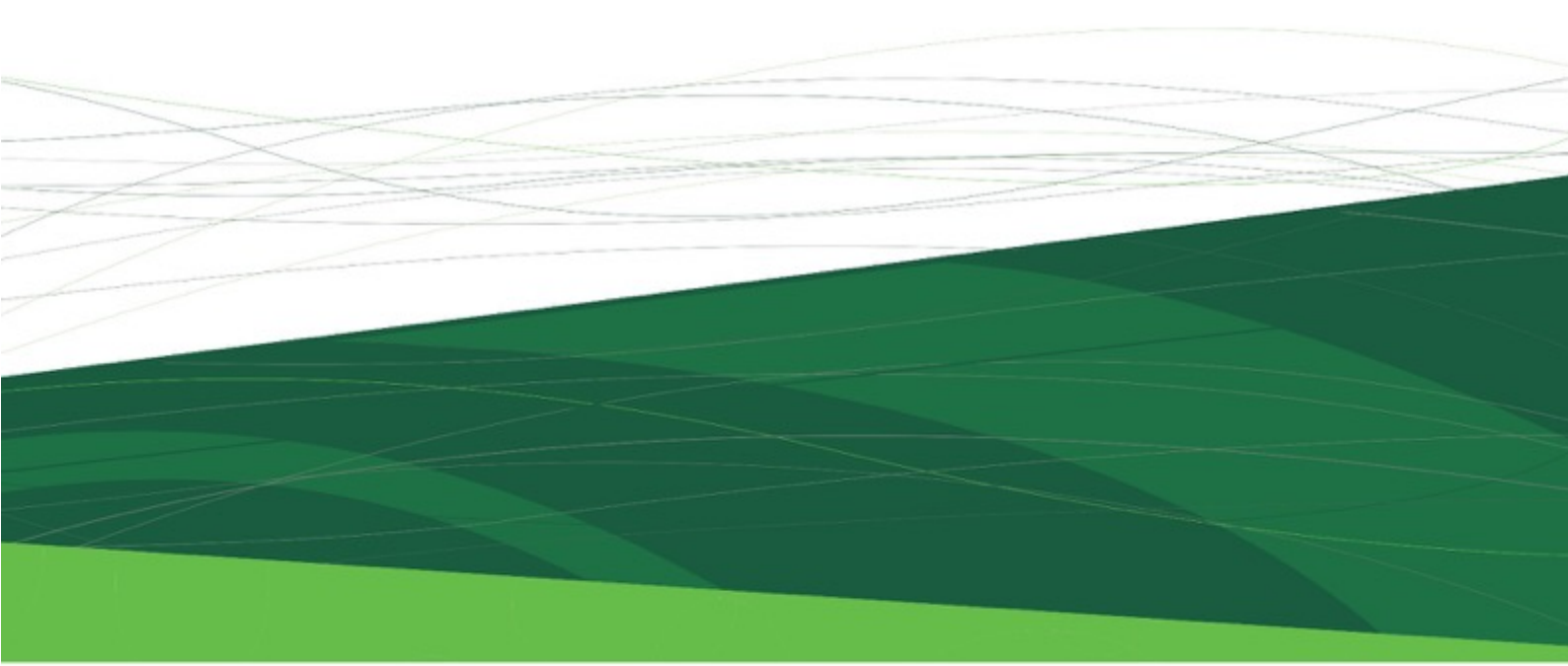


HUNTER GAS PIPELINE

Response to Public Consultation submissions

December 2018



The following document was prepared by RLMS



On behalf of Hunter Gas Pipeline


RLMS (Resource and Land Management Services) is an independent consultancy established in 1990, focusing on the energy, transport, communications and exploration sectors Australia wide. RLMS specialises in tenure management, land negotiation and acquisition, route corridor selection, environmental approvals, mapping, and gas market analysis.

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December 2018

REVISION	DATE	NATURE OF REVISION	PREPARED BY	AUTHORISED BY
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1. INTRODUCTION

This report considers and responds to the results of public consultation concerning an application to extend the time limit for the commencement of physical constrained as per Condition 1.4 of the Project Approval (Application 06_0286) for the Hunter Gas Pipeline dated 11 February 2009. This condition states that the approval for the Queensland Hunter Gas Pipeline (QHGP) will expire in 10 years unless works have physically commenced on the pipeline.

QHGP submitted an application to extend this lapse date by five years (i.e. until 11 February 2024). QHGP has not applied to change any other conditions associated with the development.

