



Narrabri Coal Seam Gas Utilisation Project

PEL 238, Gunnedah Basin

New South Wales

Response to Submissions to the Environmental Assessment

August 2008



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PREAMBLE

Following the period when the *Environmental Assessment* for the Narrabri Coal Seam Gas Utilisation Project was made publicly available, the Department of Planning forwarded submissions from five agencies and two private submissions. This document has been assembled to provide responses to the issues raised in each submission.

The responses to the submissions make references to various supporting documentation which are incorporated at the back of this document as appendices. Also compiled for consideration with the response to submissions in the Final Statement of Commitments. As a result of the various submissions, a range of commitments presented in the *Environmental Assessment* have been modified or new commitments included to reflect matters raised in the responses provided.

It is also noted that as a result of the technical review of certain components of the Project, the Proponent has made some minor modifications to some components of the Project design, all of which will have negligible changes in impact to the design included in the May 2008 *Environmental Assessment*. In some cases, the impacts will be reduced from those predicted for the original proposal. The Proponent's intended project design and operation is presented in a separate document entitled a "Preferred Project Report".

1 RESPONSE TO SUBMISSION NO. 1 FROM K & R ARCHER (LOTS 3 AND 4) AND R & D HATCH (LOT 11)

We the owners of Lots 3 and 4 Wilga Park, and Lot 11 Gunnadoo Yarrie Lake Road, Narrabri, do hereby have concerns regarding noise levels with the addition of more generators at the Wilga Park Power Station.

Response

The EA contains specific reference to the predicted or likely noise impacts of the project. The land parcels noted in this submission are within the vicinity (<2km) of the Wilga Park Power Station.

The results of noise impact assessment for the worst case scenario (all generators operating concurrently) indicates that:

- a maximum of 4% of the Hatch property 'Gunnadoo' will be impacted by greater than background noise levels and only under adverse weather conditions (inversion); and
- a maximum of 58% of the Archer property (Lot 3/1064422 Wilga Park) will be impacted by greater than background noise levels under a NW wind, 51% under inversion conditions, 49% under calm conditions and 21% under SE winds. However, the "Wilga Park" homestead is located further to the southeast and out of the area impacted in this manner under all climatic conditions.

Notwithstanding these observations, recent examples of large developments in NSW exist where the Minister's determination and conditions clearly identify the noise thresholds at which negotiations with affected landholder are to begin, the guidelines for any such negotiations and the process through which decisions in this regard are to be made. It is expected that given the results of the noise impact assessment, conditions of this type could be incorporated in a project approval issued by the Minister.

2 RESPONSE TO SUBMISSION NO. 2 FROM NSW RURAL FIRE SERVICE

2.1 Minimising the impact of radiant heat and direct flame contact by separating the development from the bush fire hazard by identifying adequate asset protection zones in accordance with Planning for Bush Fire Protection 2006. Setbacks will depend on proximity to vegetation, vegetation type and slope.

Response

All surface (non-buried) infrastructure is or would be located in the cleared agricultural lands within existing facilities. Based upon the factors required to determine adequate asset protection zones, the existing Wilga Park Power Station can be characterised in the following terms.

- The facility is currently located on a cleared site surrounded on its western side by remnant vegetation described as Semi arid woodlands (low woodlands) consisting of Bull Oak, Mugga Ironbark, Bimble Box, Pilliga Box, Wilga community. However, the shrub understorey has been modified extensively by domestic stock grazing. Slopes in the surrounding area have been described as flat to very flat (slopes of less than 1°) with small scale variations in elevation of less than 1m found in poorly defined low lying drainage depressions. FDI for the Narrabri region is 80. The setback requirements as stated in the *Planning for Bush Fire Protection 2006* have been assessed as between 10-20m for developments of this type. The setbacks currently in place exceed this requirement.

2.2 Providing adequate egress / access to the proposed development as outlined within 4.1.3 of Planning for Bush Fire Protection 2006.

Response

The Project has been assessed as possessing sufficient safe operational access and egress pathways for emergency service personnel and residents at all points along and within the Project Site.

2.3 The ability to site and provide for adequate future water supplies for bush fire suppression operations.

Response

ESG is committed to make approximately 2ML of water available to the Rural Fire Service from the impoundment located at Bibblewindi-1 for bushfire fighting purposes. This commitment is consistent with ESG's current arrangement with local NSW Forestry personnel (see Action 12.1 in the Final Statement of Commitments).

2.4 Minimising the vulnerability of buildings and structures to ignition from radiation and ember attack by addressing the construction of assets in accordance with Australian Standards AS 3959 – 1999 "Construction of buildings in bush fire-prone areas".

Response

No buildings will be constructed within the State Forests as part of the Project.

2.5 The future management regimes for any areas of bush fire hazard remaining within the subject area. This should focus on the level of hazard posed to future development by the land or adjacent land and how the hazard may change as a result of development.

Response

The Proponent is committed to undertaking risk assessments for all of its project-related activities and to adopt all necessary controls to achieve an acceptable residual risk rating (see Action 11.9 in the Final Statement of Commitments).

3 RESPONSE TO SUBMISSION NO. 3 FROM DEPARTMENT OF LANDS

The Department of Lands has no objections to the Project.

Response

Noted.

4 RESPONSE TO SUBMISSION NO. 4 FROM DECC

A. NOISE ASSESSMENT

4.1 Issue 1 – Sensitive Receptors

Information Requirements:

No additional information needed, however, DECC notes potential for future land use conflict if residences built within the predicted 35dB(A) contour.

Response

The issue of sensitive receptors around the expanded power station site and the area impacted by exceedances of the 35dB(A) $L_{eq(15 \text{ minute})}$ noise level whilst the power station is operating at full (40MW) capacity has been discussed at length in Section 5.9.4.2 of the EA.

ESG agrees with Dr Neil Pennington's recommendation that operational noise monitoring should be conducted (page 6-19 of the Noise Assessment to clearly identify the area around the Wilga Park Power Station where the 35dB(A) criteria cannot be satisfied, ie. effectively validating the zones depicted on Figure 5.13 in the EA. This monitoring is committed to in Action 10.8 in the Final Statement of Commitments. In reality, the area of land beyond the property owned by Narrabri Power Limited within the 35dB(A) contours on Figure 5.13 is comparatively small and at the "rear" of the adjoining properties where it is unlikely residences would be constructed. The pattern of residential building in this area typically shows residences between the section of the property fronting the road and the centre of the property.

Notwithstanding these observations, recent examples of large developments in NSW exist where the Minister's determination and conditions clearly identify the noise thresholds at which negotiations with affected landholder are to begin, the guidelines for any such negotiations and the process through which decisions in this regard are to be made. It is expected that given the results of the noise impact assessment, conditions of this type could be incorporated in a project approval issued by the Minister.

ESG also acknowledges that a licensing component under the *Protection of the Environment Operations Act 1997* will be triggered by the Project given the maximum power generation intended exceeds the 30MW threshold.

4.2 Issue 2 – Sound Power Levels used in Modelling

Information Requirements:

Provide further advice and modelling if required to demonstrate that $L_{Aeq(15 \text{ minute})}$ 35dB(A) can be met at "Wilga Park".

Response

Further advice, technical specifications and modelling of sound power levels for the 3MW units has been sought from the manufacturer and Australian agent, Clarke Energy Australia.

