

23rd October 2008

Department of Planning GPO Box 39 Sydney NSW 2001

Attention: Dinuka McKenzie, Senior Environmental Planner - Energy and Water

Dear Dinuka

Re: Proposed Queensland Hunter Gas Pipeline EA Comments

Thank you for the opportunity to provide comment on the Environmental Assessment for the Queensland Hunter Gas Pipeline project.

The Namoi CMA is primarily interested in major developments such as the Queensland Hunter Gas Pipeline project from the viewpoint of catchment impacts and benefits especially in terms of the potential impacts and benefits on the people in the catchment, landscapes, surface and groundwater ecosystems and native plants and animals.

The Catchment Action Plan (CAP) for the Namoi was approved by Minister Ian MacDonald, Minister for Natural Resources in January 2007. The Namoi CAP is the strategic framework that guides natural resource management for the Namoi Catchment for the next 10 years. The CAP addresses the four key resources of the catchment, namely, the people in the catchment, landscapes, surface and groundwater ecosystems and native plants and animals.

It is realised that the proponent is seeking approval of a concept plan under section 75C of the EP&A Act for a critical infrastructure development. However, Namoi CMA believes there are a number if issues and discrepancies that need to be brought to the proponents attention so they can be addressed in the proposed fieldwork and production of the Construction Environmental Management Plan (CEMP). Namoi CMA would like representation on the government liaison group to allow input and review of the CEMP, input into specific mitigation measures and onsite advice during construction and rehabilitation.

NCMA considers that the pipeline may have the potential to impact on native vegetation / biodiversity, riparian areas, shallow groundwater, salinity and soils and aboriginal cultural heritage issues.

A team of Namoi CMA technical staff have had input into the comments on the Environmental Assessment Including:

- Mr Tim Watts, Soil Management and Riparian specialist
- Mr Lester Thearle, Soil Management
- Mr Shannon Taylor, Aboriginal Heritage and Culture
- Mr George Truman, Soil and Salinity Management
- Mr Glenn Bailey, Soil and Biodiversity Management
- Mr Nathan Penny, Riparian specialist.

A number of these staff have driven and inspected the 220km of pipeline right of way that is within the Namoi Catchment. The attached spreadsheet outlines the comments made by team members.

Surface and Groundwater Assessment

Chapter 15 and appendix K deal with issues regarding surface and groundwater assessment, existing environment, potential impacts, mitigation measures and fieldwork.

The comments in the attached spreadsheet primarily focus on issues regarding surface and groundwater with respect to sensitivity assessments and crossing methodologies.

Namoi CMA agrees with the assessment methodology, however, we believe that a number of the major creeks and streams have inappropriate sensitivity assessments and crossing methodologies. It is realised that the information on surface and groundwater in this part of the EA has been undertaken as a desk top assessment, however, the assessments inform the need for further fieldwork at riparian crossings.

Section 15.5 outlines those water features that require further fieldwork. According to section 15.5 there are 9 water features within the Namoi Catchment that have a high sensitivity ranking that require further fieldwork. Namoi CMA believes there are 22 water features within the Namoi Catchment that we believe have a high sensitivity ranking and would require further fieldwork. These water features are listed in the attached spreadsheet.

Section 15.2 and 15.4 refers to shallow groundwater and its occurrence within the Namoi catchment. Namoi CMA believes that shallow groundwater (ie <5m) would occur in the following areas:

- 418km to 424km
- 431km to 450km
- 465km to 480km
- 486km to 495km
- 500km to 535km
- 535km to 575km (possibly within 2m of the surface)

- 581km to 584km
- 591km to 607km
- 610km to 621.5km

Namoi CMA believes that further investigation is warranted through these areas to identify the actual presence of shallow groundwater and to develop mitigation measures.

Namoi CMA agrees with the mitigation and management measures as detailed in section 15.4, however, Namoi CMA would also like to review and be consulted on waterway crossing techniques and mitigation measures for shallow groundwater interception when the CEMP is produced.

Native Vegetation and Biodiversity

Chapter 9 of the EA deals with native vegetation and biodiversity issues along the pipeline right of way with in the Namoi catchment.

Namoi CMA is satisfied with the assessment methodology considering the proponent is seeking conceptual approval. During inspection of the proposed pipeline right of way, data was collected on the presence native vegetation and EEC's. The attached spreadsheet highlights the sections of the pipeline right of way that has native vegetation and/or EEC's present.

Section 9.2 reports on the existing environment and EEC's. Within the Namoi catchment a number of EEC's are present, the following 2 are the most predominant.

