



Queensland  
Government

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

Our ref: D25/47283

2 April 2025

Arrow CSG (Australia) Pty Ltd  
Arrow Energy Pty Ltd  
C/- Mr Darryl Patching  
Regulatory Approvals Specialist  
email: [darryl.patching@arrowenergy.com.au](mailto:darryl.patching@arrowenergy.com.au)

Dear Mr Patching

## REQUIREMENT NOTICE

### **RPI25/004 Arrow CASS Tie-in – Installation of Tie-in valve and treated water pipeline**

(given under section 44 of the *Regional Planning Interests Act 2014*)

I refer to the assessment application which was properly made on 19 March 2025 under section 29 of the *Regional Planning Interests Act 2014* (RPI Act). The application is seeking a regional interests development approval (RIDA) for resource activity: petroleum and gas for Tie-in valve and treated water pipeline in the priority agricultural area and strategic cropping area.

#### **Application details**

Applicant	Arrow CSG (Australia) Pty Ltd Arrow Energy Pty Ltd
Project	Arrow CASS Tie-in
Description	Installation of Tie-in valve and treated water pipeline
Area of regional interest	Priority Agricultural Area (PAA) and Strategic Cropping Area (SCA)
Proposed disturbance area	PAA – 0.3ha, SCA – 0.3ha ( <i>*subject to confirmation as part of this requirement notice</i> )

#### **Site details**

Real property description	Lot 3 on RP77715
Local government area	Western Downs Regional Council

#### **Information Requirement**

Pursuant to section 44 of the RPI Act, you are advised that further information is required to assist in the assessment of the application against the assessment criteria contained in the RPI Act and the Regional Planning Interests Regulation 2014 (RPI Regulation).

1 William Street  
Brisbane Queensland 4000  
PO Box 15009  
City East Queensland 4002  
**Telephone** 13 QGOV (13 74 68)  
**Website** [www.statedevelopment.qld.gov.au](http://www.statedevelopment.qld.gov.au)  
**ABN** 29 230 178 530

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

The period within which the required information must be provided is a maximum of three months from the date of this notice. Should it be necessary, an extension to this period may be requested. Another requirement notice may be issued if the response to the initial notice does not supply sufficient information to adequately assess and decide upon the application, or in response to matters raised in a submission.

### **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 '*at least once in a newspaper circulating generally in the area of the land*' as prescribed in section 13 of the RPI Regulation
- where not the owner of the land, give the owners of the land notice about the application.

Please provide proof of delivery of notice about the application to landowners to [RPIAct@dasilgp.qld.gov.au](mailto:RPIAct@dasilgp.qld.gov.au)

Public notification must be undertaken within 10 business days of providing the response to the requirement notice to the Department of State Development, Infrastructure and Planning (DSDIP). The notification period is 15 business days after the notice about the application is first published, with the closing date being a day that is after the end of the notification period.

The approved form for public notification is available on DSDIP's website at [rpi-regional-interests-dev-approval-template.doc \(live.com\)](http://rpi-regional-interests-dev-approval-template.doc.live.com)

Please provide a copy of the notice as it appears in the newspaper circulating generally in the area to [RPIAct@dasilgp.qld.gov.au](mailto:RPIAct@dasilgp.qld.gov.au)

You are also referred to the RPI Act Statutory Guideline 06/14 Public notification of assessment applications at [RPI Act - Statutory Guideline 06/14 \(windows.net\)](http://RPI Act - Statutory Guideline 06/14 (windows.net)) for further information.

If you require any further information, or have any queries, please contact Mr Darren Brewer, Manager – Appeals and Regional Interests, Planning Group, DSDIP on (07) 3452 7472 or by email at [RPIAct@dasilgp.qld.gov.au](mailto:RPIAct@dasilgp.qld.gov.au) who will be pleased to assist.