In response to the issue raised by DECC, Clarke has informed ESG that the aggregate sound power levels contained within the technical description of the JGS 620 3MW generators and exhaust gas (122 and 131 dB(A) respectively) do not take into account its containment within an acoustic enclosure with roof mounted exhaust silencers and radiator enclosures. These enclosures are not manufactured by GE or Jenbacher, but retro-fitted by Clarke Energy. Each generator unit installed at the Wilga Park Powerstation will be contained within this type of acoustic enclosure.

The noise modelling completed by Spectrum Acoustics utilised monitoring results taken during the operation of 3 x 1MW units. This data was extrapolated for the proposed expansion scenario of up to 10 x 3MW and is considered suitable for such purposes as the 600 series generators are technologically superior to the 1MW engine, offer improvements on base operating noise and additionally are located within the aforementioned acoustic enclosures.

In order to provide further verification of the modelling methods and the veracity of the results, actual noise monitoring from a Clarke Energy Australia installation of 11 x 3MW units identical to that being proposed yields the following results ($L_{eq(15 \text{ minute})}$) taken from four locations around each enclosure at 1m.

Plant No	Position	Leq	Plant No	Position	Leq	Plant No	Position	Leq	Plant No	Position	Leq
1	1	77.4	4	1	75.4	7	1	76.4	10	1	75.2
	2	74.4		2	73.3		2	74.3		2	73.3
	3	73.1		3	75.8		3	76.6		3	75.2
	4	75.7		4	76.1		4	77.1		4	75.3
2	1	76.9	5	1	72.0	8	1	75.6	11	1	76.0
	2	75.1		2	72.8		2	74.0		2	73.7
	3	77.3		3	76.3		3	76.6		3	75.1
	4	76.7		4	75.0		4	76.4		4	75.3
3	1	76.0	6	1	71.3	9	1	76.1			
	2	75.2		2	72.3		2	74.8			
	3	76.8		3	77.4		3	76.0			
	4	76.4		4	76.6		4	76.0			

In terms of the applicability of the monitoring data used in modelling by Spectrum, it is apparent that although the 3MW units are larger, the newer technology, increased efficiencies and noise attenuation potential of the acoustic enclosures, they result in less operating noise. Furthermore, the use of actual noise monitoring data for the 1MW units in modelling the three scenarios (3 units, 10 units & 20 units in operation) provides a reliable 'worst case' scenario for the noise impact assessment.

B. WATER MANAGEMENT

4.3 Issue 3 – Erosion and Sediment Controls

Information Requirements:

Consider incorporation of an additional commitment to prepare and implement an Erosion and Sediment Control Plan prior to the commencement of construction. DECC also recommends that the following reference document be used in preparing such plans “*Managing Urban Stormwater: Soils and Construction Volume 2A: Installation of Services*” which has recently been published.

Response

ESG respectfully acknowledges the requirement for effective erosion and sediment control plans. The Statement of Commitments has been modified to incorporate the intention to prepare an Erosion and Sediment Control Plan prior to the commencement of construction (see Action 11.6 in the Final Statement of Commitments).

4.4 Issue 4 – Crossing of Bohena Creek

Information Requirements:

None at this stage, however, should be noted for consideration in preparation of environmental management plans / sediment and erosion control plans.

Response

Horizontal drilling of this section will be the method used as nominated in the preferred project report. This method does not require drilling muds of any description.

4.5 Issue 5 – Gas treatment prior to Power Generation

Information Requirements:

Please clarify whether there is any further treatment of gas following compression at the Wilga Park Power Station. If so, provide details of any residuals produced, eg. air discharges / water discharges.

Response

No further gas treatment is required prior to its consumption at Wilga Park (no air or water discharges) given the type and scale of treatment at the pipeline inlet.

C. NATURAL HERITAGE ASSESSMENT

4.6 Issue 6 **Flora Composition in Northern Section of Pipeline Route** (previously raised in adequacy check and not satisfactorily addressed)

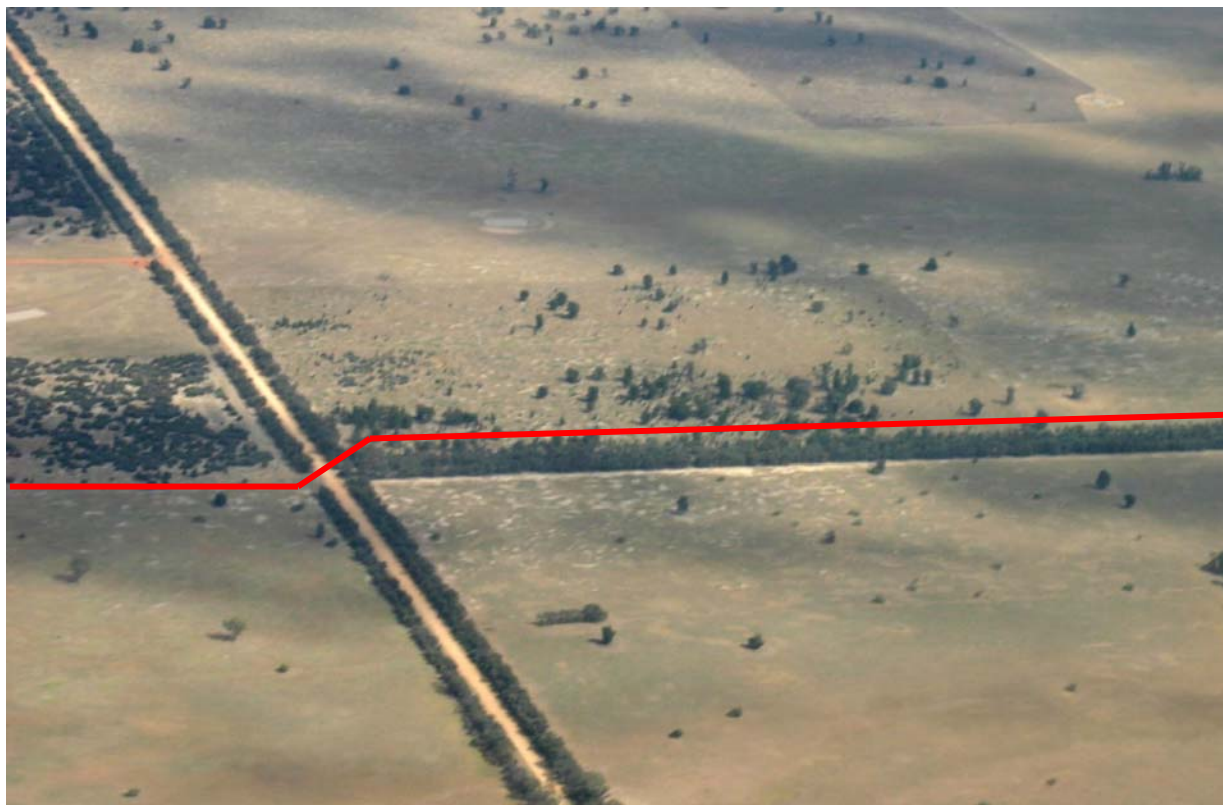
Information Requirements:

The flora assessment should be revised to encompass the northern part of the pipeline route to assess whether remnant native grasslands species, the Brigalow EEC or other native vegetation will be affected by the development. If Brigalow does occur on the pipeline route, then this needs to be identified in Figure 1 of the flora report and any impacts assessed accordingly.

