figure on page 6 is Figure 1-1 and update the Supporting report accordingly.</p>
2.	<p><u>Issue:</u></p> <p>Table 3 is referred to in s1.6.3 on pages 9 and 10, however, there is no Table 3 provided in the Supporting report.</p> <p><u>Actions:</u></p> <p>Update the Supporting report (including Table of contents) to include Table 3 as referenced in s1.6.3.</p>
3.	<p><u>Issue:</u></p> <p>The Wayleave agreement (and crossing agreement) referred to in s1.7.4 of the Supporting report concerns Lot 1 RP83755. However, there is no rail line on that lot and there are no rail interests detailed on the lot's title deed. This agreement may concern the adjacent Lot 92 SP129747.</p> <p><u>Actions:</u></p> <p>Update the Supporting report as required. If the agreement concerns Lot 1 RP83755, provide summaries and conditions of these agreements, including details on anticipated surface impacts associated with the authorised works including scope, extent, location, and timing.</p>
4.	<p><u>Issue:</u></p> <p>s2.1, s3 or s4 of the Supporting report do not detail the depths of well paths entry and terminal points (i.e., the end point of the well path), the well path trajectories and surface area subject to dial before you dig requirements and latitude and longitude coordinates for these matters.</p> <p><u>Actions:</u></p> <p>Update the Supporting report to include these details in both a table format and accompanying 3D maps for each lots subject to the proposed activity.</p>
5.	<p><u>Issue:</u></p> <p>Table 2-2 and Appendix 2 of the Supporting report details the properties subject of the application. However, the application does not provide the title deeds of the other lots that comprise these properties.</p> <p><u>Actions:</u></p> <p>Update the Supporting report by providing:</p> <p>(a) Title deeds for all lots that make up properties subject to the RIDA application; and</p>

	(b) A map of the surrounding areas to those properties detailing the extent of the properties as well as the lot on plan and ownership details for all neighbouring and adjacent lots.
6.	<p>Issue:</p> <p>It is unclear whether Figure 2-1 on page 16 of the Supporting report is the same as referred to in s1.2 on page 4, Table 1-1 on page 5, s2.2 and s2.3 on page 14 and s3.2.1 on page 19.</p> <p>Actions:</p> <p>(a) Confirm that the figure on page 16 is Figure 2-1 and update the Supporting report accordingly.</p> <p>(b) Update the legend on the figure on page 16 to include the referred to s2.3.1 on page 14.</p>
7.	<p>Issue:</p> <p>s2.3.3 of the Supporting report details overlapping resource authorities. However, the narrative is not clear on the implications for any (future) proposed activity under that resource tenure if the proposed activity subject to this RIDA application is approved.</p> <p>Actions:</p> <p>Update the Supporting report to note the consequences of the area available for permitted impacts to priority agricultural land uses (PALUs) resulting from other proposed, and cumulative, impacts.</p>
8.	<p>Issue:</p> <p>s3.2.1 of the Supporting report does not detail the water and gas extraction area for each well.</p> <p>Actions:</p> <p>Update the Supporting report to provide indicative locations of gas and water extraction areas for each deviated well.</p>
9.	<p>Issue:</p> <p>Insufficient information is provided in s3.2.1 (and s4.4.1 and Appendix 3) of the Supporting report to determine if dial before you dig requirement areas will constrain, prevent, or restrict the use of those areas for PALU or everyday farming practices or infrastructure essential to the operation of a PALU on the respective properties.</p> <p>Actions:</p> <p>(a) Update the Supporting report to discuss any implications of the dial before you dig requirements.</p> <p>(b) Provide updated figures to include these surface areas.</p>
10.	<p>Issue:</p> <p>s3.3 of the Supporting report does not discuss what the likely impacts are on landowners who undertake irrigation activities if water table and/or water pressure drops because of the proposed activity.</p> <p>Actions:</p> <p>Update the Supporting report to include and discuss how adverse impacts to irrigators will be managed, mitigated, or avoided.</p>
11.	<p>Issue:</p>

	<p>s4.1 of the Supporting report does not detail the Regional Outcomes and Policies concerning priority agricultural areas (PAAs) as detailed in the Darling Downs Regional Plan.</p> <p><u>Actions:</u></p> <p>Update the Supporting report to include and discuss the Regional Outcomes and Policies concerning PAAs as detailed in the Darling Downs Regional Plan with regards to agriculture having the primacy land use.</p>
12.	<p><u>Issue:</u></p> <p>s4.2.2 and Table 4-1 and s4-2 of the Supporting report detail PALUs on lots subject to proposed activity. However, insufficient information is provided on how the non-cropping PALUs were considered. For example, there are areas on Lot 11 SP191489 and Lot 141 AG4261 that might have been used for grazing irrigated modified pastures, but no information is provided on how this was considered, or the methodology, assumptions and data used.</p> <p><u>Actions:</u></p> <p>Update the Supporting report to detail how PALUs in classes 3.4, 4.1, 4.2, 4.4, 4.5 and 5.1 were considered eg detailed methodology, assumptions and data used, and how it was determined that these PALUs did not occur on land subject to the proposed activities.</p>
13.	<p><u>Issue:</u></p> <p>There is an inconsistent use of depths to detail minimum depths of well trajectories. For example, one metre is referenced in s4.4.1 of the Supporting report whereas 189 metres in s4.4.2 and 190 metres in s4.4.3.</p> <p><u>Actions:</u></p> <p>Update the Supporting report to detail consistent minimum depths of the well trajectories.</p>
14.	<p><u>Issue:</u></p> <p>s4.4.4 of the Supporting report discusses Office of Groundwater Impact Assessment's (OGIA) predicted change in slope for land subject to the proposed activity. However, the figures provided in Appendix 8 are too small to thoroughly investigate.</p> <p><u>Actions:</u></p> <p>Update the Supporting report to show each of the four maps provided per lot subject to the proposed activity at the A3 scale.</p>
15.	<p><u>Issue:</u></p> <p>s4.4.4 of the Supporting report discusses Figure 7-5 in the Office of Groundwater Impact Assessment's (OGIA) 2021 UWIR. This figure is not provided in the RIDA application.</p> <p><u>Actions:</u></p> <p>Update the Supporting report to include this figure.</p>
16.	<p><u>Issue:</u></p> <p>s4.4.4 of the Supporting report discusses that Coffey's subsidence modelling (2021) '<i>indicates that any subsidence that occurs will be relatively widespread and even</i>'. The application, however, excludes those lots that are not subject to the proposed activity but that are likely to be impacted by coal seam gas (CSG) induced subsidence and where voluntary agreements have not been entered into.</p>