Yours sincerely



Phil Joyce  
**A/Executive Director  
Improvement and Assessment  
Planning Group**

Encl. Attachment A

**ATTACHMENT A**

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

<p>1.</p>	<p><b><u>Issue:</u></b></p> <p>The application indicates the land in this application within SCA overlaps with land used for a Priority Agricultural Land Use (PALU) in a PAA.</p> <p>As per RPI Act Statutory Guideline 03/14, the assessor must ensure that the activity complies with the applicable PAA assessment criteria when deciding on the application relevant to the overlapping land.</p> <p><b><u>Actions:</u></b></p> <p>Please confirm whether all of the disturbance footprint is within the mapped Priority Agricultural Land Use area.</p>
<p>2.</p>	<p><b><u>Issue:</u></b></p> <p>The assessment application form lodged in support of the application states that 0.3ha of Strategic Cropping Area (SCA) is to be disturbed. However, the supporting report (page 23) states that the expected area of impact to SCA is:</p> <ul style="list-style-type: none"> <li>• 1.38 ha during construction</li> <li>• 0.82 ha during operation</li> <li>• 0.3 ha during decommissioning and restoration</li> </ul> <p><b><u>Actions:</u></b></p> <p>Clarify the total footprint of disturbance within mapped SCA for which the approval is required and the total extent will be restored to pre-activity condition through a restoration plan.</p>
<p>3.</p>	<p><b><u>Issue:</u></b></p> <p>The application supporting material states (at page 4), ‘The scale of impact is 0.3 hectares during the construction phase and 0.0016 hectares during operation, and the activities can be fully restored when the tenure expires and the broader coal seam gas (CSG) activities in the area cease.’</p> <p>However, the above statement is contradicted by evidence provided by Plate 3-1 (page 8), where during construction, the soil horizons were not returned in the same order as extraction.</p> <p>The report states, ‘The proposed work activities will be in operation for approximately 12 years, prior to being decommissioned and rehabilitated in accordance with the conditions of the Petroleum Lease, the Environmental Authority and relevant legislation.’</p> <p>The supporting report also states (at page 24), ‘The land will be returned to its previous general state’. “Previous general state” is not “pre-activity condition”</p>

and does not constitute restoration as required by the Statutory Guidelines 09/14.

In this regard, Statutory Guideline 09/14 states:

*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.*

Guideline 09/14 also states, '...information requirements for demonstrating land will be restored to pre-activity condition will be best presented through a detailed restoration plan'.

Restoration requirements have not been formalised in a restoration plan (as required by the Statutory Guideline 09/14) to support that the land can be restored to its pre-activity condition at the end of the proposed activities, as required by prescribed solution (d)(i).

The supporting report states in Table 3-2 that they will establish pre-activity soil condition. The establishment of pre-activity condition is a key component of a restoration plan. It is not to be established at some undefined point of time in the future. There are no requirements in Table 3-1 for the soil horizons to be returned in the same order as extraction.

Appendix F- Restoration Plan (within the supporting report) is stated as a Land Rehabilitation Plan. "Restoration" has a specific meaning for the purposes of impacts to SCA and is not the same as "rehabilitation."

Sections 3.2 and 7.3 of the supporting report state that construction activities include undertaking the reinstatement and rehabilitation of the balance of the disturbance area. Proposed work activities do not provide details of the reinstatement to the original land use (i.e., replanting, fallowing, revegetating).

**Actions:**

- a) Please provide further information to address requirements of the Prescribed Solution (d)(i), including a fully costed and peer reviewed restoration plan for any non-PALU areas of the PAA; and
- b) Please provide details of proposed actions to reinstate land to original PALU following construction activities.

