



1 | EIS Introduction



Section 1

EIS Introduction

The respondent comments provided in this section have been collated from all stakeholder submission comments relating to EIS Section 1 Introduction. Please refer to **Attachment A** for copies of all submissions received.

1.1 Project Overview

No submissions were received for this section.

1.2 Project Proponent

No submissions were received for this section.

1.3 Environmental Impact Statement Objective and Purpose

No submissions were received for this section.

1.4 EIS Methodology

Respondent Comment

Department of Environment Water Heritage and the Arts states that the EPBC Act values in Section 1 do not appear to be amended.

Santos Response

Matters of National Environmental Significance (MNES) such as conservation significant flora and fauna species and vegetation communities that are listed under the EPBC Act are described in EIS Appendix G and EIS Section 6.4, 7.4 and 8.4. Specific detail is also described within EIS Technical Appendices N1, N2 and N3.

1.5 Project Description

No submissions were received for this section.

1.6 Project Rationale

No submissions were received for this section.

1.7 Relationship to Other Projects

Respondent Comment

Submitter number 14 states that the LNG Industry mooted for the Gladstone Harbour should be treated on an individual company basis on the area of their plant footprint and that any other basis for consideration must be on a whole of industry.

Santos Response

Additional assessment of the cumulative impacts has been undertaken following the publication of additional material since the publication of the EIS. **Attachment J** is an updated cumulative impact assessment for the project.

Section 1

EIS Introduction

Respondent Comment

Department of Environment and Resource Management requires a more detailed cumulative impact assessment addressing the proposed coal seam gas fields, pipeline alignments and the proposed LNG facilities. Such information should include assessments of flora, fauna, soils, air emissions, treated water discharges to ephemeral streams, groundwater impacts and water course crossing impacts of all LNG projects associated with the Surat and Bowen Basins, Curtis Island and Fishermans Landing.

Santos Response

Additional assessment of the cumulative impacts has been undertaken following the publication of additional material since the publication of the EIS. **Attachment J** is an updated cumulative impact assessment for the project.

Respondent Comment

Department of Environment and Resource Management states that the Surat to Gladstone Pipeline proposal by Surat Gladstone Pipeline Pty Ltd needs to be included when describing the relationship to other projects.

Santos Response

Additional assessment of the cumulative impacts has been undertaken following the publication of additional material since the publication of the EIS. The Surat to Gladstone Pipeline has been included in this assessment and can be referred to in **Attachment J** which is an updated cumulative impact assessment for the project.

Respondent Comment

Capricorn Conservation Council states that the cumulative impact assessment associated with these combined projects needs to be more robust. The cumulative impacts of the LNG projects and industrial projects, will affect air quality, nature conservation, climate change, marine environment, and community quality of life. This project should not proceed until a detailed assessment of cumulative impacts (short term and long term) is completed and communicated to the public.

The onus of proof rests with Santos/Petronas (and other LNG companies) to prove that dugong and turtles, etc. will not be harmed. Risk and uncertainty must be taken into account. Cumulative impact assessment is imperative and as yet, seemingly not done. For example, fugitive hydrocarbons from oil spills are likely to build up in dugong fatty tissue over time.

Cumulative impacts resulting from constructing 4 - 5 separate gas transmission pipelines within the Friend Point and Laird Point area can be substantially reduced if all were constructed at the same time.

Santos Response

Additional assessment of the cumulative impacts has been undertaken following the publication of additional material since the publication of the EIS. **Attachment J** is an updated cumulative impact assessment for the project.

A Dugong and Turtle Management Plan has been developed and can be referred to in **Attachment F5**. Decreases in water quality from dredging, construction, spills of fuel or other hydrocarbons will be monitored and mitigated through:

- Monitoring of sensitive receptors prior to, during and after dredging;
- Monitoring of discharges to ensure levels meet appropriate guidelines;

Section 1

EIS Introduction

- Development of appropriately placed retention ponds;
- The concentration of total hydrocarbon in treated waste water discharge to be measured daily;
- No contaminated waste will be intentionally discharged via facility washdown;
- Containment and separation devices incorporated into onshore water management facilities;
- Spill response equipment and appropriate training of personnel;
- Spill response plan;
- Optimum under-keel clearance on dredge to reduce sediment re-suspension;
- Limiting periods of continuous dredging activity in close proximity.
- Sailing routes to disposal site minimise propeller wash within operational constraints;
- Use well maintained and properly calibrated dredging vessels;
- Use favourable weather, tide and current conditions so far as reasonably practicable to limit effects when dredging or disposal in proximity to sensitive areas;
- Limit anchor and anchor chain interference with benthic communities;
- Management measures for reclamation to reduce turbidity; and
- Construction and/or operation vessels to adhere to complete prohibition on the presence of TBT paints on ships by 1 January 2008.

