

24 June 2011



Mr Phil Dash
Assistant Coordinator-General
Department of Employment, Economic Development and Innovation
Level 4, 63 George St
BRISBANE QLD 4000

Dear Mr Dash

RE: Application to Change Appendix 1, Part 2, Condition 1 of the Coordinator General's Report on the QCLNG Project

As discussed recently, QGC wishes to make an application to modify Appendix 1, Part 2, Condition 1 of the Coordinator General's Report on the environmental impact statement for the QCLNG Project (June 2010). This report imposed a number of conditions regarding the transportation of pipe from Brisbane and Gladstone Ports to QCLNG's field marshalling areas. In particular, the conditions of the report restricted the transport of pipe by road to 25%.

Port of Brisbane

A large section of the Queensland rail network was either damaged or destroyed as a result of extensive flooding across Queensland in January 2011. This resulted in Queensland Rail being unable to transport any of QGC's pipeline sections to western Queensland for a period of approximately 3 months. Thus, six (6) shipments of pipeline have so far been unable to be moved and remain stored at the Port of Brisbane.

Recently the rail network was repaired. Unfortunately, no additional rail allocations have been permanently granted for the QCLNG Project. To ensure that there is ample storage for the remainder of shipments of pipe from China at the Port of Brisbane and to meet construction schedule, QGC will need to transport this excess pipe by road. This will mean that approximately 40% of pipe from the Port of Brisbane will need to be transported by road.

Port of Gladstone

With regard to the Port of Gladstone, QGC has been unable to rail any pipeline from the Port of Gladstone to the rail siding located in Banana Shire Council. Banana Shire Council has not provided QGC with the necessary approval to transport the pipe from the rail siding to the field marshalling area. This involves transporting the pipe along only 300m of roads administered by Banana Shire Council. QGC has received approval to transport the pipe once outside of Banana Shire Council to the various field marshalling areas along the Pipeline Right of Way by other Local Governments.

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As a result QGC has been unable to utilise its existing contract with Queensland Rail to transport pipe from the Port of Gladstone. Queensland Rail has been unable to confirm that it will be able to extend this contract once it expires.

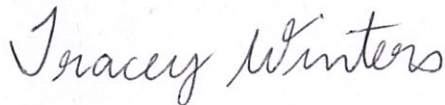
These on-going and protracted local government negotiations have now led to QGC having no option but to haul excess pipe via road to the Pipeline Right of Way. This will result in approximately 40% of pipe from the Port of Gladstone being transported by road.

Thus, to ensure the project remains on schedule, QGC is seeking a change to Appendix 1, Part 2, Condition 1 (see attached report). The change requested is to increase the amount of pipe that is allowed to be transported by road from 25% to 40%. This request applies to pipeline transported from both the Port of Brisbane and the Port of Gladstone. The accompanying report is submitted for your formal review (changes to a previous version are highlighted).

QGC is committed to rail and will continue to transport pipe by rail if more rail allocations become available. QGC is also committed to keeping Queensland roads safe and in good operating conditions and will continue to work with the Department of Transport and Main Roads and local government to achieve this.

Your assistance in this matter is greatly appreciated. Please contact James MacDermott on 3024 7013 if you require any further information regarding this matter.

Yours sincerely

A handwritten signature in cursive script that reads "Tracey Winters".

Tracey Winters
General Manager – Environment (QCLNG)

Change Report

Under s. 35 of the State Development and Public Works Organisation Act 1971

Rev B

June 2011

Uncontrolled when printed

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1.0 INTRODUCTION

In June 2010, the Coordinator-General's report on the environmental impact statement for the Queensland Curtis LNG Project (QCLNG) was released. QGC is working with the Queensland Government to implement the findings and conditions that relate to this decision.

Condition 1, Part 2, Appendix 1 stipulates a percentage of pipe transport tasks which must be transported by rail from the point of importation to the field marshalling yard. [Because of circumstances beyond its control](#) QGC needs to change this condition to allow a reduction of pipeline to be transported by rail from both Brisbane and Gladstone Ports to the field marshalling areas.

