

Attachment

Environmental Authority (EA) P-EA-100464322

Proposed changes

1. PL194 EA

Section	Changes Proposed	Reasoning
Schedule A – General Condition General 11 (a) & 11(c)	<p>Existing:</p> <ul style="list-style-type: none"> (a) for waters and aquatic environments, the Queensland Government’s Monitoring and Sampling Manual 2009 – <i>Environmental Protection (Water) Policy 2009</i> (c) for noise, the <i>Environmental Protection Regulation 2008</i> <p>Proposed:</p> <ul style="list-style-type: none"> (a) for <u>waters</u> and aquatic environments, the Queensland Government’s Monitoring and Sampling Manual Version 2, June 2018 – <i>Environmental Protection (Water) Policy 2009</i> (c) for noise, the <i>Environmental Protection Regulation 2019</i> 	This administrative amendment updates the reference to a later version of the monitoring and sampling manual and updates the reference to the current edition of the Environment Protection Regulation.
Schedule A – General Condition General 18	<p>Existing:</p> <p>General 18 The following infrastructure must be signed with a unique reference name or number in such a way that it is clearly observable:</p> <ul style="list-style-type: none"> (a) <u>regulated dams</u> and <u>low consequence dams</u> (b) exploration, appraisal, and <u>development wells</u> (c) water treatment facilities (d) brine encapsulation facilities (e) landfill cells (f) sewage treatment facilities 	This amendment removes conditions no longer required under this EA, as the infrastructure types are no longer authorised.

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	<p>(g) specifically authorised discharge points to air and <u>waters</u></p> <p>(h) any chemical storage facility associated with the environmentally relevant activity of chemical storage</p> <p>(i) field compressor stations</p> <p>(j) central compressor stations</p> <p>(k) gas processing facilities; and</p> <p>(l) pipeline compressor stations.</p> <p>Proposed: Remove -</p> <ul style="list-style-type: none"> • Condition General 18 (d) brine encapsulation facilities • Condition General 18 (e) landfill cells • Condition General 18 (g) specifically authorised discharge points to air and <u>waters</u> 	
Schedule B – Water Condition Water 1	<p>Existing:</p> <p>Contaminants that will or may cause <u>environmental harm</u> must not be directly or indirectly released to any <u>waters</u>, except as authorised by condition (B15).</p> <p>Proposed:</p> <p>Contaminants that will or may cause <u>environmental harm</u> must not be directly or indirectly released to any <u>waters</u>, except as authorised by this environmental authority.</p>	<p>This amendment removes the reference to a condition no longer required in the EA.</p> <p>This does not change the intention of the condition.</p>
Schedule B – Water Condition Water 9 (a)	<p>Existing:</p> <p>A register must be kept of all <u>linear infrastructure</u> construction and maintenance activities in a <u>wetland of other environmental value</u> and <u>watercourses</u>, which must include:</p> <p>(a) location of the activity (e.g. GPS coordinates (<u>GDA94</u>) and <u>watercourse</u> name)</p> <p>Proposed:</p> <p>(a) location of the activity (e.g., GPS coordinates (<u>GDA94</u>, GDA2020 and <u>watercourse</u> name)</p>	<p>This administrative amendment updates the mapping to be used in the register of linear infrastructure and does not change the intent of the condition.</p>

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Schedule B – Water Condition Water 12	<p>Existing: A seepage monitoring program must be developed by a <u>suitably qualified person</u> which is commensurate with the site-specific risks of contaminant seepage from containment facilities, and which requires and plans for detection of any seepage of contaminants to groundwater as a result of storing contaminants by 1 August 2019.</p> <p>Proposed: Water 12 A seepage monitoring program must be developed by a <u>suitably qualified person</u> which is commensurate with the site-specific risks of contaminant seepage from containment facilities, and which requires and plans for detection of any seepage of contaminants to groundwater as a result of storing contaminants in regulated structures.</p>	This administrative amendment removes reference to a passed date which is no longer relevant.
Schedule B – Water Condition B15 to B31	Remove (Conditions B15 to B31).	<p>These conditions relate to the discharge of treated CSG water and monitoring requirements.</p> <p>This activity is no longer required to be authorised under this EA.</p>
Schedule B, Table 2 – Treated CSG Water Release Point, Source and Receiving Waters	Remove (table).	<p>This table relate to the discharge of treated CSG water and monitoring requirements.</p> <p>This activity is no longer required to be authorised under this EA.</p>
Schedule B, Table 3 – Treated CSG Water Release Limits for Monitoring Point (M1) – Daily Monitoring	Remove (table).	<p>This table relate to the discharge of treated CSG water and monitoring requirements.</p> <p>This activity is no longer required to be authorised under this EA.</p>
Schedule B, Table 4 – Treated CSG Water Release Limits for Monitoring Point (M1) – Quarterly Monitoring	Remove (table).	This table relate to the discharge of treated CSG water and monitoring requirements.