Respondent Comment

Queensland Police Service states that the proponent should engage in consultation with QPS regarding a range of issues for both planning and response associated with impact of the GLNG Project. This will assist the QPS in determining policing impacts, strategic planning, resourcing and how the QPS can best support the development of mining, energy and infrastructure projects and service delivery to affected areas.

Santos Response

Discussions have been and will continue to be held with QPS as part of Santos' consultation strategy to ensure these issues are considered. The consultation strategy is being implemented in parallel with the EIS process.

Respondent Comment

Queensland Police Service states that they should be provided with all Environmental Management Plans once finalised subsequent to project approval.

Santos Response

Please refer to **Attachment B** for all revised EMPs. Additional EMPs, prepared as part of the Santos approvals process, will be made available to QPS.

Respondent Comment

Queensland Police Service states that a more critical and broad review (including consultation) of cumulative impact of industry development in Gladstone District would assist in determining resource requirements and development appropriate service delivery and crime investigation strategies that meet the needs of the community. The provision of a measurable baseline for cumulative impacts taking into

Section 1

EIS Introduction

account existing, planned and committed projects based on both historical data and strategic planning will enable agencies such as the QPS to more accurately measure, assess and respond to project impacts. There are a number of cross-agency impacts - the management of transport and traffic for example will impact on Department of Main Roads, Queensland Transport, Queensland Ambulance and other agencies in addition to the QPS. The development of a measurable baseline may not necessarily sit with the Proponent for this project but rather an overarching authority may need to consider the development of this concept.

Santos Response

Additional assessment of the cumulative impacts has been undertaken following the publication of additional material since the publication of the EIS. **Attachment J** is an updated cumulative impact assessment for the project.

Respondent Comment

Wildlife Preservation Society of Queensland - Policy and Campaigns Manager states that this is but only one of such future projects. There are several similar proposals gathering momentum. A major concern is what is the cumulative effects of all these projects on the environment and biodiversity of Queensland. It is suggested that this is unknown and there has been no apparent attempt by the Queensland Government to model what the total impact will be. Wildlife Preservation Society of Queensland appreciates that it is not the role of the proponents of this project to undertake such a task. However it would appear that adequate consideration of the total cumulative effects of the various components of this project alone has not been given appropriate consideration. Wildlife Preservation Society of Queensland would encourage the proponents to minimise the footprint of the project wherever feasible, at the gas extraction sites, the pipe and the plant itself.

Santos Response

Additional assessment of the cumulative impacts has been undertaken following the publication of additional material since the publication of the EIS. **Attachment J** is an updated cumulative impact assessment for the project.

Respondent Comment

WWF-Australia states that overall there are a number of the other proposed industrial development projects planned for the Gladstone port region, including Curtis Island. WWF-Australia recommends that an overarching Strategic Environmental and Cumulative Impact Assessment are developed to adequately address cumulative impacts.

Santos Response

Additional assessment of the cumulative impacts has been undertaken following the publication of additional material since the publication of the EIS. **Attachment J** is an updated cumulative impact assessment for the project.

1.8 Environmental Impact Assessment Process

No submissions were received for this section.

Section 1

EIS Introduction

1.9 Project Approvals and Legislative Framework

Respondent Comment

Department of Environment and Resource Management requires a report on potential cumulative impacts on water, noise, air, land and waste management from associated industry and proposed industry in the area. The report should include how these impacts will be minimised and managed through an integrated management plan.

Santos Response

Additional assessment of the cumulative impacts has been undertaken following the publication of additional material since the publication of the EIS. **Attachment J** is an updated cumulative impact assessment for the project.

Respondent Comment

Gladstone Regional Council states that the EIS should refer to the Public Health Act 2005 and Land Protection (Pest and Stock Route Management) Act 2002, as appropriate.

Santos Response

Santos has considered the Public Health Act 2005 and Land Protection (Pest and Stock Route Management) Act 2002 as they apply to the Project and will liaise with the relevant authorities in relation to any approvals required.