	<p><u>Actions:</u></p> <p>Update the Supporting report to discuss why land that is likely to experience CSG induced subsidence because of the proposed activity, and where there is no voluntary agreement, has not been addressed.</p>
17.	<p><u>Issue:</u></p> <p>s4.4.5 of the Supporting report does not detail the production and productive capacity of the lots the subject to the proposed activity.</p> <p><u>Actions:</u></p> <p>Update the Supporting report to detail the production and productive capacity of the lots subject to the proposed activity.</p>
18.	<p><u>Issue:</u></p> <p>s4.5 of the Supporting report does not discuss any measures to minimise impacts to PALU associated with the risk to landowners to secure new or refinance existing debt, insurance and other financial products resulting from the undertaking of the proposed activity on their properties.</p> <p><u>Actions:</u></p> <p>Update the Supporting report, specifically in addressing Prescribed Solution for (1)(e) for Required Outcome 2 and Prescribed Solution (3)(d) for Required Outcome 1 in Tables 12-1 and 12-2 respectively, to include discussion on the risks for affected landholders to secure and or refinance debt, insurance and other financial services and products and include commitments to provide a management strategy and actions that seeks to avoid, minimise, and mitigate such instances at pre-activity rates, premiums, and excesses, as well as relative terms and conditions.</p>
19.	<p><u>Issue:</u> COMBINE WITH RESOURCES ISSUE?</p> <p>The proposed area of disturbance of the priority agricultural area (PAA) is stated as being 0 ha in Table 4-2 of the Supporting report. This assumes that there will be no permanent impacts to areas of PALU through the impacts of CSG-induced subsidence. The information provided in the application indicates that the risk of impacts to land used for any PALU is being assessed through modelling and baseline monitoring to date. Consequently, appropriate monitoring and management should be established at the property scale for all properties in this RIDA (e.g. via a property scale subsidence management plan (SMP)).</p> <p><i>Note - The RPI Act 02/14 Statutory Guideline discusses options for avoiding impacts on the PAA, for example 'To demonstrate compliance, the applicant may provide an explanation of how the everyday farm practices, or an activity or infrastructure that is essential to the operation of a PALU can continue. For example.....there is no change to the overland flow characteristics where it is relied upon for the PALU', and the "To demonstrate compliance, the applicant may provide information about how the activity on the property does not have a significant impact on the PAA in which it is located. For example:..... evidence detailing how overland flows will be restored to pre-activity capacity in the PAA'.</i></p> <p><u>Actions:</u></p> <p>(a) Demonstrate how subsidence impacts will be avoided in accordance with the RPI Statutory Guidelines 02/14</p> <p>(b) Provide:</p> <p>(i) Property scale subsidence management plan (SMP) – including plans/actions to monitor/manage CSG-induced subsidence and resulting changes in overland flow</p>

	<p>(ii) Restoration Plan where overland flow is impacted by CSG induced subsidence.</p> <p><i>Note: Refer also to Item xxxx.</i></p>
20.	<p>Issue: Link to issue 25 ?</p> <p>s7.2 of the Supporting report discuss that a CSG Water Monitoring and Management Plan (WMMP) includes a three-tiered subsidence management framework. However, insufficient information is provided in this section to determine how this approach, including trigger thresholds and management/mitigation actions, may apply to lots subject to the proposed activity.</p> <p>Actions:</p> <p>Update the Supporting report to discuss the response, should CSG induced subsidence exceed the trigger thresholds.</p>
21.	<p>Issue:</p> <p>s8 of the Supporting report discusses that the most recent modelling presented in OGIA's 2021 Underground Water Impact Report indicates that the '<i>maximum impact to the Condamine Alluvium as a result of CSG production is expected to be less than 0.3 metres for most of the area...</i>' This includes discussion on how the Substitution Scheme has been designed to supply water to the area as a mitigation measure to potential impacts to the Condamine Alluvium.</p> <p>Actions:</p> <p>Update the Supporting report to discuss how offsetting impacts to the Condamine Alluvium by purchasing allocations will not adversely impact the undertaking of current PALU within the affected area.</p> <p><i>Note: If water allocation purchases are progressed, a separate application for a RIDA to manage the expected regional impacts to the PAA maybe required.</i></p>
22.	<p>Issue:</p> <p>The figures provided in Appendix 3 of the Supporting report do not clearly identify the Australian Land Use Mapping (ALUM) classes of PALUs detailed in the Darling Downs Regional Plan.</p> <p>Actions:</p> <p>Update the figures including legends to clear identify the ALUM Classes of PALUs detailed in the Darling Downs Regional Plan.</p>
23.	<p>Issue:</p> <p>The figures provided in Appendix 4 of the Supporting report do not clearly identify the ALUM classes of PALUs detailed in the Darling Downs Regional Plan.</p> <p>Actions:</p> <p>Update the figures including legends to clear identify the ALUM Classes of PALUs detailed in the Darling Downs Regional Plan.</p>
24.	<p>Issue: RESOURCES</p> <p>The proposed area of disturbance of the strategic cropping area (SCA) is stated as being 0 ha in Table 5-1 of the Supporting report.</p> <p>This assumes that there will be no permanent impacts to areas of Strategic cropping land (SCL) through the impacts of CSG-induced subsidence.</p> <p>The information provided in the application indicates that the risk of temporary and permanent impact to SCL is being assessed through modelling and baseline</p>

monitoring to date. Consequently, appropriate monitoring and management should be established at the property scale for all properties in this RIDA (e.g. via a property scale subsidence management plan (SMP)).

The RPI Act Statutory Guideline 03/14 Carrying out resource activities in the Strategic Cropping Area (Statutory Guideline 03/14) at [RPI Act - Statutory Guideline 03/14 \(windows.net\)](#) discusses options for avoiding permanent impacts on the mapped SCA and includes that:

'For land to be restored to pre-activity condition, it will require an adequate restoration to the former or original condition of the land, including the productive capacity of the land.

It does not simply mean 'revegetated', 'rehabilitated' or 'reclaimed' which are all commonly used terms under other state government permit and approval processes.

Restoring the land means that the land is not only returned to its pre-activity use but that it is also returned to its pre-activity productive capacity or potential productive capacity ...

In the context of SCL, the productive capacity refers to the intrinsic capability of the land and soil to store and supply the water and nutrients required to sustain crops in the future'.

The RPI Act Statutory Guideline 09/14 How to determine if an activity has a permanent impact on Strategic Cropping Land at [RPI Act - Statutory Guideline 09/14 \(windows.net\)](#) provides guidance on how applicants can demonstrate that a proposed activity does not have a permanent impact on SCL. A restoration plan and a subsidence management plan could also be used to help demonstrate this requirement, e.g. for monitoring and managing temporary impacts, and then restoration at the end of the activity, if required.

Independent third-party review by a suitably qualified and experienced person/panel of the property scale subsidence monitoring and management plan is recommended as a further means of ensuring or confirming that there will be no permanent impacts on mapped SCA.

Actions:

Demonstrate how permanent impacts will be avoided in accordance with the RPI Statutory Guidelines 03/14 and 09/14. **an action on its own or linked to plans below?**

Provide the following detailed plans in a stand-alone format:

- (a) Property scale subsidence management plan (SMP) – including plans/actions to monitor/manage CSG-induced subsidence and resulting changes in soil erosion (if relevant). **Should this be linked with issue and action below, as discussed with Imogen**

It is recommended that the SMP is subject to third-party independent review by a suitably qualified and experienced person/panel prior to lodgement. This would need to include an independent review of property specific CSG-induced subsidence triggers.

Note: Supporting information to the SMP that would be useful for identifying the pre-activity condition would include a suitably scaled soil survey – see Queensland Soil and Land Resource Survey Information Guideline (Department of Resources 2020) and RPI Act Statutory Guideline 08/14 for further guidance.

- (b) Restoration Plan.

25. **Issue:** Same issue as above? Link to Item 20?

The CSG-induced subsidence management discussions in the Supporting report (s7.4) are not tailored to the specific properties within this RIDA, nor reflected in a stand-alone subsidence management plan. While some of this detail required may be found in separate documentation (e.g. the WMMP), these should be specifically adapted for subsidence monitoring and management purposes at the property scale – for the properties associated with this RIDA.