Response

The recommendation of DECC to revise the flora survey to encompass a larger area of the northern section of the proposed pipeline route for remnant grassland species, Brigalow EEC or other native vegetation dismisses the findings of Elks (2007) in their entirety.

A transect survey of the possible EEC remnant (see following aerial photographs) was successful in identifying 10 of the species listed by the NSW Scientific Committee as indicative of the community. Subsequently, the route in this section was amended to avoid this higher value remnant in favour of the cleared grazing paddock to the west where scattered *Casuarina cristata* and *Eucalyptus populnea* provide shade and shelter to stock animals (as verified by the aerial photo below). The route will be preferentially located through this section to minimise impacts on the remaining vegetation in this paddock.



A random meander survey through this paddock was unable to identify any further native species listed as characteristic of the EEC or native perennial grasses. This assemblage of vegetation therefore does not constitute a whole or partial remnant of the EEC as defined by the NSW Scientific Committee.

ESG respectfully acknowledges that this does not limit the likelihood of these or other species being present, and that there is a possibility that such species may be represented in the seed bank or dormant structures (rhizomes, bulbs, corms, tubers etc). Adequate safeguards to preserve this regeneration potential have been incorporated into the soils management safeguards assembled by Cunningham (2007) and located in Section 5.5.5 of the EA.

ESG would like to restate the findings of Elks in regard to the value of further, species-focused surveying of cleared grazing and cropping lands of the northern section of the Project Site.



- Remnant native grassland species of conservation significance assessed as possibly occurring in the study area are not regarded as persistent under heavy grazing and/or cultivation. Native grasslands of the type listed in the determination for 'Native Vegetation on Cracking Clay Soils of the Liverpool Plains' are not recorded as occurring, and not predicted to occur, in the study area (http://www.threatenedspecies.environment.nsw.gov.au/tsprofile/cma_subregion_list.aspx?id=776).
- Given the apparent effort by farmers to clear, improve and crop private lands in the northern part of the preferred corridor, as observed over the period of the pipeline project to date, further survey effort on private land was assessed as futile, or even counter-productive.
- In particular, the extent of the cropland, improved pasture and remnant tree habitats in the locality is so large in comparison to the small narrow area of similar habitat to be modified by the proposed pipeline that the proposed pipeline would not (for example) be likely to have an adverse effect on the life cycle of any species such that a viable local population of the species is likely to be placed at risk of extinction, or likely to have an adverse effect on the extent or composition of any ecological community such that its local occurrence is likely to be placed at risk of extinction, or have a significant impact on the extent to which habitat is likely to be removed or modified as a result of the action proposed, or cause habitat to become fragmented or isolated from other areas of habitat.

ESG respectively suggests that the issue of further surveying has been adequately justified given:

- the short time frame of the construction period;
- the soil management procedures designed to protect the natural regeneration potential (i.e. seed banks and other propagules) of the site; and
- the high likelihood of full reversion to the prior condition.

In response to the highlighted statement referring to "occasional clumps of *Acacia harpophylla* young coppice growth" and the likely impact of the proposed development, please refer to the following photograph. The pipeline will be located on the fence line where there is a 20m wide clearance and no regrowth and hence no impact will be recorded on any such vegetation regrowth.



4.7 Issue 7 – Avoiding Clearing of Native Vegetation

Information Requirements:

ESG should clearly demonstrate that they have followed the principle of firstly avoiding impacts on biodiversity prior to consideration of offsets.

Response

The project EA clearly identifies the likely impacts on native vegetation as a high priority issue. ESG re-states its position that the route investigation process considered a wide range of factors when considering the route alternatives (Section 3.9.3 and 3.9.4 of the EA). Furthermore, consideration of the actual operating environment would support ESG's findings that the options available given the extent of vegetation cover are at best limited.

The most direct route out of the Pilliga East State Forest has been verified as likely to result in the least cumulative environmental impacts by each of the specialist consultants (flora, fauna, Aboriginal heritage).

The justification of the proposed route and its comparative impacts alongside the alternatives has been discussed at length. The route option outlined by DECC under issue 7 utilising Worombi Rd is in part a section of the alternative route proposed in Section 3.9.3 and EA Figure 3.12. However, to suggest that this option is more suitable in terms of cumulative impacts is erroneous. DECC's suggestion of an alternate route between Points C & ≈ D (EA Figure 3.5) itself suggests an imbalance in the weighting of factors considered in the route planning process. Notwithstanding the direct impacts on vegetation in this section, the increased capital costs and the operational issues with the installation of acute angles/bends in the pipe have not been considered by DECC as having equal importance alongside the stated objective of avoiding native vegetation clearance.

Further reference to the relative benefit of the proposed route is inferred under Issue 14 raised by DECC in terms of the Bohena CSG Pilot, which will contribute gas to the project, contributes low quantities of gas (<10% of total production). ESG would appreciate DECC providing the background source of this production data. The proposal to flare the gas produced at this location does not factor in either the base value of the gas being produced or the value of the electricity able to be generated from it at Wilga Park.

As a means of illustrating this point, ESG's preferred option (Route A) and DECC's suggested route (Route B) to link points C & D in figure 3.5 are compared in terms of its relative impacts.

- Route A is approx 4.7km in length while Route B is 6km.
- The extent of vegetation to be cleared for each route, based on a 10m wide working area, is 4.7ha (Route A) vs 3ha for Route B, a net reduction of 1.7ha. The vegetation community in this section has been surveyed on three separate occasions between 2002 and 2008 during which no species of significance have been identified. As a forestry resource, this section has low to very low productive capacity due to recent (<5 years) bushfire activity that sterilised much of the timber species.
- The additional 1.3km of pipe required to follow option B would add between \$250 000 & 300 000 to the project's capital costs.
- The alternate route requires the installation of acute angles into the flow line design to follow existing surface infrastructure. Whilst the use of acute angles is feasible, ideally, the flow line should be as straight as possible to achieve gas flow efficiency, minimise construction costs and avoid operations and maintenance complications.

Discussions with DECC have been successful in highlighting two further developments in terms of characterising the short and longer term biotic impacts. In summary, they are as follows.

- The proposed 10m wide easement within the Pilliga East State Forest required to install the pipeline will be reduced to approximately 3m during site rehabilitation. The remaining 7m width on the margins of the corridor will be rehabilitated as soon as practicable. Overall, this will permit the reversion of up to 70% or 10.5 ha of the original 15 ha disturbance throughout much of this southern section. This approach is reflected in Action 4.6 in the Final Statement of Commitments.
- The proposed retention of access along this section of the pipeline route has been revised. Following discussions with NSW Forests, it was decided that vehicular access will no longer be retained along the pipeline corridor following its rehabilitation. The 3m wide track will be maintained free of larger woody species via up to twice yearly slashing. This should furthermore limit the likelihood of any significant edge effects associated with permanent vehicular access.

4.8 Issue 8 – Biodiversity Offsets (previously raised in adequacy check and not satisfactorily addressed)

Information Requirements:

Offsets should be included as part of the overall proposal so that their appropriateness and adequacy can be assessed in the determination process. ESG should then clearly commit to any proposed offsets in the Statement of Commitments.

