

Attachment A

Copies of Submissions



**Belyando
Shire Council**

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10th November 2006

Project Manager – Central Queensland Gas Pipeline Project
Major Projects
The Coordinator-General
P O Box 15009
CITY EAST QLD 4002

Dear Sir or Madam,

**RE: DRAFT ENVIRONMENTAL IMPACT STATEMENT – CENTRAL
QUEENSLAND GAS PIPELINE PROJECT (MORANBAH TO GLADSTONE)**

I refer to the Invitation for Public Comment with regard to the Draft Environmental Impact Statement (EIS) for the Central Queensland Gas Pipeline Project (Moranbah to Gladstone) that was tabled to Council's Ordinary Meeting of 9th November 2006.

Council's comments on the EIS are as follows:

- **Project Cost and Time Line**

The EIS fails to clearly define the true construction cost of the proposal and provides a very wide range for anticipated costs. This will impact on time lines for the project and will have a compounding effect on the community. The construction time line and costs need to be clearly spelt out in the EIS to determine and quantify the true impacts on the community.

- **Accommodation**

The EIS does not clearly identify the location of the proposed self contained camps which are proposed to house the 250 personnel to work on the pipeline construction. The location of the work camps is a fundamental concern in the constrained accommodation market and without suitable information and consideration will impact on the route communities in an unsatisfactory way by placing further unsustainable pressure on the physical and social infrastructure of the communities.

The proposal is not specific on the provision of ensuited rooms and the report fails to justify the reduction in amenity for the resident workers.

The accommodation service detailed in the EIS provides no comment or link to the sourcing of water resources to meet the accommodation camp needs. This is considered a significant deficiency in the document and needs immediate attention to ensure the resource allocation is provided for in a sustainable way, and will not result in a reduction in service for the origin, terminus and corridor local authorities and their communities.

Department of the Premier and Cabinet	
Date Rec'd in Work Area	Action Officer
20/11/06	D Stewart
Tracking No. 104957	Mail No. 1866
Folio ID 10/11/06.15	File No. 1

-2-

The EIS raises "fly in and out" staffing operations and provides limited information on the service points for this. If significant numbers of individuals are to access locations along the pipeline sufficient detail needs to be provided so that a realistic assessment of existing transport services can be made. Without this information the EIS is deficient and provides no information on these identified impacts. A combination of a shortage of local accommodation and long travel distances will only result in undesirable health impacts upon the employee and their families as a result of increased road trauma.

- Roster (26 on, 9 off)

The EIS proposes a roster of 26 days on and 9 days off. This is considered unsuitable for sustainable communities and will result in further fracturing of the social frame work in the work and residency location.

- Compressor Station Accommodation

The EIS does not clearly identify or specify the exact needs for accommodation to meet the construction demands at the compressor station. A clear needs analysis is imperative to allow the future management of the acute accommodation demand within the Moranbah community.

- Water Supply and Storage

The EIS does not commit to supplying a reliable quantity of water to the Moranbah Community to service the demand of the construction program or the increase in additional residences over time. The EIS fails to identify an economic multiplier from the development stimulus and apply this to the water resource requirements. The EIS needs to clearly identify the sources of all water resources and confirm the sustainable availability in the present climate of restrictions. The EIS is vague in this area of concern and needs to provide considerable additional information and provide a sound and workable commitment to meeting the community needs without creating further duress on the existing communities affected by the proposal.

- Noise and Vibration

The EIS does not provide a clear time line assessment of the noise impacts of the proposal for the expansion of the existing compressor station. The EIS should clearly specify the background noise levels prior to the development commencing on the site and examine the cumulative effects of subsequent expansions of the compressor station to the first base line data. Without the rigorous assessment of the noise levels to the base line data the noise levels are affected by bracket creep and will result in unsatisfactory environmental impacts in the locality. The EIS and operational frame work needs to commit to a comprehensive notification procedure for all blasting activities to ensure local communities are informed and prepared for activity events. The EIS should be amended and have supplementary details to provide updated information on these outstanding points.

- Transport and Access arrangements

The EIS provides no commitment to upgrading the access entrance to the compressor station to a standard where lighting is provided to light the intersection and provide for elevated traffic safety. The presence of lighting to the intersection of the access with Goonyella road is paramount to maintaining good visibility and traffic safety in the locality. The construction time frame of 6.00am to 6.00pm requires significant actions to be taken to maintain the safety of all associated with the project and those passing through the locality for other work shifts. With an operational compressor plant 24hrs per day it is paramount that safety of the intersection is established early in the construction process.

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-3-

- Social Impacts


The EIS does not commit to any assistance with the longer term cumulative impacts of expanding residential and industrial development in an environment of constrained urban land supply and limited urban water supply. The notion of further expansion pressures in the constrained urban land market and the restricted water supply environment can only be expected to entrench the pressures to provide more temporary accommodation services and undermine the family friendly social fabric of Moranbah. At present some 21% of the population of Moranbah is housed in temporary accommodation, this is having adverse impacts on community cohesion and moving the social frame work in a undesirable direction, which is undermining social diversity and community liveability. It is most unacceptable for development proposals and the EIS process to ignore the acute local conditions present in Moranbah and fail to commit to delivering workable solutions to the existing intractable problems of unacceptable security on water supply and extraordinary demand for housing as a result of limited urban land supply. The community is presently under significant growth duress and the prospect of limited relief to the present constraints will not support social cohesion and the development of a sustainable and vibrant community. The EIS needs to commit to long term support for community water resources and the supply of housing at sustainable demand levels.

- Pipeline route sterilisation

The EIS identifies the preferred route for the pipeline as being to the east and west of the township of Moranbah. This combination of encirclement will entrench the sterilisation of growth opportunities for Moranbah in restricting the availability of urban and industrial growth opportunities. The proposed pipeline to the west is directly through the only viable option for large green field urban residential expansion and further towards the compressor station the line is sterilising the future industrial land adjacent to the existing industrial estate. The route also transects through extensive areas of the public recreational precinct affecting the racecourse, motor sport park and public recreational reserves. These impacts are highly unacceptable and in direct conflict with the Moranbah Growth Management Group options reports. The reduction of opportunities for land use planning diversity is not sustainable and is already manifesting undesirable community and social impacts. The route of pipeline construction in the EIS needs to be amended to secure viable long term growth options for Moranbah and prevent the further sterilisation of community growth which is impacting on industry and the community.

In any future correspondence please quote Subject/222312/JT:jlc as the reference details. If you have any queries in relation to this matter, please contact the Director Planning and Environment Mr. Scott Riley on Ph. 4941 4500.

Yours faithfully


John Torpy - Chief Executive Officer

Subject/222312/JT:jlc



Fitzroy

Shire Council



20 November, 2006

Project Manager – Major Projects
Central Queensland Gas Pipeline Project
The Co-ordinator General
PO Box 15009
BRISBANE CITY EAST QLD 4002

Dear Sir,

Re : Central Queensland Gas Pipeline – EIS

I refer to the Environmental Impact Statement issued in respect of the Central Queensland Gas Pipeline and set out below Council's comments.

1. Roads

Gavial-Gracemere Road

The EIS identifies that one of the routes for the transport of pipes etc is the Gavial-Gracemere Road. Council strongly objects to the use of this road as a major transport route as it goes through the business centre of Gracemere township. This road is controlled by the Department of Main Roads and is not an approved route for 25m B-double multi combination vehicles. An alternative route from Gladstone to the Capricorn Highway is available via the Bruce Highway and the roundabout at the entrance to Rockhampton.

Council Roads

No Council roads have been identified as transport routes. Council roads will have to be used and these should be identified and an impact assessment made in respect of each road. The Road Impact Assessment contained in Appendix 10 only identifies State Controlled Roads. A similar assessment is requested for Council roads.

Commitments 4.68 & 4.69

Commitment 4.68 should refer to Council roads as well as those of the Department of Main Roads.

FOR ENQUIRIES PLEASE CONTACT: L.V. Herman PH: (07) 49 315407	YOUR REFERENCE:	IN REPLY PLEASE QUOTE: 09/02/012 LVH: TS TMSHawLettersNovember, 2006
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Commitment 4.69 should be expanded to make it clear that not only are road conditions identified but also addressed and rectified. The statement should be enhanced to specifically state that damage will be repaired.

2. Weeds

Section 5 of the EIS refers to "the current Enertrade Environmental & Cultural Management Plan". This documentation was not part of the EIS so it is difficult to make comment on its content and how it addresses weed matters.

Construction Weed Management Plan (CWMP)

Section 6 of the CWMP under "Monitoring of QA" states that the CWMP will be managed by "seasonal monitoring of declared plant and other weed species as set out in the Pre-construction Weed Management Plan (Doc No. 080-PP-G-003). This document is not part of the EIS.

Section 8.1 - Identification. It is proposed that, as part of the Monitoring, Reporting & Corrective Action function, that "Survey of Weed prone areas to be conducted after high or seasonal rainfall events (eg March-April)". This action may not be sufficient as some weeds such as Parthenium require treatment soon after rainfall to prevent seeding. Also other weeds such as Mother of Millions may be more visible in winter months. --

Section 8.4 - Washdown - One of the performance indicators is "Presence of Weeds and Pathogens on the easement consistent with adjacent land". This is not acceptable as the benchmark should be to comply with the Land Protection Act and keep the land free of weeds.

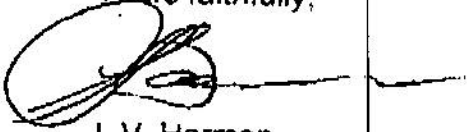
Section 8.5 - Compliance Checks - One of the performance objectives is "No spreading of Parthenium onto Parthenium free properties by the Central Queensland Gas Pipeline project". This should apply to all weeds not just to Parthenium. Giant Rats Tail Grass is equally significant and requires containment.

Commitment 4.37

This commitment stated that strict weed management protocols will be implemented including "Certification of all vehicles, plant and equipment as clean prior to commencement of work". Clarification is required as to what is "Work". Work should include not only the construction but also the ongoing operation.

Should you require any further information regarding the above matters,
please do not hesitate to contact me.

Yours faithfully,



L.V. Harman
CHIEF EXECUTIVE OFFICER

L.V. Harman
PH : (07) 49 315407

09/02/012
LVH : TS
TMShaw\Letters\November, 2006



Community, Environment
& Industry in Partnership

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PLEASE ADDRESS ALL
CORRESPONDENCE TO THE
CHIEF EXECUTIVE OFFICER

IN REPLY PLEASE QUOTE OUR REFERENCE

Mr. K Hansen:JAB:Project

YOUR REFERENCE

20 November, 2006

EIS Project Manager
Central Queensland Gas Pipeline Project
Major Projects
The Coordinator-General
PO Box 15009
CITY EAST QLD 4002

Dear Sir,

Central Queensland Gas Pipeline **Environmental Impact Assessment**

Further to your letter of 4 October 2006, in relation to the above mentioned project, I advise that Council officers have completed a review of the Environmental Impact Statement (EIS) documentation. Listed below are those issues of concern to Calliope Shire Council in relation to the proposed Central Queensland Gas Pipeline project:-

1. Weed Management
2. Crossing of sealed roads
3. Erosion Control
4. Acid Sulphate Soil
5. Storage and Loading Areas for Fuel & Chemicals
6. Food Waste
7. Construction Waste
8. Hazardous Waste
9. Campsites
10. Road Transport

Please note that these issues are not listed in order of importance to Council. Having reviewed the EIS produced by Enertrade for the proposed Central Queensland Gas Pipeline project, Council is satisfied that all these issues have been addressed satisfactorily in the EIS. It would however be appreciated if the following comments could be taken into account when final assessment of the EIS is being undertaken.

Waste Management: Council's contractor, JJ Richards & Sons can provide 240L waste and recycling services including industrial bins.

Campsites, Offices & Site Management: If food is to be provided at camps by way of a camp kitchen, then the facility will need to comply with the requirements of the "Food Act 2006" and be licensed by Calliope Shire Council.

Any accommodation would need to comply with the Building Code of Australia

Handling and Disposal of Dangerous Goods: Storage of flammable liquids to be addresses pursuant to the "Dangerous Goods Safety Management Regulation 2001" as Flammable Combustible Liquids Regulation has been repealed. Storage approval may be required by Council.

Should you have any further queries, please call Council's Development Services section on 07 49758131 during normal office hours.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Schuler', written over a light blue horizontal line.

RUSSELL SCHULER
DIRECTOR OF DEVELOPMENT SERVICES

From: andrewk@gcc.qld.gov.au
Sent: Thursday, 9 November 2006 11:01
To: Denis Wayper
Subject: EIS - Central Qld Gas Pipeline Project

Denis

Council considered the EIS at its meeting yesterday afternoon.

A formal response will be coming shortly, but in essence the resolution was as such:

That Council advise the Coordinator General that:

1. Approval for the proposed route through Gladstone City should not be considered until such time as the EIS fully addresses the issues previously raised by Council, including, but not limited to:

- Address any potential impacts as a result of the proximity to the future urban environment adjacent Kirkwood Road identified in the Kirkwood Road Structure Plan;

- Impacts of the proposed route through Council land including Byellee Wetland, Tondoon Botanic Gardens and Meteors Sports ground;

- Impacts of the proposed route (part of) within existing Council Road Reserve;

The proposed route crossing major roads including Kirkwood Road, Glenlyon Road and Dawson Highway and the potential maintenance issues that presents.