As a result of the early 2011 Queensland floods, large sections of the Queensland rail network were damaged or destroyed. This resulted in Queensland Rail being unable to transport any of QGC's pipe to western Queensland for a period of approximately three months. This has resulted in approximately 6 shipments of pipe being stranded (unable to be moved) at the Port of Brisbane.

Recently the rail network was repaired. Unfortunately, the same rail allocations have been sustained for the QCLNG Project and there has been no increase to original services (see attachment 1) provided by Queensland Rail. Thus, QGC will need to haul the excess or stranded pipe via road from Brisbane to the Pipeline Right of Way (ROW) to ensure that:

- Safety at the Port of Brisbane is maintained and double handling is minimised;
- Shipments from China can be unloaded; and
- Pipe reaches the ROW in time for construction.

With regard to Gladstone, QGC has been unable to utilise its existing contract with Queensland Rail [because Banana Shire Council will not approve transport over its 300m section of road from X to Y](#). This has now led to QGC having no option but to haul excess pipeline via road to the Pipeline Right of Way for the following reasons:

- Storage at the Port of Gladstone is now fully utilised;
- Safety at the Port of Gladstone is to be maintained;
- Shipments from China are currently being delayed at QGC's expense due to lack of storage availability at Gladstone and Brisbane; and
- The need to clear storage at the Port of Gladstone for other LNG proponents (eg. APLNG's Narrows Crossing Pipe).

To ensure that the project remains on schedule, QGC is seeking a change to Appendix 2, Part 2, Condition 1 to increase the amount of pipe that may be transported by road from 25% to 40%, representing an increase of 15% or approximately 80km of pipe. This will result in an additional 1600 truck trips for the transportation of pipe on Queensland roads.

1.1 Change Requested

QGC requests the following changes:

That Appendix 1, Part 2 – Transport, Condition 1 is changed FROM:

Subject to condition 2 below regarding pipe transport at Gladstone, rail transport from the point of importation to the field marshalling yard must be for at least **75** per cent of **pipe transport tasks** for the export pipeline and gas collection header pipelines.

TO:

Subject to condition 2 below regarding pipeline transport at Gladstone, rail transport from the point of importation to the field marshalling yard must be for at least **60** per cent of **pipe transport [tasks](#)** for the export pipeline and gas collection header pipelines.

1.2 Justification for the Change

The change will be incorporated into the Logistics plans through an addendum to each plan issued by QGC. It is not proposed to issue new versions of the Surat Region and Gladstone Logistic Plans as each has been used to develop the Road Impact Assessment and Road Use Management Plans.

To support these changes an addendum to the Road Impact Assessment (RIA) and Road Use Management Plan (RMP) will be considered and issued if required. QGC's initial assessment is that the impacts are relatively minor in terms of the total impact and subsequent changes to these plans.

The RIA has been based on condition data provided by the Department of Transport and Main Roads. The assessment requires consideration of increased pavement damage due to haulage. Any additional haulage impacts will be identified using the Fitzroy Region method as required in the Coordinator General's report and advice of changes to the RIA issued in the form of an addendum. The RMP is not changed by the current road condition however this document will be reviewed and any changes to practices proposed will be either included as an addenda or, in the event that no changes are required advice will be provided to DTMR or DEEDI in this event.

Any mechanisms required to mitigate changes in impact will be identified in the addenda to the existing Logistics Plans, RIA and RMPs.

Queensland Rail has informed QGC that it can not allocate any further rail support to the QGC project for shipment of pipe out of either Brisbane or Gladstone Ports. Due to the delay in obtaining Banana Shire Council approval, QGC has been unable to utilise the rail capacity that it had contracted and paid for, for the past five months. Unless this matter can be quickly resolved with Banana Shire Council, the cumulative impacts as modelled will be recognised once other Proponent's pipe is imported and required to be moved into the Roma and Surat regions.

It should be noted that the nature of large resource projects results in changes to delivery plans and methods from time to time and as additional opportunities or constraints are identified. In this case, the Queensland floods significantly restricted QGC's ability to transport pipeline from Brisbane over a three month period. The delay with Banana Shire Council in approving access to haul pipe from the marshalling area to the ROW has also resulted in QGC being unable to utilise its existing contract with Queensland Rail.