There is a concern that the Tier one screening referred to on page 99 using a 1km x 1km grid is insufficiently scaled to identify changes in slope and ponding (of more than 8mm per year) at the property scale. Specific exceedance triggers requiring action (at the property scale) for the properties within this application have not been included.

Analysis of ground movement was completed using a Sentinel InSAR dataset. Due to the limitations (e.g., vertical accuracy) of InSAR, the conclusions regarding the differences in elevation that have been observed since 2015 are difficult to substantiate. For example, it is unclear how InSAR can be used to accurately report on ground movement in 'mm' to form a baseline for a property scale monitoring program.

It is conceded that the movement of shrink/swell soils is cyclical and will be different during periods of drought or high rainfall, which makes it extremely difficult to establish a baseline elevation. Cultivation adds another complexity, as does the specifics of the cropping system. Even airborne LiDAR with a vertical accuracy of ± 50 mm may not be sufficiently accurate to detect critical changes in slope or depressions resulting from ponding that may temporarily and/or permanently impact the SCA and farming operations at the property scale – particularly in landscapes of very low relief.

Property scale monitoring of CSG-induced subsidence may require more accurate technology (e.g. RTK Drone LiDAR) to establish a baseline and monitor against this baseline for the properties associated with this RIDA.

There is no analysis of the DEM provided in Appendix 6. For example, there are no Figures demonstrating change in slope over 2012, 2014 and 2020 at the property scale. There has been no discussion of climatic variables which may explain changes in elevation due to changes in soil moisture.

Actions:

All issues described below should be addressed in a Subsidence Management Plan at the property scale, for the specific properties associated with this RIDA. Details to be included: proposed monitoring, appropriate exceedance action triggers if CSG-induced subsidence is detected at the property scale, reporting, and appropriate actions for management if CSG-induced subsidence is detected at the property scale:

- (a) provide the vertical accuracy of the Sentinel InSAR data and discuss any post capture processing required to achieve that vertical accuracy
- (b) confirm the metadata for the Sentinel InSAR and whether it was collected to Australian Standards
- (c) provide detailed metadata of the LiDAR DEMs.
Note: the metadata for all the LiDAR generated Digital Elevation Models must be collected to the relevant Australian Standard ([link](#)).
- (d) Confirm the difference in accuracy and precision between the LiDAR and InSAR
- (e) Clarify whether all LiDAR monitoring has been aligned to permanent survey markers of a known and recorded location (e.g., the network of geodetic permanent survey markers, and based on a common geodetic datum – e.g.,

	<p>GDA2020). All current and future surveys should reference these permanent survey markers to ensure accurate comparisons can be made between surveys.</p> <p>(f) Conduct spatial analysis to compare change of elevation and slope between different years of LiDAR capture (Example DEM of difference). Surveys should be captured at the same time of the year to minimise seasonal differences due to soil moisture variability. Any changes in soil moisture (e.g., drought or unseasonally high rainfall) should be accounted for in the analysis</p> <p>(g) Confirm with a suitably qualified and experienced agronomist, the exceedance triggers where critical changes in slope or the development of depressions result in ponding that may 1. temporarily and 2. permanently impact the SCA and farming operations at the property scale – this may be different for each property. DAF may need to be consulted to confirm the critical changes in slope and depressions resulting in ponding at the property scale (i.e., exceedance triggers). These will need to be unique to the cropping systems in the application area. These should also be verified by an independent third-party.</p> <p>(h) Once the critical changes in slope or depressions that may result in ponding (exceedance triggers) have been identified, investigate using suitably accurate monitoring measurement techniques (e.g., RTK Drone LiDAR) to accurately identify the baseline DEM, monitor against the triggers, and focus any management to ensure there is no permanent impact.</p> <p><i>NOTE: changes in slope of approximately 25 mm per kilometre as derived from Sentinel InSAR are unlikely to reflect subsidence at the property scale. Any triggers should be based on the properties applicable to this RIDA – even minor changes to slope in self-mulching, black Vertosol soils can significantly increase the erosion risk.</i></p>
26.	<p>Issue:</p> <p>Appendix K, containing details on asset specific thresholds and investigation methods of subsidence, is referenced in Appendix 9 but not provided as an attachment to the Supporting report.</p> <p>Actions:</p> <p>Provide details of Appendix K.</p>
27.	<p>Issue:</p> <p>Impacts on SCL due to salinity associated with any irrigation from treated CSG water has not been addressed or acknowledged.</p> <p><i>Note: If irrigation is to occur using treated CSG water from wells on these properties, a salinity risk assessment may be required. This may require further discussion with Department of Resources Land Resource Officers.</i></p> <p>Actions:</p> <p>Consider consulting with Department of Resources Land Resource Officers in relation to developing a salinity risk assessment where treated CSG water may be used for irrigation (if applicable).</p>
28.	<p>Issue:</p> <p>s1.6.3 on page 9 of the Supporting report refers to coexistence and the creation of 12 commitments to coexistence in the Surat Basin in 2012, and refers to the establishment of community reference groups</p> <p>Actions:</p> <p>To demonstrate compliance with Prescribed solution (1) (a) of Required outcome 2:</p> <p>(a) Provide details to demonstrate how these commitments are being implemented.</p> <p>(b) Confirm and detail if these commitments have been updated since 2012 to remain contemporary</p>

	(c) Confirm that the community reference groups (including the IFL Committee) still meet and if so, how often.
29.	<p>Issue:</p> <p>s1.6.3 on page 10 of the Supporting report states that a draft Construction and Operations simultaneous operations matrix (SIMOPS) has been developed.</p> <p>Actions:</p> <p>To demonstrate compliance with Prescribed solution (1) (a) of Required outcome 2:</p> <p>(a) Provide a copy of the draft SIMOPS. (b) Advise whether the SIMOPS has been tested in the field and if so, provide the outcomes.</p>
30.	<p>Issue:</p> <p>s1.6.4 on page 11 of the Supporting report refers to Area Wide Planning (AWP)</p> <p>Actions:</p> <p>To demonstrate compliance with Prescribed solution (1) (a) of Required outcome 2:</p> <p>(a) Advise whether the owners of the lots subject to this application and neighbouring landholders have been involved in the AWP process. (b) Provide information regarding the outcomes to support coexistence.</p>
31.	<p>Issue:</p> <p>s3.2.1 Other activities on page 20 of the Supporting report states that operational activities will be undertaken remotely.</p> <p>Actions:</p> <p>Confirm whether operational activities include workovers and whether workover activities will require access to the sub-terranean land as a preliminary activity.</p>
32.	<p>Issue:</p> <p>s4.3 on page 25 of the Supporting report includes Table 4.1 – Identification of PALU and associated properties.</p> <p>Actions:</p> <p>Rename Table 4-1 to 'Identification of PALU on properties subject to RIDA application'.</p>
33.	<p>Issue: <u>IMOGEN/ TAYLOR Can this be combined with Item 20 and Item 25?</u></p> <p>s7.2 Monitoring and Management of Subsidence on page 45 of the Supporting report refers to the amendments to the Stage 1 WMMP and states that '<i>additional monitoring method, including bi-annual collection of LiDAR...</i></p> <p>Actions:</p> <p>(a) Confirm that the proposed amendments to the WMMP will not have a material impact of the decision-making process associated with the application. (b) Clarify whether bi-annual means twice yearly or every other year.</p>
	<p>Issue:</p> <p>Actions:</p>
	<p>Issue:</p> <p>Actions:</p>