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		This activity is no longer required to be authorised under this EA.
Schedule B, Table 5 – Contaminant Release During Flow Events	Remove (table).	<p>This table relate to the discharge of treated CSG water and monitoring requirements.</p> <p>This activity is no longer required to be authorised under this EA.</p>
Schedule B, Table 6 – Receiving Water Upstream Background Sites and Downstream Monitoring Points	Remove (table).	<p>This table relate to the discharge of treated CSG water and monitoring requirements.</p> <p>This activity is no longer required to be authorised under this EA.</p>
Schedule BE – Coals Seam Gas Water Injection Trial Conditions BE 1 to BE 22	Remove (Conditions BE1 to BE22).	<p>These conditions relate to the injection of treated CSG water and monitoring requirements.</p> <p>This activity is no longer required to be authorised under this EA.</p>
Schedule BE, Table 1 – Details of Authorised Fluid Injection	Remove (table).	<p>This table relate to the injection of treated CSG water and monitoring requirements.</p> <p>This activity is no longer required to be authorised under this EA.</p>
Schedule BE, Table 2 – Specific Contaminant Limits for Injection Fluid	Remove (table).	<p>This table relate to the injection of treated CSG water and monitoring requirements.</p> <p>This activity is no longer required to be authorised under this EA.</p>

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Schedule BE, Table 3 – Monitoring Parameters and Frequencies for Injection Fluid	Remove (table).	<p>This table relate to the injection of treated CSG water and monitoring requirements.</p> <p>This activity is no longer required to be authorised under this EA.</p>														
<p>Schedule D – Land Condition Biodiversity 8B</p> <p><i>Schedule D, Table 2 – Maximum significant disturbance in environmentally sensitive areas and their protection zones.</i></p>	<p>Existing: The petroleum activities authorised under condition (Biodiversity 8A) must not exceed the maximum footprint for the activities specified in <i>Schedule D, Table 2 – Maximum significant disturbance in environmentally sensitive areas and their protection zones.</i></p> <table border="1" data-bbox="539 555 1756 711"> <thead> <tr> <th>Activity</th> <th>Maximum Footprint</th> </tr> </thead> <tbody> <tr> <td>Ground disturbance within a <u>Category B Environmentally Sensitive Area</u></td> <td>0 ha</td> </tr> <tr> <td>Ground disturbance within a <u>protection zone</u> of a <u>Category B Environmentally Sensitive Area</u></td> <td>0 ha</td> </tr> <tr> <td>Ground disturbance within a <u>Category C Environmentally Sensitive Area</u></td> <td>0 ha</td> </tr> <tr> <td>Ground disturbance within a <u>protection zone</u> of a <u>Category C Environmentally Sensitive Area</u></td> <td>0 ha</td> </tr> </tbody> </table> <p>Change to:</p> <table border="1" data-bbox="539 815 1756 879"> <thead> <tr> <th>Activity</th> <th>Maximum Footprint</th> </tr> </thead> <tbody> <tr> <td>Ground disturbance within a <u>Category C Environmentally Sensitive Area</u></td> <td>75 ha</td> </tr> </tbody> </table>	Activity	Maximum Footprint	Ground disturbance within a <u>Category B Environmentally Sensitive Area</u>	0 ha	Ground disturbance within a <u>protection zone</u> of a <u>Category B Environmentally Sensitive Area</u>	0 ha	Ground disturbance within a <u>Category C Environmentally Sensitive Area</u>	0 ha	Ground disturbance within a <u>protection zone</u> of a <u>Category C Environmentally Sensitive Area</u>	0 ha	Activity	Maximum Footprint	Ground disturbance within a <u>Category C Environmentally Sensitive Area</u>	75 ha	<p>All disturbance areas in this table current record zero disturbance values. This contradicts with Schedule D, Table 1, which clearly provides for varying levels of activities in these environmentally sensitive areas and their protection zones.</p> <p>Schedule D, Table 1 directly reflects the Streamline Model Conditions for Petroleum Activities (SMC). The SMC have been agreed between industry and regulatory authorities as providing adequate protection for ESAs.</p> <p>Arrow are proposing to amend the table to include authorisations in Category C ESA. Arrow has presented a rolled-up impact in Category C ESA with the break down of that make up in Attachment A. This proposed condition can then be read in conjunction with the proposed inclusion of Biodiversity 8C to provide the despite clause which authorises impacts in the ESA where they are in conflict with authorised activities in Schedule D, Table 1.</p>
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Biodiversity 8C	<p>Insert new proposed condition</p> <p><u>Despite condition (Biodiversity 8A) and (Biodiversity 8B), essential petroleum activities are permitted in Category B and Category C ESAs where there is significant residual impact authorised in Schedule D, Table 2 – Significant residual impacts to prescribed environmental matters and where shapefiles (consistent with the DES Spatial Schema) of the impact can be provided to the administering authority upon request.</u></p>	<p>Proposed change is to provide a linkage to the authorised limit/ pool to be drawn down on through Table 2, and a despite clause to Schedule D, Table 1 – Authorised petroleum activities in environmentally sensitive areas and their protection zones (Table 1), to allow essential petroleum activities to occur in relevant ESA without the need to go through numerous EA amendments to authorise. These authorisations would also be linked to PEMs, offsets, and SRI assessments. The inclusion and linkage to the DES Spatial Schema is to include a loop back for DES compliance to check against the limits. i.e., by Arrow Energy providing spatial data consistent with Annual returns, ERC, and Plan of Operations. DES can then do periodic checks as to where disturbance has occurred in ESAs and have the limitations been set in Table 2 of the EA and PEMs complied</p>