4.	<p><b><u>Issue:</u></b></p> <p>Section 3.1 of the supporting report states, 'The valve, a single 112m length of pipe (capped at this stage) and supporting pipeline form the entirety of the activity to be considered under this application.'</p> <p>It is unclear what this section references as the "supporting pipeline", noting that the Executive Summary, Scope and Definition of Work Activities do not include any references to a supporting pipeline. Further, the application material states, 'tie-in valve in treated water pipeline.'</p> <p><b><u>Actions:</u></b></p> <ul style="list-style-type: none"> <li>a) Clarify that the application involves a 'tie-in valve <u>and</u> treated water pipeline', given the above; and</li> <li>b) Please clarify the reference to "supporting pipeline" within the report, and provides details relating to the purpose, location and depth of the supporting pipeline.</li> </ul>
5.	<p><b><u>Issue:</u></b></p> <p>Section 3.2, Table 3-1 of the supporting report identifies the installation of a two-by-two metre fenced-out area to facilitate valve operation (0.0004 ha). This appears inconsistent with Section 8 of the supporting report, where the operational direct disturbance area for the valve (the fenced-out area) is shown as 0.0016 ha.</p> <p><b><u>Actions:</u></b></p> <p>Please provide clarification regarding this apparent inconsistency with the operational direct disturbance area.</p>
6.	<p><b><u>Issue:</u></b></p> <p>Section 3.3 of the supporting report states land and subject land are operated as a single enterprise, with the remainder of the original "Theten" leased for cattle grazing.</p> <p><b><u>Actions:</u></b></p> <p>Please provide evidence from the Farm Manager or landowner that the land is operated as a single agricultural enterprise.</p>
7.	<p><b><u>Issue:</u></b></p> <p>Section 6 of the supporting report provides minimal details regarding the methodology used to calculate the extent of shadow effects/areas with work activities.</p> <p><b><u>Actions:</u></b></p> <p>Please provide information regarding the determination of shadow effects/areas during work activities, including any relevant advice provided by the Farm Manager or landowner.</p>

8.	<p><b><u>Issue:</u></b></p> <p>Section 7.3 of the supporting report notes the intention for reinstatement and rehabilitation work activities to maintain the original overland flow conditions.</p> <p>Insufficient detail has been provided of anticipated impacts to overland flow from installed infrastructure and methods use to mitigate impacts to surrounding PALU and properties.</p> <p><b><u>Actions:</u></b></p> <p>Please provide information of anticipated impacts to overland flow from installed infrastructure and methods use to mitigate impacts to PALU on the property, as well as PALU on surrounding properties. This includes any impacts to future PALUs undertaken in the area.</p>
9.	<p><b><u>Issue:</u></b></p> <p>Section 10.1 of the supporting report states that the applicant is not the owner of the land and there is a voluntary agreement with the landowner with respect to CSG activities on the property. No evidence has been provided of a voluntary agreement (or consultation) with the landowner within the application.</p> <p><b><u>Actions:</u></b></p> <p>Please provide evidence of a voluntary agreement (or extract) with the landowner, including relevant parties, date entered and currency of agreement.</p>
10.	<p><b><u>Issue:</u></b></p> <p>Section 10.1 (and Appendix D) of the supporting report states that the Farm Manager is consulted regularly to ensure CSG activities do not adversely impact agricultural activities. No evidence has been provided of consultation conducted with the Farm Manager.</p> <p><b><u>Actions:</u></b></p> <ul style="list-style-type: none"> <li>a) Please provide advice from the Farm Manager/ landowner supporting consultation conducted to minimise impacts to agricultural activities from proposed CSG activities. If the leased area is impacted, please provide evidence that the party that operates the other agricultural enterprise has been notified of this application; and</li> <li>b) Please provide information relating to the current land use within the impacted area, and the last 10 years (2015-2024 inclusive).</li> <li>c) Specifically, please provide advice on the following matters: <ul style="list-style-type: none"> <li>i. Has the impacted area on Lot 3 RP77715 (including shadow effect areas) been used for irrigated cropping from the centre pivots identified? If so, what years was this conducted in the period 2015-2024?</li> <li>ii. <u>If not</u>, has the impacted area on Lot 3 RP77715 (including shadow effect areas) been used for dryland cropping (or another PALU)? If so, what years was this conducted in the period 2015-2024?</li> </ul> </li> </ul>