Response

ESG are pleased to accept DECC's recommendation to achieve adequate offsets for this project in light of the exhaustion of viable alternatives to avoid further impacts on vegetation.

To this extent, ESG has established a positive working relationship with the Namoi Catchment Management Authority with the intent of securing one or more revegetation projects within the Namoi River Catchment – Correspondence from the Authority supporting this relationship is attached as **Appendix 1**. It is noted that ESG's commitment to this relationship is reflected in Action 5.9 of the Final Statement of Commitments.

4.9 Issue 9 – Vegetation Community Mapping (previously raised in adequacy check and not satisfactorily addressed)

Information Requirements:

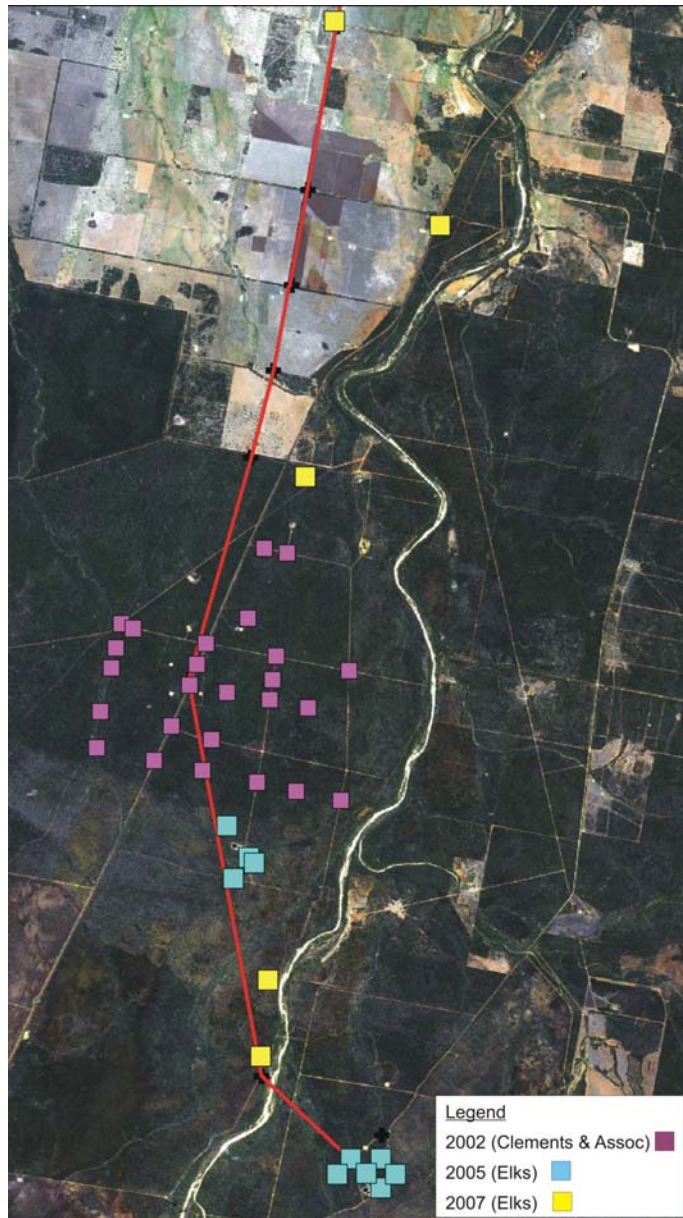
A map of the broad vegetation communities in the study area should be incorporated in the flora assessment to provide context and inform the determination process.

Response

New maps of vegetation community have been formulated which combine the results of all field surveying efforts (2002-2008) and NSW Forestry mapping. All available survey reports have been furnished to DECC.

Survey report data on flora and community composition indicates that Lindsay (1974) mapped a majority of the northern Pilliga East State Forests as Cypress Pine, Narrowleaf Ironbark and Forest Oak, corroborating with Binns and Beckers (2001) description of "Grassy White Pine-Ironbark" communities containing the same dominant canopy species. The survey efforts carried out by Mr Greg Elks of Idyll Spaces have been successful in adding to the existing knowledge base on the floristic composition of the operational areas in PAL2 complementing the survey efforts of Clements & Associates (2002).

Preliminary desktop data analysis has been based upon GIS data provide by Forests NSW (Baradine) on dominant canopy species in the area; the results of which are shown in the following figure. This indicated that the proposed pipeline route is located in and amongst vegetation communities dominated by Narrow leaf Ironbark/Bull Oak/White Cypress (COP) and White Cypress/Narrow leaf Ironbark/Bull Oak (PCO) and various assemblages dominated by Red Gum and Pilliga Box, although field verification of these communities often cannot identify a consistent difference between the stated dominance of any one species.



- Clements and Associates conducted a flora survey on the northern Pilliga East SF in 2002 in preparation for the Pilliga East Seismic Survey.
- Elks (2005/06) carried out 10 plots and 10 random meanders for a previous study prior to drilling of the Bohena South-1 well and the Bibblewindi CSG Pilot and 6 plots, associated random meanders and mapping of understorey habitat for Pilliga Mouse over 13 hours in May 2006 for the Bibblewindi Water Management Facility.
- A survey effort documented in Section 2.1 of the report (Idyll Spaces Consultants & Eastern Star Gas 2008) was a field survey of the alternate route only. That survey was undertaken in October 2006 when the alternate route was the preferred route.

- Further field survey of approximately 8km of the forested section of the now preferred route (*from Point C to the forest edge*) was undertaken as a targeted transect search for Threatened Species, and to confirm vegetation mapping, over 6 hours in October 2007. The location of this survey is shown on the Figure on the previous page. Further plot survey was not undertaken at this time because:
 - The routes were within 1.5km of each other.
 - The same floristic communities occurred on or adjoining both routes.
 - The route was affected by drought and grazing at the time of both route surveys, and survey for ground layer species would be unlikely to have yielded any new information.

Transect surveying and targeted searches Inspection was also undertaken of part of the route adjoining the remnant Brigalow EEC community on the road reserve (see Issue 6)

Issue 11 – Access to the Gas Flow Line Corridor

Information Requirements:

ESG to note above and incorporate into Statement of Commitments.

Response

The access pathways to all sections of the route will be designed and mapped with an appropriate level of consultation with Forestry NSW. Protocols governing the use and maintenance of forestry roads and tracks are currently being revised and upon completion will be incorporated into all management plans and site induction information packages.

4.12 Issue 12 – Weed Management Plan

Information Requirements:

ESG should note comments and include in development of weed management plan for the project.

Response

Monitoring of the pipeline corridor for weed infestations and native vegetation rehabilitation is discussed in the Final Statement of Commitments (Actions 5.4 and 5.5) and specific environmental management plans have also been prepared in this regard that will formulate part of the construction and operations management plan.

The additional suggestions and guidelines provided by DECC have been noted and will be incorporated into the various management plans.

4.13 Other Issues

*The Preferred Project Report presents a slightly modified alignment for the proposed gas flow line between Points A and B. It is noted that the vegetation community along both routes is a Red Gum Woodland with comparable fauna habitat attributes. Correspondence from the Ecological Consultants for the project relating to this matter are attached as **Appendix 2**.*

D. AIR QUALITY IMPACT ASSESSMENT

Issue 13 – NO_x emissions

Information Requirements:

No additional information required at this stage. DECC recommends that ESG be required to undertake air emission monitoring during operations to validate performance of NO_x emissions with requirement for ongoing testing subject to review by DECC pending emission results. Refer to Attachment 2 for details of recommended conditions.