9.	<u>Issue:</u> <u>Actions:</u>
10.	<u>Issue:</u> <u>Actions:</u> a) .
11.	<u>Issue:</u> <u>Actions:</u> a)
12.	<u>Issue:</u> <u>Actions:</u> a) .
13.	<u>Issue:</u> <u>Actions:</u> a) .
14.	<u>Issue:</u> <u>Actions:</u>
15.	<u>Issue:</u> <u>Actions:</u> a)

RTI RELEASE - DSDILGP

Lauren Holden

From: Morag ELLIOTT
Sent: Thursday, 4 August 2022 3:31 PM
To: Ross.Savage; Imogen Healy; Martin Moran; Jon Thomas
Subject: RPI22/004 Arrow : Further information required
Attachments: RPI22_004 Kupunn_Springvale_Arrow_Requirement Notice Department of Resources Response_August 2022.docx; RE: RPI22/004 Arrow Kupunn Springvale CSG Deviated Wells project - request for a Requirement Notice ; 20220803- Arrow RIDA RPI22_004 Kupunn Springvale deviated wells_requirement response DSDILGP.pdf; FW: New application under the RPI Act : RPI22/004 Arrow : Kupunn Springvale CSG Deviated Well Paths

Hi all

As discussed at the meeting please see attached information required from DAF, Resources, GFCQ and DRDMW, for your review.

Thanks all for your input and assistance.

Morag Elliott
Manager
Development Assessment Division , Planning Group
Department of State Development,
Infrastructure, Local Government and Planning

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*I acknowledge the traditional custodians of the lands and waters of Queensland.
I offer my respects to elders past, present and emerging as we work towards a just,
equitable and reconciled Australia.*



RPI22_004 Kapunn_Springvale_Arrow_Requirement Notice comments – Department of Resources

	Issue	Action
1	<p>The proposed area of disturbance of the strategic cropping area (SCA) is stated as being 0 ha in Table 5-1 of the report.</p> <p>This assumes that there will be no permanent impacts to areas of SCL through the impacts of CSG-induced subsidence.</p> <p>The information provided in the application indicates that the risk of temporary and permanent impact to SCL is being assessed through modelling and baseline monitoring to date. Consequently, appropriate monitoring and management should be established at the property scale for all properties in this RIDA (e.g., via a property scale subsidence management plan (SMP)).</p> <p>The RPI Act 03/14 Statutory Guideline discusses options for avoiding permanent impacts on the mapped SCA. This guideline states:</p> <p><i>...‘For land to be restored to pre-activity condition, it will require an adequate restoration to the former or original condition of the land, including the productive capacity of the land.</i></p> <p><i>It does not simply mean ‘revegetated’, ‘rehabilitated’ or ‘reclaimed’ which are all commonly used terms under other state government permit and approval processes.</i></p> <p><i>Restoring the land means that the land is not only returned to its pre-activity use but that it is also returned to its pre-activity productive capacity or potential productive capacity.’.....</i></p> <p><i>....In the context of SCL, the productive capacity refers to the intrinsic capability of the land and soil to store and supply the water and nutrients required to sustain crops in the future.</i></p> <p>The 9/14 Statutory Guideline provides guidance on how applicants can demonstrate that a proposed activity does not have a permanent impact on SCL. A restoration plan and a subsidence management plan could also be used to help demonstrate this requirement, e.g., for monitoring and managing temporary impacts, and then restoration at the end of the activity, if required.</p> <p>Independent third-party review by a suitably qualified and experienced person/panel of the property scale subsidence monitoring and management plan is recommended as a further means of ensuring or confirming that there will be no permanent impacts on mapped SCA.</p>	<p><i>Demonstrate how permanent impacts will be avoided in accordance with the RPI Statutory Guidelines 03/14 and 09/14. Provide the following detailed plans in a stand-alone format:</i></p> <p><i>a) Property scale subsidence management plan (SMP) – including plans/actions to monitor/manage CSG-induced subsidence and resulting changes in soil erosion (if relevant).</i></p> <p><i>b) Restoration Plan</i></p> <p><i>It is recommended that the above SMP is subject to third-party independent review by a suitably qualified and experienced person/panel prior to lodgement. This would need to include an independent review of property specific CSG-induced subsidence triggers (see more information below)</i></p> <p><i>Note: Supporting information to the SMP that would be useful for identifying the pre-activity condition would include a suitably scaled soil survey – see Queensland Soil and Land Resource Survey Information Guideline (Department of Resources 2020) and RPI Act Statutory Guideline 08/14 for further guidance.</i></p>
2	<p>The CSG-induced subsidence management discussions in the document (section 7.4) are not tailored to the specific properties within this RIDA, nor reflected in a stand-alone subsidence management plan. While some of this detail required may be found in separate documentation (e.g., the WMMP), these should be specifically adapted for subsidence monitoring and management purposes at the property scale – for the properties associated with this RIDA.</p> <p>There is a concern that the Tier one screening referred to on page 99 using a 1km x 1km grid is insufficiently scaled to identify changes in slope and ponding (of more than 8mm per year) at the property scale. Specific exceedance triggers requiring action (at the property scale) for the properties within this application have not been included.</p>	<p><i>All issues described below should be addressed in a revised Subsidence Management Plan at the property scale, for the specific properties associated with this RIDA. Details to be included: proposed monitoring, appropriate exceedance action triggers if CSG-induced subsidence is detected at the property scale, reporting, and appropriate actions for management if CSG-induced subsidence is detected at the property scale.</i></p> <p><i>Provide the vertical accuracy of the Sentinel InSAR data and discuss any post capture processing required to achieve that vertical accuracy.</i></p> <p><i>Confirm the metadata for the Sentinel InSAR and whether it was collected to Australian Standards.</i></p> <p><i>Provide detailed metadata of the LiDAR DEMs. Note: the metadata for all the LiDAR generated Digital Elevation Models must be collected to the relevant Australian Standard (link).</i></p>

