



13 May 2016

Our Reference: APLNG – COR - 0011174

Mr Barry Broe
Coordinator General
Office of the Coordinator General
PO Box 15517
CITY EAST QLD 4002

Dear Mr Broe,

Re: Submission of change report request for the Australia Pacific LNG Project

Australia Pacific LNG is seeking to amend the conditions of the Coordinator General's Report of the Australia Pacific LNG Project. The proposed changes include deletion of duplicated legislative requirements, amendment to some administrative conditions and the removal of conditions that have been satisfied. I note that Australia Pacific LNG representatives have been liaising with officers from the Office of the Coordinator General (OCG) and other government stakeholders regarding this submission for some time, and this application formalises the requests previously discussed.

The initial application fee has been paid to the OCG, and I await your determination regarding the need for public notification of this change report.

If you have any queries please do not hesitate to contact Australia Pacific LNG's Environmental Specialist Michael Schwede on (07) 3182 7159 or 0413 968 367.

Yours Sincerely,

A handwritten signature in blue ink, appearing to read 'Page Maxson', written over a faint circular stamp.

Page Maxson
Chief Executive Officer
Australia Pacific LNG Pty Limited

commercial-in-confidence



Australia Pacific LNG Coordinator-General's Report Conditions – Appendix 1

Current	Proposed	Justification	Agency with Jurisdiction
A1 P1 Condition 2 Case Management costs of Government The proponent will contribute to the case management costs of government in managing submissions....	A1 P1 Condition 2 Case Management costs of Government Proposed deletion of A1 P1 Condition 2.	Australia Pacific LNG is requesting removal of this condition as the assessment phase of the Project is now complete. Additional incidental permits required by the Project typically attract individual assessment fees, which Australia Pacific LNG will be required to pay.	DIP and EHP
A1 P1 Condition 4 Annual Environmental returns An annual Environmental Return is to be submitted to the administering authority for each Environmental Authority granted or amended as part of the APLNG Project, and in accordance with the following:...	A1 P1 Condition 4 Annual returns Proposed deletion of A1 P1 Condition 4.	Australia Pacific LNG is requesting removal of the requirement to submit annual returns from the Coordinator General's report. All environmental authorities held by APLNG have a requirement to submit an annual return and consequently this condition is a duplication of this requirement.	EHP
A1 P1 Condition 5 Environmental Offsets 3. The following is an acceptable solution to the reporting system in the Condition above: ... f. the cumulative actual (third-party audit reconciled) vegetation disturbance and rehabilitation information (qualitative and quantitative, using category descriptions as required to be presented in the operational plan), be published, maintained and	A1 P1 Condition 5 Environmental Offsets 3. The following is an acceptable solution to the reporting system in the Condition above: ... f. the cumulative actual (third-party audit reconciled) vegetation disturbance and rehabilitation information (qualitative and quantitative, using category descriptions as required to be presented in the operational plan), be published, maintained and	Australia Pacific LNG is requesting that the requirement for third party reconciliation of the vegetation disturbance and rehabilitation information be amended to only be required when requested by the Coordinator-General. It has been identified that the third party verification generates considerable administrative and cost burden, and does not provide additional environmental protection. As the Australia Pacific LNG project enters the operating phase, some areas of the Project will not experience additional disturbance for the balance of the Project lifespan. Amending the condition in question will reduce the costly and time consuming third-party audit reconciliations that frequently will repeat prior findings. The LNG facility is	EHP



Australia Pacific LNG Coordinator-General's Report Conditions – Appendix 1

Current	Proposed	Justification	Agency with Jurisdiction
<p>updated on the proponent's website for the duration of the project.</p> <p>...</p> <p>i. The reconciliation statement is updated at least annually by the proponent.</p> <p>...</p> <p>j. the reconciliation statement (third-party audit reconciled) is to be submitted to the CG, and the relevant State and Commonwealth environment administering authorities for the project (DERM and DSEWPC) on the first annual anniversary of date of approval, and annually thereafter.</p>	<p>updated on the proponent's website for the duration of the project.</p> <p>...</p> <p>i. The reconciliation statement is updated at least annually by the proponent.</p> <p>...</p> <p>j. the reconciliation statement (third-party audit reconciled) is to be developed and submitted to the CG, and the relevant State and Commonwealth environment administering authorities for the project (DEHP and DotE) upon request.</p> <p>No further changes to condition 5 are proposed.</p>	<p>an example of such, as land disturbance has been completed and no significant disturbance is anticipated for the life of the LNG facility.</p> <p>As the Coordinator-General's office is aware, Australia Pacific LNG has secured a high priority offset, as identified by the Queensland Government, which also fulfills the Australian Government requirement regarding locating the offset within a World Heritage Area. It is Australia Pacific LNG's preference that future resources be utilised to continue to achieve best practice outcomes, while avoiding unnecessary administrative burden.</p>	
<p>A1 P1 Condition 7 Impacts on Native Flora and Fauna</p> <p>The proponent must comply with the provisions of the Nature Conservation Act 1992 (NC Act), particularly in regard to the following:</p> <p>a. Where there is a requirement for clearing of plants protected under the NC Act</p>	<p>A1 P1 Condition 7 Impacts on Native Flora and Fauna</p> <p>Proposed deletion of A1 P1 Condition 7.</p>	<p>Australia Pacific LNG requests that the condition be deleted as it a duplicate of existing legislative requirements.</p> <p>Compliance with the <i>Nature Conservation Act 1992</i> is a mandatory requirement irrespective of whether it is conditioned in the Coordinator-General Report.</p> <p>To date, Australia Pacific LNG has obtained: - more than 50 clearing permits</p>	EHP



Australia Pacific LNG Coordinator-General's Report Conditions – Appendix 1

Current	Proposed	Justification	Agency with Jurisdiction
<p>i. clearing of plants must only occur in accordance with a clearing permit or an exemption under the NC Act</p> <p>ii. offsets must be provided for the permanent loss (take) of near threatened, rare, vulnerable and endangered plants to achieve an equivalent or better overall outcome at a regional scale in accordance with the Queensland Government Environmental Offsets Policy 2008 and generally in accordance with the Queensland Government Policy for Biodiversity Offsets (Consultation Draft)</p> <p>b. Where the activities of the proponent may cause disturbance to animal breeding places the prior approval of DERM must be obtained.</p> <p>c. Where there is a need to take fauna, the prior approval of DERM must be obtained.</p>		<p>- more than 10 exemption certificates</p> <p>- 2 approved species management programs for disturbance to animal breeding places.</p>	



Australia Pacific LNG Coordinator-General's Report Conditions – Appendix 1

Current	Proposed	Justification	Agency with Jurisdiction
<p>A1 P1 Condition 9 Weed and Pest Management</p> <p>1. Prior to commencement of construction work, the proponent and its contractors must consult with the relevant officers from the Department of Employment, Economic Development and Innovation in respect to the detection and control of weeds and pests.</p> <p>2. Comprehensive weed management plans to be prepared in consultation with relevant local governments and Biosecurity Queensland, for construction and operational stages of the proposed development (including gas fields, pipelines and the LNG facility).</p> <p>3. The plans must be reviewed regularly and updated to ensure weed and pest management strategies are based on the most up to date information and amended in response to any changes in the distribution, priority, biosecurity risk and status of weeds and pests.</p> <p>4. Pursuant to Section 52, Division 2 of the Land Protection (Pest and Stock Route Management) Act 2002, the proponent is required to make an application to the Chief Executive of the Department of Employment and Economic Development</p>	<p>A1 P1 Condition 9 Weed and Pest Management</p> <p>Proposed deletion of A1 P1 Condition 9 Part 4.</p> <p>4. Pursuant to Section 52, Division 2 of the Land Protection (Pest and Stock Route Management) Act 2002, the proponent is required to make an application to the Chief Executive of the Department of Employment and Economic Development and Innovation with regard to the Wild Dog Barrier Fence and to the Darling Downs Moreton Rabbit Board with regard to the Darling Downs Moreton Rabbit Board Fence and making openings in these fences for a particular purpose and period.</p>	<p>Australia Pacific LNG requests that Part 4 of this condition be deleted as it a duplicate of existing legislative requirements.</p> <p>The requirement to obtain approvals under the <i>Land Protection (Pest and Stock Route Management) Act 2002</i> for openings in the rabbit or wild dog fence applies to Australia Pacific LNG irrespective of whether it is conditioned in the Coordinator-General Report.</p> <p>To date, there has been no requirement to obtain such approvals.</p>	<p>DEEDI</p>