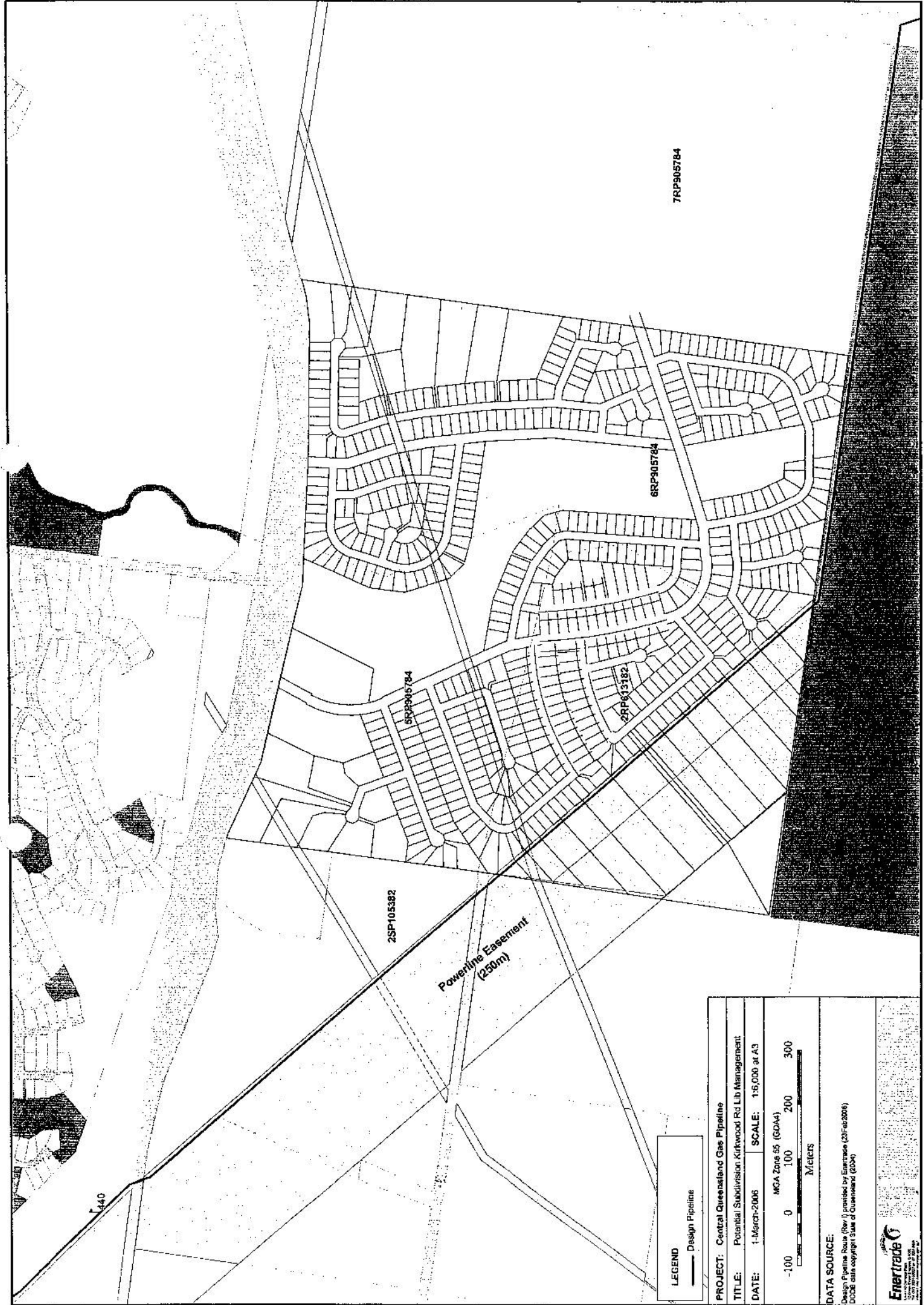
2. Council reserves the right to comment on and require conditions to be imposed as a result of further detailed information being provided to Council.

If you could pass onto the most appropriate person from Enertrade that would be appreciated.

Andrew Kearns
Manager
Assessment & Development
PH: (07) 4970 0766
FAX: (07) 4972 3381

GLADSTONE CITY COUNCIL - CIVIC CENTRE
P.O Box 29
GLADSTONE QLD 4680

WEB: www.gladstone.qld.gov.au EMAIL: andrewk@gcc.qld.gov.au



LEGEND
 — Design Pipeline

PROJECT: Central Queensland Gas Pipeline	
TITLE: Potential Subdivision Kirkwood Rd Lib Management	
DATE: 1-March-2006	SCALE: 1:6,000 at A3
-100 0 100 200 300 Meters	

DATA SOURCE:
 Design Pipeline Route (Rev 1) provided by Entrade (23-Feb-2006)
 DDCB data copyright State of Queensland (2004)



Action Officer: Eric Boardman

Contact No: 4938 4478

Mr Denis Wayper
Project Manager
Central Queensland Gas Pipeline Project
PO Box 15009
City East, QLD 4002

Dear Mr Wayper

Thank you for your letter of 11 October 2006 seeking comment from the Department of Communities on the Environmental Impact Statement (EIS) for the Central Queensland Gas Pipeline Project. The Department of Communities is committed to ensuring that all Queenslanders can live in communities where they feel safe, valued and empowered.

The Department recognises that this project:

- will have a predominantly positive impact on the economic and socio-cultural wellbeing of the communities through which it runs and
- will be temporary in nature in so far as the construction period will be for approximately 12 months.

It is also recognized that such benefits that do accrue are normally not evenly distributed across the community and indeed any negative consequences, however unintentional, tend to be visited more intensely upon those groups least able to cope with their impact.

The CQ Gas Pipeline will be running within approximately 50 km of Woorabinda, an Indigenous community of over 900 people south of Duaringa. Indigenous communities often experience rates of poverty, health, education and employment well below the National average. An opportunity exists for the proponents to work in partnership with this local community to provide valuable training and work experience for their young people.

The Department strongly recommends that the proponents make contact with the Woorabinda Shire Council with a view to offering training and employment to a group of young Indigenous residents.

Office of Rural and
Regional Communities
Department of Communities
Level 11, 111 George Street
Brisbane Queensland 4000

GPO Box 806
Brisbane Queensland 4001

General Enquiries:
Telephone +617 3008 8653

Facsimile +617 3008 8596

Website www.communities.qld.gov.au

Department of Communities Officers from the Fitzroy/Central West Region including the Office of Aboriginal and Torres Strait Islander Policy are available to advise on appropriate engagement strategies and facilitate communication between the proponents and the Woorabinda community.

I look forward to your feedback on how these matters will be addressed in the EIS.

Yours sincerely

Mark McConnell
A/Executive Director

Office of Rural and
Regional Communities
Department of Communities
Level 11, 111 George Street
Brisbane Queensland 4000

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General Enquiries:
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**Queensland
Government**

Your Ref: TN101847/DW08/CG
Our Ref: P131509

**Strategic Policy and
Executive Services**

Department of
Emergency Services

22 November 2006

Mr Geoff Dickie
Central Queensland Gas Pipeline Project
Major Projects
The Coordinator-General
PO Box 15009
CITY EAST QLD 4002

Dear Mr Dickie

ATT: Denis Wayper

Thank you for your letter dated 4 October 2006, inviting the Department of Emergency Services (DES) to comment on the Central Queensland Gas Pipeline Environmental Impact Statement (EIS).

The EIS has been considered in regard to the requirements of *State Planning Policy 1/03 Mitigating the Adverse Impacts of Flood, Bushfire and Landslide (SPP 1/03)*, the *Dangerous Goods Safety Management Act 2000* and the ability of emergency services to respond to on-site incidents.

DES comments regarding the EIS can be found in the attached comments table.

Should further information be required, please do not hesitate to contact Mr Gavin McCullagh, A/Principal Policy Officer, on telephone number (07) 3247 8782, who will be pleased to assist.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Richard Williams'.

**Richard Williams
Director**

Strategic Policy Unit

Emergency Services Complex
Cnr Kedron Park Road and Park Road
Kedron Queensland 4031

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Queensland 4001 Australia

Telephone +61 7 3247 8787
Facsimile +61 7 3247 8798
Website www.emergency.qld.gov.au

Department of Emergency Services Comments – Central Queensland Gas Pipeline EIS

Section (Document/ section and page number)	Interest / Comment & Legislative / Policy Basis
<p>Department of Emergency Services Contact Gavin McCullagh Phone Number (07) 3247 8782</p>	<p>Emergency Services Consultation</p>
<p>EIS, Chapter 4 4.13 Commitments Number 4 – 84 Section 4.12.6</p>	<p>DES is pleased that consultation with Emergency Service providers throughout areas that the pipeline will traverse is included in Table 4.13 Commitments. This department recommends some additions to the parties consulted:-</p> <ul style="list-style-type: none"> - These consultations should include Queensland Fire and Rescue Service (QFRS), Queensland Ambulance Service (QAS), State Emergency Service (SES) and Rural Fire Service (RFS). Consultation early in the planning phase with local service providers will minimise conflict throughout the construction phase. <p>Preferred DES contacts:-</p> <ul style="list-style-type: none"> - QFRS Central Region Assistant Commissioner, Neil Gallant Telephone Number (07) 4936 4891 Email ngallant@emergency.qld.gov.au - QAS Central Region A/Assistant Commissioner Rick Slanger Telephone Number (07) 4936 4896 Email rslanger@emergency.qld.gov.au - EMQ (manages SES) Central Regional Director Michael Fleming (Mick) Telephone Number (07) 4938 4981 Email mffleming@emergency.qld.gov.au
<p>4.10.2.1 Traffic Congestion</p>	<ul style="list-style-type: none"> • DES recommends potential impacts listed in this section form the basis of consultation with local emergency services providers as well as any other issues raised during consultation.
<p>4.12.6 Emergency Management Plan</p>	<ul style="list-style-type: none"> • DES recommends that the proponent add local officers from the State Emergency Service (SES) and Rural Fire Service (RFS) to the project's Emergency contact list as in some rural areas they are the primary emergency responders.

Department of Emergency Services Comments - Central Queensland Gas Pipeline EIS

<p>Department of Emergency Services Contact: Gavin McCullagh Phone Number: (07) 3247 8782</p>	<p>Conflicting Land Use</p>	
<p>Enertrade CQGP Preliminary Risk Assessment Report</p>	<p>2.4 Location Analysis Results</p> <p>Table 2 - 1: Location Analysis (based on route G)</p> <ul style="list-style-type: none"> • The proposed pipeline route will pass in close proximity to current or future residential development/school developments in these locations: <ul style="list-style-type: none"> - KP 154 - KP 311.1 - 312 - KP 311.7 - KP 314.3 - KP 342 - KP 398 - KP 410 - KP 411 - 441.2 <p>CQGP, EIS Chapter 3.3.1.9.4</p> <ul style="list-style-type: none"> - 3.1.9.4 describes temporary fencing that will be placed along the Right of Way (ROW) route to ensure there is no livestock entry. It also states that gates are to be placed where the fences must be breached during the construction phase. - DES recommends that in the locations which have adjacent current/future residential and school developments, the proponent takes into account informal pedestrian tracks entering the proximity of the ROW. Appropriate signage and fencing deterrents should be concentrated at these locations to deter casual site access. 	



**Queensland
Government**

Your Ref: *TN101847/DW08/CS*
 Our Ref: *TPAJ23620*
 Contact: *Ken Day*
 Telephone: *(07) 4938 4077*
 Facsimile: *(07) 4938 4057*
 Email: *Ken.Day@dlgpr.qld.gov.au*

Department of the Premier and Cabinet	
Date Rec'd in Work Area <i>17-11-06</i>	Action Officer
Tracking No.	Mail No. <i>1848</i>
File No. <i>17-11-06</i>	File No.

Planning Services

Department of
**Local Government, Planning,
Sport and Recreation**

Mr Geoff Dickie
 Assistant Coordinator-General
 Major Projects
 PO Box 15009
 CITY EAST QLD 4002

Attention: EIS Project Manager - Central Queensland Gas Pipeline Project

Dear Mr Dickie

Thank you for your letter of 4 October 2006 inviting this agency to provide comments on the Central Queensland Gas Pipeline Environmental Impact Statement (EIS).

Officers of the Department of Local Government, Planning, Sport and Recreation have reviewed the EIS and I would like to advise that the Department's interests have been adequately included in the EIS. There are no outstanding issues to bring to your attention.

Thank you for the opportunity to review the EIS.

Yours sincerely

Kim Mahoney
 A/ Director Statutory Planning
 Sustainable Planning

Level 14 Mineral House
 41 George Street Brisbane
 PO Box 15031, City East Qld 4002
 Telephone +61 7 3237 1763
 Facsimile +61 7 3237 1738
 Website www.dlgpr.qld.gov.au
 ABN 61 331 950 314



Queensland Government

Department of Education, Training and the Arts

Attention: Mr Denis Wayper, EIS Project Manager
Central Queensland Gas Pipeline Project
Major Projects
The Coordinator-General
PO Box 15009
CITY EAST QLD 4002

Department of the Premier and Cabinet	
Date Rec'd in Work Area 28/10/06	Action Officer DENIS WAYPER
Tracking No.	Mail No. 1712.
Folio ID 19/10/06-3	File No.

Dear Mr Wayper

I refer to correspondence dated 4 October 2006 concerning the environmental impact assessment (EIS) for the proposed Enertrade Central Queensland Gas Pipeline ("the Project").

The Department of Education, Training and the Arts notes that the capital expenditure of the Project is approximately \$220M with a nine month construction phase peaking at 300 persons and averaging 200 personnel.

As a government owned corporation, Enertrade will be required to build into the tender process compliance with the State Government Building and Construction Contracts Structured Training Policy (10% Training Policy).

This policy is designed to maximise the potential of Queensland Government capital works projects to address skills shortages and create additional employment opportunities for apprentices, trainees and cadets in the building and construction industry.

The policy requires that a minimum of 10% of the total labour hours on any Queensland Government building or civil construction project (over \$250 000 for building or \$500 000 for civil construction) be undertaken by apprentices, trainees or cadets and through the up-skilling of existing workers, to a maximum of 25% of the deemed hours. Training must also lead to a nationally recognised building and construction qualification.

Additionally, for civil infrastructure projects in excess of \$100M there is an added requirement for the principal contractor to develop a skills development plan and engage or nominate a training coordinator to ensure implementation of the plan.

- 2 -

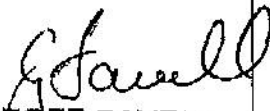
The EIS indicates that the project is not expected to create a need for additional vocational training due to the specialised nature of gas transmission pipeline construction and the relatively short term nature of the construction period. It is anticipated that many of the skilled tradespeople (such as pipe welders) will already be permanently employed and drawn from the construction contractor/s. Unskilled labour could be drawn from the Central Queensland region on an as-required basis.