	<p>Analysis of ground movement was completed using a Sentinel InSAR dataset. Due to the limitations (e.g., vertical accuracy) of InSAR, the conclusions regarding the differences in elevation that have been observed since 2015 are difficult to substantiate. For example, it is unclear how InSAR can be used to accurately report on ground movement in 'mm' to form a baseline for a property scale monitoring program.</p> <p>It is conceded that the movement of shrink/swell soils is cyclical and will be different during periods of drought or high rainfall, which makes it extremely difficult to establish a baseline elevation. Cultivation adds another complexity, as does the specifics of the cropping system. Even airborne LiDAR with a vertical accuracy of ± 50 mm may not be sufficiently accurate to detect critical changes in slope or depressions resulting from ponding that may temporarily and/or permanently impact the SCA and farming operations at the property scale – particularly in landscapes of very low relief.</p> <p>Property scale monitoring of CSG-induced subsidence may require more accurate technology (e.g., RTK Drone LiDAR) to establish a baseline and monitor against this baseline for the properties associated with this RIDA.</p> <p>There is no analysis of the DEM provided in Appendix 6. For example, there are no Figures demonstrating change in slope over 2012, 2014 and 2020 at the property scale. There has been no discussion of climatic variables which may explain changes in elevation due to changes in soil moisture.</p>	<p><i>Confirm the difference in accuracy and precision between the LiDAR and InSAR.</i></p> <p><i>Clarify whether all LiDAR monitoring has been aligned to permanent survey markers of a known and recorded location (e.g., the network of geodetic permanent survey markers, and based on a common geodetic datum – e.g., GDA2020). All current and future surveys should reference these permanent survey markers to ensure accurate comparisons can be made between surveys.</i></p> <p><i>Conduct spatial analysis to compare change of elevation and slope between different years of LiDAR capture (Example DEM of difference). Surveys should be captured at the same time of the year to minimise seasonal differences due to soil moisture variability. Any changes in soil moisture (e.g., drought or un-seasonally high rainfall) should be accounted for in the analysis.</i></p> <p><i>Confirm with a suitably qualified and experienced agronomist, the exceedance triggers where critical changes in slope or the development of depressions result in ponding that may 1. temporarily and 2. permanently impact the SCA and farming operations at the property scale – this may be different for each property. DAF may need to be consulted to confirm the critical changes in slope and depressions resulting in ponding at the property scale (i.e., exceedance triggers). These will need to be unique to the cropping systems in the application area. These should also be verified by an independent third-party.</i></p> <p><i>Once the critical changes in slope or depressions that may result in ponding (exceedance triggers) have been identified, the proponent should investigate using suitably accurate monitoring measurement techniques (e.g., RTK Drone LiDAR) to accurately identify the baseline DEM, monitor against the triggers, and focus any management to ensure there is no permanent impact. NOTE: changes in slope of approximately 25 mm per kilometre as derived from Sentinel InSAR are unlikely to reflect subsidence at the property scale. Any triggers should be based on the properties applicable to this RIDA – even minor changes to slope in self-mulching, black Vertosol soils can significantly increase the erosion risk.</i></p>
3	<p>Appendix K containing details on asset specific thresholds and investigation methods of subsidence is referenced in Appendix 9, however not supplied as an attachment to the report – ‘Kupunn Springvale Coal Seam Gas (CSG) Deviated Well Paths Regional Interests Development Approval’.</p>	<p><i>Provide details of Appendix K.</i></p>
4	<p>In addition, impacts on SCL due to salinity associated with any irrigation from treated CSG water has not been addressed or acknowledged. <i>Note: If irrigation is to occur using treated CSG water from wells on these properties, a salinity risk assessment may be required. This may require further discussion with Department of Resources Land Resource Officers.</i></p>	<p><i>Consider consulting with Department of Resources Land Resource Officers in relation to developing a salinity risk assessment where treated CSG water may be used for irrigation (if applicable).</i></p>

Lauren Holden

From: DAF RPI Referral <DAFFRPI@daf.qld.gov.au>
Sent: Thursday, 4 August 2022 7:36 AM
To: Morag ELLIOTT; Regional Planning Interests Act
Subject: RE: RPI22/004 Arrow Kupunn Springvale CSG Deviated Wells project - request for a Requirement Notice

Hi Morag

Please see Item 19 below – I have expanded this – pls see **yellow highlighted**, somehow these were missed in the email below, an oversight by me.

The matter of compensation is of concern, can we discuss how/if the RIDA will action/condition appropriate arrangements to affected landowners.

More than happy to discuss.

Thanks

Ross

From: Ross Savage
Sent: Tuesday, 2 August 2022 3:15 PM
To: Morag Elliott; Regional Planning Interests Act
Cc: DAF RPI Referral
Subject: FW: RPI22/004 Arrow Kupunn Springvale CSG Deviated Wells project - request for a Requirement Notice

Hi Morag

Below are the items I think need to be addressed through a Requirement Notice:

Item 1

Issue – Is the figure on page 6 of the RIDA Supporting Report Figure 1-1 the same as referred to in s1.3 and Table 1-1 on page 3, pages 5, s1.7.2 on page 12 and on page 64?

Action – Update the RIDA Supporting Report to identify the figure on page 6.

Item 2

Issue – Table 3 is referred in s1.6.3 on pages 9 and 10, however, there is no Table 3 provided in the RIDA Supporting Report.

Action - Update the RIDA Supporting Report (including table of contents) to include Table 3 as referenced in s1.6.3.

Item 3

Issue – The Wayleave agreement (and crossing agreement) referred to in s1.7.4 concerns lot 1RP83755. However, there is no rail line on that lot and there are no rail interests detailed on the lot's title deed. Should this agreement concern the adjacent lot 92SP129747?

Action – Update the RIDA Supporting Report as required. If the agreements concern 1RP83755, provide details on anticipated surface impacts associated with the authorised works including scope, extent, location, and timing.

Item 4

Issue – Sections 2.1, 3 or 4 do not detail the depths of well paths entry and terminal points (i.e., the end point of the well path), the well path trajectories, and surface area subject to dial before you dig requirements.

Action – Update the RIDA Supporting Report to include these details in both a table format and accompanying 3D maps.

Item 5

Issue – Table 2-2 (and Appendix 2) details the properties subject of the RIDA application. However, the application does not provide the title deeds of the other lots that comprise of these properties.

Action – Update the RIDA Supporting Report by providing:

1. Title deeds for all lots that make up properties subject to the RIDA application; and
2. A map of the surrounding areas to those properties detailing the extent of the properties as well as the lot on plan and ownership details for all neighbouring and adjacent lots.

Item 6

Issue – Is the figure on page 16 of the RIDA Supporting Report Figure 2-1 the same as referred to in s1.2 on page 4, table 1-1 on page 5, s2.2 and s2.3 on page 14 and s3.2.1 on page 19?

Action – Update the RIDA Supporting Report to identify the figure on page 16.

Note - The figure on page 16 does not include the land uses described in s2.3.1 on page 14.

Item 7

Issue – Section 2.3.3 details overlapping resource authorities. However, the narrative is not clear on the implications for any (future) proposed activity under that resource tenure if the proposed activity subject to this RIDA application is approved.

Action - Update the RIDA Supporting Report to note the consequences of the area available for permitted impacts to priority agricultural land uses (PALUs) resulting from other proposed, and cumulative, impacts.

Item 8

Issue – Section 3.2.1 does not detail the water and gas extraction area for each well.

Action – Update the RIDA Supporting Report to provide indicative locations of gas and water extraction areas for each deviated well.

Item 9

Issue – Insufficient information is provided in s3.2.1 (and s4.4.1 and Appendix 3) to determine if dial before you dig requirement areas will constrain, prevent, or restrict the use of those areas for PALU or everyday farming practices or infrastructure essential to the operation of a PALU on the respective properties.

Action – Update the RIDA Supporting Report to discuss any implications of the dial before you dig requirements. Provide updated figures to include these surface areas.

Item 10

Issue – Section 3.3 does not discuss what the likely impacts are on landowners who undertake irrigation activities if water table and/or water pressure drops because of the proposed activity.

Action – Update the RIDA Supporting Report to include and discuss how adverse impacts to irrigators will be managed, mitigated, or avoided.

Item 11

Issue – Section 4.1 does not detail the Regional Outcomes and Policies concerning priority agricultural areas (PAAs) as detailed in the Darling Downs Regional Plan.

