

Tuesday, 5 November 2019

Coal and Central Queensland Compliance
Department of Environment and Science
PO Box 3028,
Emerald QLD 4720

Attention: Dr Alison Sinclair – Team Leader (Assessment)

Dear Ally

Re: Creekpit pipeline RFI

Please find Peabody's response to the RFI issued for the Creekpit Pipeline EA application (ML700052) on 30th September 2019 (your ref: APP0040932)

1. Water

More information is required to understand if the project will result in significant impacts from the directional boring under watercourse(s), specifically:

- a) detail how risks associated with cave-ins, bed collapse or frac-outs during boring will be minimised;
- b) detail the depth of the pipeline under the watercourse to ensure it would not be exposed if the watercourse channel experiences bed or bank degradation;
- c) confirm whether bore entry and exit points are located outside designated riparian corridors and existing vegetation;
- d) whilst volumes are anticipated to be small please address the recovery and removal of construction plant and materials, including drilling mud;
- e) provide detailed design drawings which include a surveyed plan, cross sections across the watercourse(s) and a long section of the watercourse showing proposed works relative to existing (and proposed, if relevant) bed and bank profiles and water levels. The cross section is to extend to the landward limit of the identified riparian corridor. All plans must include a scale bar.

Response

There are several unnamed waterways and tributaries located within the Project area and its vicinity. While directional boring under watercourses was considered, the extent of clearing required in the adjacent riparian zone to facilitate the activity was determined to have a greater impact than trenching. Excavation across waterways will occur at right angles and will be back filled as quickly as possible. Impacts on these water courses are expected to be limited and of a short duration during the installation of the pipeline. Area specific erosion and sediment control plans will be developed by suitably qualified persons in advance of creek crossings and controls will be installed accordingly. Activities will be in accordance with the Section 4 Minimum requirements set out in the Department of Natural Resources, Mines and Energy document WSS/2013/726 (attached). The applicant will also obtain any other approvals required to carry out works in waterways.

2. Land

- a) Further information is required to understand how the project will be undertaken in terms of scheduling of vegetation clearing, trench construction and back filling operations.

Response

The vegetation clearing activities will happen independently of the pipeline trenching and installation works. The trench construction will be limited to what can be reasonably backfilled in that working day. Any trenching or other excavation remaining at the end of the work day shall be secured from unauthorised access and to prevent the risk of fauna becoming entrapped. Prior to backfilling, the trench will be inspected by the spotter catcher to identify any trapped fauna.

3. Biodiversity

More information is required to understand if the project will result in significant residual impacts to Matters of State Environmental Significance, and whether impacts to these matters will require offsets under the *Environmental Offsets Act 2014*.

a) The Significant residual impact test—criteria Table 1 in the Queensland Environmental Offsets Policy Significant Residual Impact Guideline states that for clearing for linear infrastructure the criteria for clearing is greater than 10m wide in dense to mid-dense structural category regional ecosystems (RE), that is endangered or of concern. The ecological assessment details three endangered REs which are mid-dense in structure, namely 11.3.1, 11.9.1 and 11.9.5. The area of these REs likely to be impacted is 2.6ha within ML70290 and 0.01ha in MDL495. Please provide further information which details how the significant residual impact test criteria are not triggered by the predicted impacts to REs 11.3.1, 11.9.1 and 11.9.5.

Response

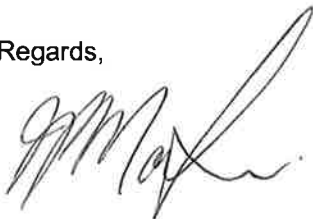
Clearing on the Coppabella and Moorvale MLs will be undertaken under the existing approvals per their respective Plan of Operations. As discussed in Section 7.2.1 of the Coppabella Pipeline Project Ecological Assessment Report, approximately 0.01 ha of endangered RE 11.3.1 was identified to occur within the proposed pipeline corridor footprint. Figure 9 of the report confirms the vegetation community is located within a small portion of the corridor footprint at approximately chainage 4900.

A review of aerial imagery, field data sheets, photographs and discussions with the ecologist that undertook the field surveys, indicate the extent of the vegetation extends to approximately 18-20 m width of the 30 m wide proposed corridor. Discussions held with the Project engineers (Engeny) during a workshop undertaken to review and revise the proposed alignment, indicated it is possible to reduce the disturbance area for the site at this particular area of the corridor to a maximum width of 10 metres, therefore avoiding the RE in its entirety. In addition, Peabody have committed to, as part of its mitigation measures, to engage a suitably qualified and experienced ecologist to demarcate the area of RE 11.3.1 as a no go zone, prior to the commencement of clearing activities, in order to avoid the RE.

As such, no result in significant residual impacts to MSES are anticipated to occur within MDL 495 due to clearing activities for the Project, and therefore an offset would not be required under the Environmental Offsets Act 2014.

Should you have any questions about the above, please feel free to contact me via email jmartin2@peabodyenergy.com or mobile phone (0477337187).

Regards,



Jason Martin
Manager Approvals and Compliance

3.2 Volumetric limits for landowners

To ensure excavation and placement of fill carried out by landowners using the exemption requirements is low risk, volumetric limits apply. Table 2 below states the volumetric limits.

Table 2—Volumetric limits for landowners

Volume	Do the exemption requirements apply?	
Excavation		
Is the volume you plan to excavate 500 cubic metres or less?	Yes—use the exemption requirements.	No—a riverine protection permit is required.
Placement of fill		
Is the volume of fill you plan to place 150 cubic metres or less?	Yes—use the exemption requirements.	No—a riverine protection permit is required.

If you answered no to any of the questions in Table 2, the riverine protection permit exemption requirements do not apply. Any enquiries can be directed to the local departmental office.

4 Minimum Requirements

The minimum requirements outlined below must be achieved to be eligible for an exemption from having to apply for and obtain a riverine protection permit.

- The extent of the area required to carry out the permitted activity must be limited to the minimum area necessary to reasonably carry out the works.
- Sediment and erosion controls must be used.
- All areas of disturbed bed and banks must be stabilised to protect against erosion.
- All fill placed must be free from contamination (e.g. weeds seeds, oils, chemicals and other contaminants).
- Disturbed banks must be returned to a profile similar to the pre-disturbance condition.
- Natural stream bed controls or features that create natural waterholes (e.g. riffles, logs, sediment or rock bars) must not be lowered or removed.
- Any excavated material that is not removed as waste must be spread evenly within the bed and banks of the watercourse so that it does not interfere with the flow of water.
- All fill placed in the bed of the stream must not redirect flow into an adjacent bank.
- Access tracks or crossings must not interfere with the low flow of water.

- The invert of culverts or the deck height of a splash through crossing must be placed at or below bed level.
- All culverts placed within the watercourse must be aligned with the stream channel and placed as close to the centre of the watercourse channel as practical.
- All culverts placed within the watercourse must be of a sufficient size to ensure uninterrupted low flows and minimise the occurrence of blockage of culverts caused by flood-borne debris.
- Constructed access tracks (e.g. culverts or splash through crossings) must be provided with a scour apron and cut off wall on the downstream side sufficient to prevent bed erosion.
- All disturbed areas must be revegetated with trees, shrub and grasses endemic to the area, sufficient to re-establish a riparian environment and protect bed and banks from erosion.

If you are unable to meet the requirements in section 3 and 4 contact your local departmental office to discuss the need for a riverine protection permit before destroying vegetation, excavating or placing fill in a watercourse, lake or spring.