Following approval of the already submitted plans by Government, QGC will issue controlled copies of the approved plans to all agencies identified by the Coordinator-General as having an interest in the contents of the specific plan. Changes to these plans would then be forwarded to Government as a series of addenda which clearly identify the proposed change and any variations to the approved plans that have resulted from this change. The adoption of this process will assist in reducing the number of differing versions of each plan and also assist Government agencies in reviewing individual changes in contribution or impact mitigations as required.

In support of this change report the following attachments are provided:

Attachment 1: Letter from Queensland Rail supporting the need for a change to the condition;

Attachment 2: Line Shipments – Brisbane Pipe Storage

Attachment 3: Line Shipments – Gladstone Pipe Storage

Attachment 4: Brisbane to In-Field Transport Matrix

Attachment 5: Gladstone to In-Field Transport Matrix

1.3 Public Consultation

The QCLNG project has undergone significant amount of community and broader public consultation and QGC continues to consult with community groups, committees, local governments, state government and federal government departments and agencies as the project develops. In relation to the QCLNG pipeline and transport approvals the following approvals and plans have undergone public and government consultation:

Relevant EIS Documents, Approvals and Permits	Days of Public Notification or Consultation	Submissions Received
QCLNG EIS (modelled 100% road transport of pipeline)	30 days	34
QCLNG QCLNG Supplementary EIS (modelled 100% road transport of pipeline)	30 days	N/A
Gas Collection Header, Environmental Authority	28 days	0
Export Pipeline, Environmental Authority	28 days	0
Gas Collection Point to Point Pipeline Licence	28 days	0
Export Pipeline Point to Point Pipeline Licence	28 days	0
Narrows Crossing (MLV7 to LNG Plant) Environmental Authority	28 days	0
Narrows Crossing (MLV7 to LNG Plant) Point to Point Pipeline Licence	28 days	0

Thus, QGC seeks the Co-ordinator General's discretion as indicated in his letter dated 6th April that based on the amount of public notification and consultation regarding the permitting and approval processes that have already been completed for the Export pipelines and that there would be no benefit in publicly notifying this application based on the:

- [Inability to comply with the original conditions for reasons beyond QGC's control;](#)
- ~~Insignificance of the change~~ [Limited nature of additional impacts;](#)
- Original intention of the condition; and
- Number of opportunities that the public has had and continues to have in voicing concerns or opinions regarding the Project's execution particularly in relation to the transport of project infrastructure.

1.4 Agency / Organisation Consultation

In preparing this report, QGC has consulted with:

- Gladstone Regional Council;
- Banana Shire Council;
- Western Downs Regional Council;
- Gladstone Port Corporation;
- Brisbane Port Corporation;
- Department of Main Roads and Transport;
- Department of Employment, Economic Development and Innovation; and
- Queensland Rail.

1.5 Recommendation

It is recommended that:

1. The application is not required to go to public notification due to the urgency of the situation at both Gladstone and Brisbane Ports, the extensive consultation and public notification that has already and continues to be undertaken with regard to the Pipeline component of the QCLNG Project, [and the fact that the condition cannot be complied with because of circumstances beyond QGC's control.](#)
2. Appendix 1, Part 2 – Transport, Condition 1 is changed FROM:

Subject to condition 2 below regarding pipeline transport at Gladstone, rail transport from the point of importation to the field marshalling yard must be for at least **75** per cent of **pipe transport tasks** for the export pipeline and gas collection header pipelines.

TO

Subject to condition 2 below regarding pipeline transport at Gladstone, rail transport from the point of importation to the field marshalling yard must be for at least **60** per cent of **pipe transport tasks** for the export pipeline and gas collection header pipelines.

1.6 Conclusion

In accordance with section 35 of the State Development and Public Works Organisation Act 1971, this change report and its recommendations are submitted for the Coordinator-General's consideration and assessment.

Due to the significance of this issue for QGC and that it will be compounded as other LNG Proponents commence the importation of pipe, QGC seeks the Coordinator-General's support for the recommendations proposed.