Response

Clarke Energy Australia has informed ESG that the referenced emission values of NO_x as 400mg/Nme³ at 5% O₂ equates to 450 mg/Nm³ at 3% O₂ reference.

Air emission monitoring will be undertaken during operations to validate performance criteria as suggested. The Final Statement of Commitments has been amended to reflect proposed monitoring (see Action 8.4).

Issue 14 – Venting methane to air

Information Requirements:

No additional information required at this stage. ESG and Planning should consider the viability of enclosed flaring best practice as an option to optimising environmental impacts associated with the project.

Response

Enclosed flaring has been considered previously, however one major constraint of this option is the relatively large area required for operation. ESG does not operate any site within the forest zone large enough to permit the operation of a flare system. Furthermore, the suggested option does not take into account the potential lost revenue from flaring produced methane from its conversion to electricity.

Enclosed flaring is not considered a viable option and will not be considered further.

E. ABORIGINAL HERITAGE ASSESSMENT

4.15 Issue 15 - **Aboriginal Community Consultation (previously raised in adequacy check and not satisfactorily addressed)**

Information Requirements:

Expand the consultation framework adopted for the Project so as to make it accord with DECC's Interim Community Consultation Guidelines.

Response

ESG has expanded the consultation framework considerably by advertising the subsequent expansion of the Aboriginal heritage survey (DECC issue 18). The advertisement was circulated in the Narrabri Courier (Tuesday July 22) and *The Australian* (Thursday July 24) requesting expressions of interest to participate in the revision and expansion process (see below).

Copies of each advertisement are attached as **Appendix 3**.

One additional expression of interest was received during the advertising period, namely from the Narrabri Gomeroi Traditional Owner Group (see **Appendix 4**). ESG will involve this group with both the PFAMC and NLALC in all future surveys / assessments.

4.16 Issue 16 - **Known sites and likely impacts from the proposed Project (previously raised in adequacy check and not satisfactorily addressed)**

Information Requirements:

More thorough description and analysis of the sites within the region and/or 1km from the gas pipeline route is required.

Response

ESG respectfully acknowledges DECC's position on the level of detail on the nature and type of known sites within the proposed flow line corridor. However, as the detailed site information is held in confidence by Forestry NSW, the Pilliga Forest Aboriginal Management Committee and Narrabri Local Aboriginal Land Council, ESG as ESG cannot provide further detail as requested and furthermore is of the opinion that such a request for data is beyond the scope of this assessment.

4.17 Issue 17 s91 Notification of the location of Aboriginal objects (previously raised in adequacy check and not satisfactorily addressed)

Information Requirements:

The preparation and submittal to DECC of site cards for all known sites within a 1km radius of the proposed corridor as soon as practicable so as to ensure compliance with Section 91 of the National Parks & Wildlife Act, 1974. If this has in fact already been done (noting the possibility of a time-lag between submittal of site cards and formal entry into the DECC's AHIMS database) then as soon as practicable provision of all information that can assist in substantiating the submittal of site information to the DECC is recommended. This will ensure the future inclusion of these sites on the AHIMS database.

Response

ESG respectfully acknowledges DECC's position on the submission of site cards for inclusion in the AHIMS database. However, as the detailed site information is held in confidence by Forestry NSW, the Pilliga Forest Aboriginal Management Committee and Narrabri Local Aboriginal Land Council, ESG as ESG cannot provide further detail as requested and furthermore is of the opinion that such a request for data is beyond the scope of this assessment.

4.18 Issue 18 Survey limit to 10m wide flow line easement (previously raised in adequacy check and not satisfactorily addressed)

Information Requirements:

It is recommended that due consideration be given to the reasonable expansion of the survey width to ensure that the cultural landscape and landform context of Aboriginal archaeological sites in close proximity (but at a distance of greater than 10m) to the preferred pipeline are adequately protected.

Response

ESG is committed to the reasonable expansion of the area of the Aboriginal heritage survey to be undertaken prior to clearing (see Action 6.5 in the Final Statement of Commitments) the conditions attached to a project approval. The survey will take place in the period directly after the placement of corridor centerline pegs by certified surveyor but prior to any activity considered construction related and will comprise:

- an Aboriginal heritage survey of a 50m corridor within which the pipeline can be located; and
- the further expansion of the survey corridor to 100m within the riparian zone of Bohena Creek.

The results of this survey and reporting will be provided to the Department of Planning along with any proposed alterations to the route as a result of this survey.

4.19 Issue 19 – Survey conducted on preferred route only

Information Requirements:

If an alternative route is chosen then the necessary consultation with the Local Aboriginal community in accordance with the DECC consultation guidelines is required.

Response

At this stage, the preferred route is the option for which approval is being sought. ESG acknowledges that any substantive alteration to the route will require further baseline investigation, not only from an Aboriginal Heritage perspective but from all abiotic and biotic factors likely to be affected.

F. OTHER

4.20 Issue 20 – Planning process for new drilling exploration for pilot production

Information Requirements:

Planning and ESG to note DECC concerns over iterative planning process for gas exploration, assessment lease production and full scale gas field production.

Response

The issue of new drilling and exploration activities remains entirely outside the scope of the proposed gas utilisation project and is not the subject of any component of the project application in question.

5 RESPONSE TO SUBMISSION NO. 5 FROM NARRABRI SHIRE COUNCIL

Council is highly supportive of the Project and would request ESG to continue to liaise with Council's Engineering Services Department on the matter of pipeline crossings affecting roads under the control of Narrabri Shire Council as per Council's letters to Eastern Star Gas contained in Appendix 4 of the Projects *Environmental Assessment* (May 2008).

Response

ESG will continue to liaise with Council's Engineering Services Department, as requested.

6 RESPONSE TO SUBMISSION NO. 6 FROM NSW DEPARTMENT OF PRIMARY INDUSTRIES

Introductory Comment

6.1 *The Department of Primary Industries (DPI) has no objections to the proposal as outlined in the EA.*

Response

Comment Noted.

6.2 *A Petroleum Production Lease (PPL) over the relevant area will be required before the project proceeds to full scale commercial production. Any granted petroleum title is subject to standard and special conditions, with the preparation of a Petroleum Production Operations Plan (PPOP) and Annual Environmental Management Report (AEMR) before operations can commence.*

Response

Comment Noted

Environment and Rehabilitation

6.3 *The pipeline route should use existing cleared corridors through the Bibblewindi and Pilliga East State Forests for Sections 1 and 2 of the proposed route and minimise the clearing of new areas that may fragment the remaining forest.*

Response

The project EA clearly identifies the likely impacts on native vegetation as a high priority issue. ESG restates its position that the route investigation process considered a wide range of factors in deciding upon the alternatives (Section 3.9.3 and 3.9.4 of the EA). Furthermore, consideration of the actual operating environment would support ESG's findings that the options available given the extent of vegetation cover are at best limited. The most direct route out of the Pilliga East State Forest has been verified as likely to result in the least cumulative environmental impacts by each of the specialist consultants (flora, fauna, Aboriginal heritage).

