

19 September 2023

Mr Steve O'Donoghue
Director, Resource Assessments
Department of Planning and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

By email: Stephen.ODonoghue@planning.nsw.gov.au

Dear Steve,

MP 06_0286: Queensland Hunter Gas Pipeline – Staging Request

I refer to condition 6.1 of the Queensland Hunter Gas Pipeline Project Approval which relates to the updating, and staging of studies, strategies and plans. The condition states:

Updating & Staging of Studies, Strategies & Plans

To ensure the studies, strategies and plans for the project are updated on a regular basis and incorporate any required measures to improve the environmental performance of the project, the Proponent may submit revised studies, strategies or plans required for the project under the conditions of approval at any time. With the agreement of the Secretary, the Proponent may also submit any study, strategy or plan required under the conditions of this approval on a staged basis.

The Secretary may approve a revised strategy or plan required under the conditions of approval, or the stage submission of these documents, at any time. With the approval of the Secretary, the Proponent may prepare the revised or staged strategy or plan without undertaking consultation with all parties nominated under the applicable condition in this approval.

Notes:

- *While any study, strategy or plan may be submitted on a progressive basis, the Proponent will need to ensure that the existing operations on site are covered by suitable studies, strategies or plans at all times.*
- *If the submission of any study, strategy or plan is to be staged, then the relevant study, strategy or plan must clearly describe the specific stage to which the study, strategy or plan applies, the relationship of this stage to any future stages, and the trigger for updating the study, strategy or plan.*

Hunter Gas Pipeline Pty Ltd (Santos) proposes to undertake construction of the project in three distinct Stages:

- Stage 1 – Commencement of works, starting Q4 2023.

Stage 1 activities are project early works and will involve the construction of temporary laydown yards at multiple strategic locations along the proposed Hunter Gas Pipeline alignment. These laydown yards will be utilised to securely store construction equipment, pipe and other materials, as they become available to Santos. Access to and from each laydown yard will also be constructed as required. Site offices will be constructed on the

laydown or, where existing buildings are present on the property, these may be utilised by the project team to support material logistics coordination, survey and land access activities to finalise the 30 metre pipeline easement. Specific details comprising Stage 1 will be contained in the respective Stage 1 plans as required by the conditions of approval.

- **Stage 2** - Construction and operation of the Narrabri to Newcastle section of pipeline.

This stage of works will comprise the physical construction and operation of the Hunter Gas Pipeline, commencing south of Baan Baa in the Narrabri Shire Council area and terminating in Newcastle where gas will be delivered into the NSW domestic market. It will also include activities / project sites developed as part of Stage 1. Construction of Stage 2 is scheduled to begin in 2024, subject to all requisite project approvals being in place including issuing of the pipeline licence.

- **Stage 3** - Construction and operation of the Wallumbilla to Narrabri section of the pipeline.

This stage of works will comprise the physical construction and operation of the Hunter Gas Pipeline, commencing at Wallumbilla in Queensland, and terminating south of Baan Baa, where Stage 2 works commenced. This development stage will comprise the final identified 30 metre pipeline easement from Baan Baa to the Queensland / NSW border. The remainder of the pipeline would be constructed under Queensland planning approvals. There is currently no scheduled commencement for this Stage of the project.

Staging of Studies, Strategies and Plans

Based on the above proposed phasing of construction execution, pursuant to condition 6.1, Santos is seeking the agreement of the Secretary to stage the delivery and approval of studies, strategies and plans required by the conditions of approval for the Hunter Gas Pipeline. At this time Santos seeks agreement to prepare specific management plans for Stage 1 activities only. The list of relevant conditions of approval, management plans, and the proposed approach to staging these is listed in the table below.

Condition	Plan	Proposed Approach to Staging
5.1	Environmental Management Strategy	The Environmental Management Strategy (EMS) will be developed to cover all stages of the project. The EMS will be updated should Stage 2 or Stage 3 activities require a change to the strategy outlined in the EMS.
6.2	Construction Environmental Management Plan	The initial Construction Environmental Management Plan (CEMP) will contemplate Stage 1 activities only. Prior to the commencement of each subsequent project stage (i.e. Stage 2 and Stage 3), a CEMP will be provided to DPE for approval.
	Sub-plans of the CEMP include:	
	2.1.1 Route alignment sheets displaying the final 30m Construction Right of Way	This requirement is not relevant to the proposed scope of Stage 1, as Stage 1 activities will not involve the construction of the pipeline within a finalised 30 m Right of Way. This information will be contained within the CEMP for both Stage 2 and Stage 3. Site plans for the Stage 1 activities will be included in the Stage 1 CEMP.

Condition	Plan	Proposed Approach to Staging
2.5	Watercourse Crossings	<p>Stage 1 will not involve watercourse crossings and activities will be designed with appropriate mitigation measures to have no impact on watercourses. Relevant details will be included in the CEMP for Stage 1.</p> <p>Full details of watercourse crossing designs and consultation outcomes as required by condition 2.5 will be included in the Stage 2 and Stage 3 CEMPs as relevant to each project stage.</p>
2.6	Wetlands	<p>This condition is not applicable to Stage 1. Stage 1 activities will not disturb, cross or be situated within 100m of a wetland mapped under the <i>State Environmental Planning Policy (Coastal Management) 2018</i>.</p> <p>Should Stage 2 or Stage 3 activities disturb, cross or be within 100m of a mapped wetland, the necessary details will be incorporated in the relevant Stage 2 and/or Stage 3 CEMP.</p>
3.15(a)	Koala Habitat Impact Study	<p>Stage 1 activities will not impact on koala habitat. Activities will be carefully selected to occur in locations that do not comprise biodiversity values (i.e. pre-cleared / disturbed areas). The CEMP will demonstrate this outcome.</p> <p>The Stage 2 and Stage 3 CEMPs will contain a koala habitat impact study as relevant to each development stage</p>
3.23	Contingency Plan for Water Pollution Events	<p>A Contingency Plan for Water Pollution Events will be prepared for Stage 1 activities only.</p> <p>Prior to each subsequent project stage, the plan will be updated to include Stage 2 and then Stage 3 activities, associated risks and mitigations.</p>
3.24	Contaminated Land Management	<p>Management measures for any contamination uncovered during excavation works associated with each project stage will be included in the relevant CEMP for that project stage.</p>