Respondent Comment

The Wildlife Preservation Society of Queensland – Policy and Campaigns Manager states by their own admission (page 6, ES7), the full extent and location of wells and infrastructure is not known and will evolve over time. The cumulative effects are an unknown. Once this project has been approved, what pressures will be brought to bear for it to continue regardless of any environmental harm.

Santos Response

The CSG field development component of the GLNG Project will occur over a 20 plus year period, and impact assessment will be ongoing throughout this period. However, Santos has now undertaken a supplementary assessment of the potential impacts of the CSG field development on the ecological values of the area. The supplementary assessment is contained in **Attachment D5**.

The following key elements are included in the supplementary assessment:

- **Constraints mapping** – a detailed analysis of the ecological values of the Reasonably Foreseeable Development Area (RFDA) within the CSG fields having regard to augmented desktop and field datasets;
- **Constraints classes** – identification and mapping of five classes of land within the RFDA with graduated levels of ecological sensitivity based on the constraints mapping;
- **Field Management Protocol** – development of a field management protocol which describes the nature of development which may be undertaken within each of the constraints classes, the process to settle the specific location of the development within each constraints class having regard to the ecological values of the area and mitigation measures;

Section 1

EIS Introduction

- **Indicative Field Development Plan** – identification of an indicative field development plan (IFDP) for the RFDA with preliminary locations for the wells and associated infrastructure;
- **Supplementary Impact Assessment** - an evaluation of potential impacts on ecological values of the development of the CSG fields based on three scenarios derived from application of the field management protocol to the field development plan;
- **Mitigation Measures** – identification of mitigation measures additional to measures outlined in the EIS; and
- **Offset Strategy** – outlining the basis of an Environmental Offset Management Strategy to offset ecological values impacted by the GLNG Project by offsite measures (such as property acquisition, covenants and reserve dedications).

1.9.1 State Legislation

Respondent Comment

Department of Environment and Resource Management states the project should determine which components of the project are petroleum activities as defined under the EP Act and therefore, exempt development under the Integrated Planning Act 1997 (IPA). The EIS should clarify which offsets are a legislative requirement, specifying the legislation, and which offsets are voluntary.

Santos Response

Any activity within the area of a petroleum authority which is 'incidental' to (i.e. reasonably necessary for) an authorised petroleum activity (excluding the construction or use of a permanent structure for office or residential accommodation) is 'exempt development'. Santos will obtain any approvals required under the *Petroleum and Gas (Production and Safety) Act 2003* and the *Integrated Planning Act* prior to commencement of the relevant activity and will consult with DERM on them as necessary.

Santos is currently developing an Environmental Offsets Management Plan which will outline which offsets are a legislative requirement and which are voluntary. It is being developed by Santos in conjunction with Ecofund Queensland (a Queensland government advisory service) to address the objectives of both the current State & Commonwealth legislative biodiversity offsetting requirements.

Respondent Comment

Department of Environment and Resource Management states the Supplementary EIS should identify those ERAs likely to be undertaken and provide sufficient information to adequately assess the proposed ERAs. Information on associated ERAs should include (reference can be):

- *Site description for each ERA;*
- *The scale or intensity of each ERA, including clear details of yearly throughput;*
- *Identify all environmental values and potential impacts from each ERA, at each location, including but not limited to:*
 - *potential water impacts;*
 - *potential noise impacts;*
 - *potential air impacts;*
 - *potential land impacts; and*
 - *waste management practices.*
- *Best practice management for each ERA to demonstrate that the potential for harm to the receiving environment is prevented or minimised;*

Section 1

EIS Introduction

- *Resilience of the receiving environment and established acceptable discharge limits that will minimise impacts on environmental values;*
- *Establish and detail ambient monitoring programs to monitor mitigation measures, compliance with conditions and for potential impacts identified in the EIS;*
- *Contingency plans and emergency procedures for non-routine or upset situations from each ERA at each location; and*
- *Periodic review of environmental performance and continual improvement.*

Santos Response

The information within the EIS and EIS Supplement, and in particular the EMPs as they are negotiated, will present potential impacts from the GLNG Project and mitigation measures that may be implemented to manage them. This information will be used in the preparation of applications for permits and approvals as part of the statutory approvals process, including for any environmental authorities required for the GLNG Project.

Respondent Comment

Department of Environment and Resource Management states that the environmental authorities are issued under the EP Act, not the Environmental Protection and Biodiversity Conservation Act 1999 (EPBC Act).