Australia Pacific LNG Coordinator-General's Report Conditions – Appendix 1

Current	Proposed	Justification	Agency with Jurisdiction
and Innovation with regard to the Wild Dog Barrier Fence and to the Darling Downs Moreton Rabbit Board with regard to the Darling Downs Moreton Rabbit Board Fence and making openings in these fences for a particular purpose and period. ...			
A1 P1 Condition 11 Emergency services planning The proponent must ... '6. Update the Performance Monitoring Strategy to include performance measures for the implementation of the emergency response plan and emergency response exercises.' ...	A1 P1 Condition 11 Emergency services planning Proposed deletion of A1 P1 Condition 11 Part 6.	Australia Pacific requests that this part of the stated condition is removed as it does not appear to link with or be defined by other conditions within the Coordinator General's Report. The Australia Pacific LNG EIS did not reference or commit to a Performance Monitoring Strategy, and does not form part of the existing Australia Pacific LNG emergency planning processes. Australia Pacific LNG maintains a robust emergency response planning framework that is administered on a site by site basis, necessitated by the large geographical area of the Project. This framework comprises emergency response plans that are authored in collaboration with the appropriate emergency service providers, and include requirements for review and continual improvement, emergency drills and emergency training.	QPS, DCS, QH and relevant Local Government



Australia Pacific LNG Coordinator-General's Report Conditions – Appendix 1

Current	Proposed	Justification	Agency with Jurisdiction
<p>A1 P1 Condition 12 Historic Cultural Heritage</p> <p>The EM Plan developed in accordance with section 310D of the Environmental Protection Act 1994 to support the application for an EA must include the findings of a pre-construction field survey for historic cultural heritage (non-indigenous) within the pipeline, gas fields and LNG facility disturbance areas, and this should include the assessment of significance and proposed mitigation strategies.</p>	<p>A1 P1 Condition 12 Historic Cultural Heritage</p> <p>Proposed deletion of A1 P1 Condition 12.</p>	<p>Australia Pacific LNG requests that the requirement to provide pre-construction field surveys for non-indigenous heritage as part of the environmental management plans submitted under the <i>Environmental Protection Act 1994</i> be deleted.</p> <p>As per amendment to <i>Environmental Protection Act 1994</i> on 31/3/13, an environmental management plan is no longer required to be submitted as part of an environmental authority (EA) application (including amendment). The information required by the condition is considered mandatory as part of the EA application and would be suitably conditioned on the respective EA.</p>	<p>Not specified (presumed EHP)</p>



Australia Pacific LNG Coordinator-General's Report Conditions – Appendix 1

Current	Proposed	Justification	Agency with Jurisdiction
<p>A1 P1 Condition 14 Protection of Good Quality Agricultural Land</p> <p>The EM Plan developed in accordance with section 310D of the Environmental Protection Act 1994 to support the application for each EA for a gas field development area, must provide to the administering authority an Operations Environmental Management Plan that describes how the positioning, design and operation of petroleum activities will avoid or minimise impacts on land identified as Good Quality Agricultural Land using the assessment methodology that supports the State Planning Policy 1/92 The Protection of Good Quality Agricultural Land Policy particularly the land identified as Class A and B using this methodology.</p>	<p>A1 P1 Condition 14 Protection of Good Quality Agricultural Land</p> <p>Proposed deletion of A1 P1 Condition 14.</p>	<p>Australia Pacific LNG requests that the requirement to provide operational environmental management plans for gas fields development areas as part of the environmental management plans submitted under the <i>Environmental Protection Act 1994</i> be deleted.</p> <p>As per amendment to <i>Environmental Protection Act 1994</i> on 31/3/13, an environmental management plan is no longer required to be submitted as part of an environmental authority (EA) application (including amendment). The information required by the condition is considered mandatory as part of the EA application and would be suitably conditioned on the respective EA.</p>	<p>Not specified (presumed EHP)</p>



Australia Pacific LNG Coordinator-General's Report Conditions – Appendix 1

Current	Proposed	Justification	Agency with Jurisdiction
A1 P1 Condition 15 Review of Sampling Results Where monitoring undertaken for the project, or any other circumstance, requires sampling to be undertaken, then the analysis of sampling results must be reviewed within 14 days of availability. Where the results indicate a condition or contaminant level that has caused, or has potential to cause a breach of the EP Act, APLNG must notify the administering authority as soon as practicable.	A1 P1 Condition 15 Review of Sampling Results Proposed deletion of A1 P1 Condition 15.	Australia Pacific LNG requests that the requirement to have reviewed sampling results within 14 days of receiving such and reporting breaches of the EP Act to the Department of Environment and Heritage Protection as soon as practicable be deleted. The requirement to provide notification to the Department of Environment and Heritage Protection for suspected breaches of environmental authority conditions (including monitoring results) is contained in the "Notification" Schedules of the environmental authorities issued for the project. For any new EAs or amendment to EA conditions the Department has also released its CSG Model conditions which would form the basis for future reporting requirements Refer to the below project EAs and the relevant "Notification" Schedule conditions - Conditions L1, L3 of EPPG00672313 (Ramyard Woleebee) - Conditions K1, and K2 of EPPG00968013 (Walloons) - Conditions K1, and K2 of EPPG00853213 (Combabula) - Conditions K1, K2 of EPPG00853013 (Condabri)	Not specified (presumed EHP)
A1 P2 Condition 6 Marine traffic management '... 3. Provide/upgrade all aids to navigation and/or vessel traffic management services required for the project in accordance with the abovementioned plans.	A1 P2 Condition 6 Part 3 Marine traffic management Proposed deletion of A1 P2 Condition 6 Part 3.	Australia Pacific LNG is requesting the deletion of the stated part of the condition, as the wording of the condition is ambiguous, and is not clear around the expectations for ongoing maintenance of marine navigation infrastructure in Gladstone Harbour. Australia Pacific LNG notes that it is compliant with the	DTMR and GPC



Australia Pacific LNG Coordinator-General's Report Conditions – Appendix 1

Current	Proposed	Justification	Agency with Jurisdiction
		condition, and has funded the required installation and upgrade to navigation infrastructure as it pertains to the Australia Pacific LNG Project. Deletion of this part of the condition will eliminate doubt regarding Australia Pacific LNG's obligations to contribute further to the maintenance of shared infrastructure in Gladstone Harbour.	
A1 P2 Condition 9 Road traffic management ... f) Obtain the relevant licenses and permits under the Transport Infrastructure Act (Qld) 1994 for works within the state-controlled road corridor, prior to undertaking any works. ...	A1 P2 Condition 9 Road traffic management Proposed deletion of A1 P2 Condition 9 Part F	Australia Pacific LNG Requests that clause f) of the condition be deleted as it is a duplicate of existing legislative requirements. The requirement to obtain approvals under the <i>Transport Infrastructure Act 1994</i> applies to Australia Pacific LNG irrespective of whether it is conditioned in the Coordinator-General Report.	DTMR



