

24 January 2023

Mr. Phil Joyce
Director
Development Assessment Division – Planning Group
Department of State Development, Infrastructure, Local Government and Planning
PO Box 15009
City East QLD 4002

Dear Mr. Joyce,

Re: Your ref: D22/172947, Requirement Notice - RPI22/007 Westside – Moura gathering lines

We refer to the Requirement Notice from the Department of State Development, Infrastructure, Local Government and Planning (**DSDILP**) dated 12 December 2022 in relation to the application submitted on 28 November 2022 for a regional interests development approval (**RIDA**) under section 29 of the Regional Planning Interests Act 2014 (**RPI Act**) seeking approval to conduct petroleum and gas resource activities, namely the installation of gas and water gathering lines within the Moura priority living area (**PLA**).

The Requirement Notice requested further information which we have provided below.

Request

The Regional Interest Development Approval Application for the Moura Priority Living Area – Assessment Report (Supporting report) provided in support of the application states at Table 3 that:

- *‘A construction ROW of a maximum of 30m will be utilised and rehabilitated immediately after construction activities are completed, leaving an access track along the pipeline ROW’*
- *‘The ongoing surface impact associated with the gathering lines, HPVs, LPDs and access is a maximum of 0.5ha over the life of the Project’.*

The Supporting report states at s6.1 that a typical low point drain (LPD) footprint is 2.5m x 2.5m and that a typical high point valve (HPV) footprint is 2.5m x 5m.

It is not clear whether the ongoing surface disturbance area, which is not to be rehabilitated, includes only the access tracks, the LPDs and the HPVs, and whether this is in accordance with the rehabilitation conditions of the environmental authority (EA).

Actions:

- a) *Provide detailed information on all areas of ongoing surface disturbance eg width and length of access tracks, number of LPDs and HPVs etc*

A summary table of proposed areas of ongoing surface disturbance is provided below. All areas of ongoing disturbance will be included within the 30m Construction Right of Way (**CROW**). On

completion of the works along the CROW, progressive rehabilitation will be undertaken. All areas of the CROW will be rehabilitated with the exception of a 3m wide formed access track, two LPDs and two HPVs. The 3m wide formed access track and the two LPDs and HPVs have been included in the area calculation of ongoing disturbance. As detailed design has not been completed, an additional area has been allowed to account for initial changes in the detailed design. The combined disturbance figures plus the contingency area account for a maximum of 0.5ha of ongoing surface disturbance over the life of the Project.

Feature Type	Total	Area	Comments
Access tracks	1010m	3030sqm (0.303ha)	3m wide formed access track
LPD and related access	2	512sqm (0.051ha)	Includes 5m access around fenced compound and up to 10m of access track to allow for travel from formed track above to infrastructure
HPV and related access	2	525sqm (0.053ha)	Includes 5m access around fenced compound and up to 10m of access track to allow for travel from formed track above to infrastructure
	Total	4067sqm (0.4067ha)	
Detailed design contingency		933sqm (0.0933ha)	The maximum proposed additional ongoing surface disturbance area should additional requirements arise through detailed design
	Total	5000sqm (0.5ha)	

A summary of proposed ongoing surface disturbance for each property is detailed in the tables below.

Location	110CP895858	
Item	Disturbance area	Comments
Access track	273sqm (0.027ha)	91m x 3m
Total	273sqm (0.027ha)	

Location	Road Reserve (Dawson Highway)	
Item	Disturbance area	Comments
Access track	568sqm (0.0567ha)	189m x 3m
LPD and access	256sqm (0.0256ha)	1 x LPD
HPV and access	262.5sqm (0.263ha)	1 x HPV
Total	1086.5sqm (0.1087ha)	

Location	1SP252890	
Item	Disturbance area	Comments
Access track	2190sqm (0.219ha)	730m x 3m
LPD and access	256sqm (0.0256ha)	1 x LPD
HPV and access	262.5sqm (0.263ha)	1 x HPV
Total	2708.5sqm (0.2709ha)	

- b) Confirm that the proposed areas of ongoing surface disturbance area that are not to be rehabilitated are in accordance with conditions of the EA relating to rehabilitation.

Rehabilitation will be undertaken over areas of ongoing surface disturbance at the end of life of the Project in accordance with the conditions of the EA relating to rehabilitation. The proposed areas of ongoing surface disturbance are authorised under the conditions of the EA.

There are three schedules within the PPL182 EA (contained in Appendix B of the Supporting Report) that contain rehabilitation conditions. These schedules are detailed below along with a table detailing compliance against each applicable condition.

Schedule E – Construction Conditions

Pipeline reinstatement and revegetation

PPSCE 17.

Pipeline trenches must be backfilled, and topsoil reinstated within 3 months after pipe laying.

PPSCR 18.

Reinstatement and revegetation of the pipeline right of way must commence within 6 months after completion of petroleum activities for the purpose of pipeline construction.

PPSCE 19.

Backfilled, reinstated, and revegetated pipeline trenches and right of way must be:

- a) A stable landform
- b) Re-profiled to a level consistent with surrounding soils
- c) Re-profiled to original contours and established drainage lines
- d) Vegetated with groundcover which is not a declared pest species, and which is established and self-sustaining.