ATTACHMENT 1: LETTER FROM QUEENSLAND RAIL SUPPORTING CHANGE REQUEST

5 May 2011

Mr Paul Frizell
Logistics Superintendent
QCLNG Upstream Project
Level 4
30 Herschel Street
BRISBANE QLD 4000



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Brisbane QLD 4001

Level 5
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Brisbane QLD 4000

Telephone: (07) 3235 1825
Facsimile: (07) 3235 5509
Email: smowen@arg.net.au

Australia Eastern Railroad Pty Ltd
ABN 84 118 274 776

Disruptions to QCLNG Pipe Train Services South West Qld

Dear Paul

State-wide flooding in early 2011 resulted in extensive damage to the Queensland Rail network, particularly over the Toowoomba Range. The most significant flooding event occurred on the Toowoomba Range on 10 January 2011 which caused major damage to the rail network. All train services west of Brisbane, including QGC pipe trains ceased from this date.

Queensland Rail's internal capability was strengthened with the engagement of Thiess and the Toowoomba was opened with reduced capacity on 28 March 2011. QGC received their contracted number of trains, 4 per week, from this time however additional pipe services could not be offered as there was no more capacity available.

Final repairs and full capacity over the Toowoomba Range is expected from 11 May 2011 and from this time it will be possible to offer QGC an additional 5th pipe service per week when available to assist with transporting the volumes lost during the closure period.

Please contact myself or Craig Acutt, on (07) 3235 2846, should you have any further questions regarding this information.