It is recommended that Enertrade meet with the departmental officers in advance of the tendering stage to discuss the 10% Training Policy and determine opportunities to collaboratively develop an employment and skilling strategy. Additionally, compliance with the 10% Training Policy may be difficult due to the remoteness and specialised nature of the Project and discussions could also centre on a more appropriate level of compliance.

The EIS indicates that significant competition for skilled labour at the local level is unlikely due to the nature of the project and the short construction period. However, the Queensland labour market remains tight due to a number of factors including the competing demands for skilled workers by industry and it is suggested that the proponent and principle contractor will need to be conscious of this in the development of workforce plans.

I trust this information is of assistance to you, however, should you wish to discuss the matter further, please contact Mr Trevor Torrens, Director Stakeholder Engagement by telephone on 07 3237 1355 or by email trevor.torrens@det.qld.gov.au.

Yours sincerely


GEOFF FAVELL
Acting Executive Director
Industry Development
19/10/2006

[OED_ID00021]



**Queensland
Government**

Ref: H05005/06

16 NOV 2006

Department of
Housing

Attention: EIS Project Manager
Central Queensland Gas Pipeline Project
Major Projects
The Coordinator-General
PO Box 15009
CITY EAST QLD 4002

Department of the Premier and Cabinet	
Date Rec'd in Work Area	Action Officer
20/11/2006	D. Stewart
Tracking No.	Mail No.
104956	1864
File No.	
16/11/06-6	

Dear Sir/Madam

I refer to the Assistant Coordinator-General's letter of 4 October 2006 inviting the Department of Housing to comment on the Draft Environmental Impact Statement for the Central Queensland Gas Pipeline.

Towns located in the Bowen Basin are under significant housing pressures in both rental and home ownership markets due to the cumulative effects of the number and scale of projects that are operating and new projects being proposed for the region. The housing market impact of these projects has been well documented through the Bowen Basin Housing Issues Report that identified issues such as rapidly rising rentals and property values beyond those affordable by local residents, particularly those on low incomes, as major concerns. The department believes that firm mitigation strategies should be provided by all project proponents.

The department supports the proposed 'Accommodation Strategy' of constructing a workers camp located at various sites along the gas pipeline route to house the construction workforce during the 12 month construction period.

It is critical that the proposed measure fully mitigates the impacts of the project on local housing markets during the life of the project. The department expects the Supplementary Environmental Impact Statement to clarify and provide firm commitments to the proponents' accommodation strategy that will ensure no further pressure is placed on the housing markets in the Bowen Basin region.

I thank you for the opportunity to comment.

If you require any further information, please telephone Mr Neil Ellard, Senior Housing Analyst, Private Housing Support, on 340 67594, who will be happy to assist.

Yours sincerely

**Natalie MacDonald
Director-General
Department of Housing**

Office of the Director-General
Level 13, 61 Mary Street
GPO Box 690
Brisbane Queensland 4001
Australia

Telephone 07 3224 5248
Facsimile 07 3224 5544
Email dgooffice@housing.qld.gov.au
Website www.housing.qld.gov.au
ABN 86 504 771 740

17 November 2006

Mr Denis Wayper
Principal Project Officer
The Coordinator General
P O Box 15009
City East Qld 4002

Dear Mr Wayper

Central Queensland Gas Pipeline Environmental Impact Statement

Thank you for your letter dated 11 October 2006 requesting comments on the Environmental Impact Statement (EIS) for the Central Queensland Gas Pipeline project.

Main Roads has reviewed the EIS. Attachment A provides recommendations and requirements to assist the completion of the EIS and for inclusion in the Coordinator-General's EIS Assessment Report.

Main Roads has a number of concerns regarding safety on the State-controlled road network impacted upon by the project as detailed in Attachment A. The proponent should continue to consult with Principal Advisor (Statewide Planning) Mr Don Seiler with respect to finalising impact assessment and agreeing on any mitigation strategies required. Don can be contacted on (07) 4931 1640.

Should you have any queries regarding this letter, please contact Advisor (Development Impact Management) Mrs Rowena Vnuk on 3120 7176.

Yours sincerely

Chris Murphy
Manager (Development Impact Management)

Enc(1)

Corridor Land Management Division
Development Impact Management Branch
Floor 24, Mineral House, 41 George Street
Brisbane, Queensland 4000
GPO Box 2595 Brisbane Queensland 4001
ABN 13 200 330 520

Our ref 890/ 00217 P MH)
Your ref TN101847/DW08/CG
Enquiries Mrs Rowena Vnuk
Telephone +61 7 3120 7175
Facsimile +61 7 3120 7199
Website www.mainroads.qld.gov.au

B/c MR DD Central Highlands
Attn: Mr Tony How Lum

MR DD Mackay
Attn: Mr Pat Aprile

MR DD Central
Attn: Mr Chris Hewitt

Principal Advisor (Strategic Planning)
Regional & Corridor Planning (Rockhampton)
Attn: Mr Ray Ford

Executive Director (Integrated Transport Planning)
Queensland Transport
Floor 14, Cromwell House
200 Mary Street
Brisbane Q 4000

For your information.

Chris Murphy
Manager (Development Impact Management)

17 November 2006

Attachment A

Central Queensland Gas Pipeline: Main Roads' comments on EIS

CHAPTER 1 – INTRODUCTION

Section 1.6 Project Approvals

Sub-section 1.6.1 Legislation, Licenses and Permits (page 1-8)

Reference is made to the *Transport Infrastructure Act (1994)* in Table 1-2. The table should also refer to *Transport Planning and Coordination Act (1994)*, the *Transport Operations (Road Use Management) Act (1995)* and the *Transport Infrastructure (SCR) Regulation (2006)*.

The proponent should also note the *Guidelines for Assessment of Road Impacts of Development (2006)* has been updated. They may wish to refer to the updated version to ensure their impact assessment methodology reflects latest thinking on best practice.

CHAPTER 3 – DESCRIPTION OF THE PROJECT

Section 3.1 Gas Pipeline

An A4 map showing the preferred route location is included in Chapter 1. Some key points along the route where the pipe crosses or passes close to road reserves are shown at a high level. However, the proposed crossing by the pipeline of the Peak Downs Highway (in the vicinity of the Isaac River) and where it is within or adjacent to the Fitzroy Developmental Road reserve (from point 145 – 176) is not provided in sufficient detail.

The proponent should provide more detailed maps at suitable large scale of the proposed pipeline route to assist with the assessment of the potential impacts of the route on the State-controlled road network, including possible implications of any road re-alignments, drainage adjacent to the road reserve, bridges, intersections, property accesses and so on.

Sub-section 3.1.6 Access (page 3-4)

Issue/Concern

The proponent should provide more precise details of the location of temporary accesses and a typical detail of the standard of access construction proposed. The location and design of such access should be in accordance with technical warrants and standards given in the Main Roads - Road Planning & Design Manual (RP&DM) and meet safety criteria for use during the construction period.

Sub-section 3.1.7 Easement Widths (page 3-5)

Issue/Concern

The proponent should provide more precise details on the proposed easement location adjacent to the Fitzroy Developmental Road reserve (from point 145 – 176) and the proposed separation distance from road infrastructure. Plans at a suitable scale should be provided to demonstrate the clearances.

CHAPTER 4 – ENVIRONMENTAL VALUES & MANAGEMENT OF IMPACTS

Section 4.1 Land

Sub-section 4.1.1 Land Use and Infrastructure (page 4-3)

Issue of Concern

The proposed pipeline will cross a number of State-controlled roads as outlined in Table 4-4 of the EIS. The level of detail provided in the EIS is inadequate to identify specific issues of concern at each location. The proposed pipeline crossing of the Peak Downs Highway appears to cross in close proximity to the Isaac River bridge.

Recommended Condition 1

The proponent shall construct each pipeline crossing of the State-controlled road network by under-boring the road surface (avoiding locations in the vicinity of bridges and pile structures). The depth of the pipe crossing of the road shall be a minimum of 1.2m below the bottom of the adjacent table drains. The depth of the pipe under the following roads shall be maintained for the full width of the road reserve to accommodate future duplication:

- Peak Downs Highway
- Capricorn Highway
- Burnett Highway
- Bruce Highway
- Gladstone – Mt Larcom Road
- Dawson Highway
- Gladstone – Benaraby Road

The proponent shall make application to the respective Main Roads District for each crossing location a minimum of 15 business days prior to commencement of construction of the crossing to avoid delays to the project. The application shall include engineering plans showing all roads, drainage and services assets for a minimum distance of 50 metres either side of the proposed pipeline crossing location.

Sub-section Co-location of pipeline with other infrastructure (page 4-10)

Issue of Concern

The pipeline is proposed to be co-located adjacent to the Fitzroy Developmental Road for a distance of approximately 22 km commencing at pipe chainage 148. Main Roads is concerned that the distance between the co-located pipeline and road infrastructure may restrict Main Roads future road improvements/re-alignment works.

Recommended Condition 2

Prior to the finalisation of the pipeline route, the proponent shall submit any proposal for co-locating the route within 300m of the existing State-controlled road centreline to Main Roads for review and resolution of any conflicts with future road improvements/re-alignment works.

The proponent must notify Main Roads a minimum of 15 business day prior to undertaking any construction works for the pipeline within a State-controlled road reserve to ensure all road safety, environmental and cultural heritage issues have been adequately planned for and managed.

Section 4.10 Traffic, Transport & Access Arrangements

Sub-section 4.10.1.1 Pipeline - Access

Issue of Concern

The proponent has identified the need for temporary access to the easement/right of way and the temporary construction camps. Main Roads is concerned that the proponent has not offered any indication of the standard of access construction in the EIS.

Recommended Condition 3

A – Construction Camp Access

Prior to the commencement of construction of any construction camp requiring direct access to a State-controlled road, the proponent shall design and **construct a Type BAR and BAL access** intersection treatment in accordance with the requirements of Main Roads - Road Planning & Design Manual. The access intersection to the State-controlled road shall be at a location approved by Main Roads. The extent of bitumen surfacing of the temporary access shall be based on specific site details. The design of the access intersection shall accommodate the maximum sized heavy vehicle approved by QT for the adjacent road link and as a minimum accommodate no less than the pipe transporter shown in Photo 4-4 on page 4-94.

B – Access from a State-controlled Road to Easement/Right of Way (ROW)

Prior to the commencement of construction of any direct access to the pipeline corridor from a State-controlled road, the proponent shall design and **construct a Type BAR and BAL temporary** access intersection treatment in accordance with the requirements of Main Roads, Road Planning & Design Manual. The access intersection with the State-controlled road shall be at a location approved by Main Roads. The extent of bitumen surfacing of the temporary access shall be based on specific site details. The design of the access intersection shall accommodate the maximum sized heavy vehicle approved by QT for the adjacent road link and as a minimum accommodate no less than the pipe transporter.

The proponent shall prepare an access management plan that addresses how access to the easement from the State-controlled roads via new or existing locations will be achieved including identifying impacts on cultural heritage and the environment and addressing these impacts with appropriate mitigation measures. The completed plan should be submitted to the Rockhampton office of Department of Main Roads for review (in consultation with other districts) and District Director (Central) approval.

C – Access to Local Government roads from a State-controlled road leading to the Easement/ROW

The proponent shall demonstrate (by preparation of swept path diagrams) that the turning of over-length vehicles can be safely accommodated within the confines of the existing intersection lane configurations. Where the over-length vehicles cannot safely turn at **any existing intersection of a State-controlled road with a Local Government road**, the proponent shall undertake intersection safety improvement works prior to the commencement of haulage of any pipes to that part of the pipeline corridor proposed to be served by the existing intersection.

D – Removal of Temporary Accesses

The proponent shall liaise with Main Roads on the extent of the reduction/removal of each temporary access intersection. Within 20 business days of the completion of the Easement/ROW restoration works, the proponent shall reduce/remove the temporary access intersection to that part of the pipeline corridor served by the existing access intersection and undertake vegetation restoration works in the road reserve.

Section 4.10 Traffic, Transport & Access Arrangements

Sub-section 4.10.1.2 Compressor Station

The Compressor Station, part of the pipeline link and the temporary construction camp are located at Moranbah. The construction camp will accommodate an average of 60 persons. No traffic analysis or safety assessment for the Peak Downs Highway intersection with the Moranbah Access Road has been presented in the EIS. The assessment should also include traffic generated by recreational and other non-work activities of the construction workers on days off, travelling from Moranbah area to Mackay and/or other centres (primarily coastal) via the Peak Downs intersection.

Issue of Concern

Main Roads is also concerned that no traffic impact assessment on the Peak Downs Highway / Moranbah Access Road intersection has been conducted to identify the impact of the project of the project traffic on the safety and efficiency of the same intersection. This intersection is currently a Type 1 Road Train Route with many excess dimensioned vehicles turning at the intersection. The swept path of a Type 2 Road Train should reflect the average of these multi-combination vehicles including the pipe transporter.

The Peak Downs Highway intersection with the Moranbah Access Road is an existing Type AUR treatment. The existing Type AUR form of the intersection is no longer considered to be a safe form of intersection. The Type AUR treatment has recently been removed from Main Roads – Road Planning and Design Manual for its inadequate record of safety performance and has been replaced with a CHR(S). A more appropriate treatment for the intersection is required on safety grounds.

Recommended Condition 4

Prior to commencement of construction of the Compressor Station upgrade, the proponent shall improve the safety and efficiency of the Peak Downs Highway intersection with the Moranbah Access Road by providing a full Type CHR raised channelised right turn treatment and a Type AUL left turn treatment in accordance with Chapter 13 of the Main Roads – Road Planning and Design Manual October 2006. This treatment is required to address the safety of turning vehicles at the intersection.

