

1 December 2022

Mr Stephen O'Donoghue
Director, Resource Assessments
Department of Planning and Environment

Dear Stephen,

RE: Kurri Kurri Lateral Pipeline – Crossing of John Renshaw Drive and entry to Donaldson mine (Lot 1391DP1126633)

Ongoing consultation with the landholder and mine operator (Donaldson Coal Pty Ltd) has resulted in the identification of a potential conflict with the pipeline alignment where it enters Lot 1391DP1126633.

Initial feedback from the mine operator indicated a preference to relocate the pipeline alignment from within rehabilitated areas to within disturbed areas. As a result of this APA modified the entrance to Lot 1392 DP1126633 as part of a amendment report submitted to the Department of Planning and Environment (DPE) in September 2022 ([Major Projects Portal Link](#)) to an alternative which entered Lot 1392DP1126633, using a Horizontal Direction Drill method, within an existing mining void (known as the West pit). Subsequent discussions with Donaldson mine and review of the [Donaldson Coal Mine – Rehabilitation Management Plan](#) (August 2022) has identified a potential conflict with the transmission pipeline alignment where it enters Lot 1392 DP1126633, directly north of John Renshaw Drive.

The Donaldson Rehabilitation Management Plan identifies the potential need to use blasting as part of mine closure activities on the eastern, western and southern walls of the West Pit to batter back to a maximum slope of 18 degrees. The transmission pipeline alignment is currently directly impacted by these activities. The Peak Particle Velocity (PPV) limit for blasting around operational natural gas pipelines in accordance with APA's 3rd party works guidelines is a maximum of 20mm/s, measured at the pipeline. This ppv would be exceeded should blasting occur as proposed.

APA is continuing to engage with Donaldson to further understand if alternative rehabilitation methodologies are available to avoid blasting in the vicinity of the pipeline. An outcome on these discussions is not expect until mid-2023.

To enable meaningful negotiations to progress with Donaldson Coal Mine, APA requests that both options to enter the Donaldson Coal Mine as described separately in the EIS and Addendum Report be approved as part of the KKLP EIS determination. There is no change to the project impacts other than biodiversity between the two options. A biodiversity summary of the eastern option (original option presented in the EIS) is provided below.



Figure 1. Two options to enter the Donaldson Coal Mine

Biodiversity summary

The information below relates to the proposed transmission pipeline alignment crossing John Renshaw Drive into the mine area (from kilometre point (KP) 4.3 to 5.5 as identified on EIS figure 2.1B).

The vegetation types within the construction footprint from KP 4.3 to 5.5 (and associated plant community types (PCTs) if relevant) consist of:

- Smooth-barked Apple - Red Bloodwood - Brown Stringybark - Hairpin Banksia heathy open forest of coastal lowlands (PCT 1619 - thinned/disturbed condition)
- Spotted Gum - Broad-leaved Mahogany - Red Ironbark shrubby open forest (PCT 1590 – thin/disturbed condition and moderate/good condition)
- Cleared/exotic vegetation
- Native plantation.

A description of the two PCTs and their conservation status is provided below.

PCT 1590 - Spotted Gum - Broad-leaved Mahogany - Red Ironbark shrubby open forest

This PCT occurs in the lower elevations of the lower Hunter Valley and Central coast regions and is largely characterised by open forests and dominated by spotted gum (*Corymbia maculata*). The mid-storey is generally open and shrubby, with the ground layer retaining a diversity of grasses and forbs. Within this section of the transmission pipeline alignment this PCT is found in both moderate/good condition and thin/disturbed condition.

The NSW and Commonwealth Conservation status of this PCT is as follows:

- *Biodiversity Conservation Act 2016* (BC Act) status
 - This PCT is associated with the threatened ecological community (TEC) - Lower Hunter Spotted Gum Ironbark Forest in the Sydney Basin and NSW North Coast Bioregions – listed as endangered.

- *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) status
 - This PCT is not consistent with any listed TEC under the EPBC Act.

PCT 1619 - Smooth-barked Apple - Red Bloodwood - Brown Stringybark - Hairpin Banksia heathy open forest of coastal lowlands

This PCT consists of open forest dominated by smooth-barked apple and stringy-bark on low nutrient soils with a sandy influence. This vegetation zone encompasses a small area within the Donaldson Coal mining site near KP5. Within this section of the transmission pipeline alignment this PCT is found in thin/disturbed condition.

The NSW and Commonwealth Conservation status of this PCT is as follows:

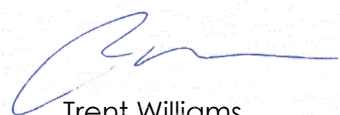
- BC Act status
 - This PCT is not consistent with any listed TEC under the BC Act.
- EPBC Act status
 - This PCT is not consistent with any listed TEC under the EPBC Act.

Table 1. Alternative Donaldson coal mine alignment PCT impact

Impacted PCT/vegetation zone	Area of Impact (ha)	Approx. Impact Credit Liability
1590_moderate to good	0.37	11
1590_thinned/disturbed	0.2	8
1619_thinned disturbed	0.84	18
Squirrel glider (habitat aligned with 1619_thinned/disturbed)	0.84	34
Total	-	71

If you require any further information, please do not hesitate to contact the undersigned (trent.williams@apa.com.au).

Yours sincerely



Trent Williams

Access and Approvals Manager - KKL Infrastructure Planning and Approvals