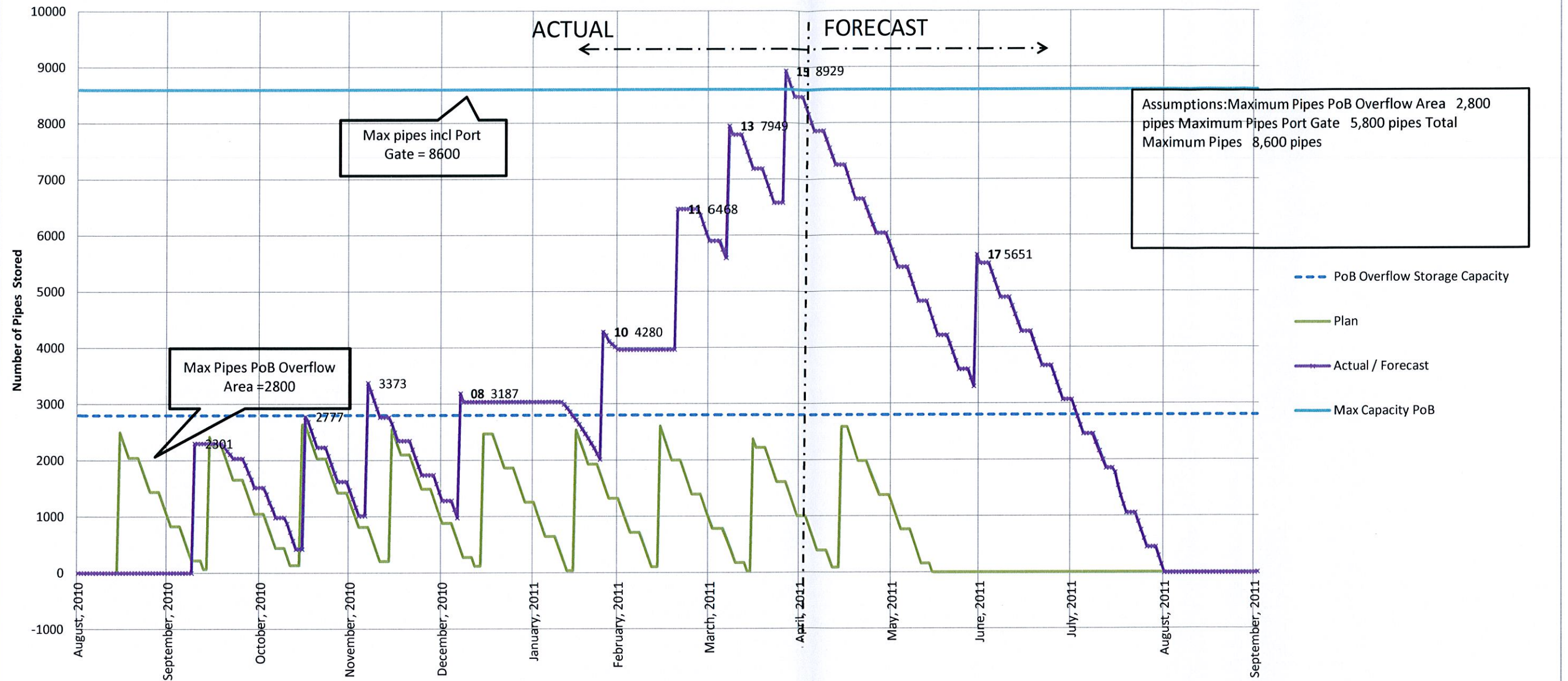
Yours sincerely

A handwritten signature in black ink that reads 'Sean Mowen'. The signature is written in a cursive, flowing style.

Sean Mowen
Manager Marketing & Business Development Agriculture & Bulk Commodities
ARG Bulk East