As part of the assessment of this application the NSW Department of Planning and Environment published the request to extend the lapse date as per the requirements of the EP&A Act (NSW) and invited submissions from various state and local government jurisdictions and the general public.

This report provides a response to the submissions received. The responses are arranged so that government departments, local authorities and organisational responses are addressed on a specific comment and issue basis. Matters raised by individual submitters are addressed on issues raised. A number of individual submitters raised similar issues and on a number of occasions submitted identical documents.

It is noted that the justification for the pipeline and the associated pipeline corridor was assessed as part of the original Development Application, which remains unaltered. The conditions imposed, including various management plans provide for any update of environmental and amenity impact management as applicable. These aspects of the submission may not be within the scope of the requested modification.

2. NSW GOVERNMENT DEPARTMENTS, LOCAL AUTHORITY AND ORGANISATIONAL SUBMISSIONS

Table 1 NSW government, local authority and organisation submissions

Number	Issue description	Submitter	Draft response
1	Heritage impacts already described in impact assessment	Office of Environment and Heritage (Heritage division)	Acknowledged
2	The approved route of the gas pipeline overlaps and/or intersects a proposed water pipeline from Scone to Murrurundi at a number of locations between Wingen and Murrurundi. Plans of the two pipeline routes are attached. It is requested that the proponent contact Council to discuss the implications of the overlapping routes	Upper Hunter Shire Council	QHGP proposes to discuss the waterline and will request a GIS overlay of the water pipeline to examine the gas pipeline easement within this corridor as appropriate to minimise crossings. A crossing protocol will be prepared where the pipeline crosses existing infrastructure.
3	It is understood that the pipeline will include off-take points at regional towns along the route to allow for local gas reticulation. Council would support the provision of off-take points to supply Murrurundi, Scone and Aberdeen.	Upper Hunter Shire Council	QHGP notes that these nominated off-take points are already identified within the conditions of approval as off-takes. The contribution of the pipeline to the social and economic development of these communities will be fully supported.

Number	Issue description	Submitter	Draft response
4	Should the proposed modification be approved, it is recommended that a condition of consent be imposed requiring the proponent to enter into Voluntary Planning Agreement (VPA) with Council. The requirement for a VPA is considered to be reasonable given that the proposed modification is seeking an extension of the lapse date of the consent.	Upper Hunter Shire Council	Whilst QHGP agrees with entering into negotiations with Upper Hunter Shire Council regarding a VPA, it notes that this is and should remain a voluntary agreement. QHGP does not support mandating a voluntary agreement through conditions of approvals.
5	To substantiate its claim that the lapse deadline is needed, the proponent provides little evidence... There is no explanation as to why, in the years since approval was granted, while the price of gas on the east coast has surged and supply tightened, the proponent has not made any move to secure finance or customers for its pipeline, done no survey work to identify the route the pipeline will take, nor any of the extensive additional environmental or other work required to commence construction.	Lock the Gate Alliance	<p>QHGP has been in negotiation with potential constructors and customers. The details of these negotiations are commercial in confidence.</p> <p>QHGP notes that the surge in prices and supply constraints are relatively recent and follow the development of the major Queensland gas projects of the 2008 - 2016 period. It is only now that those projects are maturing that the east coast gas picture is emerging and providing the impetus for the QHGP. The situation with respect to NSW supply constraints and price is that the current supply is limited to two sources, Bass Strait and Cooper Basin.</p> <p>QHGP notes that the transportation of gas from these sources is controlled by a single entity. QHGP provides additional supply to ensure competition and supply security.</p>

Number	Issue description	Submitter	Draft response
6	<p>The ten year old conditions of consent lump most of the required additional environmental studies into a "Construction Environmental Management Plan". The proponent provides a document titled "Construction Readiness Report" which refers to itself as "this Construction Environmental Management Plan" and "this environmental management plan" indicating the proponent considers that the construction readiness report is the CEMP referred to in the conditions of consent.</p>	Lock the Gate Alliance	<p>The Construction Readiness Report is not the Construction Environmental Management Plan and should not be read as the defining document required by the conditions of approval.</p> <p>Whilst there are elements of the Construction Readiness Report that will be directly incorporated into the CEMP (such as Section 4.4 of the Construction Readiness Report) it identifies the work that has been completed towards construction readiness and identifies the forward work plan.</p> <p>To clarify any misunderstanding QHGP does not consider the construction readiness report to be the Construction Environmental Management Plan required by the conditions of consent.</p>
7	<p>The section on Ecological Communities notes that this information needs to be current but does not address the matter of the communities, species and populations that have been listed or had their listing changed in the last ten years or provide any current information. The report says that "Environmental and ecological systems are dynamic and consequently data collected on ecological systems and assemblages must be current at the time of construction but does not provide any of</p>	Lock the Gate Alliance	<p>QHGP correctly identifies the work on ecological communities that is currently outstanding and must be completed prior to the commencement of construction. QHGP correctly identifies that the ecological communities are dynamic with the result that ecological surveys should be appropriately timed to coincide with construction and decisions to minimise impact during construction planning.</p> <p>There are a number of steps that are precedent to obtaining the field data identified by QHGP and referred to by the objector including but not</p>