Action – Update the RIDA Supporting Report to include and discuss the Regional Outcomes and Policies concerning PAAs as detailed in the Darling Downs Regional Plan with regards to agriculture having the primacy land use.

Item 12

Issue – Section 4.2.2 and Table 4-1 and 4-2 detail PALUs on lots subject to proposed activity. However, insufficient information is provided on how the Applicant considered the non-cropping PALUs. For example, there are areas on lots 11SP191489 and 141AG4261 that may have been used for grazing irrigated modified pastures. How was this considered, what was the methodology, assumptions and data used?

Action – Update the RIDA Supporting Report to detail how PALUs in classes 3.4, 4.1, 4.2, 4.4, 4.5 and 5.1 were considered and how it was determined that these PALUs did not occur on land subject to the proposed activities.

Item 13

Issue – Inconsistent use of depths to detail minimum depths of well trajectories. For example, one metre is referenced in s4.4.1, whereas 189 metres in s4.4.2 and 190 metres in s4.4.3.

Action – Update the RIDA Supporting Report to detail consistent minimum depths of the well trajectories.

Item 14

Issue – Section 4.4.4 discuss OGIA’s predicted change in slope for land subject to the proposed activity. However, the figures provided in Appendix 8 are too small to thoroughly investigate.

Action – Update the RIDA Supporting Report to show each of the four maps provided per lot subject to the proposed activity at the A3 scale.

Item 15

Issue – Section 4.4.4 discusses Figure 7-5 in OGIA’s 2021 UWIR. This figure is not provided in the RIDA application.

Action – Update the RIDA Supporting Report to include this figure.

Item 16

Issue - Section 4.4.4 discusses that Coffey’s subsidence modelling (2021) “indicates that any subsidence that occurs will be relatively widespread and even”. Why does the RIDA exclude those lots that are not subject to the proposed activity where the Applicant was not entered into a voluntary Conduct and Compensation Agreements (CCAs) that are likely to be impacted by coal seam gas (CSG) induced subsidence, given this advice mentioned above?

Action – Update the RIDA to discuss why land that is likely to experience CSG induced subsidence because of the proposed activity, which the Applicant has not entered voluntary CCAs, not been addressed.

Item 17

Issue – Section 4.4.5 does not detail the production and productive capacity of the lots the subject to the proposed activity.

Action – Update the RIDA Supporting Report to detail the production and productive capacity of the lots subject to the proposed activity.

Item 18

Issue – Section 4.5 does not discuss any measures to minimise impacts to PALU associated with the risk to landowners to secure new or refinance existing debt, insurance and other financial products resulting from the undertaking of the proposed activity on their properties.

Action – Update the RIDA Supporting Report, specifically in addressing Prescribed Solution for (1)(e) for Required Outcome Two and Prescribed Solution (3)(d) for Required Outcome One in Tables 12-1 and 12-2 respectively, to include discussion on the risks for affected landholders to secure and or refinance debt, insurance and other financial services and products and include commitments to provide a management strategy and actions that seeks to avoid, minimise, and mitigate such instances at pre-activity rates, premiums, and excesses, as well as relative terms and conditions.

Item 19

A)

Issue – Section 6.2 and Appendix 10 detail the status of consultations with landowners of lots subject to the proposed activity. However, no copies of the Conduct and Compensation Agreements (CCAs) or Deviated Well Agreements (DWAs) presented to landholders have been provided.

Action – Update the RIDA Supporting Report to include copies of the CCAs and DWAs presented to landowners, as detailed in Appendix 10.

B)

Issue – There is insufficient information on the compensation arrangements the Applicant has offered to the affected landowners.

Action – Update the RIDA Supporting Report to include discussion on the compensation arrangements that Applicant has offered to affected landowners.

Item 20

Issue – Section 7.2 discuss that a CSG Water Monitoring and Management Plan (WMMP) includes a three-tiered subsidence management framework. However, insufficient information is provided in this section to determine how this approach, including trigger thresholds and management/mitigation actions, may apply to lots subject to the proposed activity.

Action – Update the RIDA Supporting Report to discuss what the Applicant’s response will be when CSG induced subsidence exceeds the trigger thresholds.

Item 21

Issue – Section 8 discusses that the most recent modelling presented in Office of Groundwater Impact Assessment’s (OGIA) 2021 Underground Water Impact Report indicates that the “*maximum impact to the Condamine Alluvium as a result of CSG production is expected to be less than 0.3 metres for most of the area...*”. This includes discussion on how the Applicant has designed the Substitution Scheme to supply water to the area as a mitigation measure to potential impacts to the Condamine Alluvium.

Action – Update the RIDA Supporting Report to discuss how offsetting impacts to the Condamine Alluvium by purchasing allocations will not adversely impact the undertaking of current PALU within the affected area. If water allocation purchases are progressed, the Applicant should detail how it will apply for a separate RIDA application to manage the expected regional impacts to the PAA that may result.

Item 22

Issue – The figures provided in Appendix 3 do not clearly identify the Australian Land Use Mapping (ALUM) classes of PALUs detailed in the Darling Downs Regional Plan.

Action - Update the figures including legends to clear identify the ALUM Classes of PALUs detailed in the Darling Downs Regional Plan.

Item 23

Issue – The figures provided in Appendix 4 do not clearly identify the ALUM classes of PALUs detailed in the Darling Downs Regional Plan.

Action - Update the figures including legends to clear identify the ALUM Classes of PALUs detailed in the Darling Downs Regional Plan.

Please do not hesitate to call me to discuss
Kind regards

Ross Savage
A/Project Manager
Natural Assets Policy and Planning
Department of Agriculture and Fisheries
Level 6, 41 George Street, Brisbane, Queensland 4000
GPO Box 46, Brisbane Qld 4001
T: 07 3096 6535
E: ross.savage@daf.qld.gov.au
W: www.daf.qld.gov.au

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RTI RELEASE - DSDILGP

3 August 2022

Ms. Morag Elliott

Department of State Development, Infrastructure, Local Government and Planning
1 William Street Brisbane
QLD 4000

Via email

Dear Morag,

I am writing to you in relation to the Regional Interest Development Approval application lodged by Arrow Energy (the Applicant), reference "RPI22/004 – Kupunn Springvale Coal Seam Gas (CSG) Deviated Well Paths. The GasFields Commission (the Commission) has conducted a preliminary review of the application and supporting documentation.

To enable the Commission to provide advice to the Chief Executive pursuant to section 46 of the *Regional Planning Interest Act 2014* (RPI Act), the Commission is requesting further information from the Applicant. The attached table provides a summary of the requested additional information.

Under the *Gasfields Commission Act 2103*, the Commission has statutory function of advising the Chief Executive under the RPI Act about the ability of landholders, regional communities and the resources industry to coexist in areas of regional interest.

The preliminary review of the application and subsequent request for additional information has been conducted with this function in mind. It is anticipated that the additional information will inform the Commission to enable it to provide fulsome advice to the Chief Executive relating to matters of coexistence.

If you would like any additional information, please contact me on Sch. 4(4)(6) - Disclosing personal information in the first instance.