Australia Pacific LNG Coordinator-General's Report Conditions – Appendix 2

Current	Proposed	Justification	Agency with Jurisdiction
<p>A2 P1 Condition 10 Rural residential allotments, impact management</p> <p>1. Prior to the issue of the Environmental Authority for a petroleum tenement over land that contains rural residential allotments, a rural residential code of conduct (RRCC) must be submitted to the Coordinator General for approval.....</p>	<p>A2 P1 Condition 10 Rural residential allotments, impact management</p> <p>Entire condition proposed for deletion</p>	<p>Australia Pacific LNG requests that the requirement for a rural residential code of conduct be deleted as the matters proposed by the condition are satisfactorily managed via existing legislative requirements.</p> <p>A Land Access Code (current version November 2010) which applies to all private landholders has been developed under Section 24A of the <i>Petroleum and Gas (Production and Safety) Act 200</i>. This code:</p> <ol style="list-style-type: none"> 1. States best practice guidelines for communication between the holders of authorities and owners /occupiers of all private land; and 2. Imposes on the authorities mandatory conditions concerning the conduct of authorised activities on all private land. <p>Additionally, Environmental authorities issued for the project make it an offence to affect any sensitive receptor with dust, noise, light or other environmental nuisance - the only exclusion to this is where the EA holder has negotiated an "alternative arrangement" with the relevant sensitive receptor.</p>	<p>DIP – Social Impact Assessment Unit</p>



Australia Pacific LNG Coordinator-General's Report Conditions – Appendix 2

Current	Proposed	Justification	Agency with Jurisdiction
A2 P2 Condition 1 Constraints Planning 1. The EM Plan developed in accordance with section 310D of the Environmental Protection Act 1994 to support the application for each EA for a gas field development area, must include a constraints plan and field development protocol for the development of petroleum activities that shows how the following constraints have been identified and avoided. 2. The plan must include.... 3. The constraints plan and field development protocol must....	A2 P2 Condition 1 Constraints Planning Entire condition proposed for deletion	Australia Pacific LNG requests that the requirement to provide Constraints Plan and Field Development Protocols within environmental management plans submitted under the <i>Environmental Protection Act 1994</i> be deleted. The <i>Environmental Protection Act 1994</i> (EP Act) specifies the mandatory requirements for submitting an Environmental Authority (EA) application (including amendment). The requirement for an Environmental Management Plan was removed from the EP Act on 31/3/13. The information requested by this condition forms part of the mandatory requirements of an EA application for which the administering authority imposes conditions on the respective EA. Particular EAs have had references to Constraints Planning and Field Development Protocols embedded in EA conditions. Refer EAs and conditions below: - Condition A11 of EPPG00968013 (Walloons) - Condition A11 of EPPG00853213 (Combabula) - Condition A11 of EPPG00853013 (Condabri) For development areas that are still subject to exploration EAs, suitable conditions for constraints planning will be negotiated with the Administering Authority during the EA amendment process to authorise petroleum production	EHP
A2 P2 Condition 2 Noise constraints plan for fixed plant in gas fields 1. The EM Plan developed in accordance with section 310D of the Environmental	A2 P2 Condition 2 Noise constraints plan for fixed plant in gas fields Entire condition proposed for deletion	Australia Pacific LNG requests that the requirement to provide a noise constraints plan as part of the environmental management plans submitted under the <i>Environmental Protection Act 1994</i> be deleted. As per amendment to <i>Environmental Protection Act 1994</i> on	EHP



Australia Pacific LNG Coordinator-General's Report Conditions – Appendix 2

Current	Proposed	Justification	Agency with Jurisdiction
<p>Protection Act 1994 to support the application for each EA for a gas field development area, must include a noise constraints plan.</p> <p>2. The plan must address....</p> <p>3. The noise constraints plan must address, but not be limited to....</p> <p>4. The noise constraints plan must provide commitments.....</p>		<p>31/3/13, an environmental management plan is no longer required to be submitted as part of an environmental authority (EA) application (including amendment). The information required by the condition is considered mandatory as part of the EA application and would be suitably conditioned on the respective EAs. Refer below for EAs that have been issued and the respective conditions relating to noise which have been imposed</p> <ul style="list-style-type: none"> - Conditions E1-20 of EPPG00968013 (Walloons) - Conditions E1-20 of EPPG00853213 (Combabula) - Conditions E1-20 of EPPG00853013 (Condabri) - Condition A25, F7-14 of EPPG00672313 (Ramyard Woleebee) <p>For development areas that are still subject to exploration EAs, suitable conditions for the management of noise will be negotiated with the Administering Authority during the EA amendment process to authorise petroleum production</p>	
<p>A2 P2 Condition 3</p> <p>Noise constraints plan for drilling activities in gas fields</p> <p>1. The EM Plan developed in accordance with section 310D of the Environmental Protection Act 1994 to support the application for each EA for a gas field development area, must include a noise constraints plan. The plan must address, but not be limited to....</p> <p>2. The noise constraints plan must include commitments to....</p> <p>3. The noise constraints plan must include</p>	<p>A2 P2 Condition 3</p> <p>Noise constraints plan for drilling activities in gas fields</p> <p>Entire condition proposed for deletion</p>	<p>Australia Pacific LNG requests that the requirement to provide a noise constraints plan as part of the environmental management plans submitted under the <i>Environmental Protection Act 1994</i> be deleted.</p> <p>As per amendment to <i>Environmental Protection Act 1994</i> on 31/3/13, an environmental management plan is no longer required to be submitted as part of an environmental authority (EA) application (including amendment). The information required by the condition is considered mandatory as part of the EA application and would be suitably conditioned on the respective EAs</p> <p>Noise conditions are addressed by Schedule E and F (Noise) of the EAs</p>	EHP



Australia Pacific LNG Coordinator-General's Report Conditions – Appendix 2

Current	Proposed	Justification	Agency with Jurisdiction
<p>a program for continual improvement for drilling activities.....</p> <p>4. The noise constraints plan must also address commitments to, but not be limited to....</p> <p>5. The noise constraints plan must provide commitments to conduct a site based noise assessment for each drilling activity in the gas field.....</p>		<ul style="list-style-type: none"> - Conditions E2 of EPPG00968013 (Walloons) - Conditions E2 of EPPG00853213 (Combabula) - Conditions E2 of EPPG00853013 (Condabri) - Condition F9 of EPPG00672313 (Ramyard Woleebee) <p>For development areas that are still subject to exploration EAs, suitable conditions for the management of noise will be negotiated with the Administering Authority during the EA amendment process to authorise petroleum production</p>	
<p>A2 P2 Condition 4 Coal Seam Gas Water Management Plan</p> <p>1. The EM Plan developed in accordance with section 310D of the Environmental Protection Act 1994 to support the application for each EA for a gas field development area, must include a Coal Seam Gas Water Management Plan (CWMP) for the tenure relevant to the particular EA. The CSG Water Management Plan must address, but not be limited to....</p>	<p>A2 P2 Condition 4 Coal Seam Gas Water Management Plan</p> <p>Entire condition proposed for deletion</p>	<p>Australia Pacific LNG requests that the requirement to provide a CSG water management plan as part of the environmental management plans submitted under the <i>Environmental Protection Act 1994</i> be deleted.</p> <p>As per amendment to <i>Environmental Protection Act 1994</i> on 31/3/13, an environmental management plan is no longer required to be submitted as part of an environmental authority (EA) application (including amendment). The information required by the condition is considered mandatory as part of the EA application and would be suitably conditioned on the respective EAs. To date, where CSG water management plans have been suitably conditioned by the Administering Authority. Refer conditions and EAs below.</p> <ul style="list-style-type: none"> - Conditions B68 of EPPG00968013 (Walloons) - Conditions B36-45 of EPPG00853213 (Combabula) - Conditions G6-12 of EPPG00853013 (Condabri) - Condition H6-18 of EPPG00672313 (Ramyard Woleebee) <p>For development areas that are still subject to exploration EAs,</p>	EHP