Notwithstanding the direct impacts on vegetation in the State Forests, the increased capital costs and the operational issues with the installation of acute angles/bends in the pipe have not been considered by DPI as having equal importance alongside the stated objective of avoiding native vegetation clearance.

Two further developments have occurred since the EA was prepared in terms of characterising the short and longer term biotic impacts. These are outlined as follows.

- The proposed 10m wide corridor within the Pilliga East State Forest required to install the pipeline will be reduced to approximately 3m during site rehabilitation. The remaining 7m width on the margins of the corridor will be rehabilitated as soon as practicable. Overall, this will permit the reversion of up to 70% or 10.5 ha of the original 15 ha disturbance throughout much of this southern section. This approach is reflected in Action 4.6 in the Final Statement of Commitments.

- The proposed retention of access along this section of the pipeline route has been revised. Following discussions with NSW Forests, it was decided that vehicular access will no longer be retained along the pipeline corridor following its rehabilitation. The 3m wide track will be maintained free of larger woody species via up to twice yearly slashing. This should furthermore limit the likelihood of any significant edge effects associated with permanent vehicular access.

6.4 *None of the three gas flow line route alternatives appears to have been designed to minimise clearing. The proposed alignment should be revised accordingly to minimise environmental impacts.*

Response

The statement that “none of the three alternatives appears to have been designed to minimise clearing” is erroneous in its entirety.

- The “early alternative gas flow line corridor” shown in Figure 3.12 of the EA follows an existing road north from the CSG Pilot and intersects an existing cleared power line easement running north west back towards the Newell Highway. This route was abandoned as the installation of a pipeline and the operation of power lines is highly incompatible.
- The “alternative gas flow line corridor” shown in this figure makes extensive use of existing roads/access however was abandoned due to increased (\approx \$1 million) capital costs required for additional 4km of pipe, does not intersect the Bohena CSG Pilot requiring a further 1500m of pipe and results in higher cumulative vegetation clearances including a remnant EEC within the travelling stock route running parallel to the Newell Highway.

The preferred route has been selected as it results in the least cumulative impacts, provides the most efficient pathway out of the forested zone and additionally makes best use of the low impact route traversing cleared agricultural lands (existing fencelines etc).

Furthermore, consideration of the actual operating environment would support ESG’s findings that the options available given the extent of vegetation cover are at best limited. The most direct route out of the Pilliga East State Forest has been verified as likely to result in the least cumulative environmental impacts by each of the specialist consultants (flora, fauna, Aboriginal heritage).

6.5 *Wherever possible, the proposed pipeline corridor should be constrained to 10 metres wide. The necessity for a 20 metre wide corridor for the purpose of vegetation storage is not considered to be adequate justification.*

Response

The statement on page 3-7 of the EA has been reviewed and is now considered to be unnecessary under any circumstance to occupy a width greater than 10m. No extension of the 10m wide corridor will need to occur to facilitate vegetation storage.

- 6.6 *Final land use and closure criteria have not been provided for the pipeline corridor – these are essential for monitoring of site rehabilitation. It should be made clear whether the pipeline is to be left in-situ at the completion of the Project.*

Response

With an expected operating lifespan in excess of 25 years and taking into account response 6.2 (re: PPL), further discussion of final land use and closure criteria will occur during any further review of PAL2 and the partial or whole conversion of this lease to a production licence.

- 6.7 *Provision for additional pilot production drilling should ideally be covered by the Part 3A Approval – otherwise any subsequent wells will not be able to be tied into the pipeline.*

Response

The issue of new drilling and exploration activities remains entirely outside the scope of the proposed gas utilisation project and is not the subject of any component of the current project application.

- 6.8 *No provision for green offsets has been proposed in relation to cleared vegetation.*

Response

ESG is currently in preliminary discussions with the Namoi CMA to participate/create in an adequate offsets program for this project in light of the exhaustion of viable alternatives to avoid further impacts on vegetation.

ESG has established a positive working relationship with the Namoi Catchment Management Authority with the intent of securing one or more revegetation projects within the Namoi River Catchment – Correspondence from the Authority supporting this relationship is attached as **Appendix 1**. It is noted that ESG's commitment to this relationship is reflected in Action 5.9 in the Final Statement of Commitments.

Annual Reporting

- 6.9 *Within 28 days after each anniversary of the grant of a Lease, the Leaseholder must provide a written report to the Director-General of DPI that includes a range of matters.*

Response

ESG will submit an AEMR to both the Department of Planning and DPI(MR) reporting the Project's performance over the previous 12 months – see Action 11.6 in the Final Statement of Commitments.

Abandoning and Decommissioning

- 6.10 *Before a pipeline is abandoned an abandonment plan is required to be compiled and provided to the Director-General of DPI for his approval.*

Response

Comment noted. The Final Statement of Commitments has been amended to reflect this position (see Action 11.7).

Records

6.11 *The leaseholder is required to obtain and maintain records that are necessary to safely operate and maintain the pipeline and to determine the fitness for purpose of the pipeline at any stage of the pipeline operating life. These should be available for inspection by DPI Officers on request.*

Response

Comment noted.

Safety

6.12 *Under the provisions of the Petroleum (Onshore) Act 1991 DPI has legislative responsibility for overseeing the safe operation of petroleum production activities. The EA appears to identify safety standards in sufficient detail for this document. More specific requirements such as marking the pipeline route are conditions attached to the Petroleum Assessment Lease.*

Response

Comment noted. The Final Statement of Commitments has been amended to reflect this position – see Action 1.3.

7 RESPONSE TO SUBMISSION NO. 7 FROM PHILLIP HARDCASTLE

Noise Impacts on Lot 2/DP 1049313

The adjoining landholder to the north of a 150ha property expressed concerns regarding noise generated from the 3MW Generators within the expanded Wilga Park Power Station and the impacts of the uncertainties created by ESG on his plans for the block of land.

Response

The issue of sensitive receptors around the expanded power station site and the area impacted by exceedances of the 35dB(A) $L_{eq(15 \text{ minute})}$ noise level whilst the power station is operating at full (40MW) capacity has been discussed at length in Section 5.9.4.2 of the EA.

ESG agrees with Dr Neil Pennington's recommendation that operational noise monitoring should be conducted (page 6-19 of the Noise Assessment to clearly identify the area around the Wilga Park Power Station where the 35dB(A) criteria cannot be satisfied, ie. effectively validating the zones depicted on Figure 5.13 in the EA. In reality, the area of land beyond the property owned by Narrabri Power Limited within the 35dB(A) contours on Figure 5.13 is comparatively small and at the "rear" of the adjoining properties where it is unlikely residences would be constructed. The pattern of residential building in this area typically shows residences between the section of the property fronting the road and the centre of the property.

Notwithstanding these observations, recent examples of large developments in NSW exist where the Minister's determination and conditions clearly identify the noise thresholds at which negotiations with affected landholder are to begin, the guidelines for any such negotiations and the process through which decisions in this regard are to be made. It is expected that given the results of the noise impact assessment, conditions of this type could be incorporated in a project approval issued by the Minister.

ESG also acknowledges that a licensing component under the *Protection of the Environment Operations Act 1997* will be triggered by the Project given the maximum power generation intended exceeds the 30MW threshold.