	<p>iii. Is any part of Lot 3 RP77715 currently leased to a third party? Where is this land in relation to the impacted areas (including shadow effect areas)?</p>
11.	<p><b><u>Issue:</u></b></p> <p>Appendix D of the report states:  <i>The Subject Land is located within the Darling Downs Regional Plan and the Western Downs Planning Scheme. The PALUs specific to the PAAs mapped in the Darling Downs regional plan are largely land uses and practices associated with Class 2 (Production from Relatively Natural Environments, to the west of Wilkie Creek) and Class 4 (Production from Irrigated Agriculture and Plantations to the East of Wilkie Creek) in accordance with the Australian Land Use Management (ALUM) classification Version 8 (October 2016).</i></p> <p>It is unclear how the applicant determined ALUM Schedule 2 grazing from natural environments as PALU, noting that the Darling Downs Regional Plan 2013 defines PALU as land uses included in class 3.3 (cropping), 3.4 (perennial horticulture), 3.5 (seasonal horticulture), 4 (production from irrigated agriculture and plantations) or 5.1 (intensive horticulture) under the ALUM Classification Version 7 (2010).</p> <p><b><u>Actions:</u></b></p> <p>Please clarify which ALUM Classifications have been used to determine PALU on the land, relevant to the previous statement above.</p>
12.	<p><b><u>Issue:</u></b></p> <p>Figure D1 of the supporting report does not identify PAA relevant for a PALU trigger.</p> <p><b><u>Actions:</u></b></p> <p>Please update Figure D1 to demonstrate the extent of PAA.</p>
13.	<p><b><u>Issue:</u></b></p> <p>Figure E1 of the supporting report includes construction phase impact area but does not clearly define the shadow effect areas in the figure's legend.</p> <p><b><u>Actions:</u></b></p> <p>Please update Figure E1 legend to clearly define shadow effect area.</p>

14.	<p><b><u>Issue:</u></b></p> <p>Figure E1 of the supporting report demonstrates the shadow effects during construction. No shapefile of shadow effect impact area has been provided with the report.</p> <p><b><u>Actions:</u></b></p> <p>Please provide relevant shapefile of shadow effects during construction and operational phases.</p>
15.	<p><b><u>Issue:</u></b></p> <p>Appendix H of the supporting report provides no information regarding the depth of the tie-in valve and associated pipe to establish it will not impact PALU.</p> <p><b><u>Actions:</u></b></p> <p>Please update the supporting report to include the indicative depth of the tie-in valve and pipeline.</p>
16.	<p><b><u>Issue:</u></b></p> <p>The supporting report uses varying terms and figures to demonstrate various areas of impact during work activities, which impact the review of the report.</p> <p><b><u>Actions:</u></b></p> <p>Please provide a single table that clearly sets out all of the areas of impact, including direct disturbances and associated shadow impacts during each work activity.</p>
17.	<p><b><u>Issue:</u></b></p> <p>Section 2 of the supporting report identifies the disturbance area, including shadow effect areas, as 1.38 hectares during construction. This is inconsistent with the Assessment Application Form, which identifies that the disturbance to 0.3 hectares of PAA.</p> <p><b><u>Actions:</u></b></p> <p>Please update the Assessment Application Form to reflect the extent that the carrying out of PALU is precluded within the PAA.</p>

18.	<p><b><u>Issue:</u></b></p> <p>The declaration in Section 10 of the supporting report does not identify the relevant company name of the authorised signatory, noting the two applicants, Arrow CSG (Australia) and Arrow Energy, and the Circulating Resolution provided.</p> <p><b><u>Actions:</u></b></p> <p>Please confirm the relevant company name within Section 10 of the Assessment Application Report.</p>
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