The design shall include the following requirements:

- Provide a minimum 1.2m wide raised median to separate right turning traffic from the opposing eastbound traffic stream.
- Provide a minimum 3.5m wide auxiliary right turn lane in the through road.
- Provide a 3.5m wide through lane and a 1.5m wide shoulder for the westbound traffic on the Peak Downs Highway.
- Provide a raised concrete median in the side road generally in accordance with figure 13.84 of the RP&DM. The raised median shall extend north around the horizontal curve to the northern tangent point of the curve to provide adequate approach visibility to the nose.
- The design turning vehicle should be based on a Type 2 Road Train or equivalent new generation multi-combination vehicle.
- Provide full intersection lighting in accordance with chapter 17 of the RP&DM.

Plans of operational works to be undertaken in the State-controlled road should be prepared (in accordance with Main Roads - Central Highlands District guidelines) and submitted to the Emerald office for approval. No operational works are to commence within the State-controlled road/future State-controlled road reserve until approval of the plan/s, showing the operational works, is issued by the department

Appendix 3 Road-use Management Plan (Volume 1)

Issue of Concern

The draft Road-use Management Plan (RMP) needs to be completed prior to the construction of the pipeline. It should address mitigation measures such as monitoring and notification measures advising road users of traffic restrictions, possible impacts on school bus transport routes and so on for the construction phase of the project.

These impacts are to be monitored and managed by strategies defined in the Road-use Management Plan. To assist the development of this plan, a proforma outline is available from the Rockhampton district office.

Recommended Condition 5

Prior to the commencement of any road use or works associated with the project, the proponent shall update and finalise the Road-use Management Plan in consultation with the Rockhampton office of Department of Main Roads to address all of the road use issues identified in the EIS process during construction. The updated plan should be submitted to the Rockhampton office for review (in consultation with other districts) and District Director (Central) approval.

The proponent should also finalise plans for any operational works to be undertaken on State-controlled roads affected by the project and submit them to the Rockhampton office of Department of Main Roads.

Appendix 10 Road Impact Assessment (Volume 2)

Issue of Concern

Main Roads is concerned that the Road Impact Assessment report has nominated the full length of the Gavial - Gracemere Road link as a haul road for the project. The Local Government has requested that no heavy vehicles pass through the main street of Gracemere.

Recommended Condition 6

- A. Prior to the commencement of the CQ Gas Pipeline construction project, the proponent shall:
- Amend the tables and figures to reflect the restriction of heavy vehicles on the Gavial – Gracemere Road from the Burnett Highway to Capricorn Highway.
 - Submit the amended pavement impact assessment report to the District Director (Central) for acceptance.
 - Submit any required payment for the agreed contribution to mitigating impacts to the Central District office of the Department of Main Roads prior to the commencement of the haulage of materials and components for the project.

B. Variation of Project Operation:

During the operation of the Project, the proponent shall:

- Inform the Rockhampton office of the Department of Main Roads of any proposed changes to the existing haulage routes, haulage volumes, vehicle impacts etc which may require variation of the road impact assessment report and contribution.

Author: Jacki Wirth
Your Ref: TN101847/DW08/CG
Our Ref: NO1006MKY0001
Catchment & Regional Planning
Phone: 4967 0975

20 November 2006

Mr Geoff Dickie
Assistant Coordinator-General
Major Projects
PO Box 15009
CITY EAST
QUEENSLAND 4002

Attn: Denis Wayper

Dear Sir,

RE: Central Queensland Gas Pipeline Environmental Impact Assessment

I refer to your letter received by this Department on 4 October 2006, seeking comments on the Environmental Impact Statement (EIS) for this project.

The Department of Natural Resources and Water (NRW) has reviewed the EIS in relation to our portfolio of State Interest and considers the document to be comprehensive in addressing the terms of reference. NRW notes that a sufficient level of detail appears to have been provided in the EIS document to finalise development of an Environmental Management Plan (EMP) which can deal with the impacts of the construction and operational phases of the project. It is essential that the resulting EMP be sufficiently detailed to describe fully the processes to allow effective management of all project impacts. Further comments on the EIS are outlined in the attachment.

As you know, the recent 'machinery of government' changes have lead to the creation of the new Department of Mines and Energy (DME). NRW is currently transitioning the coordination of 'whole of department' responses where mining is relevant. Please consider the attached comments as addressing the interests of both NRW and DME. Separate referral to both departments will be required once the separation of the Minerals and Petroleum functions from this Department is progressed and you will be advised further on this at the

appropriate time. The appropriate contact officer for DME is Mr David Coffey who can be contacted on telephone (07) 3237 1476.

The Department would like to thank you for the invitation to review the EIS and look forward to finalising our involvement with the project in the near future. Should you require any clarification in relation to this response, please contact Ms Jacki Wirth on 4967 0975.

Yours sincerely

M Merrin
A/Regional Manager
Landscapes and Community Services
Central West Region

CC.
Director-General
NRW
GPO Box 2454
BRISBANE QLD 4001

Att

ATTACHMENT 1

Resource Sterilisation

The Department of Mines and Energy does not support the route of the proposed pipeline on its currently proposed alignment as being the preferred / 'ideal' choice from the perspective of its potential impact on coal seams underlying the intended pipeline - particularly where the pipeline is to 'exit' Moranbah township (to the east and south of the existing compressor station) where it will lie within Anglo Coal's Grosvenor Coal Deposit - Mineral Development Licence (MDL) 273 and Kumba's Moranbah South Deposit - MDL Application No. 277. Both of these deposits comprise identified resources of prime hard coking coal that realistically, could be mined in the foreseeable future and which partially underlie the proposed route.

The Department does however acknowledge that the selection of a final alignment for a project of this nature, must be done taking into consideration numerous, often conflicting factors. Accordingly on an 'all things considered basis', the Department considers that the route as proposed in its current form, is acceptable on the proviso that the proponent has consulted with all (MRA administered) tenure holders and has agreements in place with the holder of any Mineral Development Licence or Exploration Permit for Coal along the proposed route, where coal resources have already been identified and quantified to at least an "Indicated" Status (i.e. in accordance with the definitions of the 2004 JORC Code) to allow mining of the coal resources in the future without any undue commercial burden being placed on the tenure holder (its successors or assigns) by virtue of the existence of the pipeline or any associated infrastructure.

In addition to consulting with the holders of current exploration and mining tenures over the Grosvenor and Moranbah South coal deposit referred to above, particular consideration should be given to consulting with the holders of EPC 795 (Bowen Central Coal Pty Ltd - a company which has affiliations with both AMCI Coal Australia and Aquila Coal Limited) and EPC 837 (held by New Hope Exploration Pty Ltd) located directly to the east of the Peak Downs and Saraji mining leases to ascertain the outcome of recent exploration activities by these companies and the potential impact that the proposed pipeline might have on future mine developments in this area.

Hazard and Risk

The Hazard and Risk section of the report relies on Australian Standard AS2885 which is mandated under the *Petroleum and Gas (Production and Safety) Act 2004*. This is acceptable as it stands, but there are issues which require follow up as the design progresses. Therefore, we request that further development of this area be undertaken in conjunction with the Chief Inspector, Petroleum and Gas of the Department of Mines and Energy.

Occupational Health and Safety also refers to the above Act, but does not refer to the prime legislation having carriage of many construction issues, namely the *Workplace Health and Safety Act 1995*. This should be referred to and should be the prime document against which WH&S issues are determined.

Land Tenure

The EIS outlines that 33 leasehold lots, 8 reserves and 13 parcels of USL will be affected by this proposal. However these lots have not been specifically identified. Individual parcels should be identified to allow NRW to determine whether the impact of an easement of this nature will affect any action in the future.

For example, the lots may be in the process of having a nature refuge agreement registered over them, in the process of being converted to freehold or there may be other registered encumbrances that need to be accommodated. Irrespective of whether there are any impediments to the proposed easement or not, this Department would appreciate knowing which lots will be affected by the proposal to allow the respective files to be flagged in relation to the proposed action.

Soil Types

No reference has been provided for the mapping reference for the soil study, *DNRW 1993 at 1:7 500 000*, in the References List, Chapter 7. This should be provided.

The CSIRO land system mapping by Story et.al. (1967) and Speck et.al. (1968) at 1:500 000 scale will provide the most accurate soils mapping up to Mount Larcom in Calliope Shire, then land system mapping by DPI (Forster and Barton, 1995) through to Gladstone. Therefore, the DNRW 1993 mapping (whatever this is) at such a large scale should not be used.

Medium density soils mapping is also available in four areas as follows:

1. Around Middlemount, the proposed route traverses through the Windeyers Hill 1:100 000 map sheet where medium density soil mapping has been undertaken by Jon Burgess, DNRM (2002).
2. Around Gogango, the proposed route traverses the Fitzroy River where medium density soil mapping has been undertaken by Forster and Sugars, DNR (2000).
3. Around Gracemere, the proposed route traverses through the Gavial-Gracemere area with soils mapping undertaken by Jim McClurg, DNR (1999).
4. Around Gladstone, the proposed route traverses through the Calliope area with soils mapping undertaken by John Ross, DNR (1999).

Around Middlemount, the proposed route traverses through the Windeyers Hill 1:100 000 map sheet where medium density soil mapping has been undertaken by Jon Burgess, DNRM (2002). Around Gracemere, the proposed route traverses through the Gavial-Gracemere area with soils mapping undertaken by Jim McClurg, DNR (1999). Around Gladstone, the proposed route traverses through the Calliope area with soils mapping undertaken by John Ross, DNR (1999). This soils mapping should be used in the environmental impact assessment of the pipeline.

The Dominant Soils map presented in Fig 4.6 is quite coarse considering the soils and land system mapping available, so more details of the variation in soils could be provided. The Soil Orders could be classified into groups based on parent material and depth to hard rock which are characteristics useful for assessment of construction, impact and management. For example, Vertosols could be subdivided into those overlying Quaternary Alluvium, Cainozoic Unconsolidated Sediments, Basalt, Sedimentary rocks, etc with the relevant depth such as deep, moderately deep, shallow, very shallow.

Acid Sulfate Soils

The EIS has correctly identified that Acid Sulfate Soils (ASS), are likely to be encountered in the Calliope River area including the area immediately to the north of the river. Once the route has been finalised, a detailed ASS investigation report should be undertaken to determine whether ASS are present in the area to be disturbed. If such soils are present, the report needs to define the location, depth and existing /potential acidity of ASS relative to the proposed disturbance as per State Planning Policy 2/02 *Planning and Managing Development Involving Acid Sulfate Soils* and associated guidelines. An ASS Management Plan should then be developed outlining the mitigation measures to be adopted.

Water Resources

The EIS should specify that creek crossing will be managed to ensure impacts are kept to a minimum and site specific plans for each crossing will be provided. Any works which involve excavation, placing fill or clearing native vegetation within a watercourse will require a riverine Protection Permit from this department. One permit should cover all crossings for the duration of the project.

Enertrade have stated that riverine quarry material will not be required. A commitment should be provided in the document in relation to this area.

Consideration should be given to placing gates at fences where the pipeline crosses, rather than simply reinstating the fences, in order to make inspections easier and minimise impact. Contingency planning needs to be undertaken in the case of stream bed crossing failures during operation (eg. pipeline becomes exposed through washouts, or stream bed rehabilitation work fails).

The site is within the area covered by the Fitzroy Basin Water Resource Plan. Any take of water will need an authorisation which can only be issued if it is in accordance with the principles of the plan and the subsequent Resource Operations Plan.

Environmental Management Plan

Element 10.10 - Erosion management

Add the following: Stockpiles should not be placed in any drainage line. Topsoil stockpiles should be analysed chemically from a plant growth view point (sodicity, salinity, fertility and cation exchange capacity) to determine suitability for plant growth. Soils not deemed suitable for plant growth should be buried at an approved site.

It is recommended that provisions be made with landholders regarding temporary fencing from stock, for the areas being rehabilitated for the first 12 months.

Element 10.17 - Acid Sulfate Soils

The preamble for this element of the EMP is incorrect. It is likely that ASS will be encountered for some sections of the pipeline as per section 4.1.3 of the EIS. The current strategy included in this section of the EMP is inadequate and should be amended to meet the requirements of SPP2/02.

From: Coffey David [David.Coffey@dme.qld.gov.au]
Sent: Thursday, 16 November 2006 14:53
To: Denis Wayper
Subject: FW: Revised Department of Mines & Energy Comments - Moranbah to Gladstone Gas Pipeline Project EIS

Hi Denis

The Department's comments on the proposed Moranbah to Gladstone gas pipeline have been revised (refer below) to make specific mention of some EPC holders who have been undertaking exploration in recent years down-dip of BMA's Peak Downs and Saraji mines. I will call you either later today or early tomorrow to go through our comments and the rationale for making them.

Regards

David Coffey

David Coffey

Senior Advisor - Coal
Mining and Petroleum

Department of Mines and Energy

Level 3, Mineral House

41 George Street

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Brisbane Qld 4001 Australia

(Telephone: +61 7 3237 1476
2 Fax : +61 7 3237 1534

From: Coffey David
Sent: Thursday, 16 November 2006 12:46 PM
To: Wirth Jacqueline
Cc: O'flynn Mick
Subject: Revised Departmental Comments- Moranbah to Gladstone Gas Pipeline Project

Jacki

Following contact with Phil Ferenczi this morning, in order to specifically acknowledge the interest of those holders of Exploration Permits for Coal (EPCs) located to the east of Peak Downs and Saraji Mines, would you be able to add the words below (in blue) to the end of those which I provided to you earlier this morning please.

Additional Wording....

"In addition to consulting with the holders of current exploration and mining tenures over the Grosvenor and Moranbah South coal deposits referred to above, particular consideration should be given to consulting with the holders of EPC 795 (Bowen Central Coal Pty Ltd - a company which has affiliations with both AMCI Coal Australia and Aquila Coal Limited) and EPC 837 (held by New Hope Exploration Pty Ltd) located

directly to the east of the Peak Downs and Saraji mining leases to ascertain the outcome of recent exploration activities by these companies and the potential impact that the proposed pipeline might have on future mine developments in this area."

The revised comments should now read as follows.....