- 'Native Vegetation on cracking clays on the Liverpool Plains EEC' It is contended that the 'Native Vegetation on cracking clays on the Liverpool Plains EEC' is not present at KP 460 to 450km or KP465 to 468km as these sites are not within the Liverpool Plains area as defined within the EEC. Namoi CMA believes that the pipeline right of way may dissect at least 30km of 'Native Vegetation on cracking clays on the Liverpool Plains EEC' within the Namoi catchment.
- 'White Box, Yellow Box, Blakely's Gum Grassy Woodland EEC'
 Namoi CMA believes that this EEC is present within the Namoi catchment and that
 the pipeline right of way may dissect the EEC at KP576 to KP579 and KP620 to
 KP635.5km. This represents a linear length of at least 18km within the Namoi
 catchment.

Namoi CMA believes there are a number of other EEC's that are present within the Namoi catchment. The presence of the above 2 EEC's and other EEC's need to be investigated further during the field work. Section 9.3 outlines the potential impacts during construction and operation, however, the EA focuses primarily on weed management within the EEC's. The mitigation measures in section 9.4 focuses on avoidance rather then revegetation. Measures need to be detailed in the CEMP for revegetation and post development management of the pipeline route especially when it dissects the above 2 EEC's.

Soils and Salinity

Section 17.3 of the EA deals with geology and soil issues along the proposed pipeline right of way. There are significant areas of expansive soils within the Namoi catchment that may present construction challenges during construction. The areas of expansive soils are predominantly found within the basaltic floodplain areas and the volcanic slopes of the Liverpool Range of the Namoi catchment.

Namoi CMA believes that expansive soils are found within the following areas:

- 418km to 424km
- 431km to 450km
- 465km to 480km
- 500km to 505km
- 535km to 584km
- 591km to 593km
- 604km to 635.5km

Furthermore, during the pipeline right of way inspection, it was realised that the pipeline right of way would dissect known saline outbreak sites at KP 475 and KP 585.5.

The presence of expansive soils and the saline site needs to be investigated further during the field work and detailed mitigating measures need to be included in the CEMP.

Aboriginal Cultural Heritage

Chapter 10.1 of the EA deals with issues relating to aboriginal cultural heritage including assessment methodology, existing environment, potential impacts and mitigation measures. Namoi CMA believes there are a number of significant aboriginal cultural heritage issues within the Namoi catchment that are in close proximity to the pipeline ROW.

Namoi CMA believes that significant aboriginal cultural heritage areas close to pipeline ROW can be found near the following kilometre marks:

- KP480 Namoi River
- KP 501 and 504 scar trees
- KP512 Campsite
- KP 527.5 scar trees
- KP538 to 565 trading route
- KP584 to 585 scar trees
- KP587 to 591 scar trees
- KP614 cultural sites
- KP621 to 623 cultural site

The presence of aboriginal cultural heritage sites needs to be investigated further during the field work and detailed mitigating measures need to be included in the CEMP.

In conclusion, the Namoi CMA looks forward to implementation of the QHGP project as it is anticipated that it will have significant social and economic benefits to the catchment and its people. We further look forward to be able to participate in the government liaison group and the development of the CEMP.

If you need to discuss this matter further, please do not hesitate to contact Glenn Bailey on (02) 6742 9204.

Yours Sincerely

Bruce Brown, General Manager Namoi Catchment Management Authority

Pipeline Right of Way Assessment and Comments by Namoi CMA

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site to be rehabilitated to ground level to avoid breakout across the floodplain			High possibility of erosion, night level of native vege. Annual Species for Revegetation	Annual Species for Revegetation	Annual Species for Revegetation Link possibility of erosion high level of native year	vegetation, plains grass, high diversity (grey box, white High possibility of erosion, high level of native vege.	Soortroos ringrion varietation present remnant	Drainage depression to be avoided		Annual Species for Revegetation	Drainage depression to be avoided	Annual Species for Revegetation	Annual Species for Revegetation	Annual Species for Revegetation High possibility of ension high level of native year. High possibility of ension high level of native year.	Aboriginal sites on slope above river (eastern side) between 480km and 481km	Signifiaent area					surface salinity discharge area			Liverpool Plains (see 9-8)	Not on Liverpool plains therefore nt Nat yea on CC of						high flow, low banks					Previous knowledge of area used					Previous knowledge of area used		Notes on assessment, site conditions and landscape conditions