Santos Response

It is acknowledged that this submission is correct; the table/chart/fig (1.9.1) should reflect the respondent's assertion. Environmental Authorities for petroleum activities are issued under the *Environment Protection Act 1994*.

Respondent Comment

Department of Environment and Resource Management recommends to include reference to approvals that may also be required under the Forestry Act 1959 for borrow pits and any quarrying activity located on State Land.

Santos Response

The comment is noted and to the extent such approvals are required, then Santos will apply for them.

Santos acknowledges that additional approvals are required to carry out activities under the *Forestry Act 1959* that are not otherwise authorised under petroleum authorities (e.g. within a State forest). Where activities regulated under the *Forestry Act 1959* are to be carried out, Santos will obtain the approvals required to carry out those activities.

Respondent Comment

Department of Environment and Resource Management states all potential approvals required under the various acts have not been identified in Table 1.9.1:

- 1) *Under the Water Act 2000, include details of potential approvals to take or trade associated water for uses not permitted under the Petroleum and Gas (Production and Safety) Act 2004 (P&G Act).*

Section 1

EIS Introduction

- 2) *Under the Forestry Act 1959, include details of potential approvals associated with including use of quarry materials and forest products and activities within State Forests and Timber Reserves.*
- 3) *Under the Land Act 1994 and Land Title Act 1994, an applicant must obtain appropriate tenure, or level of occupation, over all non-freehold land prior to any activity commencing on it. This should include roads or land administered under the Nature Conservation Act 1992 and or the Forestry Act 1959.*
- 4) *Under the Coastal Protection and Management Act 1995, a development permit is required for works within a Coastal Management District removing or interfering with coastal dunes on land, other than State coastal land, that is in the erosion prone area and above high-water mark. Additionally, where quarry material (material below the high water mark) will be removed and an approved Dredge Management Plan is not in place, an application for an Allocation of Quarry Material would be required.*

Santos Response

- 1) The *Water Act 2000*. If use of associated water extended past those rights specifically authorised under Section 186 of the *Petroleum and Gas (Production and Safety) Act 2004* or under Section 86 of the *Petroleum Act 1923*, approvals will be sought under Section 74 of the *Water Act 2000* by Santos, as required.
- 2) The *Forestry Act 1959*. Santos acknowledges that additional approvals are required to carry out activities under the *Forestry Act 1959* that are not otherwise authorised under petroleum authorities (e.g. activities within a State forest). Where activities regulated under the *Forestry Act 1959* are to be carried out, Santos will obtain the approvals required to carry out those activities.
- 3) Santos acknowledges that additional approvals are required to carry out activities under the *Land Act 1994*, *Land Title Act 1994*, *Nature Conservation Act 1992* and *Forestry Act 1959* that are not otherwise authorised under petroleum authorities. Where activities regulated under these pieces of legislation are to be carried out, Santos will obtain the approvals required to carry out those activities.
- 4) Santos acknowledges that additional approvals are required to carry out activities under the *Coastal Protection and Management Act 1995* that are not otherwise authorised under petroleum authorities. Where activities regulated under *Coastal Protection and Management Act 1995* are to be carried out, Santos will obtain the approvals required to carry out those activities.

Respondent Comment

*Queensland Department of Transport and Main Roads requests to review EIS Sections 1.9.1; 4.5.3.7; 10.2 and 14.15.6 to ensure they appropriately reflect the legislative obligations under the *Transport Operations (Marine Safety) Act 1994 (TOMSA)* and the related *Transport Operations (Marine Pollution) Act 1995 (TOMPA)*.*

Santos Response

Santos acknowledges the Department of Transport and Main Roads and Maritime Safety Queensland's integral role in regulating applicable operational activities of the project under the *Transport Operations (Marine Safety) Act 1994* and the *Transport Operations (Marine Pollution) Act 1995*. Santos will work with both the Department of Transport and Main Roads and Maritime Safety Queensland in ascertaining and applying for approvals required for the project under this legislation.

Respondent Comment

Gladstone Regional Council states that the EIS process of having individual proponents come up with responses for their individual projects is flawed in that they will inevitably fail to properly account for

Section 1

EIS Introduction

cumulative impacts. This EIS in particular appears to be centred on strategies to reduce the accountability of the proponents without recognition of the reality of what will occur.