"The Department of Mines and Energy does not support the route of the proposed pipeline on its currently proposed alignment as being the preferred / 'ideal' choice from the perspective of its potential impact on coal seams underlying the intended pipeline - particularly where the pipeline is to 'exit' Moranbah township (to the east and south of the existing compressor station) where it will lie within Anglo Coal's Grosvenor Coal Deposit - Mineral Development Licence (MDL) 273 and Kumba's Moranbah South Deposit - MDL Application No. 277. Both of these deposits comprise identified resources of prime hard coking coal that realistically, could be mined in the foreseeable future and which partially underlie the proposed route.

The Department does however acknowledge that the selection of a final alignment for a project of this nature, must be done taking into consideration numerous, often conflicting factors. Accordingly on an 'all things considered basis', the Department considers that the route as proposed in its current form, is acceptable on the proviso that the proponent has consulted with all (MRA administered) tenure holders and has agreements in place with the holder of any Mineral Development Licence or Exploration Permit for Coal along the proposed route, where coal resources have already been identified and quantified to at least an "Indicated" Status (ie in accordance with the definitions of the 2004 JORC Code) to allow mining of the coal resources in the future without any undue commercial burden being placed on the tenure holder (its successors or assigns) by virtue of the existence of the pipeline or any associated infrastructure.

In addition to consulting with the holders of current exploration and mining tenures over the Grosvenor and Moranbah South coal deposits referred to above, particular consideration should be given to consulting with the holders of EPC 795 (Bowen Central Coal Pty Ltd - a company which has affiliations with both AMCI Coal Australia and Aquila Coal Limited) and EPC 837 (held by New Hope Exploration Pty Ltd) located directly to the east of the Peak Downs and Saraji mining leases to ascertain the outcome of recent exploration activities by these companies and the potential impact that the proposed pipeline might have on future mine developments in this area."

Revised comments end.

Regards

David Coffey

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From: Fleming John [John.Fleming@dme.qld.gov.au]
Sent: Monday, 20 November 2006 08:24
To: Denis Wayper
Cc: Wirth Jacqueline; Coffey David
Subject: FW: Revised Department of Mines & Energy Comments - Moranbah to Gladstone Gas Pipeline Project EIS

Denis

I have looked at the EIS with particular reference to ss 4.11 - Hazard and Risk and 4.12 - Occupational Health and Safety. The Hazard and Risk chapter relies on Australian Standard AS2885 which is mandated under the Petroleum and Gas (Production and Safety) Act 2004. This is acceptable as it stands, but there are issues which properly will be followed up as the design progresses. It would be proper to request that further development of this area be undertaken in conjunction with the Chief Inspector, Petroleum and Gas of the Department of Mines and Energy.

Section 4.12 - Occupational Health and Safety also refers to the above Act, but does not refer to the prime legislation having carriage of many construction issues, namely the Workplace Health and Safety Act 1995. This should be referred to and should be the prime document against which WH&S issues are determined.

Regards

John Fleming
Chief Inspector, Petroleum and Gas

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Fax: 61 (0)7 3224 7768
Email: john.fleming@qld.gov.au

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foreseeable future and which partially underlie the proposed route.

The Department does however acknowledge that the selection of a final alignment for a project of this nature, must be done taking into consideration numerous, often conflicting factors. Accordingly on an 'all things considered basis', the Department considers that the route as proposed in its current form, is acceptable on the proviso that the proponent has consulted with all (MRA administered) tenure holders and has agreements in place with the holder of any Mineral Development Licence or Exploration Permit for Coal along the proposed route, where coal resources have already been identified and quantified to at least an "Indicated" Status (ie in accordance with the definitions of the 2004 JORC Code) to allow mining of the coal resources in the future without any undue commercial burden being placed on the tenure holder (its successors or assigns) by virtue of the existence of the pipeline or any associated infrastructure.

In addition to consulting with the holders of current exploration and mining tenures over the Grosvenor and Moranbah South coal deposits referred to above, particular consideration should be given to consulting with the holders of EPC 795 (Bowen Central Coal Pty Ltd - a company which has affiliations with both AMCI Coal Australia and Aquila Coal Limited) and EPC 837 (held by New Hope Exploration Pty Ltd) located directly to the east of the Peak Downs and Saraji mining leases to ascertain the outcome of recent exploration activities by these companies and the potential impact that the proposed pipeline might have on future mine developments in this area."

Revised comments end.

Regards

David Coffey



**Queensland
Government**

Reference: 05/08229

Department of
Primary Industries and Fisheries

16 November 2006

Major Projects
The Coordinator-General
PO Box 15009
City East Qld 4002

Department of Primary Industries and Fisheries	
Date Rec'd in Work Area	22/11/06
Tracking No.	105330
Folio ID	1900
	16/11/06-11

Attn : EIS Project Manager

Dear Sir

CQ Gas Pipeline EIS

I am writing in response to your letter dated 4 October 2006, seeking comments from the Department of Primary Industries and Fisheries (DPI&F) on the environmental impact statement (EIS) for the proposed central Queensland Gas Pipeline. Officers from DPI&F have reviewed the information provided and offer the following comments. It should be noted that a site inspection was not undertaken for the purposes of these comments.

DPI&F is generally satisfied with the level of information provided in the EIS and can see no major impediments to the project proceeding. Approvals under the *Fisheries Act 1994* will be required for this project (for waterway barrier works and disturbance of marine plants). The assessment associated with these approvals will provide an opportunity to address any issues of concern at specific locations. The following specific comments in relation to the EIS should be noted:

Many significant areas of fish habitat (e.g. freshwater waterways, tidal waterway, tidal land etc) are present between the Bowen Basin and Gladstone. It is clear that the proposed pipeline route generally attempts to minimise interaction with fish habitats, as far as practicable (e.g. most tidal lands and tidal waterways have been avoided). However, it remains that the pipeline construction project will result in the following areas of impact to DPI&F interests:

Mission Vision
Profitable primary industries for Queensland
Maximise the economic potential of Queensland primary industries on a sustainable basis

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Cnr Yeppoon Road & Bruce Highway
CQMC Qld
Queensland 4701 Australia
Business Centre 13 25 23
Website www.dpi.qld.gov.au
ABN 78 342 684 030

- Many waterway crossings that have the potential to impact on fish movement and the fish habitat values of the waterways; and
- The possible disturbance of protected marine plants at the Calliope River crossing.

Waterway Crossings

DPI&F is generally supportive of the methodologies proposed in the EIS for:

- selecting the specific location of waterway crossings;
- constructing the waterway crossings;
- restoring and rehabilitating any disturbances;
- monitoring the locations post works.

It should be noted that under the provisions of the *Fisheries Act 1994* a Waterway Barrier Works (WWBW) approval is required for the construction or raising of a dam, weir or other barrier across a waterway, if the barrier limits fish stock access and movement along a waterway. Any of the proposed waterway crossings along the pipeline route that require the construction of an upstream and/or downstream bund within the waterway, to ensure a dry construction area, will require a WWBW approval.

A WWBW approval is issued as a Development Approval under the *Integrated Planning Act 1997*. It is most likely that a single application would be made, which would include all proposed WWBWs for the pipeline project.

The assessment of a WWBW application would explore, in further detail than has been provided in the EIS, the fish movement issues associated with the proposed construction methodology.

The Environmental Management Plan should be amended to reflect the need for, and compliance with any conditions of a WWBW approval.

Possible Marine Plants Disturbance at the Calliope River Crossing

The EIS indicates that the pipeline construction works within areas below Highest Astronomical Tide is limited to the verges of the Calliope River, where a small area of marine plants may need to be cleared. The disturbance of any marine plants would require specific assessment and approval under the *Fisheries Act 1994*. An approval to disturb marine plants is issued as a Development Approval under the *Integrated Planning Act 1997*.

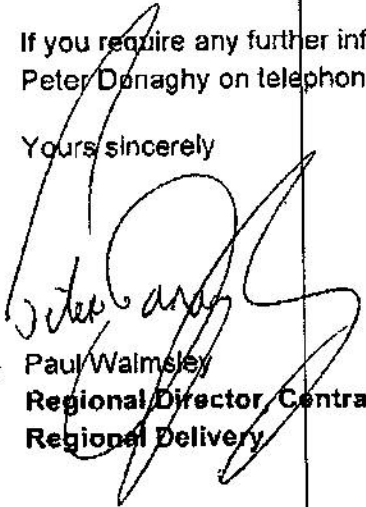
The EIS provides limited information regarding the proposed marine plant disturbance at the proposed Calliope River crossing. Detailed consultation with DPI&F, prior to the submission of an application for the disturbance of marine plants, will be required in relation to this crossing location to ensure impacts have been minimised and to optimise the success of post works rehabilitation.

Recommendation

It is recommended that the proponent organise a specific meeting with DPI&F to discuss the waterway barrier and marine plant applications. This meeting should be organised well before any works are proposed to allow negotiation of interests prior to lodgement of the applications.

If you require any further information regarding this matter, please do not hesitate to contact Peter Donaghy on telephone 07 4936 0306 or email peter.donaghy@dpi.qld.gov.au.

Yours sincerely



For Paul Walmsley
Regional Director, Central
Regional Delivery



Enquiries Janelle O'Neill
Telephone 4982 4555
Your reference TN102285/DW08/CG
Our reference EMD1900; BNE23143
BNE2006/13426

Environmental Protection Agency

Incorporating the
Queensland Parks and Wildlife Service

17 November 2006

Mr Denis Wayper
EIS Project Manager- Enertrade Central Queensland Gas Pipeline
PO Box 15009
CITY EAST QLD 4002

Dear Mr Wayper

Comments for Environmental Impact Assessment (EIS) for the Enertrade Central Queensland Gas Pipeline

I refer to your letter received on 11 October 2006 requesting comments be directed for the Enertrade Central Queensland Gas Pipeline EIS. The attached comments on the EIS are offered for your consideration.

The main matter of interest highlighted from the review concerned the disturbance to sensitive environments. The Environmental Protection Agency has since engaged meetings with the proponent to address the pipeline route and minimise impact to sensitive environments. The enclosed suggested comments would assist to clarify some aspects of the EIS.

Should you have any queries, please contact Janelle O'Neill on 4982 4555.

Yours sincerely



Dean Ellwood
Director Integrated Assessment Branch

Response from the Environmental Protection Agency on the Environmental Impact Statement for the Central Queensland Gas Pipeline Project

The Environmental Protection Agency has assessed the Environmental Impact Statement for the above project and offers the following comments.

Where possible, requests for information have been specific. Where this is not the case, it is recommended that the proponent contact the EPA Project Manager for clarification on what is requested.

Comments are provided under the following EIS headings:

1.6.1 Relevant Legislation and Policy Requirements

2.1 –3.1.5 Highest Astronomical Tide Line

3.1 -Management of Wastewater from Campsite Accommodation

3.1.3 Pipe Burial Criteria

3.1.5 Preferred Route and 4.3.1.1 Surface Water Downstream Environments

3.1.9 Construction, 3.1.9.12 Testing, 3.6.1 Water Demand, 3.6.1.1 Construction, 3.9 Commitments

3.1.9.14 Watercourse Crossings, Horizontal Directional Drilling, 4.3.2.1 Surface Water Construction Techniques

3.6.2 Water Supply and Storage and 3.6.2.1 Construction

4.1 –Water Supply/Storage

4.1.2.1 Description of Environmental Values Topography and 4.1.3.2 Description of Environmental Values Soil Stability and Erosion Control

4.1.2.1 Description of Environmental Values Acid Sulphate Soils and 4.1.3.2 Potential Impacts and Mitigation Measures Acid Sulphate Soil

4.4.1.1 Description of Environmental Values – Matters of State, Regional and Local Biodiversity

4.4.2 Terrestrial Flora

4.7 Air Environment

4.8 Noise and Vibration

5.0 Environmental Management Plans

1.6.1 Relevant Legislation and Policy Requirements

Issue 1: Legislation requirements

Table 1-2 does not list the requirement for a permit to rescue protected animals.

Recommendation:

Table 1-2 (*Nature Conservation Act 1992*) should be amended to include the requirement for a permit to rescue/rehabilitate protected animals.

2.1 –3.1.5 Highest Astronomical Tide Line

Issue 1: Disturbance to wetlands and waterways

"...clearing of marine plants...areas of saltmarsh...and fringing mangroves... Calliope River..."

The maximum proposed area that is likely to be impacted by pipe-laying activities should be addressed in greater detail (individually if necessary) where wetlands of national significance, slightly to moderately disturbed ecosystems, and/or waterways with sensitive/threatened ecosystems/species are located downstream.

Recommendation:

Please provide site-specific appraisals of the likely disturbance, paying attention to the specific local and downstream environmental values.

3.1 Management of Wastewater from Campsite Accommodation

Issue 1: Effluent Treatment

There seems to be a lack of information pertaining to the management of human wastes derived from ablution facilities at the temporary campsites erected to house pipeline workers. How will the licensed contractor typically be disposing of wastewater?

Recommendation:

It is recommended that information be included regarding the storage and disposal of wastewater/effluent from workers accommodated in campsites.

3.1.3 Pipe Burial Criteria

Issue 1: Clarification of pipeline depth

"...Enertrade typically provides a minimum 900mm cover to the top of the pipe."

This statement conflicts with what was said on p.ES-9; *"...buried with a depth of cover of at least 750mm."*

There may be a higher risk associated with the pipeline buried at one depth as opposed to another, especially in ASS areas, and also with regards to the mass of material that needs to be managed.

Recommendation:

Please clarify the standard depth that the pipeline buried.

3.1.5 Preferred Route and 4.3.1.1 Surface Water Downstream Environments and Description of Environmental Values Habitats

Issue 1: Impacts to Wetlands

"...proposed pipeline route...does traverse the mapped area of the Port Curtis 'Nationally Important Wetland'."

*"Only one wetland (i.e. Port Curtis) is potentially directly impacted by the pipeline."
"...with the assistance of ecological experts the route has been located so as to not impact any areas of high ecological significance"*

The proposed cutting of a 30m wide ROW and the associated trenching through a nationally important wetland is a matter of concern to the EPA.

Recommendation:

It is recommended that the specific details of the information used by the ecological experts to conclude that the pipeline route has been chosen so as to not impact any areas of ecological significance be presented.