Number	Issue description	Submitter	Draft response
	the "further ecological investigation" it admits is required.		limited to negotiation of access with current landholders. QHGP has identified areas for detailed ecological assessment and maturing the scopes of work for engagement of suitably qualified consultants to undertake the work required.
8	There is no mention made of the specific assessment of impacts on Koalas required by the conditions of consent, nor the new SEPP44 "Koala habitat protection."	Lock the Gate Alliance	Assessment of the impacts on koalas is a required element of the ecological assessment work required. QHGP proposes to engage suitably qualified ecologists to address the impact on koalas and the requirements of SEPP44.
9	There are no route alignment sheets demonstrating the avoidance of endangered ecological communities	Lock the Gate Alliance	QHGP proposes to undertake the ecological surveys prior to developing the alignment sheets required by the conditions of approval. QHGP is aware that the provision of alignment sheets demonstrating the avoidance of endangered ecological communities is a condition precedent to commencing construction.

Number	Issue description	Submitter	Draft response
10	There appears to be no progress on identifying what biodiversity offsets are needed, or how they will be obtained and managed despite a biodiversity offset needs study being a condition of consent.	Lock the Gate Alliance	Biodiversity offsets are dependent on the type of ecological community, the degree of disturbance from construction and rehabilitation. QHGP acknowledges that a biodiversity needs study is a condition of approval and is required to be completed and submitted to the NSW government following the assessment of disturbance.

Number	Issue description	Submitter	Draft response
11	There is none of the required information identifying "all sources of water for construction and operation nor is there a justification of the water to be extracted and potential impacts to other users as required by the conditions of consent	Lock the Gate Alliance	<p>Water requirements during construction will be significantly greater than the water requirements during operation.</p> <p>Construction water requirements will include a range of treated and raw water for a number of purposes, including:</p> <ul style="list-style-type: none"> • Potable water for construction camps and offices. This water may be sourced from local authorities and purchased as required. At this time the construction camp locations are not identified and the source of this water will be determined during the construction phase. • Water for dust suppression which does not need to be potable or treated water and may be recycled assuming the water quality is consistent with the appropriate guidelines. A variety of sources can be used for this purpose including treated greywater, water from dams and impoundments, raw water from allocations or purchased, and rainwater captured from settlement dams and sediment basins along the route. • Water for other purposes such as hydrotesting, which is a compliance management requirement during commissioning. This water does not require a high level of quality or treatment and can be raw water available in the region. It is

Number	Issue description	Submitter	Draft response
			<p>usual to recycle hydrotreated water along the pipeline from one section undergoing hydrotesting to the next with small makeup volumes sourced locally to replace any volume lost during the hydrotest process.</p> <p>During the operational phase water requirements will be rare and only required undertake maintenance as necessary.</p>

Number	Issue description	Submitter	Draft response
12	There is only passing mention made of the Gomeri Native Title application, and headings without anything below them for Oral History study and Cultural Heritage	Lock the Gate Alliance	QHGP acknowledges that an oral history study is required is required as a condition precedent to commencing construction. QHGP will comply with the condition of development.
13	There are no details provided of the water crossings, nor maps of soils, flooding or biodiversity along the route.	Lock the Gate Alliance	<p>The waterway crossing methodologies are described in the Construction Readiness Report, as is the selection process for determining an appropriate methodology. Engineering drawings for these methodologies will be completed by the Construction Contractor.</p> <p>Soil investigations were undertaken during the environmental impact assessment for the Project and this information is reasonably expected to remain static over time.</p> <p>Flooding risk is factored into the construction scheduling and the engineering aspects of the flooding (e.g. buoyancy of the pipeline) is incorporated into civil engineering design (such as the inclusion of ballast or additional depth of cover in flooding areas. Addressing flood risk is a mature practice of pipeline design and construction.</p> <p>Biodiversity maps will be prepared following ecological assessment of the route.</p>