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		with. It then removes the need to provide GPS coordinates (which historically often only corner points), and an assessment where there are despite/exemptions provided for certain infrastructure as the EA provides for limitations in the ESA and PEMs table.
Protecting biodiversity values, Table 3 – Significant residual impacts to prescribed environmental matters	<p>Changes: As per the following sections table <i>Protecting biodiversity values, Table 3 – Significant residual impacts to prescribed environmental matters</i></p> <p>REGULATED VEGETATION</p> <p>Remove:</p> <ul style="list-style-type: none"> • Endangered regional ecosystems RE 11.4.2 • Of Concern regional ecosystem (not within and urban area) RE 11.3.2, RE 11.3.4 • Regional ecosystems (not within and urban area) that intersect a wetland on the on the vegetation management wetlands map RE 11.3.4, RE 11.3.2, RE11.3.25, RE11.4.12, RE 11.7.4. <p>Add:</p> <ul style="list-style-type: none"> • Regional ecosystems (not within and urban area) that intersect a wetland on the on the vegetation management wetlands map RE 11.3.14 (0.6ha). 	<p>These values represent updated predicted impacts based on the current infrastructure alignment, habitat mapping rules and ground-truthed survey information.</p> <p>Ecological assessment have included inspecting relevant data sources to identify threatened species (flora and fauna specially protected under the EPBC Act and NC Act 1992, which are known within and surrounding the SGP. ‘Rules’ were created to map</p>