Condition	Plan	Proposed Approach to Staging	
	3.27	Oral Histories	<p>The oral histories study for the proposed HGP alignment is well progressed. Oral histories relevant to the Stage 1 locations will inform the Stage 1 CEMP as appropriate.</p> <p>For Stage 1 activities, Santos will seek locations that are unlikely to contain cultural heritage items (i.e. disturbed land) and are not of significance to the Traditional Owners.</p> <p>Oral history studies will be undertaken in stages, as relevant to Stage 2 and to Stage 3. The results of the oral histories studies will be used to inform the final pipeline alignment for each subsequent project stage and will inform mitigation measures included in the Stage 2 and Stage 3 CEMPs.</p>
	6.3(a)	Construction Noise Management Plan	<p>A Construction Noise Management Plan will be prepared for Stage 1 activities only.</p> <p>Prior to each subsequent project stage, a Construction Noise Management Plan will be prepared for Stage 2 and then Stage 3 activities.</p>
	6.3(b)	Construction Traffic Management Plan	<p>A Construction Traffic Management Plan will be prepared for Stage 1 activities only.</p> <p>Prior to each subsequent project stage, a Construction Traffic Management Plan will be prepared to include Stage 2 and then Stage 3 activities.</p>
	6.3(c)	Water Management Plan	<p>A Water Management Plan will be prepared for Stage 1 activities only.</p> <p>Prior to each subsequent project stage, a Water Management Plan will be prepared for Stage 2 and then Stage 3 activities.</p>
6.4	Operation Environmental Management Plan		<p>The Operation Environmental Management Plan (OEMP) is not applicable for Stage 1 activities. Stage 1 activities are construction activities.</p> <p>Prior to the operation of Stage 2, an OEMP will be submitted for approval by the Secretary. The OEMP will be updated to include Stage 3 activities prior the commencement of operation of Stage 3.</p>

Staged Operation of other Conditions

In addition to the staging of plans pursuant to condition 6.1 above, Santos also requests the Secretary’s agreement to defer compliance with the requirements of the conditions set out in the table below, for the purposes of undertaking the Stage 1 works.

Condition	Obligation	Request for Secretary’s agreement
2.9	Local council consultation outcomes for off-take points	<p>Condition 2.9 states:</p> <p><i>“.....The Proponent shall consult with the relevant local council in identifying locations for off-take points referred to under this condition and in relation to any requirements for servicing relevant areas. The outcomes of this consultation shall be provided to the Department prior to the commencement of construction of the relevant part of the project, <u>unless otherwise agreed by the Secretary</u>”.</i></p> <p>Consultation with affected local governments for Stage 2 of the project has commenced to identify opportunities for off-take points on the pipeline for the provision of gas. However, given gas off-takes are not relevant to the proposed scope of Stage 1, Santos seeks the agreement of the Secretary that the record of consultation outcomes for the provision of off-take points is not required to be provided prior to commencement of Stage 1.</p> <p>All consultation outcomes relating to off-take points will be provided prior to the commencement of Stage 2 and Stage 3 as relevant.</p>
3.18	Biodiversity Offset Needs Study	<p>Condition 3.18 states</p> <p><i>“.....<u>Unless otherwise agreed by the Secretary, the Biodiversity Offset Needs Study shall be submitted to the Secretary for approval prior to the commencement of any construction works</u>”.</i></p> <p>Santos will carefully select locations to undertake Stage 1 activities which do not comprise biodiversity values (i.e. pre-cleared / highly disturbed). Consequently, no biodiversity values will be disturbed, nor require offsetting. The CEMP for Stage 1 will clearly demonstrate this outcome when presenting the finalised location(s) and designs for Stage 1 infrastructure.</p> <p>Given the above, Santos seeks agreement from the Secretary that the Biodiversity Offset Needs Study is not required prior to the commencement of Stage 1.</p> <p>Prior to the commencement of each of the subsequent project stages (i.e. Stage 2 and Stage 3), a Biodiversity Offset Needs Study will be completed and submitted for approval.</p>

Condition	Obligation	Request for Secretary's agreement
3.19	Final Hazard Analysis	<p>Condition 3.19 states:</p> <p><i>Prior to the commencement of the construction of the project, unless the Secretary agrees otherwise, the Proponent shall prepare a Final Hazard Analysis (FHA) of the project to the satisfaction of the Secretary.</i></p> <p>As described earlier, the proposed Stage 1 works will primarily involve the construction of multiple laydowns areas along the proposed pipeline alignment for the secure storage of construction materials and equipment. Stage 1 activities will not comprise: the construction or use of gas-related infrastructure or other hazardous infrastructure.</p> <p>Given the above, Santos seeks agreement from the Secretary that the FHA is not required prior to the commencement of Stage 1 activities.</p> <p>Prior to the commencement of each subsequent project stage (i.e. Stage 2 and Stage 3), a Final Hazard Analysis will be completed and provided to DPE for approval.</p>

I look forward to discussing this staging request for the Hunter Gas Pipeline project with you. If you have any questions about this matter, please contact Liz Dunlop on (07) 3838 3668 or by e-mail to liz.dunlop@santos.com

Yours sincerely



Todd Dunn
Development Manager NSW/NT