Number	Issue description	Submitter	Draft response
14	No mention is made of any gas companies that intend to use the pipeline	Lock the Gate Alliance	<p>QHGP does not intend to publish the commercial details of gas transportation agreements.</p> <p>QHGP notes that the provisions of the Trade Practices Act may govern fair access to the pipeline from third party gas producers and wholesalers. QHGP may not be able to restrict access to the pipeline.</p>

15	<p>As evidence of the need for the project, the proponent provides a copy of AEMO's 2018 Gas Statement of Opportunities, making the claim that the Hunter Gas pipeline is "required" by AEMO. This is not strictly accurate. The Queensland Hunter Gas Pipeline is identified as a potential contribution to increased flows if exploration and new gas field developments in the north provide sufficient gas production to meet southern demand, this additional transport capacity could relieve constraints on the SWQP and MSP, and allow more flows to be diverted south</p>	Lock the Gate Alliance	<p>The AEMO 2018 Gas Statement of Opportunities discusses the Queensland Hunter Gas Pipeline on pages 32 and 33. Neither of these references supports the assertion made by the submitter that "...This is not strictly accurate..." QHGP is clearly identified as providing additional capacity of 450 TJ/day (160PJ/y) in additional supply to meet NSW demand. The AEMO statement identifies the northern imports will be increasingly relied on within the parameters of the "Low Southern Resource Case" explored by the AEMO 2018 statement.</p> <p>Section 4.1.2 of the AEMO 2018 Statement discusses the Neutral - Low southern resource case stating "...Expansion of pipeline infrastructure to alleviate constraints on SWQP and MSP would be required by 2030 to avoid domestic supply gaps. Without this expansion, southern supply gaps of up to 160PJ per year are projected by 2038.</p> <p>Projected southern supply gaps first appear in 2030, when peak winter capacity can no longer be supported by the combination of southern production, storage and imports. As the supply gap widens, the forecast supply demand balance is so tight that there is forecast to be insufficient gas to fill storages over the summer and shoulder periods and an inability to meet demand all year round..."</p>
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			<p>It should be noted that without QHGP gas supply to Sydney will be completely reliant on the Moomba Sydney Pipeline which was commissioned in 1976 and will be an aging asset by 2030.</p> <p>The case for QHGP pipeline to be constructed to address the projected supply demand imbalance is such that QHGP is required to prevent shortfalls in gas supply and provide a reliable supply alternative to the existing aging asset.</p>
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Number	Issue description	Submitter	Draft response
16	The proposed pipeline's 10 year deadline will expire in February 2019, so in our opinion, this is a last minute rush to extend the project without taking into account significant changes that have occurred during the past 10 years. For example, new ecological communities that have become endangered, National Park extensions, new towns or towns that have expanded, and new farming enterprises that have begun.	Mullaley Gas and Pipeline Accord	<p>QHGP has applied for an extension of the existing approval. It is acknowledged that additional work will be required, by QHGP, to identify changes in the environment, social and community landscape since the original approval was granted.</p> <p>QHGP proposes to undertake ecological surveys and to comply with the conditions of the approvals requiring QHGP to demonstrate the avoidance of endangered ecological communities. QHGP acknowledges that the most recent iterations of endangered ecological communities mapping will be utilised for the investigations.</p>
17	The justification for the project has changed within the 10 year timeframe and that MUST be addressed appropriately.	Mullaley Gas and Pipeline Accord	As indicated in the above response to the Lock the Gate Alliance (response to comment 15) the case for QHGP to be constructed to alleviate foreshadowed shortfall in gas supply has strengthened over the past 10 years and is likely to be stronger over time.