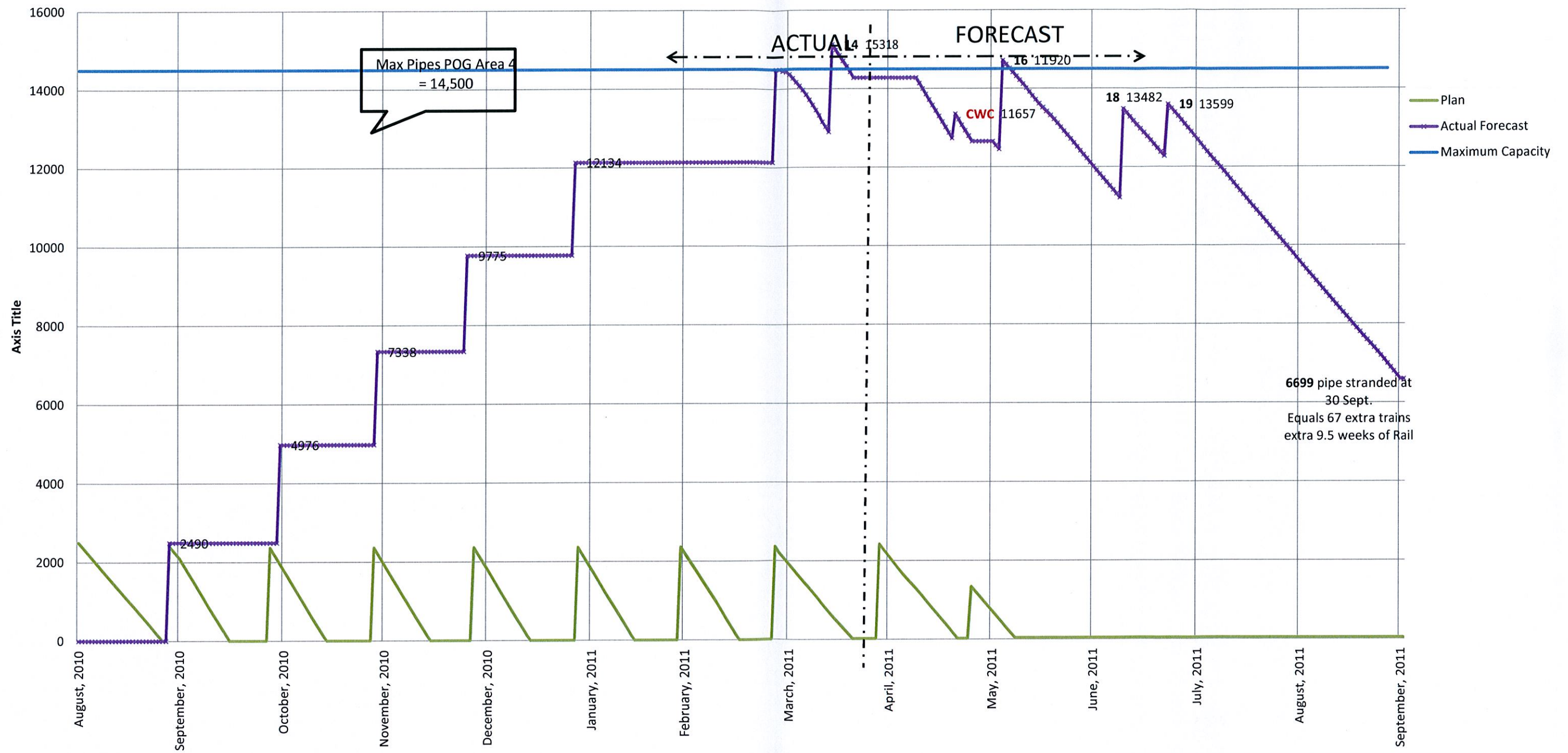
ATTACHMENT 2: LINE SHIPMENTS – BRISBANE PIPE STORAGE

Linepipe Shipments - Brisbane Pipe Storage



ATTACHMENT 3: LINE SHIPMENTS – GLADSTONE PIPE STORAGE

Linepipe Shipments - Gladstone Pipe Storage



ATTACHMENT 4: BRISBANE TO IN-FIELD PROJECTED ROAD TRANSPORT MATRIX

Brisbane to In-Field laydown yard - Transportation Matrix

August

	Number of Deliveries	Pipes per Truck	Article Weight	Point of Origin	Destination	Total Pipes Delivered
01st August	6	4	21.372	PoB	KP65.5	24
2nd August	6	4	21.372	PoB	KP65.5	24
3rd August	6	4	21.372	PoB	KP65.5	24
4th August	6	4	21.372	PoB	KP65.5	24
5th August	6	4	21.372	PoB	KP65.5	24
6th August	6	4	21.372	PoB	KP65.5	24
7th August	6	4	21.372	PoB	KP65.5	24
8th August	6	4	21.372	PoB	KP65.5	24
9th August	6	4	21.372	PoB	KP65.5	24
10th August	6	4	21.372	PoB	KP65.5	24
11th August	6	4	21.372	PoB	KP65.5	24
12th August	6	4	21.372	PoB	KP65.5	24
13th August	6	4	21.372	PoB	KP65.5	24
14th August	6	4	21.372	PoB	KP65.5	24
15th August	6	4	21.372	PoB	KP65.5	24
16th August	6	4	21.372	PoB	KP65.5	24
17th August	6	4	21.372	PoB	KP65.5	24
18th August	6	4	21.372	PoB	KP65.5	24
19th August	6	4	21.372	PoB	KP65.5	24
20th August	6	4	21.372	PoB	KP65.5	24
21st August	6	4	21.372	PoB	KP65.5	24
22nd August	6	4	21.372	PoB	KP65.5	24
23rd August	6	4	21.372	PoB	KP65.5	24
24th August	6	4	21.372	PoB	KP65.5	24
25th August	6	4	21.372	PoB	KP65.5	24
26th August	6	4	21.372	PoB	KP65.5	24
27th August	6	4	21.372	PoB	KP65.5	24
28th August	6	4	21.372	PoB	KP65.5	24
29th August	6	4	21.372	PoB	KP65.5	24
30th August	6	4	21.372	PoB	KP65.5	24
31st August	6	4	21.372	PoB	KP65.5	24
	186	124	662.532			744