Previous knowledge of area used	Open trench	Yes	Nat Veg on Cracking Clays EEC	High		ZZ	528 Native Vegetation 529 Native Vegetation	52
	HDD Open trench	No	Significant Area, incised banks, scar trees	High	Agree	High	527.5 Namoi River	527.
Previous knowledge of	Open trench	Yes	Nat Veg on Cracking Clays EEC	High		Z	Native Vegetation	527
	Open trench	Yes		Low	Agree	Low	526.5 Pig Hole Floodrunner	526.
Cropping Area								526
Previous knowledge of	Open trench	Yes	Nat Veg on Cracking Clays EEC	High		Z:	525 Native Vegetation	52
Previous knowledge of	Open trench	No	Low lying drainage depression	Low	Agree	Low	524 Rangari Creek	52
Plains Grass, scar trees scattered throughout the area	Open trench	Yes	Nat Veg on Cracking Clays EEC	High		Z.	Native Vegetation	523
	Open trench	Yes	Nat Veg on Cracking Clays EEC	High		N:	522 Native Vegetation	522
Annual Species for Revegetation	Open trench	No	Low lying drainage depression	Low		N.	Unknown	521
Previous knowled	Open trench	Yes	Nat Veg on Cracking Clays EEC	High		N.	520 Native Vegetation	520
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Previous knowledge of area used	Open trench	No	Nat Veg on Cracking Clays EEC	High		N.	513 Native Vegetation	513
Aboriginal Campsite							512 Aboriginal site	512
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Previous knowledge of area used	Open trench	Yes	Nat Veg on Cracking Clays EEC	High		N:	510 Native Vegetation	510
Previous knowledge of area used	Open trench	yes	Nat Veg on Cracking Clays EEC	High		Z.	509 Native Vegetation	508
Previous knowledge of area used	Open trench	yes	Nat Veg on Cracking Clays EEC	High		Z	Native Vegetation	508
Annual Species for Revegetation	Open trench	No	Low lying drainage depression	Low	Disagree	Low	Unknown	508
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Annual Species for Revegetation High possibility of erosion, high level of native vege.	Open trench	No	Low lying drainage depression	Low		Z:	497 Unknown	497
High possibility of ero								496
Annual Species for Revegetation	Open trench	No	Low lying drainage depression	Low		N.	495 Unknown	495
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landscape conditions	method	assessment	Reasons	Recommended Sensitivity	Agree/Disagre	EA Sensitivity	Feature present	Distance (KP)

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621 to 623 607 to 608 Distance (KP) Feature present 621 to 623 612.5 to 613 628 to 635.5 633 to 635 633 to 635.5 618.5 Borambil Creek 617.5 Colly Creek 635.5 627.5 Borambil Creek 625.5 Unknown 632 614 Aboriginal significance 613 Unknown 612 Borambil Creek 633 Unknown 629 Native Vegetation 628 Native Vegetation Native Vegetation Native Vegetation Floodplain Shallow water tables Steep land Native Vegetation Aboriginal significance Borambil Creek Low Low Z Low Moderate Low Low Moderate Agree/Disagre Recommende e Sensitivity Disagree Agree Agree Agree Agree Agree Low Moderate Low High Low Nat Veg on Cracking Clays EEC Good riparian vegetation present Potential Flooding issues Box gum Woodland EEC Low lying drainage depression Water feature with high sensitivity as recommended by EA Water feature with high sensitivity as recommended by Namoi CMA Gravel drainage line Box gum Woodland EEC Significant bed lowering Significant bed lowering ow lying drainage depression EEC's with high signicance Prone to erosion and land slumping Low lying drainage depression Low lying drainage depression Low lying drainage depression Physical site assessment Yes Yes Yes Yes Yes N_O Yes Yes S Yes Yes N_o Yes Yes Yes Yes crossing HDD Open trench Open trench Open trench HDD Open trench Recommended Open trench HBD Open trench native vegetation, cracking clays, significant head cut Previous knowledge of area used flooding flooding Notes on assessment, site conditions and landscape conditions side creek aboriginal cultural sites, scar trees, axe grooves western side creek stream bank erosion, bed lowering and flooding issues Endangered Ecological Community (box gum woodland)
Endangered Ecological Community (box gum woodland) flooding and bed lowering issues
Avoid aboriginal cultural sites, scar trees, axe grooves
western side creek Steep and unstable banks flooding and bed lowering issues flooding and bed lowering issues aboriginal sites on western side of Borambil creek aboriginal cultural sites, scar trees, axe grooves wester sox trees, steep nills, erosion, vegetation clearing