Australia Pacific LNG Coordinator-General's Report Conditions – Appendix 2

Current	Proposed	Justification	Agency with Jurisdiction
		suitable conditions for CSG water management will be negotiated with the Administering Authority during the EA amendment process to authorise petroleum production	
A2 P2 Condition 5 Coal Seam Gas Operational Plan 1. Prior to commencing significant construction activities, the proponent must provide provide to DERM for review and assessment, an operational plan that provides detailed information about the activities and their scheduling that are to be carried out under the environmental authority. In this regard, the operational plan must include.... 2. The Operational Plan must cover development of the gas fields for the initial 5 years.... 3. The Operational Plan must be consistent with the requirements of the environmental authorities....	A2 P2 Condition 5 Coal Seam Gas Operational Plan Entire condition proposed for deletion	Australia Pacific LNG requests that the requirement to provide a CSG Operational Management Plan to the Department of Environment and Heritage Protection be deleted as this is now a mandatory requirement under the <i>Environmental Protection Act 1994</i> . The <i>Environmental Protection Act 1994</i> was amended on 31/3/13 to require Plan of Operations for petroleum environmental authorities (refer Chapter 12, sections 285-291)	EHP
A2 P2 Condition 6 Brine and salts management plan 1. The EM Plan developed in accordance with section 310D of the Environmental Protection Act 1994 to support the application for each EA for a gas field development area, must include a Salinity	A2 P2 Condition 6 Brine and salts management plan Entire condition proposed for deletion	Australia Pacific LNG requests that the requirement to provide a brine and salts management plan as part of the environmental management plans submitted under the <i>Environmental Protection Act 1994</i> be deleted. As per amendment to <i>Environmental Protection Act 1994</i> on 31/3/13, an environmental management plan is no longer required to be submitted as part of an environmental authority (EA)	EHP



Australia Pacific LNG Coordinator-General's Report Conditions – Appendix 2

Current	Proposed	Justification	Agency with Jurisdiction
<p>Management Plan for the tenure relevant to the particular EA.</p> <p>2. The Salinity Management Plan must address, but not be limited to...</p>		<p>application (including amendment). The information required by the condition is considered mandatory as part of the EA application and would be suitably conditioned on the respective EAs. To date, where required brine and salt management plans have been suitably conditioned by the Administering Authority. Refer conditions and EAs below.</p> <ul style="list-style-type: none"> - Condition G7 of EPPG00968013 (Walloons) - Condition G7 of EPPG00853213 (Combabula) - Condition G14 of EPPG00853013 (Condabri) <p>For development areas that are still subject to exploration EAs, suitable conditions for the management of brine and salts will be negotiated with the Administering Authority during the EA amendment process to authorise petroleum production</p>	
<p>A2 P2 Condition 7</p> <p>Discharge to surface waters</p> <p>1. Where it is proposed to release treated CSG water to a watercourse, the EM Plan developed in accordance with section 310D of the Environmental Protection Act 1994 to support the application for an EA for a gas field development area, must include a CSG water release strategy as part of each CSG water management plan.</p> <p>2. The CSG water release strategy must, at a minimum...</p> <p>3. The release strategy must be developed taking into account...</p>	<p>A2 P2 Condition 7</p> <p>Discharge to surface waters</p> <p>Entire condition proposed for deletion</p>	<p>Australia Pacific LNG requests that the requirement to provide a CSG water release strategy as part of the environmental management plans submitted under the <i>Environmental Protection Act 1994</i> be deleted.</p> <p>As per amendment to <i>Environmental Protection Act 1994</i> on 31/3/13, an environmental management plan is no longer required to be submitted as part of an environmental authority (EA) application (including amendment). The information required by the condition is considered mandatory as part of the EA application and would be suitably conditioned on the respective EAs. To date, where required, water releases have been suitably conditioned by the Administering Authority. Refer conditions and EAs below.</p> <ul style="list-style-type: none"> - Conditions B2-23 of EPPG00968013 (Walloons) - Conditions B70-77 of EPPG00853213 (Combabula) - Conditions B2-23 of EPPG00853013 (Condabri) 	EHP

Australia Pacific LNG Coordinator-General's Report Conditions – Appendix 2

Current	Proposed	Justification	Agency with Jurisdiction
<p>4. The proponent may consider the need for systems and structures (eg: off-stream storages to store and release) to ensure the release rules can be met.</p> <p>5. In systems where detailed pre-development model/s are not available, a precautionary approach to release rules must be adopted.</p>		<p>- No release to watercourse is authorised for EPPG00672313 (Ramyard Woleebee)</p> <p>For development areas that are still subject to exploration EAs, suitable conditions for the management of brine and salts will be negotiated with the Administering Authority during the EA amendment process to authorise petroleum production</p>	
<p>A2 P2 Condition 8 Public Health Water Quality Standards</p> <p>1. Prior to any discharge of treated CSG water the proponent must have either:</p> <p>a. Appropriate approvals under the Water Supply (Safety and Reliability) Act 2008; or</p> <p>b. Another appropriate approval that includes conditions requiring:</p> <p>i. details of the infrastructure for the production and supply, or supply only, of CSG water</p> <p>ii. a verification plan for final water quality</p> <p>iii. details of the water quality monitoring program</p> <p>iv. initial water quality results</p> <p>v. an incident and emergency response plan that demonstrates how these activities will be appropriately managed to ensure protection of public health.</p>	<p>A2 P2 Condition 8 Public Health Water Quality Standards</p> <p>Entire condition proposed for deletion</p>	<p>Australia Pacific LNG requests that the requirement for obtaining public health approvals be deleted as it is a duplicate of existing approval requirements under the <i>Water Supply (Safety and Reliability) Act 2008</i></p>	EHP



Australia Pacific LNG Coordinator-General's Report Conditions – Appendix 2

Current	Proposed	Justification	Agency with Jurisdiction
A2 P2 Condition 9 Aggregation Dams, Evaporation Dams and Brine Dams 1. The EM Plan developed in accordance with section 310D of the Environmental Protection Act 1994 to support the application for each EA for a gas field development area, must include design for Aggregation dams, CSG water dams and Brine dams establishing that they will... 2. Brine dams must have a system for the collection and proper disposal of any contaminants that move beyond the bounds of the containment system. 3. The design, construction, operation, modification and decommissioning of any regulated dam that is part of a CSG project must be undertaken in accordance with DERM's Manual for Assessing Hazard Categories and Hydraulic Performance of Dams and the accompanying Guideline Dams in Environmentally Relevant Activities. (Draft as of 1st September 2010)	A2 P2 Condition 9 Aggregation Dams, Evaporation Dams and Brine Dams Entire condition proposed for deletion	Australia Pacific LNG requests that the requirement to provide designs for Aggregation dams, CSG water dams and Brine dams as part of the environmental management plans submitted under the <i>Environmental Protection Act 1994</i> be deleted. As per amendment to <i>Environmental Protection Act 1994</i> on 31/3/13, an environmental management plan is no longer required to be submitted as part of an environmental authority (EA) application (including amendment). The information required by the condition is considered mandatory as part of the EA application and would be suitably conditioned on the respective EAs. To date, where required Aggregation dams, CSG water dams and Brine dams requirements have been suitably conditioned by the Administering Authority. Refer conditions and EAs below. - Condition C17-18 of EPPG00672313 (Ramyard Woleebee) - Conditions C14-15 of EPPG00968013 (Walloons) - Conditions C14-15 of EPPG00853213 (Combabula) - Conditions C7-8 of EPPG00853013 (Condabri) For development areas that are still subject to exploration EAs, suitable conditions for the design of dams will be negotiated with the Administering Authority during the EA amendment process to authorise petroleum production	EHP
A2 P2 Condition 10 Groundwater monitoring 1. The EM Plan developed in accordance	A2 P2 Condition 10 Groundwater monitoring Entire condition proposed for	Australia Pacific LNG requests that the requirement to provide ground watering monitoring plans as part of the environmental management plans submitted under the <i>Environmental Protection Act 1994</i> be deleted.	CG, QWC