Appendices

- | | |
|------------|--|
| Appendix 1 | Correspondence from the Namoi Catchment Management Authority |
| Appendix 2 | Correspondence from Ecological Consultants |
| Appendix 3 | Aboriginal Stakeholder Consultation Newspaper Advertisements |
| Appendix 4 | Correspondence from Craig Trindall on behalf of the Narrabri Gomeroi Traditional Owner Group |

(No. of pages excluding cover pages = 6)

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Appendix 1

Correspondence from the Namoi Catchment Management Authority

(No. of pages excluding this page = 1)



Contact: James Hutchinson-Smith
Phone: (02) 67645970
Mobile: 0428 485985
Fax: (02) 6764 5995
Email: james.hutchsmith@cma.nsw.gov.au

File: G:\CMA\NAMOI\Operations\Clients\Industry\EasternStar
Gas

Mr Tim Donnan
Environmental Officer
Eastern Star Gas
GPO Box 4526
Sydney NSW 2001

1 August 2008

Dear Tim,

Subject: Narrabri Gas Utilisation Project

Thankyou for your letter and CD containing Eastern Star's Part 3A Project. Having now reviewed the supplied information, we are looking forward to working with Eastern Star to secure revegetation projects (offset or otherwise) in the Namoi Catchment.

To continue the discussions we would ask that the detail requirements (prescribed by DECC) be supplied to us so that we can start to develop an appropriate methodology for you to deliver on-ground offsets and revegetation activities. This information may be sourced from the Biobanking tools however the sooner we know the 'rules' the sooner we can help target and cost activity.

We look forward to hearing from you soon, with the updated information, as we have district and technical staff in the location of the Gas Utilisation project, who are well positioned to contribute to biobanking / targeted revegetation processes.

Yours sincerely

James Hutchinson-Smith
Catchment Coordinator
(Program Implementation)
Namoi Catchment Management Authority.

Appendix 2

Correspondence from Ecological Consultants

(No. of pages excluding this page = 2)



ENVIRONMENTAL CONSULTANTS
ABN 32 636 391 783

21 Titans Close, Bonville NSW 2441
+61(0)2 66534190; 0428 534190
gregelks@bigpond.com

4 August 2008

Tim Donnan
Eastern Star Gas Limited
tim.donnan@easternstar.com.au

Re: modification of the proposed route as proposed 1 August 2008

Dear Tim,
I have reviewed the proposed changes to the location of the southern terminus of the pipeline and the associated route for the final leg of the pipeline. Plot survey data from my flora assessment of November 2005 indicates that these areas are occupied by a Red Gum Woodland the same that described for the final leg of the route as assessed in my November 2007 Flora Assessment.

Given that both the pipeline route as assessed and as now proposed both fall within this same community, that there were no threatened flora detected in this community and that the area to be affected would not change, I consider it highly unlikely that the modified proposed route would result in any specific impacts significantly different to those that have already been assessed.

Regards,

Greg.

G N Elks BSc MLitt MECA. Botanist and Ecologist



KENDALL & KENDALL
ECOLOGICAL SERVICES PTY
LTD

PO BOX 196
WEST KEMPSEY NSW 2440
PHONE FAX 02 65669280
Email: kendall@midcoast.com.au
ABN 91 076 759 969

18th August 2008

Mr Tim Donnan
Eastern Star Gas Limited
GPO Box 4526, Sydney, NSW 2001

Dear Tim,

I have reviewed the map you e-mailed me as a pdf file "Amended Route010808_ElksKendall" on 1 August 2008.

It is my opinion the amendments to the proposed route will not result in any specific impacts significantly different to what is described in my fauna assessment report re the pipeline i.e. I consider there will not be a significant impact on any known or likely to occur threatened species populations provided that the recommended ameliorative measures are implemented.

Yours faithfully,

Keith Kendall

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Appendix 3

Aboriginal Stakeholder Consultation Newspaper Advertisements

(No. of pages excluding this page = 2)

THE AUSTRALIAN THURSDAY JULY 24 2008

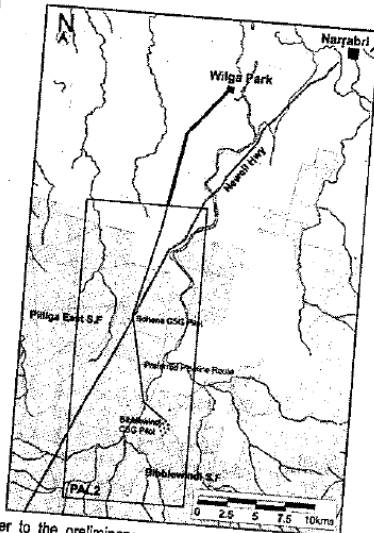
16 SPORT

Melbourne wins fight for grudge

Ray Gatt

PUBLIC NOTICE Aboriginal Stakeholder Consultation Narrabri Coal Seam Gas Utilisation Project

Eastern Star Gas Limited, in accordance with the NSW Department of Environment and Climate Change (DECC) Interim Community Consultation Requirements for Applicants is seeking registration from interested Aboriginal stakeholders who may wish to be involved in additional archaeological surveying for this project.



Further to the preliminary surveying completed in consultation with the Pilliga Forest Aboriginal Management Committee and Narrabri Local Aboriginal Land Council, Eastern Star proposes to expand the survey along the preferred route.

Interested parties are requested to register their interest by writing to Tim Donnan, Environmental Officer, Eastern Star Gas Ltd, GPO Box 4526, Sydney NSW 2001. Expression of interest should include current contact details. The closing date for registration is the close of business Friday August 8.

For further information please contact Eastern Star Gas Ltd on (02) 9251 5599.

Congratulations to the winners of the All Bran Investigation Promotion: First Prize: T Mance, West Guildford NSW, Runners Up - T Lyons, Glen Waverley VIC; R Lance, Windsor QLD; T Ismail; Z Lobo Camberwell VIC