18	<p>As farmers, we are extremely concerned about the rich agricultural land through which the pipeline would pass. Much of this land (in particular self mulching vertosols) has been deemed unsuitable to host infrastructure such as a large gas pipeline. It has been shown by our group in the past that the construction of a large gas pipeline through these unstable soils would unavoidably lead to massive erosion threats. The resulting problems from such erosion are as follows:</p> <ul style="list-style-type: none"> • Damage to the viability of agricultural businesses on which the erosion occurs. This includes the loss of fertile topsoils as well as physical damage to land and any corresponding earthwork expenses for repatriation. <ul style="list-style-type: none"> o • Reduced access to areas on our farms with heavy machinery to comply with pipeline safety. <ul style="list-style-type: none"> o Inability to access the pipeline during times of above average rainfall/flooding. This presents the very serious threat that any damage sustained during an erosion event may not be able to be repaired in a timely manner. Such an instance would pose a very serious threat to the safety of the local community. 	Mullaley Gas and Pipeline Accord	<p>QHGP acknowledges the concerns regarding the effects of construction on cropping lands and soils. Recent construction experience with respect to pipeline construction in vertosols and laser levelled cropping land (including irrigated crops) has demonstrated that productive capacity can be restored following construction.</p> <p>Access during adverse weather is often counter productive to pipeline management. Controls over erosion and sediment is established prior to and during construction, checking and inspection occurs following construction including corrective actions</p> <p>Erosion and Sediment control is considered during construction planning, including introducing management measures to prevent loss of soil and amelioration as required (such as addition of gypsum to correct sodic soils). QHGP will prepare an Erosion and Soil Management Plan prior to construction,</p> <p>QHGP will prepare and implement a soil management plan to identify and protect topsoil and soil chemistry.</p> <p>QHGP does not agree that access to farm areas will be restricted for heavy machinery. The ground pressure from heavy equipment can be managed through increasing the depth of cover. Typically in cropping land the depth of cover is</p>
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			<p>increased to 1200 mm from the usual 750 mm to ensure separation between the farming activities and the pipeline. QHGP will discuss farm access requirements with landholders during construction.</p> <p>Construction experience indicates that it is feasible to control the erosion risk and that doing so will address the concern expressed by the community regarding safety concerns from pipe exposure from erosion.</p>
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Number	Issue description	Submitter	Draft response
19	As farmers we see a legitimate threat to the biosecurity of our farms from the introduction of service vehicles and personnel. A considerable expense in any farming business is in the control of weeds and diseases and we take extra measures to prevent the introduction of further weed/disease threats. Service vehicles and people travelling from farm to farm across the length of the pipeline would break down any biosecurity barriers we have and place an extra cost burden on our businesses.	Mullaley Gas and Pipeline Accord	<p>QHGP acknowledges the risk associated with construction vehicles and the spread of weeds and diseases. QHGP will map existing weeds on properties during ecological surveys and treat these weeds prior to construction. A range of recent techniques were developed during the construction of large cross country pipelines in Queensland, including the use of cover crops, washdowns, preconstruction treatments, inspection and rehabilitation including post construction monitoring and treatment of emergent weeds.</p> <p>The risk associated with biosecurity during pipeline construction is well understood and can be managed.</p>

Number	Issue description	Submitter	Draft response
20	<p>In general, landholders would bear an extra risk by having a high pressure gas pipeline under their land which would affect our ability to excavate and may increase our insurance premiums.</p> <hr/>	Mullaley Gas and Pipeline Accord	<p>The design and construction of large cross country pipelines such as QHGP is governed by Australian Standard 2885. QHGP proposes to comply with this standard during design and construction. AS2885 is accepted by the various state jurisdictions and the pipeline industry as being effective in managing design, construction and operational risks from pipelines.</p> <p>Whilst some excavation (or construction) may not be permitted over the pipeline, all other farming activities (including ploughing and deep ripping) would be permitted. The pipeline will not sterilise farmland or curtail farming activities.</p> <p>The available evidence does not support a conclusion that a pipeline increases the insurance premiums of the landholders.</p>
21	<p>We also note that the modification only seeks to extend the lapse date for the project as the current approval will expire on 11 February 2019. No other changes to the nature and extent of the gas pipeline are proposed as a part of the modification application,</p> <p>In this regard, we do not have any further comments or objections to the proposed modification</p>	Liverpool Plains Shire Council	Acknowledged

Number	Issue description	Submitter	Draft response
22	The key interests for Roads and Maritime Services are the safety and efficiency of the road network, traffic management, the integrity of infrastructure and the integration of land use and transport.	Transport Roads & Maritime Services	Acknowledged
23	New England Highway [HW9] and Kamilaroi Highway [HW29] are classified (State) roads under the <i>Roads Act 1993</i> (Roads Act). Liverpool Plains Shire Council and Gunnedah Shire Council are the roads authorities for all public roads (other than freeways or Crown roads) in the local government areas pursuant to Section 7 of the Roads Act. Roads and Maritime is the roads authority for freeways and can exercise roads authority functions for classified roads in accordance with the Roads Act. Any proposed works on a classified (State) road will require the consent of Roads and Maritime. Consent is provided under the terms of a Works Authorisation Deed (WAD).	Transport Roads & Maritime Services	Acknowledged. QHGP will make the appropriate application prior to construction.