Santos Response

The EIS addressed the cumulative impacts that could be expected from the construction and operation of the GLNG Project. Since that time a number of the projects included in the cumulative impact assessment have advanced with further information becoming available and also a number of new projects have been announced. As a consequence of this a further cumulative impact assessment has been undertaken and is provided in **Attachment J**.

The objective of the cumulative impact assessment is to assess the potential for impacts from the GLNG Project to have compounding or synergistic interactions with similar impacts from other projects proposed or under development within the sphere of influence of the GLNG Project.

1.9.3 Regional Planning Frameworks

Respondent Comment

Queensland Department of Infrastructure and Planning suggested that further assessment of the EIS against the final regional plan is warranted, given that there have been changes to the draft based on extensive community consultation on the plan and as a result of the resources summits held in late 2008. It is recommended that further information be provided on how the project can address issues raised in the Maranoa-Balonne Regional Plan.

Department of Environment and Resource Management also states that reference to and consideration of the draft Maranoa-Balonne Regional Plan should be included in the Supplementary EIS.

Santos Response

The *Maranoa-Balonne Regional Plan 2009* (the Plan) was released on 22 September 2009 under the provisions of the *Integrated Planning Act 1997* (IPA).

The Plan recognises the region's significant reserves of coal seam gas, conventional gas and petroleum and attributes a moderate growth within the region from these important resources. It also recognises that managing the growth associated with the development of these energy resources provides opportunities and challenges for the people who live and work in the region. Although the traditional strengths of the regional economy were based on primary production the Plan highlights the "pivotal role" that the energy (gas) reserves play in assisting Queensland to achieve its clean electricity generation targets. In addition to assisting the state to achieve these targets, Santos' presence within the region has provided much needed community infrastructure, support programs and an overall economic and social benefit to the major regional activity centre of Roma and smaller regional centres such as Injune. This project aims to increase that presence and provide long term benefits for residents, business and industry within the region.

Maranoa-Balonne Regional Plan Policies and Strategies:

- Policy 2 Natural Resource Management, identifies the potential for coal seam gas water (associated water) to supplement existing water supplies dependant on the quality and treatment processes.

Santos has undertaken a water demand study and regional bore inventory to ensure these potential supplies are able to be utilised by the grazing industry throughout the region and to monitor the existing subsurface water quality and supply. The study provides valuable insight into the development potential arising from this water supply and has undertaken a community wide consultation program in order to measure potential demand.

Section 1

EIS Introduction

- Policy 4 Urban Development, also promotes the energy resources such as coal seam gas as enhancing and promoting lifestyle and quality of life (Policy 4.3) where it states: "Furthermore, the development of energy resources within the Surat Basin has the potential to significantly enhance the range of regional employment opportunities and change the region's fundamentally rural character".
- Policy 5 Economic Development, identifies the significant undeveloped energy resources contained within the Surat Energy Resources Province which takes in the Maranoa-Balonne region as having the potential to support large scale energy and industry development of which the coal seam gas reserves being of most significance to the region.
- Policy 6 Infrastructure, identifies the need to ensure that infrastructure development (such as gas field development and associated pipelines) does not detrimentally impact the natural environment or existing uses, including agriculture unless overriding community need is identified. regardless of overriding community need (which has been expressed in the plan for coal seam gas development), Santos is developing the resources and associated infrastructure in cooperation with the farming, grazing and other agricultural industries within the region, improving on practices previously undertaken such as reducing footprints for well development, engaging with indigenous owners and cultural experts to recognise significant sites, and incorporating expert studies (within and external to the EIS) to protect existing land use and the natural environment.

1.9.6 Local Authority Planning Schemes

Respondent Comment

Department of Environment and Resource Management states that the Roma Regional Council has been renamed "The Maranoa Regional Council"; and the Dalby Regional Council has been renamed as "The Western Downs Regional Council" and Planning Schemes for the former Taroom, Tara and Murilla Shires should be referenced.

Santos Response

As the EIS was prepared during the transitional arrangements period of the amalgamation of local governments, references to local governments in the EIS were made in their pre-amalgamation form (e.g. reference is made to the former Taroom, Tara and Murilla local government areas under EIS Section 6.11.3.3). References to local governments in the Supplement EIS, however, are now made in their post-amalgamation form (e.g. Roma Regional Council is now referred to as the combined local government area of Maranoa Regional Council).

1.10 Report Structure

No submissions were received for this section.