Australia Pacific LNG Coordinator-General's Report Conditions – Appendix 2

Current	Proposed	Justification	Agency with Jurisdiction
<p>with section 310D of the Environmental Protection Act 1994 to support the application for each EA for a gas field development area, must include a groundwater monitoring plan for all aquifers potentially affected by the petroleum activities.</p> <p>2. The plan must include...</p> <p>3. The monitoring plan must be capable of detecting changes in ground water level or pressure as well as any contamination that may occur due to the petroleum activities undertaken by APLNG or its contractors.</p> <p>4. The monitoring plan must include water quality monitoring parameters that may be necessary to assesses potential contamination from CSG activities, including possible impacts from hydraulic fracturing....</p>	deletion	<p>As per amendment to <i>Environmental Protection Act 1994</i> on 31/3/13, an environmental management plan is no longer required to be submitted as part of an environmental authority (EA) application (including amendment). The information required by the condition is considered mandatory as part of the EA application and would be suitably conditioned on the respective EAs as appropriate (refer EAs below).</p> <ul style="list-style-type: none"> - Condition BB3 of EPPG00672313 (Ramyard Woleebee) - Condition B64 of EPPG00968013 (Walloons) - Condition B32 of EPPG00853213 (Combabula) - Condition B85 of EPPG00853013 (Condabri) <p>For development areas that are still subject to exploration EAs, suitable conditions for groundwater monitoring will be negotiated with the Administering Authority during the EA amendment process to authorise petroleum production</p>	
<p>A2 P2 Condition 12 Groundwater and springs assessment</p> <p>The EM Plan developed in accordance with section 310D of the Environmental Protection Act 1994 to support the application for each EA for a gas field development area, must include a report on its ongoing assessment of risks to</p>	<p>A2 P2 Condition 12 Groundwater and springs assessment</p> <p>Entire condition proposed for deletion</p>	<p>Australia Pacific LNG requests that the requirement to provide groundwater dependant ecosystem assessments as part of the environmental management plans submitted under the <i>Environmental Protection Act 1994</i> be deleted.</p> <p>As per amendment to <i>Environmental Protection Act 1994</i> on 31/3/13, an environmental management plan is no longer required to be submitted as part of an environmental authority (EA) application (including amendment). The information required by the</p>	EHP



Australia Pacific LNG Coordinator-General's Report Conditions – Appendix 2

Current	Proposed	Justification	Agency with Jurisdiction
groundwater dependant ecosystems (including springs and river reaches dependent on base flow) that could be affected by its CSG activities; and a strategy to minimise or mitigate these risks.		<p>condition is considered mandatory as part of the EA application and would be suitably conditioned on the respective EAs.</p> <p>For development areas that are still subject to exploration EAs, suitable conditions for groundwater dependant ecosystem assessments will be negotiated with the Administering Authority during the EA amendment process to authorise petroleum production</p>	
<p>A2 P2 Condition 13 Proponent trials for injection to aquifers</p> <p>1. The proponent must provide to the administering authority a report each year on progress with its injection trials. 2. The proponent must have regard to the Queensland Government's policy position on injection to aquifers.</p>	<p>A2 P2 Condition 13 Proponent trials for injection to aquifers</p> <p>Entire condition proposed for deletion</p>	<p>Australia Pacific LNG requests that the requirement to provide the Department of Environment and Heritage Protection (EHP) with an annual update on the progress of injection trials be deleted.</p> <p>Injection of CSG water into aquifers is a petroleum activity which is required to be authorised on the respective Environmental Authority (EA) should it be undertaken. To date injection has been authorised on the following EAs with subsequent monitoring / reporting requirements to EHP contained on the EAs</p> <ul style="list-style-type: none"> - EPPG00853213 (Combabula) has moved from trials to operational injection and now has operational reporting requirements under conditions B62-63 - Condition of B74-75 EPPG00853013 (Condabri) - Condition B90-92 of EPPG00968013 (Walloons) <p>For development areas that are still subject to exploration EAs, suitable conditions for injection trials will be negotiated with the Administering Authority during the EA amendment process to authorise petroleum production</p>	EHP



Australia Pacific LNG Coordinator-General's Report Conditions – Appendix 2

Current	Proposed	Justification	Agency with Jurisdiction
<p>A2 P2 Condition 15 Borrow pits</p> <p>Prior to the construction of borrow pits the proponent must undertake an assessment of the environmental values, potential impacts, mitigation measures for the siting, construction, operation, decommissioning and rehabilitation of borrow pits required for petroleum activities and will provide this assessment to the administering authority.</p>	<p>A2 P2 Condition 15 Borrow pits</p> <p>Entire condition proposed for deletion</p>	<p>Australia Pacific LNG requests that the requirement to provide the Department of Environment and Heritage Protection (EHP) with a borrow pit assessment prior to constructing borrow pits be deleted.</p> <p>Borrow pits are petroleum activities that are required to be identified and assessed as part of an environmental authority (EA) application (or amendment application). Environmental values, potential impacts, mitigation measures and rehabilitation are mandatory requirements under the <i>Environmental Protection Act 1994</i> to support an application (refer s125(l) and s226(k)). Conditions have been imposed on the respective EAs to manage the siting, construction, operation, decommissioning and rehabilitation of borrow pits.</p> <ul style="list-style-type: none"> - Condition D49 of EPPG00968013 (Walloons) - Condition D44 of EPPG00853213 (Combabula) - Condition D39 of EPPG00853013 (Condabri) <p>For development areas that are still subject to exploration EAs, suitable conditions for borrow pit management will be negotiated with the Administering Authority during the EA amendment process to authorise petroleum production</p>	EHP
<p>A2 P2 Condition 16 Access tracks in ESAs</p> <p>New access tracks are not permitted within Category B or C Environmentally Sensitive Areas unless they are co-located with gas collection or CSG associated water pipelines, unless</p>	<p>A2 P2 Condition 16 Access tracks in ESAs</p> <p>Entire condition proposed for deletion</p>	<p>Australia Pacific LNG requests that the requirement to seek Department of Environment and Heritage Protection (EHP) approval for new access tracks in environmentally sensitive areas be deleted.</p> <p>Access tracks are petroleum activities which are required to be identified and assessed as part of an environmental authority (EA) application (or amendment application). Environmental values,</p>	EHP

Australia Pacific LNG Coordinator-General's Report Conditions – Appendix 2

Current	Proposed	Justification	Agency with Jurisdiction
otherwise authorised by the administering authority.		<p>potential impacts, mitigation measures and rehabilitation are mandatory requirements under the <i>Environmental Protection Act 1994</i> to support an application (refer s125(l) and s226(k)). Conditions have been imposed by the administering authority on the respective EAs which authorise access tracks in environmentally sensitive areas. Refer to following conditions on the respective EAs</p> <ul style="list-style-type: none"> - Condition D12 of EPPG00968013 (Walloons) - Condition D10 of EPPG00853213 (Combabula) - Condition D10 of EPPG00853013 (Condabri) - Condition E8 of EPPG00672313 (Ramyard Woleebee) <p>For development areas that are still subject to exploration EAs, suitable conditions for the locating access tracks in environmentally sensitive areas will be negotiated with the Administering Authority during the EA amendment process to authorise petroleum production</p>	
<p>A2 P2 Condition 17 Ramp-up gas</p> <p>The EM Plan developed in accordance with section 310D of the Environmental Protection Act 1994 to support the application for each EA for a gas field development area, must include an assessment of the environmental values, potential impacts, mitigation measures for any ramp up gas storage.</p>	<p>A2 P2 Condition 17 Ramp-up gas</p> <p>Entire condition proposed for deletion</p>	<p>Australia Pacific LNG requests that the requirement to provide ramp up gas assessments as part of the environmental management plans submitted under the <i>Environmental Protection Act 1994</i> be deleted.</p> <p>As per amendment to <i>Environmental Protection Act 1994</i> on 31/3/13, an environmental management plan is no longer required to be submitted as part of an environmental authority (EA) application (including amendment). The information required by the condition is considered mandatory as part of the EA application and would be suitably conditioned on the respective EAs. To date, where ramp up gas has been proposed suitable conditions have been imposed by the Department of environment and Heritage</p>	EHP