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	<p>Change:</p> <ul style="list-style-type: none"> Regional ecosystems (not within and urban area) that intersect a wetland on the on the vegetation management wetlands map RE 11.3.18 (reduce from 0.43ha to 0.3ha), RE 11.5.1 (reduce from 0.72ha to 0.5ha), RE 11.7.7 (increase from 0.14ha to 0.6ha). <p>CONNECTIVITY AREAS</p> <p>Remove:</p> <ul style="list-style-type: none"> Connectivity area that is a regional ecosystem (not in urban area) 6.7ha. <p>PROTECTED WILDLIFE HABITAT</p> <p>Remove:</p> <ul style="list-style-type: none"> Habitat for an animal that is vulnerable wildlife: <ul style="list-style-type: none"> <i>Jalmenus eubulus</i> <p>Add:</p> <ul style="list-style-type: none"> Habitat for an animal that is vulnerable or endangered wildlife: <ul style="list-style-type: none"> <i>Petaurus australis</i> (71.3ha) <i>Nyctophilus corbeni</i> (71.9ha) <i>Stagonopleura guttata</i> (72.2ha) <i>Glyphodon (Furina) dunmalli</i> (71.4ha) <i>Adclardia cameroni</i> (0.4ha) <i>Phascolarctos cinereus</i> (145.7ha) <i>Petauroides volans</i> (71.8ha) <p>Change:</p> <ul style="list-style-type: none"> <i>Acanthophis antarcticus</i> (increase from 53ha to 72.2 ha) <i>Calyptorhynchus lathamii</i> (increase from 16ha to 29.2ha) <i>Hemiaspis damelii</i> (reduce from 36ha to 1.3ha) <p>FISH HABITAT AREAS</p> <p>Change:</p> <ul style="list-style-type: none"> Fish passage (not in an urban area) – remove. <p>Change: Total numbers of Maximum extent of impact to the ones in table below <i>Protecting biodiversity values, Table 3 – Significant residual impacts to prescribed environmental matters</i> below:</p>	<p>habitat for these Matters of National and State Environmental Significance (MNES and MSES) based on GIS data, allowing the prediction of high value habitat. These surveys and mapping rules were also used to assess the impacts and environmental values associated with PL194.</p> <p>Habitats were classed as ‘core’ habitat or ‘general’ habitat. Core habitat areas reflect those REs which are likely to be regularly inhabited by, or of ‘high importance’ to, the species. Such areas include high amenity habitat which could include important resources such as roosting and nesting sites or food resources. General habitats are ‘those REs that may be used less regularly by fauna’ (3DE and ESE 2011) and have lower amenity habitat. These definitions roughly match the definitions of ‘Core Habitat Possible’ and ‘General Habitat Possible’ in DES (2020), which was not available in 2011. The mapping has been used to calculate predicted impacts (and subsequently offset requirements) based on the extent of Core Habitat Known and Core Habitat Possible.</p> <p>Considerable field work has been completed within and surrounding the SGP area (which included the PL194 area) since this work was</p>

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	<p>Add: Schedule D to the table title (see below).</p> <p>Schedule D, Protecting biodiversity values, Table 3 – Significant residual impacts to prescribed environmental matters</p> <table border="1" data-bbox="546 352 1727 1361"> <thead> <tr> <th data-bbox="546 352 1162 453">Prescribed environmental matter</th> <th data-bbox="1162 352 1503 453">Location of impact</th> <th data-bbox="1503 352 1727 453">Maximum extent of impact</th> </tr> </thead> <tbody> <tr> <td colspan="3" data-bbox="546 453 1727 501" style="text-align: center;">REGULATED VEGETATION</td> </tr> <tr> <td colspan="3" data-bbox="546 501 1727 549"><u>Endangered regional ecosystem</u></td> </tr> <tr> <td data-bbox="546 549 1162 596" style="text-align: center;">RE 11.4.2</td> <td data-bbox="1162 549 1503 596" style="text-align: center;">PL194</td> <td data-bbox="1503 549 1727 596" style="text-align: center;">2 ha</td> </tr> <tr> <td colspan="3" data-bbox="546 596 1727 644"><u>Of concern regional ecosystem (not within an urban area)</u></td> </tr> <tr> <td data-bbox="546 644 1162 692" style="text-align: center;">RE 11.3.2</td> <td data-bbox="1162 644 1503 692" style="text-align: center;">PL194</td> <td data-bbox="1503 644 1727 692" style="text-align: center;">4 ha</td> </tr> <tr> <td data-bbox="546 692 1162 740" style="text-align: center;">RE 11.3.4</td> <td data-bbox="1162 692 1503 740" style="text-align: center;">PL194</td> <td data-bbox="1503 692 1727 740" style="text-align: center;">3 ha</td> </tr> <tr> <td colspan="3" data-bbox="546 740 1727 820"><u>Regional ecosystems (not within an urban area) within the defined distance from the defining banks of a relevant watercourse on the vegetation management watercourse map</u></td> </tr> <tr> <td data-bbox="546 820 1162 868" style="text-align: center;">RE 11.3.2 (BVG 17a)</td> <td data-bbox="1162 820 1503 868" style="text-align: center;">PL194</td> <td data-bbox="1503 820 1727 868" style="text-align: center;">0.14 ha</td> </tr> <tr> <td data-bbox="546 868 1162 916" style="text-align: center;">11.3.4 (BVG 16c)</td> <td data-bbox="1162 868 1503 916" style="text-align: center;">PL194</td> <td data-bbox="1503 868 1727 916" style="text-align: center;">0.72 ha</td> </tr> <tr> <td data-bbox="546 916 1162 963" style="text-align: center;">11.3.18 (BVG 17a)</td> <td data-bbox="1162 916 1503 963" style="text-align: center;">PL194</td> <td data-bbox="1503 916 1727 963" style="text-align: center;">0.43 ha 0.3ha</td> </tr> <tr> <td data-bbox="546 963 1162 1011" style="text-align: center;">11.3.25 (BVG 16a; 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22e)	PL194	2.14 ha	11.4.12 (BVG 17a)	PL194	0.14 ha	11.5.1 (BVG 17a; 18b)	PL194	0.72 ha 0.5 ha	11.7.4 (BVG 12a)	PL194	0.07 ha	11.7.7 (BVG 12a)	PL194	0.14 ha 0.6	11.3.14 (BVG 18a)	PL194	0.6	CONNECTIVITY AREAS			<u>Connectivity area that is a regional ecosystem (not in urban area)</u>			PL194	PL194	6.7 ha	Essential habitat (not in an urban area) for endangered wildlife			<i>Phascolarctos cinereus (Koala)</i>	PL194	8.7	<p>completed our local knowledge has increased substantially. In a few cases, this has identified ways in which the mapping rules could be modified and improved for greater accuracy. Furthermore, additional MNES and MSES species have been listed under legislation since the original work was completed.</p> <p>These new additional species had not been previously assessed (given their latest change in status) but have been included in this assessment as an abundance of caution based on likelihood of occurrence assessment and suitability of habitat within the survey corridor for the PL194 area utilising the aforementioned ecology surveys, survey data and mapping rules.</p> <p>The changes in this table also represent reduced disturbance through refinements to infrastructure layout.</p>
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Schedule D – Land Condition D17 to D22	<p>Remove (Conditions D17 to D22).</p> <p>These conditions relate to:</p> <ul style="list-style-type: none"> • Daandine Brine Dam 2 • release of treated CSG water to Wilke Creek • disturbance areas for water release outlets, Tipton Treated Water Pipeline • Longswamp 31 monitoring bore 	These activities are no longer required to be authorised under this EA. Therefore, the conditions are no longer required.																																																									