Number	Issue description	Submitter	Draft response
24	For minor access works, under road boring or work in the road reserve adjacent to a classified (State) road a Section 138 approval may suffice to replace the need for a WAD. In accordance with Section 138 of the Roads Act Council must obtain concurrence from Roads and Maritime prior to granting approval to the works	Transport Roads & Maritime Services	Acknowledged. QHGP will make the appropriate application prior to construction.
25	Roads and Maritime recommends the projects requirements should be updated and supported by a Construction Traffic Access Management Plan (CTAMP) prepared by a suitably qualified person in accordance with the Austroads Guide to Traffic Management Part 12, Roads and Maritimes Supplements and RTA Guide to Traffic Generating Developments.	Transport Roads & Maritime Services	Acknowledged. QHGP will prepare the CTAMP in accordance with the quoted guideline and addressing the matters in the Transport Roads & Maritime Services submission.

26	<p>Any proposed new access, works and structures on or below a classified road reserve will require the approval of the roads authority (Council) and concurrence from Roads and Maritime Services in accordance with Section 138 of the Roads Act 1993. The following information is to be submitted to the roads authority for consideration;</p> <ol style="list-style-type: none"> 1. Detailed plans of any new access, works or structure should be submitted to the local Council prior to any work commencing. The application will then be referred to Roads and Maritime for concurrence. 2. Any proposed new access is to be designed and constructed in accordance with Austroads Guidelines, Australian Standards and Roads and Maritime Supplements. Attached is a copy of Northern Regions "Typical Rural Property Access" standard for low volume side road access in rural locations. 3. Any proposed new access is to be designed and constructed in accordance with Austroads Guidelines, Australian Standards and Roads and Maritime Supplements. Attached is a copy of Northern Regions "Typical Rural Property 	Transport Roads & Maritime Services	Acknowledged QHGP will make the application for approval and address the elements contained in the submission
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	<p>Access” standard for low volume side road access in rural locations.</p> <p>4. Construction of an access or road works is to be undertaken in accordance with the RTA Traffic Control at Worksites Manual and a Road Occupancy Licence (ROL) must be obtained from Roads and Maritime prior to the implementation of any traffic control on classified (State) roads.</p>		
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Number	Issue description	Submitter	Draft response
27	Where road safety concerns are identified at a specific location along the proposed route, Roads and Maritime suggests that the CTAMP be supported by a targeted Road Safety Audit undertaken by suitably qualified persons.	Transport Roads & Maritime Services	QHGP will include this requirement into the construction contract and ensure compliance is incorporated in to the construction contract.
28	The current Austroads Guidelines, Australian Standards and Roads and Maritime Supplements are to be adopted for any proposed works on the classified road network.	Transport Roads & Maritime Services	Acknowledged
29	If the developer is required to enter into a Works Authorisation Deed (WAD) with Roads and Maritime for any works deemed necessary on the classified (State) road network. The developer will be responsible for all costs associated with the works and administration for the WAD.	Transport Roads & Maritime Services	Acknowledged
30	<p>The EPA understands from the supporting documents that the project transitioned to Critical State Significant Infrastructure (CSSI) in July 2018 and that the only modification being sought relates to the “Commencement of Construction” timing.</p> <p>The EPA does not have a regulatory role in relation to the pipeline construction</p>	NSW EPA	Acknowledged

Number	Issue description	Submitter	Draft response
	and therefore has no comments on the proposal.		
31	Please note that since the original approval, many guideline documents may have been updated. The Department of Planning and Environment may wish to review the original environmental impact assessment and the existing approval against contemporary guidelines when considering whether the current approval should be extended.	NSW EPA	<p>QHGP understands that a reference, in the approval, to legislation, guidelines or standards is a reference to the latest edition of these documents when preparing for construction.</p> <p>QHGP proposes to use the most recent edition of the guidelines referenced in the approval.</p>
32	OEH recommends that the final route alignment, Construction Environmental Management Plan and Biodiversity Offset Needs Study incorporate consideration of threatened species and endangered ecological communities that have been listed since the original Environmental Impact Assessment.	NSW Office of Environment and Heritage	QHGP agrees with the recommendation.