Issue 2: Justifications of wetland impacts

"...Shoalhaven and Corio Bay RAMSAR sites will not be affected by the proposed work"

"Fitzroy River Delta... Fitzroy River Floodplain... The Narrows... It is not anticipated that these wetlands will be affected by the project activities."

Explanations of the grounds that the works will not affect the wetlands have not been provided in the EIS.

Recommendation:

It is recommended that the proponent provide further justification for the statements that suggest these wetlands will not be impacted.

3.1.9 Construction, 3.1.9.12 Testing, 3.6.1 Water Demand, 3.6.1.1 Construction, 3.9 Commitments

Issue 1: Disposal of Hydrotest Water

It has been noted that details on hydrotest water sourcing and disposal will be provided during the detailed design and construction phase.

Recommendation:

It is recommended that details on corrosion inhibiting chemicals to be used in hydrotest water be provided together with more detailed sourcing information and disposal procedures (e.g. information pertaining to the chemical's toxicity characteristics).

3.1.9.14 Watercourse Crossings, Horizontal Directional Drilling and 4.3.2.1 Surface Water Construction Techniques

Issue 1: Drilling mud toxicity

The EIS does not identify the potential hazard posed by drilling muds escaping into the waterway.

Recommendation:

If the drilling mud has the potential to cause environmental impact, please provide the relevant information on the management strategies to prevent impact.

3.6.2 Water Supply and Storage and 3.6.2.1 Construction

Issue: Treatment of raw water

“...or raw water will be treated on-site at the campsite.”

Where potable water cannot be used, what are the likely raw water treatment facilities that will be employed and how will the waste stream be managed?

Recommendation:

It is recommended that likely type(s) of water treatment methods be presented along with a protocol for the management of the waste stream produced by the treatment process.

4.1 Water Supply/Storage

Issue 1: Construction of Storage Dams

“Dams may be built to hold hydrotest water to ensure acceptable fill flow rates.”

Recommendation:

It is recommended that if dams are required for this purpose then all the appropriate dam construction, permeability testing, hazard assessment and restoration and environmental rehabilitation enquiries and information be performed and presented.

4.1.2.1 Description of Environmental Values Topography and 4.1.3.2 Description of Environmental Values Soil Stability and Erosion Control

Issue 1: Burial pipelines through waterway banks

“...steeply eroded banks of waterways...Isaac, Mackenzie, Fitzroy...etc”

It is unclear how the burial of the pipeline will take place where the waterway possesses steeply eroded banks or is deeply entrenched.

Recommendation:

Please provide detailed information as to how the pipeline contractors will address the situations mentioned above.

4.1.2.1 Description of Environmental Values Acid Sulphate Soils and 4.1.3.2 Potential Impacts and Mitigation Measures Acid Sulphate Soil

Issue 1: Disturbance to ASS

“...presence of (PASS) has been regarded as possible issue for the Calliope River... between approx. KP424-427... at a depth of 0.5-1.0m.”

“...KP426.8-427.2...PASS at depths of 1-2m...and ASS at depths of 0.5-1.0m”

“KP441-442...”

Should the disturbance of ASS become necessary, it is essential that further information be provided.

Recommendation:

It is recommended that information pertaining to the downstream ecology (of ASS areas that are to be disturbed) be described and a figure provided of ASS areas. A risk assessment should be performed of ASS impacts on surrounding sensitive environments and management strategies be implemented.

4.4.1.1 Description of Environmental Values – Matters of State, Regional and Local Biodiversity

Issue 1: Location of pipeline route within Mount Maurice State Forest

The proposed route is within the northern boundary of Mount Maurice State Forest, which is mapped as being fully covered by remnant vegetation. Certified updates of regional ecosystem mapping show the freehold area immediately adjacent to the State forest boundary as partially cleared of remnant vegetation.

Recommendation:

The EIS should discuss alternative route options in the vicinity of the northern boundary of Mount Maurice State Forest, and provide details supporting a conclusion that these alternatives options are unsuitable or unavailable for the required purpose.

Issue 2: Amended route within Rainbow Mountain Nature Refuge

The initial route near Stanwell Power Station that was discussed with the Environmental Protection Agency was appropriately located to minimise impacts. The current route (Revision I) would result in maximising the impact of the pipeline on Rainbow Mountain Nature Refuge.

Recommendation:

The EIS should support the change of pipeline route with appropriate information in the absence of further discussion with the Environmental Protection Agency. Pipeline route change relating to electrical induction issues should be supported in view of alignments in apparently similar circumstances elsewhere on the pipeline route.

The EIS should specifically detail the reasoning behind relocation of the proposed route within Rainbow Mountain Nature Refuge.

Discussions of alternative route options should be included, detailing why these options were found to be unsuitable or unavailable for the required purpose.

4.4.2 Terrestrial Flora and 4.4.2.2 Potential Impacts and Mitigation Measures

Issue 1: Impacts on State Forests

The proposed route¹ is immediately adjacent to the northern boundary of Mount Stowe State Forest and within the northern boundary of Mount Maurice State Forest. The EIS does not identify what impacts (e.g. clearing) are specifically occurring within either State Forest.

¹ As shown in GIS layer 'Current_Design_Pipeline_Rev_I_2006-06-23_polyline' received in October 2006

Recommendation:

The EIS should detail what impacts are proposed within State Forests, including:

- clearing widths;
- the area of each regional ecosystem to be cleared; and
- the presence of any endangered, vulnerable or rare flora/fauna species (if surveys of the area have not already been undertaken).

Issue 2: Biodiversity impacts within Rainbow Mountain Nature Refuge

The current proposed location of the pipeline parallel to Quarry Creek and tributary will maximise impacts on riparian areas that are very important fauna habitat within the refuge. The route proposed is much longer than earlier versions (approximately an additional 4.5km within vegetation identified as State significant under the Brigalow Belt BPA) and may be through more difficult terrain. EIS Figure 4-19 shows the greatest concentration of EVR flora was recorded at this location.

Recommendation:

The EIS should detail what impacts are proposed within Rainbow Mountain Nature Refuge, including proposed clearing widths and the area of each regional ecosystem to be cleared. The proximity of the ROW clearing to Quarry Creek/riparian vegetation should be included.

4.7 Air Environment

Issue 1: Air quality impacts from the TEG unit

Terms of reference 4.7.2 Potential Impacts and Mitigation Measures, requires consideration of:

- “Impacts on air quality from gaseous emissions including carbon monoxide (CO), oxides of nitrogen (NO_x) from the compression facilities, accidental and planned gas releases, greenhouse gas emissions and ozone depleting substances.”

Terms of reference 3.2 Compression Facilities, require description including:

- “Options considered in determining the design of the facilities and reasons for the preferred option.” There are a range of options for minimising emissions from TEG plant but there is not indication of these being considered.

The EIS does not cover all planned gas releases. In particular, it does not address emissions from the Triethylene glycol (TEG) unit where gas is treated by TEG to absorb water and a range of other hydrocarbons. The TEG is then recovered through a regenerator unit where water and volatile hydrocarbons are driven off and vented to atmosphere. Volatile organic compounds (VOCs) vented from the regenerator will contain benzene, toluene, ethylbenzene, and xylene isomers. Air quality goals for toluene are included in the *Environmental Protection (Air) Policy 1997 (EPP (Air))*, and benzene, toluene and xylene are included in the National Environment Protection (Air Quality) Measures and the National Pollution Inventory.

Types and quantities of chemicals emitted is dependant on gas composition and operating parameters of the unit. A comparison with similar installations suggests that two units at Moranbah could emit on the order of 1 ton of these chemicals per year.

Recommendation:

Provide an estimate of the emissions of benzene, toluene, ethylbenzene, and xylene from the TEG units and the impacts of these emissions on air quality.

That the proponent be requested to provide details of the means proposed to control emissions from the TEG unit including design of the unit and, in particular, the use of flash tanks and condensers.

Issue 2: Air quality impacts from the compressors

Compressor unit emissions used to model air quality impacts do not provide information on whether the emission estimates represent normal operating or high load conditions, nor does it provide information on abnormal conditions such as start up and shut down.

Air quality modelling shows NO₂ concentrations in the Moranbah area of about one third of the EPP (Air) goal value, out to a distance of five kilometres from the compressor station. The modelling is unlikely to be accurate to within a factor of three due to limitations on the available meteorological data and the model used, and caution is warranted considering this information.

NO and NO₂ concentrations are closely coupled in the atmosphere and can rapidly interconvert. Consequently, total oxides of nitrogen is generally used for modelling purposes. The terms of reference specify emissions of NO_x rather than NO₂ as the chemical species of interest.

The EIS provides figures for NO_x emissions and figures for resulting ambient NO₂ concentrations, indication of how the two have not been linked. Without information on the total load of oxides of nitrogen and conversion ratios it is not possible to determine what concentrations of NO₂ will be found at a distance from the source.

Recommendation:

That the proponent be requested to provide details of:

- The operating conditions used as a basis for determining emissions from the gas compressors and emissions that can be expected from worst case operating conditions;
- How ambient NO₂ concentrations were derived from estimated NO_x emissions; and
- The source and anticipated concentration of hydrocarbons emitted from the gas compressors.

4.8 Noise and Vibration

Issue 1: Noise assessment

The noise limits for the current Enertrade NQGP project are set out in the Licence shown in EIS Table 4-33, and compliance is confirmed in the EIS under Compressor Station on page 4-89. The night time (10pm to 7 am) level at a noise sensitive place is 28 dB (A). Under Future Noise Levels on EIS pages 4-89 and 4-90 it is stated that the total noise level for the four existing compressors and the three new compressors would be, for calm atmospheric conditions, 34 dB(A) at the closest permanent residential area. This level is 6 dB (A) above the noise limit, not 1 dB (A) as stated in the EIS. A similar statement is made on page 5 of the Appendix 9 Report No: R05165/D1388/Rev.0/27.09.05. The design of the new barrier depends upon the required noise reduction.

Recommendation:

It is recommended that clarification be provided on the required noise reduction for the new compressors to ensure that the night time environmental authority conditions are not exceeded.

Issue 2: Noise mitigation

Terms of Reference 4.8.2 Potential Impacts and Mitigation Measures, call for:
“Proposals to minimise or eliminate these effects should be provided, including details of any screening, lining, enclosing or bunding of facilities, or timing schedules for construction and operations that would minimise environmental harm and environmental nuisance from noise”.

EIS Section 1.4 Environmental Impact Assessment Process Page 1-5 states:
“A definitive statement of the measures or actions that Enertrade has identified to minimise any adverse impacts during and following the implementation of the Project is provided in the Table of Commitments at the end of each chapter”.

While the proposal to mitigate the noise generated by the proposed expansion of the Enertrade compressor station is described in the above section of the EIS, the EIS Executive Summary and in the Appendix 9 consultant report, the mitigation measure is not included into the commitments for this section (commitment number 4-56 to 4-58).

Recommendation:

It is recommended that clarification be provided on the required noise reduction approach to be taken for the new compressors.

5.0 Environmental Management Plans

Issue 1: Purpose of the Environmental Management Plan

While the environmental management plan for construction of the pipeline addresses most of the requirements of the ToR and provides a good working document, the EIS treatment of the environmental management plan is not in accordance with intention of the EP Act (s103). The purpose of the environmental management plan is to help the EPA decide the conditions of the environmental authority which would be included into the Coordinator-General's report on the EIS.

As detailed in the preamble to the ToR, as a significant project under the *State Development and Public Works Organisation Act 1971* the Coordinator-General's report on the EIS may state conditions or make recommendations for Environmental Authorities which gain legal effect under other legislation (EP Act s114(5)).

Recommendation:

The EIS commitments summarised in EIS Appendix 4 Proponent Commitments should be included into the appropriate section of the environmental management plan.

Issue 2: Financial Assurance

The Environmental Management Plan does not provide a calculation of financial assurance.

Recommendation:

The Environmental Management Plan section of the EIS should present calculation of a financial assurance in line with the EPA Guideline: *Environmental regulation of petroleum activities, Financial assurance for petroleum activities.*

END OF COMMENTS



**Queensland
Government**

Queensland Health

Enquiries to: Steven Begg
Senior Scientific Officer
Telephone: 3234 0850
Facsimile: 3234 1480
File Ref: 4005-0345-001

Mr Denis Wayper
Project Manager – Central Queensland Gas Pipeline Project
Major Projects
The Coordinator-General
PO Box 15009
City East Qld 4002

Dear Mr Wayper

Thank you for the opportunity to provide comments on the Environmental Impact Statement (EIS) for the *Central Queensland Gas Pipeline Project (Moranbah to Gladstone)*.

Queensland Health has reviewed the EIS for the *Central Queensland Gas Pipeline Project* and the attached comments are provided. It is recognised that there is a broad range of factors that have the potential to positively or negatively change the health status of workers, individuals and communities. These factors include demographic, social, economic, lifestyle and behaviours, access to services, and the natural and built environment. The consideration of these factors during the construction and operational phases of the project will minimise the impacts on the communities affected.

For further assistance on this matter, please contact Clive Paige, Principal Scientific Advisor, Environmental Health Unit on telephone 3234 0959. — after 11am - 20/12.