September

	Number of Deliveries	Pipes per Truck	Article Weight	Point of Origin	Destination	Total Pipes Delivered
01st September	8	4	21.372	PoB	KP65.5	32
2nd September	8	4	21.372	PoB	KP65.5	32
3rd September	8	4	21.372	PoB	KP65.5	32
4th September	8	4	21.372	PoB	KP65.5	32
5th September	8	4	21.372	PoB	KP65.5	32
6th September	8	4	21.372	PoB	KP65.5	32
7th September	8	4	21.372	PoB	KP65.5	32
8th September	8	4	21.372	PoB	KP65.5	32
9th September	8	4	21.372	PoB	KP65.5	32
10th September	8	4	21.372	PoB	KP65.5	32
11th September	8	4	21.372	PoB	KP65.5	32
12th September	8	4	21.372	PoB	KP65.5	32
13th September	8	4	21.372	PoB	KP65.5	32
14th September	8	4	21.372	PoB	KP65.5	32
15th September	8	4	21.372	PoB	KP65.5	32
16th September	8	4	21.372	PoB	KP65.5	32
17th September	8	4	21.372	PoB	KP65.5	32
18th September	8	4	21.372	PoB	KP65.5	32
19th September	8	4	21.372	PoB	KP65.5	32
20th September	8	4	21.372	PoB	KP65.5	32
21st September	8	4	21.372	PoB	KP65.5	32
22nd September	8	4	21.372	PoB	KP65.5	32
23rd September	8	4	21.372	PoB	KP65.5	32
24th September	8	4	21.372	PoB	KP65.5	32
25th September	8	4	21.372	PoB	KP65.5	32
26th September	8	4	21.372	PoB	KP65.5	32
27th September	8	4	21.372	PoB	KP65.5	32
28th September	8	4	21.372	PoB	KP65.5	32
29th September	8	4	21.372	PoB	KP65.5	32
30th September	8	4	21.372	PoB	KP65.5	32
	240	120	641.16			960

Brisbane to In-Field laydown yard - Transportation Matrix Summary

Month	Truck Trips	Total Tonnage Moved	Total Pipes Delivered
August	186	662.532	744
September	240	641.16	960

Totals 426 1303.692 1704

Total Requirement (Km) 20.448

ATTACHMENT 5: GLADSTONE TO IN-FIELD PROJECTED ROAD TRANSPORT MATRIX

Gladstone to In-Field laydown yard - Transportation Matrix

August

	Number of Deliveries	Pipes per Truck	Article Weight	Point of Origin	Destination	Total Pipes Delivered
01st August	10	4	21.372	PoB	KP65.5	40
2nd August	10	4	21.372	PoB	KP65.5	40
3rd August	10	4	21.372	PoB	KP65.5	40
4th August	10	4	21.372	PoB	KP65.5	40
5th August	10	4	21.372	PoB	KP65.5	40
6th August	10	4	21.372	PoB	KP65.5	40
7th August	10	4	21.372	PoB	KP65.5	40
8th August	10	4	21.372	PoB	KP65.5	40
9th August	10	4	21.372	PoB	KP65.5	40
10th August	10	4	21.372	PoB	KP65.5	40
11th August	10	4	21.372	PoB	KP65.5	40
12th August	10	4	21.372	PoB	KP65.5	40
13th August	10	4	21.372	PoB	KP65.5	40
14th August	10	4	21.372	PoB	KP65.5	40
15th August	10	4	21.372	PoB	KP65.5	40
16th August	10	4	21.372	PoB	KP65.5	40
17th August	10	4	21.372	PoB	KP65.5	40
18th August	10	4	21.372	PoB	KP65.5	40
19th August	10	4	21.372	PoB	KP65.5	40
20th August	10	4	21.372	PoB	KP65.5	40
21st August	10	4	21.372	PoB	KP65.5	40
22nd August	10	4	21.372	PoB	KP65.5	40
23rd August	10	4	21.372	PoB	KP65.5	40
24th August	10	4	21.372	PoB	KP65.5	40
25th August	10	4	21.372	PoB	KP65.5	40
26th August	10	4	21.372	PoB	KP65.5	40
27th August	10	4	21.372	PoB	KP65.5	40
28th August	10	4	21.372	PoB	KP65.5	40
29th August	10	4	21.372	PoB	KP65.5	40
30th August	10	4	21.372	PoB	KP65.5	40
31st August	10	4	21.372	PoB	KP65.5	40
	310	124	662.532			1240