Number	Issue description	Submitter	Draft response
33	The Hunter-Qld pipeline has the potential to aid and abet the development of the Narrabri Gas Project, currently under application. We are opposed to the Narrabri Gas Project due to the extensive reasoning provided in our submission, rather than wasting our time in repeating this information	People for the Plains	<p>QHGP is not associated with the Narrabri Gas Project and does not have any knowledge regarding the comments or issues raised in respect of the EIS reviews by the People of the Plains (or other individuals or groups). QHGP is not dependent on the Narrabri Gas Project being approved. QHGP connects the Wallumbilla hub in Queensland and Newcastle, with various offtaker opportunities between the two points.</p> <p>Whilst QHGP would be available for the transport of Narrabri Gas it is noted that the current preference for the Narrabri Gas Project proponent is the Western Slopes Pipeline and not QHGP.</p>
34	Therefore, by association, a pipeline that facilitates the development of that gasfield, we are also opposed to.	People for the Plains	QHGP notes the comment and notes that the current preference for the proponent of the Narrabri Gas Project is the proposed Western Slopes Pipeline
35	Its [the QHGP] path to approval has been vastly different to that of the Western Slopes Pipeline and this application, if approved will allow to continue its stealthy path.	People for the Plains	<p>QHGP has complied with the planning and impact assessment processes during the approval process. Public consultation was included in the approval processes and was conducted and completed. Concerns raised by the public were addressed and the project was approved.</p> <p>This application is to change the date of expiry and does not propose to change the conditions of approval other than the expiry date.</p>

Number	Issue description	Submitter	Draft response
36	This proposed pipeline is poorly conceived, has not had appropriate levels of survey work or community consultation done on it.	People for the Plains	QHGP has undertaken extensive development work on the proposed pipeline. The pipeline has undergone an assessment program as required by the legislation including survey work and community consultation. Work outstanding is related to the construction readiness and fulfilling the conditions of development required to be complete prior to construction.

3. ISSUES RAISED BY INDIVIDUAL SUBMITTERS

Number	Issue raised	Response
1	Project will support the development of CSG resources	<p>A number of objectors to the project raised the possibility QHGP will promote the development of coal seam gas (CSG) resources with associated impacts on the environment from the exploitation of CSG.</p> <p>QHGP does not consider there is a relationship between this project and the development of CSG. Whether any particular CSG resource is produced is a matter for the company involved in the CSG tenement and the various regulatory bodies associated with the approval and conditioning of that tenement. Impacts and the management of impacts is a matter for these parties. QHGP does not rely on CSG and will be available to transport conventional resources from existing gas fields connected to Wallumbilla.</p>
2	QHGP will lead to the development of the Pilliga gas field	<p>As noted above (response to Lock the Gate) the gas resource identified in the Pilliga is under separate application for development approval. This matter is currently under examination by the NSW regulators. QHGP is not dependent on the approval of the Pilliga resource and whether this occurs or not is separate to the construction and operation of the QHGP.</p> <p>QHGP notes that the current preferred transportation route for Pilliga gas to market is the proposed Western Slopes pipeline.</p>

Number	Issue raised	Response
3	Opposition to fracking	<p>A number of individual responses to the QHGP public consultation raised opposition to fracking. The decision to utilise a fracking technique for gas extraction is one for the operators of the gas field, and the regulators associated with the compliance oversight of that gas tenement. QHGP does not promote fracking nor is QHGP linked to a particular resource or gas field.</p> <p>QHGP will be available to transport gas of suitable pipeline quality regardless of the production methodology employed to extract the gas. The issue of fracking is a matter for a state regulator to manage with the holder of the tenement.</p>

Number	Issue raised	Response
4	Pipeline will cross rivers	<p>Several objections identified river crossing as a matter of concern including specific references to the Namoi River. QHGP has identified a number of methodologies for crossing watercourses. These techniques are well established in pipeline construction and include:</p> <ol style="list-style-type: none"> 1. Open Cut 2. Causeway with pipe drain 3. Water diversion using flume 4. Water diversion using pump 5. Horizontal Directional Drilling <p>Each technique has advantages and disadvantages and a decision on the most appropriate technique is made for each watercourse. Criteria for selection of a technique includes the size of the water course, steepness of bank and access through banks, erosion risk, presence of water and flow rates of the water course, and the climatic conditions expected at the time of crossing.</p> <p>Whilst it is too early in the construction assessment to determine a crossing methodology for each watercourse on the QHGP route, the preferred crossing technique will be developed in the watercourse crossing management plan and identified in engineering drawings and alignment sheets.</p>