Yours sincerely

Sophie Dwyer
Senior Director
Environmental Health Unit
27/11/2006

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**Queensland Health's comments on the
Environmental Impact Statement for the
Enertrade Central Queensland Gas Pipeline Project (Moranbah to Gladstone)**

Section	Comments
Executive Summary (ES-5)	The executive summary makes reference to the <i>Food Act 1994</i> for the management of camp food preparation areas. Reference should be made to the current legislation (ie. <i>Food Act 2006</i>). Depending on the style of food business, this camp may need to be licensed by the relevant Local Government.
1.6.1 Relevant Legislation and Policy Requirements (Table 1-2)	Please include the <i>Public Health Act (2005)</i> in Table 1-2.
1.6.1 Relevant Legislation and Policy Requirements (Table 1-2)	Please update the <i>Food Act 1981</i> to the <i>Food Act 2006</i> in Table 1-2.
3.6.2.1 Water Demand – Construction)	<p>The proponent suggest that "<i>In the case of potable water for the pipeline construction this will be trucked in by a contractor during construction, or raw water will be treated on-site at the campsite.</i>"</p> <p>If the potable water will be supplied through treated raw water on-site at the campsite, it would be appropriate for the proponent to describe management practices to maintain the quality of the water, including the source of the water, transportation, water treatment processes, microbiological and chemical testing program. The water quality should meet the NHMRC <i>Australian Drinking Water Guidelines 2004</i>. If water is treated on-site the proponent should advise the Rockhampton Population Health Unit Environmental Health Services.</p>
3.6.2 Water Supply and Storage	<p>It is understood that the pipeline construction process will also require considerable quantities of water. Water allocations for the project should not compromise community water supplies.</p> <p>It is noted that recently the Belyando Shire Council refused an application for a mine site construction camp partly on the grounds that water supplies for the existing community would be compromised.</p>
4.7.2 Potential Impacts and Mitigation Measures (Air Environment)	<p>In 4.7.2.1 (Construction phase) the proponent states "<i>As a consequence, the resultant dust concentrations and dust fallout is anticipated to be well within acceptable limits at all sites.</i>"</p> <p>Considering the potential for dust to impact on sensitive receptors (such as the Mackenzie State School) it would be appropriate for the proponent to model the potential worst case airborne dust levels and compare those predicted values against the EPP (Air) and Ambient Air NEPM values.</p> <p>This should be done for both the construction and operational phases.</p>

Enertrade Central Queensland Gas Pipeline EIS -- Queensland Health Comments

	<p>The proponent should provide further advice on mitigation measures if the seeding of the ROW does not bind the soil and prevent ongoing dust problems.</p> <p>The proponent acknowledges that they have not assessed nitrogen dioxide levels against the annual NEPM ambient air quality guideline. As the predicted 1-hr average nitrogen dioxide level in Moranbah is up to $105 \mu\text{g}/\text{m}^3$ and the NEPM annual guideline is $62 \mu\text{g}/\text{m}^3$, it would be appropriate for the proponent to estimate the annual average nitrogen dioxide levels at sensitive receptor locations.</p>
4.8 Noise and Vibration	<p>In 4.8.2.1 (vibration) the proponent states that <i>"Those most likely to be affected would be residents within a kilometre of the route (e.g. Gladstone and Bouldercombe areas) however the vibration levels are unlikely to damage structures or cause damage to fauna species."</i></p> <p>The proponent should consult with potentially affected residences (including hospitals) when it may be expected that vibration levels exceed acceptable limits. This may require the proponent to predict likely vibration levels. Hospitals may be affected as they have sensitive equipment that is influenced by vibration.</p>



Mr Denis Wayper
Project Manager – Major Projects
PO Box 15009
Brisbane City East QLD 4002

15 November 2006

Brisbane Corporate Office

Rob Reeson
Manger – Studies Group

Direct Fax +61 (0)7 3221 7131
Direct Line +61 (0)7 3834 1836
e-mail rob.reeson@anglocoal.com.au

Dear Sir

Enertrade Central Queensland Pipeline

Anglo Coal (or its subsidiaries) are the holders of MDL273, MDLA274, EPC747 and EPC748. Anglo Coal further holds a 50 % interest in MDLA277 and is also replying on behalf of its Joint Venture Partners Kumba Australia Pty Ltd.

Anglo Coal has for some time been in negotiations with Enertrade with regard to the above mentioned pipeline and would like to acknowledge Enertrade personnel for their efforts to date in working with us in regard to the route selection.

The Anglo Coal position on infrastructure of this type has always been that it should not be located over coal reserves due to the inherent risks associated with mining and mine subsidence. If an alternate route is not viable it is acceptable to Anglo Coal that the infrastructure is placed across our tenements on the proviso that the owner of the infrastructure accepts the risks that are presented by mining in the future, including but not limited to damage and or relocation.

Enertrade have been working with Anglo Coal to assess these risks and formalise an agreement regarding future development and accountability for risk, however at the date of this letter there are still a number of issues outstanding and as such ACA objects to the route as it stands in relation to our tenements.

We would further highlight that there has been a significant route change between our discussions with Enertrade and the preparation of the EIS preferred option over MDLA274 and MDL 273. It is our belief based on an assessment of the EIS route that it would be impossible for both mine and pipeline to exist together in this area without substantial risk and cost to one or both parties due to the impacts of mining and the alignment of the pipeline.

Anglo Coal Australia Pty Ltd

201 Charlotte Street Brisbane 4000 Australia GPO Box 1410 Brisbane 4001 Australia
Tel +61 (0)7 3834 1333 Fax +61 (0)7 3834 1390 www.anglocoal.com.au

ABN 93 076 059 679

Ref

2113

We intend to continue our discussions with Enertrade in order to resolve these issues. ACA and its Joint Venture Partners do not accept liability for any risks posed by mining activities to the pipeline should Enertrade persist with its preferred pipeline location

Should you wish to discuss our objection further please feel free to contact us on the number above.

Yours sincerely
Anglo Coal Australia Pty Ltd

A handwritten signature in black ink that reads "Rob Reeson". The signature is written in a cursive, flowing style.

Rob Reeson
Manager – Studies Group

BOWEN CENTRAL COAL



17th November 2006

Project Manager – Major Projects
Central Queensland Gas Pipeline Project
The Coordinator-General
PO Box 15009
BRISBANE CITY EAST QLD 4002

Dear Sir

Re: Submission on the Environmental Impact Statement for the Central Queensland Gas Pipeline

This submission on the Environmental Impact Statement for the Central Queensland Gas Pipeline (CQGP) will demonstrate real concerns with the project.

Specifically, the route selected for the CQGP traverses Exploration Permit for Coal (EPC) 795, in which this company is currently exploring on behalf of the holders (in the vicinity of chainage 30km to 40km) with the objective of defining an underground coal resource in seams of the Moranbah Coal Measures (MCM). These seams are noted for their ability to produce high value coking coal products.

Being an underground coal resource, the method of mining will most likely be longwall, which the proponents have acknowledged will cause subsidence and place the pipeline at risk unless mitigating measures are taken. However, no allowance has been made for protection of the pipeline from subsidence in this area, yet the proponents have acknowledged that they will need to protect the pipeline from subsidence in an adjacent area.

It is acknowledged that the route has been selected after consultation with mining tenement holders but it appears in this instance that, without taking measures to protect the pipeline, the true cost of the pipeline has not been considered. Indeed, it could be interpreted that the proponents are relying on conditions being inserted in any future Mining Lease over the coal resource that will prevent subsidence to the pipeline, thus transferring this cost to the coal project developers.

The worst case is that coal in the vicinity of the pipeline is sterilized. The opportunity costs arising from sterilization need to be seriously considered in the context of the less than convincing justification for the project, which has not been justified on a demonstrated coal seam gas (CSG) supply or on market demand.

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It is proposed to refer to specific areas in the EIS (referencing the headings and sub-headings used in the document) and discuss them in the specific context of the issues raised above.

1.1 Project Description

The project is described as the construction and operation of a 450km long pipeline for transporting CSG. The availability of sufficient reserves of gas to support the need for the pipeline is not demonstrated.

1.5 Public Consultation Process

The Stakeholder List (Appendix 2) does not include affected mining tenement holders although consultation with mining tenement holders is described elsewhere.

Presumably, that mining tenement holders were not considered as stakeholders has resulted in that consultation not being recorded in the summary of stakeholder consultation (Appendix 2).

Consultation with the DNRM did take place but potential sterilization of coal resources was not recorded as an issue.

2.1.2 Demand on Natural Resources

CSG resources are described as “potentially very large” ie they have not been defined, but more significantly, no definition of reserves of CSG is provided. The construction of the pipeline is apparently justified on the “potential” to deliver 20PJ per annum.

2.2 Costs and Benefits of the Project to Consumers and the Wider Community

While nobody should doubt the benefit of reduced greenhouse gas emissions, the benefits claimed for the pipeline are less tangible:

- Royalty revenue will not accrue simply from the existence of the pipeline: it is extraction of CSG that will provide the royalty revenue, proposals for which are not the subject of this project.
- It is claimed that the pipeline will “unlock” the potential of the vast resource of CSG. In Central Queensland existing operators currently consider 500m to be the maximum depth for economic recovery of CSG. At these depths, mining of the coal is quite feasible and recovery of the gas does and will occur as part of the mining process – several mining operations are already using that gas to generate electricity.
- Securing further long term sources of gas for Queensland: a nebulous claim.

Furthermore, apart from the cost of construction of the pipeline no other costs are considered such as:

- Potential sterilization of coking coal resources (CSG cannot substitute for coking coal in the manufacture of steel);
- Increased cost of energy as compared to that provided by coal.

2.3.2 Pipeline Route Alternatives

Strategic objectives for route selection have apparently not considered potential sterilization of coal resources (see section 2.3.2.1) but it is acknowledged that discussions were held with coal mining tenement holders.

It is claimed that the route selection strikes a balance between the need for the pipeline to be located close to existing and future CSG resources whilst reducing the impact on future coal extraction "to the extent possible". This is achieved by total avoidance of Mining Leases, crossing of unavoidable Mineral Development Licences (MDL) and within Exploration Permits for Coal the route is "generally located over deep Moranbah Coal Measures" (see section 2.3.2.2).

The rationale for the progressive selection of route locations is presented in Table 2-3. In the area from the start point to around 120km chainage route selection has changed:

- from the initial Route A to the west of the sub-crop of the Moranbah Coal Measures (ie clear of any coal resource but still close to CSG resources);
- to Route E being around 20km further to the East;
- with final selection (Route I) being somewhere in between.

It is stated that Route E, which is well clear of the Moranbah Coal Measures was developed with the input of mining tenement holders but was then changed to Route F (close to the final position Route I in this area) as a result of further consultation with mining tenement holders. That is, the route has moved around considerably with each round of consultation suggesting a far from perfect solution.

Reducing the impact on future coal extraction "to the extent possible"

To remove any impact on future coal extraction the pipeline route should be moved to the west of the sub-crop of the Moranbah Coal Measures or well to the East of the sub-crop of the Rangall Coal Measures. The reasons why this is not "possible" are not defined.

Within Exploration Permits for Coal the route is generally located over deep Moranbah Coal Measures

Unfortunately, where the pipeline is currently planned to traverse this company's EPC795 (to the East of Peak Downs Mine) Moranbah Coal Measures are not deep being well within the 450m depth at which mining is planned at the Broadmeadow Mine (see "Broadmeadow's new chapter", September 2006 Australian Longwall Magazine).

It is acknowledged that the pipeline has been located roughly on the boundary between EPC795 and the adjacent MDL321. However, it is not out of the question that the optimal configuration for development of the coal resources in these two tenements could make this boundary irrelevant and, in that situation, the pipeline, if not designed to withstand the expected subsidence arising from longwall mining, will still sterilize significant resources of coking coal.

The table below provides an estimate of the quantum of coal sterilized at close to the shallowest point (depths and seam thicknesses from borehole E795014R) if the pipeline is not to be affected by subsidence assuming an angle of draw of 20 degrees and coal relative density of 1.45:

Seam	Thickness (m)	Depth (m)	Coal sterilized (Mt/km pipe run)
Q	2.4	172	0.4
Harrow Creek Upper	3.8	277	1.1
Harrow Creek Lower	8.3	332	2.9
Dysart	5.2	406	2.2
TOTAL			6.6

Of course, as the seams get deeper, the amount of coal sterilized will increase.

3.1.1.1 Risk

It is noted that a database will be developed that identifies all of the risks and that future mining is acknowledged as a risk.

3.4 Gas Supply

Enertrade currently sources CSG from CH4, which is the holder of PL191. It is stated that CH4 has proven and probable reserves of 384PJ, which are sufficient for 9 years supply only at the proposed transport rate of 40PJ per annum (20PJ per annum in each pipeline). No reference is quoted to support the reserves number.

It is stated that ATP364, which surrounds PL191, contains a resource of gas estimated at 12,000PJ and "provides additional security of supply". Again, the basis for this estimate is not provided.

It is not clear that Enertrade has secured a gas supply for this pipeline.

4.1.1.1 Description of Environmental Values

The proponent has considered the relevant provisions of the Mineral Resources Act 1989 in determining the proposed alignment. What provisions have been considered?

The proponent claims to have consulted with mining and exploration companies to "accommodate current and future needs". While there has been consultation with this company, our future needs have been compromised not accommodated.

4.1.1.5 Mining Land Subsidence

Mining areas potentially subject to subsidence have been avoided where possible but where such areas have been unavoidable the pipeline design will "consider" additional measures to protect the pipeline. How will affected tenement holders know that the pipeline has been constructed with such additional measures?

Although the above statement suggests consideration of additional measures but not commitment to additional measures, an apparent commitment has been made to determine a pipeline design that will allow for land movement in the area KP2 to KP20, which has been specifically identified as subject to longwall subsidence. However, the commitment does not appear in the commitment register (4.13): rather commitment 4-77, which relates to this section 4.11.5 relates to a risk assessment process, which does not seem relevant.

Why has the proponent committed to subsidence protection in this specific area and not over EPC795? The tenure of this area is an exploration permit for coal (EPC548): there is an application for a Mineral Development Licence (MDLa277) over the area, which was made several years ago, but it is yet to be granted. That is the tenement status is no different to that of EPC795.

To summarise:

- The CQGP is being proposed and justified without any apparent commitment of gas supply to the pipeline or sales of gas from the pipeline;
- The route selected, although based on consideration of the needs of mining tenement holders, will still traverse areas subject to longwall subsidence;
- A commitment is discussed (although not listed in the commitments register) whereby the pipeline will be designed to protect it from subsidence in one area subject to longwall mining; and
- For the other areas subject to longwall mining, no valid reasons are presented as to why the pipeline should not be protected from subsidence, but the costs of future protection are apparently being transferred to the tenement holders in those areas.

In conclusion, we are seeking relocation of the pipeline route to the west of the sub-crop of the Moranbah Coal Measures. Alternatively, we are seeking a commitment from the proponent to design and construct the pipeline so that it is protected from subsidence damage in any location that could be subject to longwall mining.