Schedule E Requirement	Comment
PPSCE 17	In line with the construction methodology in S6.1 of the Supporting Report, once the pipe is lowered into the trench, the trench is backfilled and then re-profiled consistent with the surrounding area. The topsoil and vegetation stockpiles are then respread over the ROW to promote natural regeneration. Backfill is generally completed immediately after the pipe installation and topsoil is generally reinstated approx. 1-2 weeks after pipeline installation.
PPSCE 18	In accordance with the construction methodology in S6.1 of the Supporting Report and PPSCE 17 comment above, reinstatement and revegetation occur after the backfill and topsoil reinstatement of pipeline trench and CROW. Revegetation includes seeding of the CROW with a similar mix of vegetation to that which existed pre-disturbance. Often plants and seeds are collected during clearing activities and used during reinstatement.
PPSCE 19	In accordance with S6.1 and S6.3 of the Supporting Report and PPSCE 17 & PPSCE 18 comments above, proposed pipeline trenches and CROWs are backfilled, reinstated and revegetated as part of the construction activity and prior to the commissioning of the pipeline. Following rehabilitation, access to infrastructure will be limited to essential activities only to minimise future impacts to the rehabilitated land. Maintenance of rehabilitated areas will take

Schedule E Requirement	Comment
	<p>place as required following monitoring to ensure the following objectives are met:</p> <ul style="list-style-type: none"> • landforms remain stable with no significant subsidence or erosion; • erosion control measures remain effective; • stormwater runoff and seepage from reinstated areas do not negatively affect the environmental values of any waters; • plants show healthy growth and recruitment is occurring; and • pest and weed species are managed in accordance with the Biosecurity Act 2014.

Schedule F – Post-Construction conditions including operations, maintenance and decommissioning.

Final acceptance criteria for rehabilitation

PPSCF 4.

After decommissioning, all significantly disturbed land caused by the carrying out of the petroleum activity(ies) must be rehabilitated to meet the following acceptance criteria:

- a) Any contaminated land (e.g. contaminated soils) is remediated and rehabilitated
- b) Rehabilitation is undertaken in a manner such that any actual or potential acid sulfate soils on the area of significant disturbance are treated to prevent or minimize environmental harm in accordance with the Instructions for the treatment and management of acid sulfate soils (2001)
- c) For land that is not being cultivated by the landholder:
 - i. Ground cover, that is not a declared pest species is established and self-sustaining
 - ii. Vegetation of similar species richness and species diversity to pre-selected analogue sites is established and self-sustaining
- d) For land that is to be cultivated by the landholder, cover crop is revegetated, unless the landholder will be preparing the site for cropping within 3 months of petroleum activities being completed.

Schedule F Requirement	Comment
PPSCF 4	<p>The Moura PLA is outside of any mapping for acid sulfate soils therefore it is highly unlikely that construction crews will encounter any <i>potential acid sulfate soils</i> (PASS) during the course of the works.</p> <p>Westside will conduct a contaminated land assessment following the completion of CSG activities and this will form part of the final rehabilitation report in accordance with the EA.</p> <p>Decommissioning of infrastructure will be undertaken in accordance with the relevant provisions of the Petroleum and Gas (Production and Safety) Act 2004 and the Petroleum and Gas (Safety) Regulation 2018.</p> <p>Where a landholder wishes to retain certain infrastructure, such as access tracks, an agreement will be put in place to transfer the infrastructure to the landholder.</p>

Schedule F Requirement	Comment
	Through the rehabilitation phase post-decommissioning, landholders will be consulted. Pending the response, the rehabilitation will follow either PPSCF 4 (c) or PPSCF 4 (d).
	Monitoring will be undertaken to confirm that the final rehabilitation acceptance criteria, as detailed in PPSCF 4, has been achieved.

In addition to the rehabilitation conditions mentioned above, there are conditions in the EA for the management of soils where land has been disturbed, discussed below:

Schedule C – General Conditions

Soil Management

PPSCC 8.

Measures must be implemented and maintained to minimize stormwater entry onto significantly disturbed land.

PPSCC 9.

Sediment and erosion control measures to prevent soil loss and deposition beyond significantly disturbed land must be implemented and maintained.

PPSCC 10.

The measures required by standard conditions (PPSCC 8) and (PPSCC 9) must be in accordance, to the greatest practicable extent, with the International Erosion Control Association (IECA) Best Practice Erosion and Sediment Control (BPESC) document and/or the Australian Pipeline Industry Association (APIA) Code of Environmental Practice: Onshore Pipelines (2009).

Schedule C Requirement	Comment
PPSCC 8	As noted in S6.1 and S6.3 of the Supporting Report, during the rehabilitation activities of the CROW, all areas of ongoing surface disturbance will be sited to ensure minimal stormwater entry onto the disturbed land.
PPSCC 9	As noted in S6.1 and S6.3 of the Supporting Report, during the rehabilitation activities of the CROW, all areas of ongoing surface disturbance will have appropriate erosion and sediment control practices implemented and maintained to prevent the loss of soil from the disturbed area.
PPSCC 10	The measures implemented under conditions PPSCC 8 and PPSCC 9 will be undertaken in accordance with International Erosion Control Association (IECA) Best Practice Erosion and Sediment Control (BPESC) document and/or the Australian Pipeline Industry Association (APIA) Code of Environmental Practice: Onshore Pipelines (2009).

We trust this response satisfies the Department's queries. We thank you for your time in assessing our application and look forward to receiving your response.

If you have any questions in relation to the above, please do not hesitate to contact Nimandra Gunasekera, Access and Approvals Manager, on 07 3020 0900.

Your sincerely

A handwritten signature in black ink, appearing to read 'Simon Mewing', written in a cursive style.

Simon Mewing
Chief Development Officer
Westside Corporation Pty Ltd