Australia Pacific LNG Coordinator-General's Report Conditions – Appendix 2

Current	Proposed	Justification	Agency with Jurisdiction
		<p>Protection. Refer conditions and EAs below.</p> <ul style="list-style-type: none"> - Condition A31 of EPPG00968013 (Walloons) - Condition A31 of EPPG00853213 (Combabula) <p>For development areas that are still subject to exploration EAs, suitable conditions for ramp up gas will be negotiated with the Administering Authority during the EA amendment process to authorise petroleum production</p>	
<p>A2 P2 Condition 18 Dam decommissioning</p> <p>1. The EM Plan developed in accordance with section 310D of the Environmental Protection Act 1994 to support the application for each EA for a gas field development area, must include an assessment of the disposal options for any contaminated material (i.e. salt or dam liners) in accordance with the DERM waste management hierarchy and consistent with the DERM Guideline: Preparing an environmental management plan (EM Plan) for Coal Seam Gas (CSG) activities.</p> <p>2. Decommissioned dams are to be rehabilitated and the landform must be reinstated such that it will not function as a dam and will be stable and sustainable for the foreseeable future (unless</p>	<p>A2 P2 Condition 18 Dam decommissioning Entire condition proposed for deletion</p>	<p>Australia Pacific LNG requests that the requirement to provide dam decommissioning information as part of the environmental management plans submitted with environmental authority applications be deleted.</p> <p>As per amendment to <i>Environmental Protection Act 1994</i> on 31/3/13, an environmental management plan is no longer required to be submitted as part of an EA application (including amendment). The information required by the condition is considered mandatory as part of the EA application and would be suitably conditioned on the respective EAs. For EAs where dams have been authorised, below are conditions that EHP have provided in relation to decommissioning</p> <ul style="list-style-type: none"> - Condition C30 - C32 of EPPG00968013 (Walloons) - Condition C39 - C42 of EPPG00853213 (Combabula) - Condition C33 - C36 of EPPG00853013 (Condabri) - Condition H19, I2, I9 of EPPG00672313 (Ramyard Woleebee) <p>For development areas that are still subject to exploration EAs, suitable conditions for dam decommissioning will be negotiated with the Administering Authority during the EA amendment process to</p>	EHP

Australia Pacific LNG Coordinator-General's Report Conditions – Appendix 2

Current	Proposed	Justification	Agency with Jurisdiction
otherwise negotiated with landholders). A minimum depth of 0.25m topsoil must be placed over decommissioned storage dams to ensure an adequate vegetal cover can be established.		authorise petroleum production	
<p>A2 P2 Condition 19 Water quality and aquatic ecology monitoring</p> <p>1. The EM Plan developed in accordance with section 310D of the Environmental Protection Act 1994 to support the application for each EA for a gas field development area, must include a monitoring program of water quality and aquatic ecological parameters at sites upstream and downstream of the proponent's gas fields activities where the proponent's activities will have impacts on surface runoff. The program should...</p> <p>2. Where treated CSG water discharges are proposed the program must include...</p>	<p>A2 P2 Condition 19 Water quality and aquatic ecology monitoring</p> <p>Entire condition proposed for deletion</p>	<p>Australia Pacific LNG requests that the requirement to provide water quality and aquatic ecological monitoring as part of the environmental management plans submitted under the <i>Environmental Protection Act 1994</i> be deleted.</p> <p>As per amendment to <i>Environmental Protection Act 1994</i> on 31/3/13, an environmental management plan is no longer required to be submitted as part of an environmental authority (EA) application (including amendment). The information required by the condition is considered mandatory as part of the EA application and would be suitably conditioned on the respective EAs. For EAs where release to surface waters have been authorised conditions have been included on the EAs to monitor water quality and aquatic ecological parameters under receiving environment monitoring programs as outlined below:</p> <ul style="list-style-type: none"> - Conditions B29-31 of EPPG00968013 (Walloons) - Conditions B85-87 of EPPG00853213 (Combabula) - Conditions B29-31 of EPPG00853013 (Condabri) - No release to watercourse is authorised for EPPG00672313 (Ramyard Woleebee) <p>For development areas that are still subject to exploration EAs, suitable conditions for water quality and aquatic ecology monitoring will be negotiated with the Administering Authority during the EA amendment process to authorise petroleum production.</p>	EHP



Australia Pacific LNG Coordinator-General's Report Conditions – Appendix 2

Current	Proposed	Justification	Agency with Jurisdiction
A2 P2 Condition 20 Surface Water monitoring sites The EM Plan developed in accordance with section 310D of the EP Act to support the application for an EA for a gas field development area must include upstream and downstream monitoring of water quality parameters where discharges are proposed.	A2 P2 Condition 20 Surface Water monitoring sites Entire condition proposed for deletion	<p>Australia Pacific LNG requests that the requirement to provide water quality parameters as part of the environmental management plans submitted under the <i>Environmental Protection Act 1994</i> be deleted.</p> <p>As per amendment to <i>Environmental Protection Act 1994</i> on 31/3/13, an environmental management plan is no longer required to be submitted as part of an environmental authority (EA) application (including amendment). The information required by the condition is considered mandatory as part of the EA application and would be suitably conditioned on the respective EAs. To date, where surface water discharge has been proposed suitable conditions have been imposed by the Department of environment and Heritage Protection. Refer conditions and EAs below.</p> <ul style="list-style-type: none"> - Conditions B29-31 of EPPG00968013 (Walloons) - Conditions B85-87 of EPPG00853213 (Combabula) - Conditions B29-31 of EPPG00853013 (Condabri) - No release to watercourse is authorised for EPPG00672313 (Ramyard Woleebee) <p>For development areas that are still subject to exploration EAs, suitable conditions for upstream and downstream water quality monitoring will be negotiated with the Administering Authority during the EA amendment process to authorise petroleum production.</p>	EHP
A2 P2 Condition 21 Receiving Environment Monitoring Program The EM Plan developed in accordance	A2 P2 Condition 21 Receiving Environment Monitoring Program Entire condition proposed for	<p>Australia Pacific LNG requests that the requirement to provide a receiving environment monitoring plan as part of the environmental management plans submitted under the <i>Environmental Protection Act 1994</i> be deleted.</p>	EHP



Australia Pacific LNG Coordinator-General's Report Conditions – Appendix 2

Current	Proposed	Justification	Agency with Jurisdiction
with section 310D of the EP Act to support the application for the gas fields, must include a receiving environment monitoring program to monitor and record the effects of the release of contaminants on the receiving environment, with the aims of identifying and describing the extent of any adverse impacts to local environmental values, and monitoring any changes in the receiving water.	deletion	<p>As per amendment to <i>Environmental Protection Act 1994</i> on 31/3/13, an environmental management plan is no longer required to be submitted as part of an environmental authority (EA) application (including amendment). The information required by the condition is considered mandatory as part of the EA application and would be suitably conditioned on the respective EAs. To date, where receiving environment monitoring plan have been required suitable conditions have been imposed by the Department of environment and Heritage Protection. Refer conditions and EAs below.</p> <ul style="list-style-type: none"> - Conditions B29-31 of EPPG00968013 (Walloons) - Conditions B85-87 of EPPG00853213 (Combabula) - Conditions B29-31 of EPPG00853013 (Condabri) - No release to watercourse is authorised for EPPG00672313 (Ramyard Woleebee) <p>For development areas that are still subject to exploration EAs, suitable conditions for a receiving environment monitoring program will be negotiated with the Administering Authority during the EA amendment process to authorise petroleum production.</p>	
<p>A2 P2 Condition 22 Hydraulic fracturing chemicals</p> <p>1. The EM Plan developed in accordance with section 310D of the EP Act to support the application for an EA for a gas field development area must include, where hydraulic fracturing is proposed, an independent scientific assessment of the</p>	<p>A2 P2 Condition 22 Hydraulic fracturing chemicals</p> <p>Entire condition proposed for deletion</p>	<p>Australia Pacific LNG requests that the requirement to provide a receiving environment monitoring plan as part of the environmental management plans submitted under the <i>Environmental Protection Act 1994</i> be deleted.</p> <p>As per amendment to <i>Environmental Protection Act 1994</i> on 31/3/13, an environmental management plan is no longer required to be submitted as part of an environmental authority (EA) application (including amendment). The information required by the</p>	EHP