Section	Changes Proposed	Reasoning
Schedule D, table 4 – Coordinates Enclosing the Disturbance Area for Daandine Brine Dam 2	Remove (table).	This activity is no longer required to be authorised in this EA.
Schedule D, Table 5 – Coordinates Enclosing the Disturbance Area for the Water Release Outlet and Pipeline	Remove (table).	This activity is no longer required to be authorised in this EA.
Schedule D, Table 6 – Coordinates Enclosing the Disturbance Area for Tipton Treated Water Pipeline	Remove (table).	This activity is no longer required to be authorised in this EA.
Schedule D, Table 7 – Authorised footprint for disturbance to environmentally sensitive areas	Remove (table).	This activity is no longer required to be authorised in this EA.
Schedule E – Acoustic Condition E10 and E11	Remove (Conditions E10 and E11).	These conditions relate to the Tipton expansion project which is no longer required to be authorised under this EA.
Schedule E, Table 3 – Tipton Expansion Project units	Remove (table).	This table relates to the Tipton expansion project which is no longer required to be authorised under this EA.
Schedule F, Table 1 – Authorised Point Sources	Remove (table).	This table relate to activities no longer required to be authorised under this EA.
Schedule F, Table 2 – Annual Air Quality Monitoring	Remove (table).	This table relate to activities no longer required to be authorised under this EA.

Tables for PL194 EA.

Attachment A:

Schedule D, Table 2 – Authorised footprint for disturbance to environmentally sensitive areas and PPZ

Regional Ecosystem (ground-verified)	Area (ha)	VMA	BD (ESA)	Cat B ESA (ERE)	Cat C ESA (OCRE)	Cat C ESA (Essential Habitat)	Cat C ESA (State Forest)
11.3.14	0.554	LC	NCAP			0.167	0.428
11.3.18	0.408	LC	NCAP			0.216	0.216
11.3.25	0.303	LC	OC		0.303		
11.5.1	50.701	LC	NCAP			6.352	31.256
11.7.4	5.958	LC	NCAP			0.625	2.724
11.7.7	13.453	LC	NCAP			1.398	13.123
Regrowth (11.5.1)	49.608	LC	NCAP			7.213	6.058
Regrowth (11.7.4)	23.172	LC	NCAP			1.341	
Total	199.559	Totals		0.000	0.303	17.313	56.964