A Carmel, S Hanter, J Dublin, J Spring, J Lovell, E Ben, C Jones, M Doyle, A Fildolo, L Kearny, R Cook, E Long, D Lake, K Nelson, C Hamilton, K Hilyard, N Dent, ACT: E Daly, P Zordo, A Garrety, K Paton, J Cooper, J Short, J Miller, J Barthow, SA: J Perrin, M Dienelt, S Schilling, B McMullen, M Adcock, T Pierce, E Robinson, L Jensen, R Lamerton, E Cowan, C Deputula, G Fitzgerald, K Eakins, K Spencer, P Griggs, J Zheng, J Wreford, D Garron, J Colangelo, M Allen, M Garreffa, S Gili, K Sheppard, T Osterman, G Laubsch, L Beddell, D Childs, NT: M Hamon, S Cull, S Siddins, K Chapman, A Matkules, C Hinspeter, E Burr, V Salva, R Nolen, QLD: A Rowe, A Moran, G Rowsell, S Vassalli, N Jory, M Hook, S Scott, J McConnell, S Murphy, M Moore, H O'Leary, J Jordan, J Allen, A Cooper, L Grime, B Cupples, J Cop, G Kollmorgan, J Oldaker, E Winner, A English, B Woolway, L Jordan, R Donnelly, R Wanklyn, J Millward, T Holmes, K Walker, D Gould, A Chatman, N Corb, T Martin, S Atkinson, I Willis, S Brown, H Coates, K Coleman, K Cousins, B Woolgrave, J Rossiter, A Ermslow, A Dyson, F Court, M Jones, M Pettigrove, T Finch, J McCartney, E Schultz, D Gibbons, A Wright, T Smith, L Brodrick, J Bolke, D Cox, M Stein, S Lowe, C Maslin, T Johnson, S Lowe, J Whitland, E Giorgiordani, T Flattery, A Astorquia, K Wilson, T Holmes, S Boxall, J McGinn, J Hill, G Hart, WA: B Warren, S Willock, C Jarden, S Carr, M Mullins, M Forbes, T Woodford, S Mattheson, J Hoslop, L Anderson, C Green, B Picknell, L Upston, A Tyrell, K Johnson, C Negle, J Court, H O'Brien, B Picknell, L Upston, S Matheson, J Hoslop, L Anderson, C Green, B Picknell, L Upston, D Grant, VIC: M Hammon, K Sneddon, A Miller, K Watson, P Ward, R Nicks, J Slots, C Monash, K Harvey, P Briller, M James, A Lockhead, N Jackson, C Alterman, T Lewis, A Scardamaglia, J Tartar, D Evans, M Ognerovskid, N Jenkin, R Mason, J Barber, T Maule, K Bentley, G Smith, E Finla, S Tupou, M Eton, K Baudinette, N Bojeski, V Chau, M Porter, N Williamson, J Barre, H Johnson, B Dargavel, C Chau, H Montago, A Turra, R Eddie, H Skapeitis, L DeUilo, J Zilcer, K Nicholson, K Smith, C Robertson, T Newman, A Chipperfield, G Keast, E Mann, M Elkhali, S Bardsley, T Woods, R Ryley, K Theobald, F Bozkut, D Bentine, A Hooper, D Jones, C James, D Metcalf, L Sorath.

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Matthew Welton NSW

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Members please Union announces HOME / INVEST Advantage Home Discount Variable 8.90% Variable Home 9.50%; Mortgage 11.18%.

*These rates are u products.

Members please tai Union announces th

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Plus Variable Rate C

rates are used to deti

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(SA&NT) AFSL 23

Members please tak

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Variable Home Loan fi

Members please take

Credit Union announce

HOME / INVESTME

Mortgage Line Of Credi

Dulux Trade Australia w of the Dulux Trade M winner Prodigy Painting; and Adams Scott; QLD

position.
"In rugby league, I was only ever on one side of the field all the time whereas playing rugby union, I've got to be everywhere. You've got to know

ling Mortlock at outside centre, Kopbie Deans subjected the 27-year-old Waratahs centre to a spot examina-

tralian Rugby Union came to the table. I did want to play for the All

Wallabies

TUESDAY, JULY 22, 2008

THE COURIER

13

POSITIONS VACANT

A Qualified Mechanic is required

The President
Narrabri Golf Club
PO Box 91
NARRABRI NSW 2390

COUNCIL NOTICES

NARRABRI SHIRE COUNCIL

General Manager
P.O. Box 261
NARRABRI
NSW 2390



Telephone
(02) 6799 6866
Fax
(02) 6799 6888

Environmental Services: (02) 6799 6855;
Engineering Services: (02) 6799 6877
Works Depot: (02) 6799 6700;
Email: council@narrabri.nsw.gov.au
After hours emergency: 0429 911 111

**Narrabri Shire Council – Tenders For
– CONTRACT 2008-09/10**

– TIPPING TRUCK HIRE (Hourly or Haulage)

Tenders are invited and will be received up until 2:00pm on Tuesday 12 August 2008 for "Contract No. 2008-09/10 – Tipping Truck Hire (Hourly or Haulage) for the period from 1 October 2008 to 30 June 2009".

To receive tender documents and for any further information please contact Council Administration Officer, Sue Verrier, on (02) 6799 6877 during office hours.

All tenders shall be submitted in accordance with the Tender Documentation and shall be endorsed with the Contract Number and Description and placed in the Tender Box, which is located in the foyer at Council's Administration Centre. The responsibility for lodgement of the tender in the tender box lies solely with the tenderer.

The canvassing of Councillors or Council staff, at any time, in respect of this Tender will disqualify a tenderer.

The lowest or any tender not necessarily accepted.

Administration Centre
46-48 Maitland Street
NARRABRI NSW 2390

Max Kershaw
General Manager
PO BOX 261

Cancer Council local grants on offer

Small grants are now available from Cancer Council to fund North

sexy DD bust

Full service and massage in Narrabri Wednesday only.

0402 108 632

Grant Program is to provide small funding to groups to meet local can-

ing together.

The Cancer Council NSW wants to help our

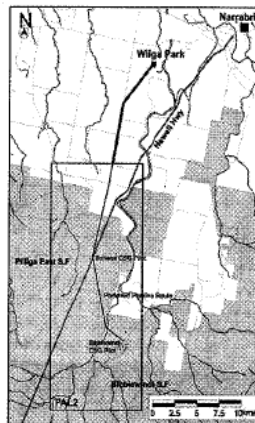
Phone: 02 6792 2533

Failure to lodge your return will incur additional charges & penalties

PUBLIC NOTICE

**Aboriginal Stakeholder Consultation
Narrabri Coal Seam Gas Utilisation Project**

Eastern Star Gas Limited, in accordance with the NSW Department of Environment and Conservation (DEC) Interim Community Consultation Requirements for Applicants is seeking registration from interested Aboriginal stakeholders who may wish to be involved in additional archaeological surveying for this project.



Further to the preliminary surveying completed in consultation with the Pilliga Forest Aboriginal Management Committee and Narrabri Local Aboriginal Land Council, Eastern Star proposes to expand the survey along the preferred route.

Interested parties are requested to register their interest by writing to Tim Donnan, Environmental Officer, Eastern Star Gas Ltd, GPO Box 4526, Sydney NSW 2001. Expression of interest should include current contact details. The closing date for registration is the close of business Friday August 8.

For further information please contact Eastern Star Gas Ltd on (02) 9251 5599.

visory Committee, comprising representatives from all areas of cancer prevention across the north

Cancer prevention and screening; Advocacy; Working in the community



Fiona Hill.



Bethany Mison during a workshop.

Editorial email
editorial@nwcourier.com.au

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Appendix 4

Correspondence from Craig Trindall on behalf of the Narrabri Gomeroi Traditional Owner Group

(No. of pages excluding this page = 1)

Mr Craig Trindall
29 Doyle Street
NARRABRI NSW 2390
(h) 6792 3402
(m) 0430 295 911

Mr Tim Donnan
Environmental Officer
Eastern Star Gas Limited
GPO Box 4526
SYDNEY NSW 2001

Dear Mr Donnan

In response to your Public Notice advertisement in the Narrabri Courier in July 2008 I would like to register an interest in additional archaeological surveying that your company has indicated will occur in the Pilliga on behalf of the Narrabri Gomeroi Traditional Owner group.

Should you wish to discuss this matter with me further I can be contacted via correspondence at the above address and also on the phone numbers supplied.

We appreciate the opportunity to take part in discussions relating to Cultural Heritage management within our traditional lands.

Kind regards,



Craig Trindall
On behalf of the Narrabri Gomeroi Traditional Owner Group

6 August 2008