Yours sincerely

Jon Thomas
Director Policy and Projects

GasFields Commission

Attachment 1 – Request for information ref RPI22/004

Item	Section and page	Applicant	Request
1	1.2 – page 4	Arrow refers to Figure 2-1.	There is no figure 2-1 notated. Can the Applicant please confirm that Figure 2-1 is listed (and any other figures that are missing reference notations)?
2	1.2 – page 5	Arrow states that well pads are being constructed and operated under an exemption pursuant to section 22 of the RPI Act.	Can the Applicant provide a summary of the agreements? This is relevant from a transparency and coexistence perspective.
3	1.6.3- page 9	Arrow refers to coexistence and the creation of 12 commitments to coexistence in the Surat Basin in 2012.	Can the Applicant provide details to demonstrate how these commitments are being implemented? Can the Applicant confirm and detail if these commitments have been updated since 2012 to remain contemporary as almost 10 years have passed since they were created?
4	1.6.3 – page 9	Arrow refers to the establishment of community reference groups.	Can the Applicant confirm that these groups (including the IFL Committee) still meet? If so, how often do they meet? This is relevant from a coexistence perspective to build confidence in the community that stakeholders are being engaged with in a meaningful way.
5	1.6.3 - page 10	Arrow has developed a draft Construction and Operations simultaneous operations matrix (SIMOPS).	Can the Applicant provide a copy of the draft SIMOPS? Has the SIMOPS been tested in the field and if so, what were the outcomes?
6	1.6.3 – page 10	Arrow references “Table 3”.	It is not evident where Table 3 is and it could not be located. Can the Applicant please provide Table 3 and or the correct reference?
7	1.6.4 - page 11	Area Wide Planning (AWP)	Can the Applicant demonstrate that the land owner subject to this RIDA application has been involved in the AWP process? Have the neighbouring landholders subject to this RIDA application been involved in the AWP process? What were the outcomes to support coexistence?
8	1.7.4- page 12	Other Approvals	The Applicant refers arrangements under a Wayleave and a cross agreement. Can the Applicant provide summaries and conditions of these agreements?
9	3.2.1 - page 20	Other activities. Arrow states that operational activities will be undertaken remotely.	Can the Applicant confirm whether operational activities include workovers? Will workover activities require access to the sub-terranean land as a preliminary activity?
10	4.3 - page 25	Table 4.1 – Identification of PALU and associated properties.	Can the Applicant confirm what the associated properties are and why are they included in Table 4.1?
11	7.2 - page 45	Monitoring and Management of Subsidence. Arrow refers to the amendments to the Stage 1 WMMP.	Can the Applicant confirm that the proposed amendments to the WMMP will not have a material impact of the decision making process associated with this RIDA application?

12	7.2 – page 45	Monitoring and Management of Subsidence. Arrow refers to the amendments to the Stage 1 WMMP.	The Applicant refers “additional monitoring method, including bi-annual collection of LiDAR...” Can the Applicant clarify where bi-annual means twice yearly or every other year?
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RTI RELEASE - DSDILGP

Lauren Holden

From: Martin Moran <Martin.Moran@rdmw.qld.gov.au>
Sent: Monday, 1 August 2022 9:04 AM
To: Morag ELLIOTT
Subject: FW: New application under the RPI Act : RPI22/004 Arrow : Kupunn Springvale CSG Deviated Well Paths

The only comment I make is that they do not talk or map the tracks and connecting pipeline to the deviated wells on the subject land on the basis these surface impacts are on properties not the subject of this RPIA. This is faulty logic. So, it is difficult with the information provided to assess the surface impacts of tracks and pipelines associated with this project.

Regards



Martin Moran
Senior Water Officer
Water Services | Water Resource Management
Department of Regional Development, Manufacturing and Water

P: 07 4529 1394 M

E: martin.moran@rdmw.qld.gov.au

A: 203 Tor Street, Toowoomba QLD 4350 | PO Box 310, TOOWOOMBA, QLD 4350

W: www.rdmw.qld.gov.au

[Chat with me on Teams](#)

Sch. 4(4)(6) - Disclosing personal information

From: Martin Moran
Sent: Friday, 29 July 2022 11:15 AM
To: Morag Elliott
Cc: Ross Savage; Adam Gilmour
Subject: RE: New application under the RPI Act : RPI22/004 Arrow : Kupunn Springvale CSG Deviated Well Paths

Morag

I have no request for further information having gone through the supplied information seems adequate to assess it.

Regards

Martin

From: Morag ELLIOTT <Morag.Elliott@dasilgp.qld.gov.au>
Sent: Monday, 25 July 2022 2:53 PM

To: DoR Planning; WaterServices Toowoomba; DAF RPI Referral

Cc: Ross Savage; Adam Gilmour; Martin Moran

Subject: New application under the RPI Act : RPI22/004 Arrow : Kupunn Springvale CSG Deviated Well Paths

Good afternoon

Please be advised that an application for a Regional Interests Development Approval (RIDA) for resource activities: petroleum and gas, was lodged with the Department of State Development, Infrastructure, Local Government and Planning (DSDILGP) late on Friday 22 July 2022.

The application reference is RPI22/004 Arrow – Kupunn Springvale CSG Deviated Well Paths. Please quote this reference in all future correspondence.

The documents provided are:

- Cover email (attached)
- Assessment application form (attached)
- Supporting report
- Shapefiles
- CONFIDENTIAL Summary of Progress of Consultation (attached).

I will ask the applicant to send the link to the Supporting report and the Shapefiles to you separately. **Please advise by return email, today if possible:**

- **who this link should be sent to in your agency and**
- **the responsible officer via return email.**

Points

- You have been advised of the application as it involves resource activities (petroleum and gas) in the PAA and the SCA associated with Arrow Energy's Surat Gas Project
- The application proposes:
 - 14 sub-surface well trajectories (paths) proposed on six lots within PLs 198, 238 and 252 under Environmental Authority (EA) EPPG00972513
 - depths of the sub-surface deviated well trajectories (well paths) ranging from approximately 190 m to 607 m.

Task

Please review the application material and advise if you:

- require additional information from the applicant to assist in the assessment of the application.

OR

- do not require additional information from the applicant.

Timing

Please note the following timing:

- Monday 25 July 2022 - distribution to Department of Agriculture and Fisheries, Department of Resources and Department of Regional Development, Manufacturing and Water
- On or before **Tuesday 2 August 2022** - assessing agencies to :
 - provide DSDILGP with any further information required from the applicant to assist in the assessment of the application

Please include the Issue to which the further information relates, and the Actions required to address the Issue.

- advise DSDILGP that no further information is required from the applicant

- Friday 5 August 2022 - DSDILGP to issue a Requirement Notice, if required (i.e. request for further information and/or notification required).

Further timing will be provided as the application progresses. This will be dependent upon whether additional information/notification is required.

Thank you and if you have any queries please contact me.

Morag Elliott
Manager
Development Assessment Division , Planning Group
Department of State Development,
Infrastructure, Local Government and Planning

P 07 3452 7653



Level 13, 1 William Street, Brisbane QLD 4000
PO Box 15009 CITY EAST QLD 4002

statedevelopment.qld.gov.au



*I acknowledge the traditional custodians of the lands and waters of Queensland.
I offer my respect to elders past, present and emerging as we work towards a just,
equitable and reconciled Australia.*



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From: [Jon Thomas](#)
To: [Morag ELLIOTT](#)
Subject: RE: New application under the RPI Act : RPI22/004 Arrow : Kupunn Springvale CSG Deviated Well Paths
Date: Wednesday, 3 August 2022 4:38:14 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[20220803- Arrow RIDA RPI22_004 Kupunn Springvale deviated wells requirement response DSDILGP.pdf](#)
Importance: High

Good afternoon Morag.