September

	Number of Deliveries	Pipes per Truck	Article Weight	Point of Origin	Destination	Total Pipes Delivered
01st September	15	4	21.372	PoB	KP65.5	60
2nd September	15	4	21.372	PoB	KP65.5	60
3rd September	15	4	21.372	PoB	KP65.5	60
4th September	15	4	21.372	PoB	KP65.5	60
5th September	15	4	21.372	PoB	KP65.5	60
6th September	15	4	21.372	PoB	KP65.5	60
7th September	15	4	21.372	PoB	KP65.5	60
8th September	15	4	21.372	PoB	KP65.5	60
9th September	15	4	21.372	PoB	KP65.5	60
10th September	15	4	21.372	PoB	KP65.5	60
11th September	15	4	21.372	PoB	KP65.5	60
12th September	15	4	21.372	PoB	KP65.5	60
13th September	15	4	21.372	PoB	KP65.5	60
14th September	15	4	21.372	PoB	KP65.5	60
15th September	15	4	21.372	PoB	KP65.5	60
16th September	15	4	21.372	PoB	KP65.5	60
17th September	15	4	21.372	PoB	KP65.5	60
18th September	15	4	21.372	PoB	KP65.5	60
19th September	15	4	21.372	PoB	KP65.5	60
20th September	15	4	21.372	PoB	KP65.5	60
21st September	15	4	21.372	PoB	KP65.5	60
22nd September	15	4	21.372	PoB	KP65.5	60
23rd September	15	4	21.372	PoB	KP65.5	60
24th September	15	4	21.372	PoB	KP65.5	60
25th September	15	4	21.372	PoB	KP65.5	60
26th September	15	4	21.372	PoB	KP65.5	60
27th September	15	4	21.372	PoB	KP65.5	60
28th September	15	4	21.372	PoB	KP65.5	60
29th September	15	4	21.372	PoB	KP65.5	60
30th September	15	4	21.372	PoB	KP65.5	60
	450	120	641.16			1800

October

	Number of Deliveries	Pipes per Truck	Article Weight	Point of Origin	Destination	Total Pipes Delivered
01st October	15	4	21.372	PoB	KP65.5	60
2nd October	15	4	21.372	PoB	KP65.5	60
3rd October	15	4	21.372	PoB	KP65.5	60
4th October	15	4	21.372	PoB	KP65.5	60
5th October	15	4	21.372	PoB	KP65.5	60
6th October	15	4	21.372	PoB	KP65.5	60
7th October	15	4	21.372	PoB	KP65.5	60
8th October	15	4	21.372	PoB	KP65.5	60
9th October	15	4	21.372	PoB	KP65.5	60
10th October	15	4	21.372	PoB	KP65.5	60
11th October	15	4	21.372	PoB	KP65.5	60
12th October	15	4	21.372	PoB	KP65.5	60
13th October	15	4	21.372	PoB	KP65.5	60
14th October	15	4	21.372	PoB	KP65.5	60
15th October	15	4	21.372	PoB	KP65.5	60
16th October	15	4	21.372	PoB	KP65.5	60
17th October	15	4	21.372	PoB	KP65.5	60
18th October	15	4	21.372	PoB	KP65.5	60
19th October	15	4	21.372	PoB	KP65.5	60
20th October	15	4	21.372	PoB	KP65.5	60
21st October	15	4	21.372	PoB	KP65.5	60
22nd October	15	4	21.372	PoB	KP65.5	60
23rd October	15	4	21.372	PoB	KP65.5	60
24th October	15	4	21.372	PoB	KP65.5	60
25th October	15	4	21.372	PoB	KP65.5	60
26th October	15	4	21.372	PoB	KP65.5	60
27th October	15	4	21.372	PoB	KP65.5	60
28th October	15	4	21.372	PoB	KP65.5	60
29th October	15	4	21.372	PoB	KP65.5	60
30th October	15	4	21.372	PoB	KP65.5	60
31st October	15	4	21.372	PoB	KP65.5	60
	465	124	662.532			1860

Brisbane to In-Field laydown yard - Transportation Matrix Summary

Month	Truck Trips	Total Tonnage Moved	Total Pipes Delivered
August	310	662.532	1240
September	450	641.16	1800
October	465	662.532	1860
Totals	1225	1966.224	4900

Total Requirement (Km) 58.8