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13 January, 2022

Our ref: 21/29

Your ref: MP10_0108-Mod-1

Joanna Bakopanos
Industry Assessments
Department of Planning, Industry and Environment
12 Darcy Street
PARRAMATTA NSW 2150

Attention: Tom Bertwistle

Dear Joanna and Tom,

**RE: SHOALHAVEN STARCHES – GAS PIPELINE (MP10_0108-MOD 1)
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION FROM DPIE - WATER**

I refer to the Department's email dated 16th December 2021 attached to which was a response from DPIE - Water in relation to the above Modification Application. This submission has been prepared to respond to the matters raised by DPIE – Water.

DPIE - Water

The proponent should:

- *predict the groundwater inflows within cut/excavation depths and determine if inflows are less than or equal to 3 ML/year and therefore exempt from licensing for any aquifer interference activities listed in Clause 7 of Schedule 4 of the Water Management (General) Regulation 2018. For more information visit <https://www.dpie.nsw.gov.au/nrar/how-to-apply/water-licences/Groundwater> (noting application for exemption and some documentation is required).*
- *if take is estimated to be greater than 3 ML/year, provide a statement of how the project complies with the 'minimal impact considerations' as required by the NSW Aquifer Interference Policy (2012).*

Response

Attached to this submission is a revised geotechnical report prepared by GHD which in part addresses this issue. In summary GHD state in relation to this matter:

In relation to the extent of groundwater extraction expected from inflows to the trenching, given the shallow depth of trench proposed and temporary condition of an open trench with staged excavations, no permanent aquifers will be intercepted, and groundwater inflows will be from temporarily perched water within permeable soil layers within the trench depth. Groundwater levels were assessed based on our review of the local soil and groundwater conditions from nearby borehole information, water levels in Abernethy's Creek being below trench level, and our review of a previous report by Coffey Environments Australia Pty Ltd (Coffey, 2011). Given that the proposed trenching for the gas pipeline will be a maximum of 1.0 m, the expected groundwater inflow based on the above information, maximum inflows are not expected to exceed 1,000 L/day. Assuming a construction period for the pipeline in the vicinity of the packing plant will not exceed 20 days, total groundwater extraction over the construction period is not expected to exceed 20,000 L. If the trench was open for a whole year, then this would equate to extraction of less than 0.4 ML/year, which would not trigger an aquifer licence.

DPIE - Water

The proponent should:

- provide details of excavation works including width of the trench for the pipeline on waterfront land of Abernethy's Creek.*
- provide details on how the proposed pipeline realignment is in accordance with the Guidelines for Controlled Activities on Waterfront Land (NRAR 2018) as works are encroaching within the riparian zone.*

Response

This issue is also canvassed in the attached revised report prepared by GHD. GHD state:

Manildra has now amended the Mod 1 plans to re-locate the gas pipeline to 19 m from the western bank of Abernethy's Creek, outside of the approved 18 m riparian re-vegetation area along Abernethy's Creek. The trench depth will be a maximum of 1 m and trench width will be less than 0.5 m.

Please also find attached a revised drawing set for this Modification Proposal showing the relocation of the proposed pipeline alignment now setback back 19 metres from the bank of Abernethy's Creek and therefore outside the approved 18 metres setback to this creek.

I trust that the attached information is of assistance in the Department's consideration of this Modification Application. If you require any further clarification or information in relation to this matter, please do not hesitate to contact me.

Yours faithfully



Stephen Richardson
COWMAN STODDART PTY LTD