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Major Projects
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Your reference SSD 6456
Our Ref. S14/0006
DA17022406207

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Dear Mr O'Donoghue

Narrabri Gas Project Environmental Impact Study

Thank you for the opportunity to comment on the above referenced Environmental Impact Statement (EIS).

It is noted that the New South Wales Rural Fire Service (NSW RFS) has previously provided comment for trial wells to be constructed in the forest. The trial applications have been segregated into the following names:

- Bibblewindi Gas Exploration Pilot
- Dewhurst Gas Exploration Pilot
- Wilga Park Power Station
- Westport Workers Accommodation

These trial wells and infrastructure are included in the overall Coal Seam Gas (CSG) project to be approved.

This CSG project involves the following components:

- 850 new wells located on 425 well pads;
- Well pads are initially to be 1 hectare in size during drilling and reduced to 2500m² upon commission of the wells;
- New gas processing facilities include atmospheric flaring of gases;
- New gas transport pipelines;
- New telecommunication towers;
- Workers accommodation for 200 people.

As such, to reduce risk to fire fighters, workers and the gas infrastructure the following comments are made:

- All above ground gas extraction, transport, processing and ancillary facilities shall be located outside modelled flame length from potential forest fires;
- All gas extraction transport, processing and ancillary facilities shall be engineered to withstand the modelled radiant heat exposure. Proposed infrastructure shall be 'certified' by a registered and practicing engineer for that related field of work;
- Flame length and radiant heat values be modelled for the proposed gas flaring infrastructure. Radiant heat levels on surrounding vegetation shall not exceed 10kW/m² on days of FFDI 120.
- All gas transfer pipelines shall be buried to a minimum depth of 300mm.
- Prior to development commencing the developer shall prepare, in consultation with the Narrabri District Fire Control Centre, a Bush Fire Management Plan. This needs to address both prevention and operational issues regarding bush fire protection.

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- All telecommunication facilities to be installed to RFS policy as per the Practice Note on telecommunication facilities.
- Expansion of Westport Workers accommodation shall be to the requirements of SFPP developments i.e. 10kW/m², Emergency Evacuation plan, and water supplies.
- Some understanding of shutdown procedures in relation to well heads and associated infrastructure needs to be incorporated into the BFMP.
- A detailed risk management plan needs to be developed that forms the basis for the bush fire management plan. This needs to address both the risk of fire spread to and from the CSG project.

In essence, the EIS is considered to be short on detail with respect to bush fire impacts on the various components of the development proposal. It is important that the proponent can demonstrate vegetation clearing requirements to achieve suitable separation distance before any consent is granted.

As such the current document does not provide sufficient detail for a conclusive environmental impact assessment centred around vegetation clearing requirements. The proponent should submit detailed site plans for all infrastructure incorporating satisfactory vegetation management requirements.

If you have any questions please contact me on (02) 8741 5445.

Sincerely Yours,



David Boverman
Manager Development Planning and Policy