With reference to our recent conversations in relation to RIDA application RPI22/004, please find attached correspondence detailing the GasFields Commissions request for additional information via the requirement notice that you are preparing.

Please do not hesitate to contact me should you require any additional information.

Also, thank you for the additional time to prepare.

Regards,

Jon Thomas

GFCQ Director - Policy and Projects

jon.thomas@gfcq.org.au | www.gfcq.org.au

Sch. 4(4)(6) -
Disclosing personal
information

From: Morag ELLIOTT <Morag.Elliott@dsdilgp.qld.gov.au>

Sent: Monday, 25 July 2022 2:57 PM

To: Jon Thomas <Jon.Thomas@gfcq.org.au>

Subject: New application under the RPI Act : RPI22/004 Arrow : Kupunn Springvale CSG Deviated Well Paths

Good afternoon

Please be advised that an application for a Regional Interests Development Approval (RIDA) for resource activities: petroleum and gas, was lodged with the Department of State Development, Infrastructure, Local Government and Planning (DSDILGP) late on Friday 22 July 2022.

The application reference is RPI22/004 Arrow – Kupunn Springvale CSG Deviated Well Paths. Please quote this reference in all future correspondence.

The documents provided are:

- Cover email (attached)
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- Supporting report
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I will ask the applicant to send the link to the Supporting report and the Shapefiles to you separately.

Please advise by return email, today if possible:

- who this link should be sent to in your agency and
- the responsible officer via return email.

Points

- You have been advised of the application as it involves resource activities (petroleum and gas)

in the PAA and the SCA associated with Arrow Energy's Surat Gas Project

- The application proposes:
 - 14 sub-surface well trajectories (paths) proposed on six lots within PLs 198, 238 and 252 under Environmental Authority (EA) EPPG00972513
 - depths of the sub-surface deviated well trajectories (well paths) ranging from approximately 190 m to 607 m.

Task

Please review the application material and advise if you:

- require additional information from the applicant to assist in the assessment of the application.

OR

- do not require additional information from the applicant.

Timing

Please note the following timing:

- Monday 25 July 2022 - distribution to Department of Agriculture and Fisheries, Department of Resources, Department of Regional Development, Manufacturing and Water and Gasfields Commission Queensland
- On or before **Tuesday 2 August 2022** - assessing agencies to :
 - provide DSDILGP with any further information required from the applicant to assist in the assessment of the application

Please include the Issue to which the further information relates, and the Actions required to address the Issue.

- advise DSDILGP that no further information is required from the applicant
- Friday 5 August 2022 - DSDILGP to issue a Requirement Notice, if required (i.e. request for further information and/or notification required).

Further timing will be provided as the application progresses. This will be dependent upon whether additional information/notification is required.

Thank you and if you have any queries please contact me.

Morag Elliott
Manager

Development Assessment Division , Planning Group
Department of State Development,
Infrastructure, Local Government and Planning

P 07 3452 7653

Level 13, 1 William Street, Brisbane QLD 4000
PO Box 15009 CITY EAST QLD 4002



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RTI RELEASE - DSDILGP

3 August 2022

Ms. Morag Elliott

Department of State Development, Infrastructure, Local Government and Planning
1 William Street Brisbane
QLD 4000

Via email

Dear Morag,

I am writing to you in relation to the Regional Interest Development Approval application lodged by Arrow Energy (the Applicant), reference "RPI22/004 – Kupunn Springvale Coal Seam Gas (CSG) Deviated Well Paths. The GasFields Commission (the Commission) has conducted a preliminary review of the application and supporting documentation.

To enable the Commission to provide advice to the Chief Executive pursuant to section 46 of the *Regional Planning Interest Act 2014* (RPI Act), the Commission is requesting further information from the Applicant. The attached table provides a summary of the requested additional information.

Under the *Gasfields Commission Act 2103*, the Commission has statutory function of advising the Chief Executive under the RPI Act about the ability of landholders, regional communities and the resources industry to coexist in areas of regional interest.

The preliminary review of the application and subsequent request for additional information has been conducted with this function in mind. It is anticipated that the additional information will inform the Commission to enable it to provide fulsome advice to the Chief Executive relating to matters of coexistence.

If you would like any additional information, please contact me on Sch. 4(4)(6) - Disclosing personal information in the first instance.

Yours sincerely

Jon Thomas
Director Policy and Projects

GasFields Commission

Attachment 1 – Request for information ref RPI22/004

Item	Section and page	Applicant	Request
1	1.2 – page 4	Arrow refers to Figure 2-1.	There is no figure 2-1 notated. Can the Applicant please confirm that Figure 2-1 is listed (and any other figures that are missing reference notations)?
2	1.2 – page 5	Arrow states that well pads are being constructed and operated under an exemption pursuant to section 22 of the RPI Act.	Can the Applicant provide a summary of the agreements? This is relevant from a transparency and coexistence perspective.
3	1.6.3- page 9	Arrow refers to coexistence and the creation of 12 commitments to coexistence in the Surat Basin in 2012.	Can the Applicant provide details to demonstrate how these commitments are being implemented? Can the Applicant confirm and detail if these commitments have been updated since 2012 to remain contemporary as almost 10 years have passed since they were created?
4	1.6.3 – page 9	Arrow refers to the establishment of community reference groups.	Can the Applicant confirm that these groups (including the IFL Committee) still meet? If so, how often do they meet? This is relevant from a coexistence perspective to build confidence in the community that stakeholders are being engaged with in a meaningful way.
5	1.6.3 - page 10	Arrow has developed a draft Construction and Operations simultaneous operations matrix (SIMOPS).	Can the Applicant provide a copy of the draft SIMOPS? Has the SIMOPS been tested in the field and if so, what were the outcomes?
6	1.6.3 – page 10	Arrow references “Table 3”.	It is not evident where Table 3 is and it could not be located. Can the Applicant please provide Table 3 and or the correct reference?
7	1.6.4 - page 11	Area Wide Planning (AWP)	Can the Applicant demonstrate that the land owner subject to this RIDA application has been involved in the AWP process? Have the neighbouring landholders subject to this RIDA application been involved in the AWP process? What were the outcomes to support coexistence?
8	1.7.4- page 12	Other Approvals	The Applicant refers arrangements under a Wayleave and a cross agreement. Can the Applicant provide summaries and conditions of these agreements?
9	3.2.1 - page 20	Other activities. Arrow states that operational activities will be undertaken remotely.	Can the Applicant confirm whether operational activities include workovers? Will workover activities require access to the sub-terranean land as a preliminary activity?
10	4.3 - page 25	Table 4.1 – Identification of PALU and associated properties.	Can the Applicant confirm what the associated properties are and why are they included in Table 4.1?
11	7.2 - page 45	Monitoring and Management of Subsidence. Arrow refers to the amendments to the Stage 1 WMMP.	Can the Applicant confirm that the proposed amendments to the WMMP will not have a material impact of the decision making process associated with this RIDA application?

12	7.2 – page 45	Monitoring and Management of Subsidence. Arrow refers to the amendments to the Stage 1 WMMP.	The Applicant refers “additional monitoring method, including bi-annual collection of LiDAR...” Can the Applicant clarify where bi-annual means twice yearly or every other year?
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RTI RELEASE - DSDILGP