Number	Issue raised	Response
5	Pipeline crosses a number of Local Government Areas	Many submissions identified that the pipeline will pass through Local Government Areas. Local Governments along this route provided comments on the implications of the pipeline within their jurisdiction and were directly consulted as part of the application for the extension of the expiry date. QHGP has contacted the relevant local governments along the route and is direct negotiations with these entities with respect to matters such as crossing local roads and reserves.
6	Impacts on declared ecological communities, ecological impacts and amenity	<p>As noted above QHGP acknowledges that additional work is required characterise the ecological communities that intersect the pipeline route. QHGP will complete this work prior to construction and comply with the existing conditions of approval regarding demonstrating the ecological impacts are minimised, and that impacts can be managed through the construction phase.</p> <p>QHGP does not accept that the buried pipeline will affect visual amenity as raised by some individuals. Above ground visual impacts will be wholly contained to valve stations as required by AS2885. The valve stations will be approximately 100km apart. The only other above ground indication of the pipeline will be the signposts identifying a pipeline is buried in the vicinity. The marker posts are required by AS2885 and are required to be visible from any point on the pipeline. QHGP will install these in accordance with the requirements of the standard.</p>
7	Impact on groundwater	QHGP construction will be shallow with the base of the trench being approximately 2 metres deep (this is the maximum depth allowing for a 1.2 m depth of cover over the pipe). It is unlikely to intersect groundwater at this depth.
8	Impact on irrigation systems	QHGP will negotiate with each individual landholder regarding the pipeline route on each property including the irrigation systems present on each property. QHGP will avoid impacts on these systems.

Number	Issue raised	Response
9	Australia should not export this gas	This is a broad policy issue outside the scope of consideration of the extension of Condition 1.4 of the existing approval. The approved pipeline will focus on domestic gas supply. QHGP will solely be supplying gas to the domestic and industrial consumers in NSW, benefiting and supporting Australian economic and social development.
10	Renewable energy and climate change	<p>A number of individuals raised an objection to QHGP citing a preference for renewable electricity and a concern for climate change. Gas is used in a number of industrial and domestic applications including, chemical manufacture (such as ammonia and phosphate fertilisers, aluminium recycling, heating, cooking including commercial restaurants and public transport fuel). Electricity generation is one application of gas use in our society.</p> <p>Whilst acknowledging the concerns of the individual submitters on the use of renewables, QHGP notes that at present renewable electricity cannot provide system stability nor currently meet the total energy needs of our society. A mix of energy generation types is required to ensure a stable system operates for the benefit of society. Gas generation is regarded as a transition fuel between the higher emission coal fired energy and the low emission renewables and is consistent with sustainable energy practice and applications.</p>
11	QHGP will impact on communities along the pipeline route	<p>A number of submitters raised concerns regarding the impact the pipeline will have on communities along the route. Local suppliers of services will have the opportunity to be engaged for work during the construction of the pipeline. QHGP has agreed to provide offtaker points (enabling gas reticulation systems to be constructed) in the following rural towns Narrabri, Boggabri, Port Stephens, Gunnedah, Murrundi, Scone, Aberdeen and Quirindi.</p> <p>QHGP will support the provision of alternate energy solutions in local communities with consequential benefits in social and economic development.</p>

Number	Issue raised	Response
12	Pipeline risk of rupture and spills creating environmental disasters.	<p>QHGP will transport gas from Wallumbilla to the Sydney basin. The gas transported will be lighter than air and in the event of a release will not cause land contamination or an environmental disaster.</p> <p>Modern pipelines have leak detector systems laid during construction and which shut down the pipeline in the event of a rupture. The leak detection will shut the valves upstream and downstream of the rupture point and enable venting through the valves to reduce the risk of explosion.</p> <p>There are approximately four million kilometres of natural gas pipelines in operation in the US. The US Department of Transportation Pipeline and Hazardous Materials Safety Administration notes that "Pipelines are the safest, most environmentally friendly and most efficient and reliable mode of transporting natural gas.</p>
13	Concern that the pipeline will be a terrorist target	<p>The pipeline will be buried and not easily accessible to the common methods of destruction available to terrorists. Whilst the minor above ground infrastructure (such as valve stations) may be exposed these are typically remote and not associated with population centres. Security is established around valve stations including CCTV, patrols and security fencing.</p>