Yours Faithfully,

Bowen Central Coal Management Pty Ltd



Julian Hoskin
General Manager
Tel. 0419 783413

David, Denis

re our phone conversations earlier today I have checked the proposed alignment as you described it along the eastern margin of EPC 837, along the "inner" points of the EPC. If the pipeline was to be constructed along this alignment then it will potentially sterilise the significant resource of both premium hard coking coal in the Harrow Creek and Dysart coal seams and the resources in the P series of seams above these. The coal resources are presently reported as 452.15 million tonnes Inferred as per the JORC code. These coal seams are the down dip extensions of the coal seams mined today at the Saraji Mine and represent one of the last significant remaining deposits of this type of coal in Queensland.

If the pipeline is to be routed through this area then it should be routed to the eastern margin of the EPC 837 along the western "outer" points of the EPC, in this way it will minimise the impact on the extraction of the coal resources in EPC 837 and at the same time minimise any impact on the development of the Lake Vermont open cut coal mine in Mining Lease 70331.

I would be grateful if you could pass this along to the relevant authorities in Enertrade and at the Coordinator Generals department.

Many thanks.

Regards,
Dennis Brown-Kenyon
General Manager Corporate Development
& Government Relations
NEW HOPE COAL AUSTRALIA
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Website: www.newhopecoal.com.au

TN 104836

16 November 2006

RE: Draft Environmental Impact Statement Central Queensland Gas Pipeline Project (Moranbah to Gladstone).

The Coordinator-General
Project Manager-Central Queensland Gas Pipeline Project
Major Projects
The Coordinator-General
PO Box 15009
CITY EAST QLD 4002

Dear Sir or Madam:

We are writing to inform you of our concerns regarding your proposed pipeline. We are small land holders roughly 40km outside of Gladstone and 5kms out of Mt Larcom. We have been approached by your representatives concerning an easement to go through our property. Your pipeline will effectively cover a very large portion of our property as the it is a small 40-acre block which is long and narrow, it will also cross our creek, which is our sole water source for the property other than, rain water tanks. (Which we use only for drinking)

We are not over joyed with the pipeline going through our property, especially since it is going to go through our creek. This creek in our eleven years of residency has always had water in it. As we are going through what they call the worst drought in 100years the amount of water it had in it at the time your surveyor came out was not a true indication of the normal level. Since he was out we have had rain and the creek is once again flowing and full. We have been told that you may drill under the creek or that you may dig right through it. We know that you can not 100% guarantee that you will not in some way damage our creek in either of these processes. Neither of these propositions is acceptable to us. We believe that you have not truly done a study on our creek and the environment around it. We could not find any real reference to our creek in the EIS. We are concerned about the impact you will have on our creek, the fact that you will clear a 30mtr wide strip on either side of it as well. This creek floods regularly and the body of water that flows through it would erode any soil that was left exposed. We know that if you try to sink bores on the sides of the creek you will hit salt water. We also believe that you will need water for dust suppression and to hydro test your pipeline, we do not wish for our water to be what you use in this process. With water being such a valuable commodity in Australia now. We feel we have got to protect the most valuable asset we have.

We are also concerned about the damage your pipeline could do to the resale value of our property. As for most Australians, our property is our investment and we need to be able to know that this pipeline will not hinder our being able to sell it, if we chose too. Your pipeline will be roughly 500mtrs from our home and this also is a worry to us. We believe that this could prevent some prospective buyers from looking at the property. In effect this could cost us a considerable amount of loss. We hope that some resolution can be reached that may suit the both of us.

Sincerely yours,

Charles and Catherine O'Neil

LOT 2 RAGLAN STATION RD
AMBROSE QLD 4702

610733977730

Central Queensland Gas Pipeline EIS Submission

75 Solar Street
Coorparoo QLD 4151

20 November 2006

Project Manager
Central Queensland Gas Pipeline Project
Major Projects
The Coordinator-General
PO Box 15009
City East QLD 4002

Dear Sir

RE: Submission on the Central Queensland Gas Pipeline – Enertrade EIS

I wish to submit for your consideration, some comments on the Central Queensland Gas Pipeline EIS. These comments are based on perceived matters of concern that may have the potential to adversely affect the construction and the operation of the pipeline once it has been commissioned.

I propose to limit my comments to the Construction Weed Management Plan and related issues.

In the definitions (p.2) it refers to **Washdown** "Travel off road or repeatedly come into contact with roadside vegetation (e.g. off bitumen to overtake)" This is an unreasonable definition as not all the roadside vegetation would be weed (declared or non-declared). Also, the definitional term of "**Washdown**" denies any other form of presenting a "clean vehicle" e.g. blow down with high pressure air. In these times of water being a precious resource it may be timely to investigate alternative methods to remove the reproductive material of weeds generally.

If water is to be used then the washdown pad design should incorporate recovery of the majority of water in order to mitigate adverse comments from landholders of a government instrumentality being prodigal in its use of water.

In the abbreviations (p.2) **GIS** is the acronym for Global Information System. In usual parlance, GIS stands for Geographic Information System.

All the washdown pads shown on the maps for vehicle washdown are shown to be off the ROW. Also, no mention is made of constructing washdown pads for operating the pipeline. It is submitted that washdown pads (if this is the way to go) should be constructed on the ROW so the vehicle arrives clean and departs clean. The actual locations of the washdown pads should be on the access points and at the junction of the change of weed variety/density from high to low or from one type of weed to another.

Central Queensland Gas Pipeline EIS Submission

This is the only way that Enertrade could comply with the relevant legislation.

If it is decided that washing down is the most effective and efficient method to maintain vehicle cleanliness then a permanent water supply should be available at the site of the pad.

Another drawback to the proposed locations of the washdown pads is the cost to the government through having to spray the access roads and tracks for weeds for the life of the pipeline. These costs should be included in any cost/benefit study for the pipeline and well may have been. However, lack of time has not allowed me to read the full document.

The EIS does not include an Operations Weed Management Plan that forecasts how weeds will be controlled when the pipeline is operational. This is a major philosophical flaw in the document and if it had been considered, it would have revealed the omissions in the present document.

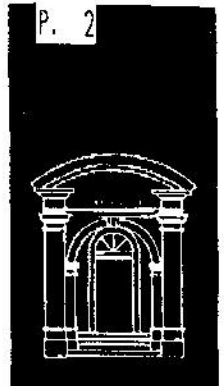
While it is necessary to clean vehicles in moving in and through weed infested areas, research has shown that more seed is propagated through reproductive material being the cabin of the vehicles and the clothing of the occupants. This matter should be reflected in the guidelines to prevent the spread of weeds.

Yours faithfully


Peter Young

TN105978

Contact : Geoffrey Cunningham
Email : gcunningham@pblaw.com
Our Ref : BAM004/10:GPC
Your Ref :



PAYNE
BUTLER
LANG
SOLICITORS

6 December, 2006

The Project Manager
Central Queensland Gas Pipeline Project
Major Projects
The Co-Ordinator-General
P O Box 15009
CITY EAST 4002

Dear Sir,

**Re: Draft Environmental Impact Statement
Central Queensland Gas Pipeline Project (Moranbah to Gladstone)**

We act on behalf of Mr. Peter Bambling and Mrs. Estelle Susan Bambling, the owners of Lot 6 on SP 161856 and Lot 15 on ROP190.

Our client, Mr. Peter Bambling, suffers from Motor Neurone Disease and has been unable to peruse the draft Environmental Impact Statement until recently.

Our client requests that you consider his comments on the draft Environmental Impact Statement even though the deadline of 20 November, 2006 has now passed.

Our client's comments on the draft Environmental Impact Statement are as follows:-

1. the impact of the pipeline will be greatly reduced on our clients' property if it is located on the Road Reserve for the Fitzroy Developmental Road in Broadsound Shire and our client advises that the Main Roads Department for the Mackay area are agreeable to the pipeline being on the Road Reserve;
2. the formation of the pipeline in Lot 6 on SP 161856 will interfere with erosion control banks that our client has spent a great deal of time, effort and cost in establishing;
3. the Road Reserve on the boundary of Lot 6 is very wide in Broadsound Shire and the carriage way is partly offset to the northern side of the Reserve, providing ample room for the pipeline;
4. an easement currently exists from Lot 15 on ROP190 across the Fitzroy Developmental Road down to Mackenzie River in Lot 6 for the supply of water to a service station site approved on Lot 15 and the pipeline will interfere with the use of this easement; and

Partners

John Grose
Anthony Ryan
Bruce Dalton
Glen Keebs

Senior Associate

Kym-Marie Bush

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-2-

Project Manager

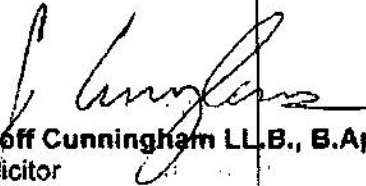
6 December, 2006

5. the internal roads on Lot 6, the "Merion" property are all of a very high standard and all steel gates and internal steel gates are steel 3 metre gates, giving an opening of 6 metres in width. All internal roads have grid accesses through the fences to allow our client to check his cattle and fences by vehicle and requiring only calls for assistance by two way radio if the situation such as broken fences or sick cattle eventuate. The pipeline would interfere with our client's management of his property if installed in the current proposed location.

We request that you accept these comments on the draft Environmental Impact Statement and forward them to Enertrade in the Australian Department of the Environment and Heritage.

Yours faithfully,

PAYNE BUTLER LANG



Geoff Cunningham LL.B., B.App.Sc., M.Agr.Sc
Solicitor
JYV

-----Original Message-----

From: Tony McCray [mailto:tocol@bigpond.net.au]

Sent: Thursday, 4 January 2007 3:20 PM

To: Denis Wayper

Subject: Comments on Draft EIS - CQ Gas Pipeline Project

Hello Denis,

Your office advised me of this contact address. If you are not the right person could you please forward it on.

Your Ref PMB_730.238.068.028_10828

I am the owner of property at 700 Glenlyon Road Gladstone and wish to provide input. Thankyou for the details provided on the possible pipeline route.

- I have no fundamental objection to the pipeline's existence
- A shown on the sketch the route after crossing Police Creek heading east would cut straight through a stand of very very old Gum Topped Box on the undeveloped road easment. These were not cleared like all the surrounding freehold land by the grazing pioneers. I would prefer it passed 30 m either north or south to avoid these potential heritage trees.
- Straight after this the route doglegs and heads north east up the power easment but on its northern edge. I would prefer it was on the southern edge (my property boundary). Placed on the northern edge it sterilises potential vineyard site and so my compensation claim would be significantly higher. By moving to the southern side you also have a much lower ridge to cross and less road problems a little further east. There is a water pipeline near the southern edge but I believe "room for both".

Kind Regards

Tony McCray
0414 884 987

This message has been scanned for viruses

23/01/2007

Gladstone Pacific Nickel Ltd

ABN 27 104 261 887

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9 January 2007

Project Manager – Major Projects
Central Queensland Gas Pipeline Project
The Coordinator-General
PO Box 15009
Brisbane City East QLD 4007

Attention: Denis Wayper

Submission to EIS

Dear Denis,

Further to the discussion in December with our Engineering Manager Stewart Peters, the following is a submission to the Central Queensland Gas Pipeline Project (CQGPP) EIS from Gladstone Pacific Nickel Limited (GPNL).

Firstly, GPNL is fully supportive of the development by Enertrade to build a new gas pipeline from Moranbah to the Gladstone Region as we consider the availability of gas-on-gas competition to be critical to the future success and development of the Gladstone region. The proposed Enertrade pipeline helps to satisfy this requirement while also providing the opportunity to tap into existing coal seam gas deposits which have previously been unable to be utilized. The end result is what GPNL considers is a win-win for Queensland – the opportunity to further develop a regional centre like Gladstone using Queensland energy resources. The potential benefits to Gladstone industry should not be underestimated. Any infrastructure development that boosts the opportunity to further develop Gladstone is considered good for Gladstone, and is certainly supported by GPNL.

If the Gladstone Nickel Project (GNP) goes ahead as per our current plan, we intend to use gas supplied via the Enertrade pipeline to assist in the operation of our proposed Nickel Refinery in Gladstone. As such the development is seen as very important to GPNL.

One issue that needs to be further worked through with CQGPP is the planned route of the Pipeline through the Gladstone State Development Area (GSDA). Currently the broad detail indicates the pipeline will follow the existing Powerlink 275 kVA easement route. These routes may change over land already earmarked for GPNL.

The Powerlink easements through the GSDA land identified for potential use by the GNP are expected to be relocated to enable the Nickel Refinery to be built and operated. We are in negotiation with the State Government to purchase the GSDA land in question and expect this to be finalized in the 1st quarter of 2007. If the purchase is finalized as expected, some of the Powerlink easements will be relocated. We are in discussions with The Office of The Coordinator General (OCG), Powerlink and Queensland Rail (QR) to determine the optimal solution for these parties that also supports the development of our planned refinery. However, we have not considered the 30m easement requirement sought for CQGPP in this analysis.

GPNL seeks assurance from CQGPP's Project Manager that the final route of the CQGPP through the expected land areas to be owned by GPNL (currently within the GSDA) will be negotiated and agreed by GPNL before being finalized. GPNL will act reasonably with CQGPP but seeks to ensure GPNL's Project's requirements are considered and incorporated within the final pipeline route.

Furthermore, GPNL have proposed to establish pipelines associated with the GNP which will traverse common corridors in the GSDA on land owned by the state government. To ensure that the corridors are used effectively, GPNL seeks to establish a cooperative planning arrangement with CQGPP and state government.

Please confirm agreement to our request that the final pipeline route through GPNL's proposed land and along common corridors within the GSDA, will be agreed with GPNL before being finalized.

Our point of contact for any further discussions on this matter is Mr Stewart Peters, our Engineering Manager.

Kind Regards

A handwritten signature in black ink, appearing to read 'Gavin', with a long horizontal stroke extending to the right.

Gavin Becker
General Manager – Project Development

CC Paul McKenna – Enertrade; Mike Davidson (OCG)