Australia Pacific LNG Coordinator-General's Report Conditions – Appendix 2

Current	Proposed	Justification	Agency with Jurisdiction
<p>possible impacts from hydraulic fracturing.</p> <p>2. The assessment must address, but not be limited to:</p> <ul style="list-style-type: none"> a. a complete inventory of biocides, corrosion inhibitors and all other chemicals used in drilling, completions and stimulation operations (hydraulic fracturing). b. toxicity data for each chemical and any mixture of chemicals. c. details of where, when and how often drilling, completions and stimulation operations are to be undertaken. d. a risk assessment of the potential for drilling, completions and stimulation operations to cause environmental harm to the receiving environment. e. the risk assessment must include but not be limited to: a mass balance determining the concentrations and absolute masses of chemicals that will be left in situ subsequent to drilling, completions and stimulation operations, and the results of any fluid monitoring undertaken in the course of previous drilling, completions and stimulation operations. f. the long-term monitoring program of drilling, completions and stimulation operations fluid chemical concentrations 		<p>condition is considered mandatory as part of the EA application and would be suitably conditioned on the respective EAs. To date, where hydraulic fracturing has been required suitable conditions have been imposed by the Administering Authority. Refer conditions and EAs below.</p> <ul style="list-style-type: none"> - Condition J1 of EPPG00672313 (Ramyard Woleebee) - Condition I6 of EPPG00853013 (Condabri) - Condition I8 of EPPG00968013 (Walloons) - Condition I8 of EPPG00853213 (Combabula) <p>For development areas that are still subject to exploration EAs, suitable conditions for hydraulic fracturing will be negotiated with the Administering Authority during the EA amendment process to authorise petroleum production.</p>	

Australia Pacific LNG Coordinator-General's Report Conditions – Appendix 2

Current	Proposed	Justification	Agency with Jurisdiction
in water produced from wells that is to be implemented by the proponent. g. management measures that will be taken to avoid and mitigate any potential adverse impact on environmental values.			
A2 P2 Condition 23 Synthetic drilling muds Based on the model conditions for CSG activities, the model conditions stated below will be imposed on any Environmental Authority for the Gas Fields: • oil-based drilling muds must not be used in the carrying out of the petroleum activity • synthetic-based drilling muds must not be used in the carrying out of the petroleum activity other than with the written approval of the administering authority.	A2 P2 Condition 23 Synthetic drilling muds Entire condition proposed for deletion	Australia Pacific LNG requests that this condition be deleted on the basis that it is a model Environmental Authority (EA) condition that would be negotiated as part of any EA application or EA amendment. For EAs issued to Australia Pacific LNG these conditions have been imposed on the EAs as identified below. - Condition J11, J12 of EPPG00672313 (Ramyard Woleebee) - Conditions I3, I4 of EPPG00968013 (Walloons) - Conditions I3, I4 of EPPG00853213 (Combabula) - Conditions I3, I4 of EPPG00853013 (Condabri) For development areas that are still subject to exploration EAs, suitable conditions for synthetic drilling muds will be negotiated with the Administering Authority during the EA amendment process to authorise petroleum production.	EHP
A2 P2 Condition 24 Pad drilling (multiple drill holes from the one location) The EM Plan developed in accordance with section 310D of the EP Act to support the application for an EA for a gas field development area, should include	A2 P2 Condition 24 Pad drilling (multiple drill holes from the one location) Entire condition proposed for deletion	Australia Pacific LNG requests that the requirement to provide pad drilling considerations as part of the environmental management plans submitted under the <i>Environmental Protection Act 1994</i> be deleted. As per amendment to <i>Environmental Protection Act 1994</i> on 31/3/13, an environmental management plan is no longer required to be submitted as part of an environmental authority (EA)	EHP

Australia Pacific LNG Coordinator-General's Report Conditions – Appendix 2

Current	Proposed	Justification	Agency with Jurisdiction
consideration of pad drilling wherever medium or high environmental values, including strategic cropping lands are impacted by the petroleum activities. The EMP must demonstrate that where pad drilling is shown to be not feasible, alternative ways of siting drilling rigs and other petroleum facilities are proposed to protect environmental values.		<p>application (including amendment). The information required by the condition is considered mandatory as part of the EA application and would be suitably conditioned on the respective EAs. To date, where pad drilling has been required to be imposed suitable conditions have been imposed by the Department of environment and Heritage Protection. Refer conditions and EAs below.</p> <ul style="list-style-type: none"> - Conditions D51 of EPPG00968013 (Walloons) - Conditions D46 of EPPG00853213 (Combabula) - Conditions D41 of EPPG00853013 (Condabri) <p>For development areas that are still subject to exploration EAs, suitable conditions for minimising disturbance to medium and high environmental value areas will be negotiated with the Administering Authority during the EA amendment process to authorise petroleum production.</p>	
<p>A2 P2 Condition 26 Gas trunkline easements</p> <p>The EM Plan developed in accordance with section 310D of the EP Act to support the application for an EA for a gas field development area, must include an assessment of the construction of co-located trunklines to minimise width and total disturbance required for the right of way.</p>	<p>A2 P2 Condition 26 Gas trunkline easements</p> <p>Entire condition proposed for deletion</p>	<p>Australia Pacific LNG requests that the requirement to provide a gas trunkline easement assessment as part of the environmental management plans submitted under the <i>Environmental Protection Act 1994</i> be deleted.</p> <p>As per amendment to <i>Environmental Protection Act 1994</i> on 31/3/13, an environmental management plan is no longer required to be submitted as part of an environmental authority (EA) application (including amendment). The information required by the condition is considered mandatory as part of the EA application and would be suitably conditioned on the respective EAs. This condition is now addressed by Schedule D (Land) of the Environmental Authority:</p> <ul style="list-style-type: none"> - Conditions D12, D42-43 of EPPG00968013 (Walloons) 	EHP



Australia Pacific LNG Coordinator-General's Report Conditions – Appendix 2

Current	Proposed	Justification	Agency with Jurisdiction
		<ul style="list-style-type: none"> - Conditions D10, D37-38 of EPPG00853213 (Combabula) - Conditions D10, D36 of EPPG00853013 (Condabri) - Condition E8 of EPPG00672313 (Ramyard Woleebee) <p>For development areas that are still subject to exploration EAs, suitable conditions for minimising right of way disturbance will be negotiated with the Administering Authority during the EA amendment process to authorise petroleum production.</p>	
A2 P3 (All Schedules)	A2 P3 (All Schedules) Entire part proposed for deletion	Appendix 2, Part 3 contains the model conditions for coal seam gas fields that were in circulation at the time of the CG report finalisation. Since the release of these model conditions the Administering Authority has published its updated guideline titled "Streamlined model conditions for petroleum activities" (2014) which is now the appropriate conditions which inform negotiations for environmental authority (EAs) conditions for new or amendments applications to EAs.	EHP

Australia Pacific LNG Coordinator-General's Report Conditions – Appendix 3

Current	Proposed	Justification	Agency with Jurisdiction
<p>A3 P1 C2 MCU Conditions for CICSDA and GSDA</p> <p>The proponent is required to obtain an environmental authority approval from DERM prior to the commencement of construction.</p>	<p>A3 P1 C2 MCU Conditions for CICSDA and GSDA</p> <p>Proposed deletion of A3 P1 Condition 2.</p>	<p>Australia Pacific LNG requests that the requirement to obtain an environmental authority for pipeline activities be deleted from the development approval conditions as it is a duplicate of existing legislative requirements.</p> <p>The <i>Environmental Protection Act 1994</i> regulates the need for an Environmental Authority and the approval process for resource activities (including pipelines).</p>	DIP- State Development Area
<p>A3 P2 Condition 9 Good Quality Agricultural Land</p> <p>The proponent must include provisions in the EM Plan for the gas pipeline, ensuring that, on land identified as being good quality agricultural land (GQAL), the pipeline contractor must:</p> <p>a) on completion of construction, remove temporary access tracks b) on completion of construction, lightly rip disturbed areas, replace topsoil and return the surface to a land use condition that serves the preconstruction use c) on completion of construction, implement land management and erosion control measures</p>	<p>A3 P2 Condition 9 Good Quality Agricultural Land</p> <p>Proposed deletion of A3 P2 Condition 9.</p>	<p>Australia Pacific LNG requests that the requirement to provide an EM plan for the good quality agricultural land be deleted.</p> <p>The <i>Environmental Protection Act 1994</i> (EP Act) specifies the mandatory requirements for submitting an Environmental Authority (EA) application (including amendment). The requirement for an Environmental Management Plan was removed from the EP Act on 31/3/13. The information requested by this condition forms part of the mandatory requirements of an EA application for which the administering authority imposes conditions on the respective EA.</p> <p>Additionally, in 2011 the state government introduced the <i>Strategic Cropping Land Act 2011</i>, which has subsequently been replaced with the <i>Regional Interests Planning Act 2014</i>. Both these pieces of legislation regulated the co-existence of strategic cropping areas and activities that can be undertaken on petroleum tenures for which there is an assessment process undertaken by the Department of Natural Resources and Mines.</p> <p>As the management of petroleum infrastructure on these areas is now regulated by the <i>Regional Planning Interests Act 2014</i>, the condition is no longer required.</p>	EHP

Australia Pacific LNG Coordinator-General's Report Conditions – Appendix 3

Current	Proposed	Justification	Agency with Jurisdiction
d) on land with GQAL class A, B or C1, bury the pipeline to at least 0.9m below finished land surface, or greater if deep ripping is a normal practice.			
<p>A3 P2 Condition 12 Mosquitoes</p> <p>A mosquito and biting midge management plan must be developed as part of the gas pipeline EM Plan and include:</p> <ul style="list-style-type: none"> • assessment of work areas to identify potential breeding sites • any required specific area control plans based on assessment of potential breeding sites must conform to DERM'S Mosquito Management Code of Practice for Queensland. <p>Queensland Health and relevant local councils must be contacted for assistance in choosing a suitable method.</p>	<p>A3 P2 Condition 12 Mosquitoes</p> <p>Proposed deletion of A3 P2 Condition 12.</p>	<p>Australia Pacific LNG requests that the requirement to develop a mosquito and biting midge management plan as part of the environmental management plans submitted under the Environmental Protection Act 1994 be deleted.</p> <p>The Environmental Protection Act 1994 (EP Act) specifies the mandatory requirements for submitting an Environmental Authority (EA) application (including amendment). The requirement for an Environmental Management Plan was removed from the EP Act on 31/3/13. The information requested by this condition forms part of the mandatory requirements of an EA application for which the administering authority would impose suitable conditions on the respective EA.</p>	EHP and relevant local government
A3 P2 Condition 20 EM Plan for the Kangaroo Island wetlands and The Narrows pipeline segment	A3 P2 Condition 20 EM Plan for the Kangaroo Island wetlands and The	<p>Australia Pacific LNG requests that the requirement to provide an EM plan for the Kangaroo Island wetlands and Narrows pipeline segments be deleted.</p> <p>The <i>Environmental Protection Act 1994</i> (EP Act) specifies the mandatory</p>	EHP



Australia Pacific LNG Coordinator-General's Report Conditions – Appendix 3

Current	Proposed	Justification	Agency with Jurisdiction
Parts 1-11	Narrows pipeline segment Proposed deletion of A3 P2 Condition 12	requirements for submitting an Environmental Authority (EA) application (including amendment). The requirement for an Environmental Management Plan was removed from the EP Act on 31/3/13. The information requested by this condition forms part of the mandatory requirements of an EA application for which the administering authority imposes conditions on the respective EA.	



Australia Pacific LNG Coordinator-General's Report Conditions – Appendix 4

Current	Proposed	Justification	Agency with Jurisdiction
A4 Part 1 MCU conditions for GSDA Conditions 1 - 15	A4 Part 1 MCU conditions for GSDA Conditions 1 – 15 are proposed for deletion	<p>Australia Pacific LNG requests that Part 1 of Appendix 4 is deleted in its entirety. It is understood that the conditions referenced were intended to be model conditions until such time as a Material Change of Use approval in the GSDA could be obtained. As the LNG facility has a Material Change of Use (MCH2011/008-002) approval in place, the conditions listed replicate another regulatory approval, and serve no further purpose.</p> <p>It is noted that some conditions listed in Part 1 of Appendix 4 are inconsistent with the content of the Material Change of Use approval. Removal of these conditions from Part 1 will eliminate ambiguity, and will allow the Australia Pacific LNG Project to continue to be compliant with the Material Change of Use conditions.</p>	DIP – State Development Area
A4 Part 2 Condition 4 Environmental Management Precinct Exclusion Management Plan APLNG shall prepare an Environmental Management Precinct Exclusion Management Plan for the approval of the Coordinator-General which sets out the areas to be excluded from access by vehicle or foot by the proponent or its construction contractor workers. The proponent or its construction contractors shall incur a security	A4 Part 2 Condition 4 Proposed deletion of A4 Part 2 Condition 4	<p>Australia Pacific LNG requests that the stated condition be removed as the Environmental Management Precinct is now owned and managed by the Queensland Parks and Wildlife Service. Australia Pacific LNG has entered into a funding agreement for the ongoing management of the Environmental Management Precinct, and consequently this condition is no longer relevant.</p>	JAG



Australia Pacific LNG Coordinator-General's Report Conditions – Appendix 4

Current	Proposed	Justification	Agency with Jurisdiction
<p>fee to be set by the Coordinator-General upon consideration of the circumstances, of a minimum of \$2500 to a maximum of \$75,000, for each incidence of environmental damage occurring in or around Curtis Island as a result of illegal access to the Environmental Management Precinct by employees or contractors of the proponent. The fee maximum will be indexed each calendar year as provided for in Schedule 1 of Clause 25A of the <i>SDPWO Act 1971</i>.</p>			
<p>A4 Part 2 Condition 6 Currency period</p> <p>The currency of this report will lapse four years after it is released unless it is extended pursuant to section 35A of the <i>SDPWO Act</i>. In the event that APLNG has not received material change of use approval for Trains 3 and 4 within four years of the date of this report, then the Coordinator-General is prepared</p>	<p>A4 Part 2 Condition 6 Currency period</p> <p>Proposed deletion of A4 P2 Condition 6.</p>	<p>Australia Pacific LNG requests that the stated condition be removed as Coordinator General's Report has been substantially carried out. Additionally, the Material Change of Use approval obtained for the LNG Facility permits the construction of LNG Trains 3 and 4. The condition is thus satisfied, and deletion will remove any future doubt regarding the currency period of the Coordinator General's Report.</p>	<p>DIP – State Development Area</p>



Australia Pacific LNG Coordinator-General's Report Conditions – Appendix 4

Current	Proposed	Justification	Agency with Jurisdiction
to extend the currency period of this report for a further two years provided that APLNG informs the Coordinator-General within the currency period, that it has decided to proceed with construction of a subsequent train/s and provides satisfactory supporting documentation.			
A4 Part 4 Environmental Authority conditions Schedule A - K	A4 Part 4 Environmental Authority conditions Schedule A - K and all contained conditions are proposed for deletion.	<p>Australia Pacific LNG requests that Part 4 of Appendix 4 is deleted in its entirety. It is understood that the conditions referenced were intended to be model conditions until such time as an Environmental Authority for the LNG Facility could be obtained.</p> <p>As the LNG facility has an Environmental Authority (EPPG00715613) in place, the conditions listed replicate another regulatory approval and can serve no further purpose.</p> <p>It is noted that some conditions listed in Part 4 of Appendix 4 are inconsistent with the content of the Environmental Authority. Removal of these conditions from Part 4 will eliminate ambiguity, and will allow the Australia Pacific LNG Project to be compliant with any changes to the Environmental Authority instigated by the Department of Environment and Heritage Protection in future without needing to apply to change the Coordinator General's Report.</p>	EHP