



SESA Pipeline

Supplement to the Statement of
Environmental Objectives and
Environmental Impact Report
for South Australia



SESA Pipeline

Supplement to the Statement of Environmental Objectives and Environmental Impact Report for South Australia

Prepared for:

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February 2005

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Cover photo:

Landscape near Penola, typical of the SESA Pipeline route, showing scattered River Red Gums over exotic pasture. The pipeline has been aligned to avoid clearing mature River Red Gums.

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Appendix A: Submissions to PIRSA

1 Introduction

Origin Energy (Origin) proposes to construct an underground gas transmission pipeline, the SESA Pipeline, from the SEA Gas pipeline in western Victoria to the Katnook gas plant and the Ladbroke Grove Power Station in South Australia's south east.

The proposed pipeline requires a variety of regulatory approvals under South Australian and Victorian legislation. A joint Environment Effects Report / Environmental Impact Report (EER/EIR) and Statement of Environmental Objectives (SEO) were prepared in support of applications for a Victorian Pipeline Permit and a South Australian Pipeline Licence under the Victorian *Pipelines Act 1967* and the South Australian *Petroleum Act 2000*.

The EER/EIR and SEO were available for public comment in South Australia from Monday 20 December 2004 until Thursday 3 February 2005.

This document is the *Supplement to the Statement of Environmental Objectives and Environmental Impact Report for South Australia* and has been prepared by Origin in response to submissions received from South Australian stakeholders. This supplement serves two main purposes:

- to provide responses to individual submissions
- to assist the Minister in considerations regarding the grant of the Pipeline Licence.

A total of 10 submissions were received by PIRSA Petroleum Group. Submissions were forwarded to Origin for response. Each submission was reviewed and issues relating to the EER/EIR, SEO and potential environmental impacts which required a response identified. These responses are listed in Section 2. Copies of the original submissions are included in Appendix A.

A number of minor changes will be made to the *Statement of Environmental Objectives* as a result of suggestions made in the submissions. These changes are contained in the table of responses in Section 2 and summarised in Section 2.1.

Section 3 of this document contains additional information relevant to the EER/EIR provided in response to the submission from PIRSA Petroleum Group.

2 Response to Submissions

Submissions were received from the following:

- Department for Aboriginal Affairs and Reconciliation
- Department for Environment and Heritage
- Department of Health
- Environment Protection Authority
- Limestone Coast Regional Development Board
- Lower South East Soil Conservation Board
- PIRSA Petroleum Group
- Planning SA
- Setonix Pty Ltd
- Transport SA.

Responses to the comments or issues raised in these submissions are outlined in the following table. Where submissions raised no issues of concern, this too is indicated.

Table 1: Responses to Submissions

No.	Agency or Individual	Issues Raised or Comments Made	Response
1.	Department for Aboriginal Affairs and Reconciliation	... it is possible that there are sites of significance to Aboriginal heritage, which have not yet been discovered in the area of interest. Under Section 20 of the <i>Aboriginal Heritage Act 1988</i> (the Act), an owner or occupier of private land, or an employee or agent of such an owner or agent, must report the discovery on the land of any Aboriginal sites, objects and remains to the Minister for Aboriginal Affairs, as soon as practicable, giving the particulars of the nature and location of the Aboriginal sites, objects or remains. Penalties apply for failure to comply with the Act.	Noted. An Aboriginal heritage survey of the proposed alignment has been carried out by archaeologist Vivienne Wood with representatives from the Tattyara Aboriginal Heritage Consultancy and the Kungari Aboriginal Cultural Heritage Association. No Aboriginal sites, objects or remains were noted and the proposed pipeline alignment was considered to be of generally low archaeological sensitivity. Consequently, the likelihood of Aboriginal sites, objects or remains being discovered during construction is very low. Although this likelihood is very low, construction crews will be trained in the recognition and protection of Aboriginal heritage sites and the Construction Environmental Management Plan and Cultural Heritage Management Plan include procedures for protection and reporting of Aboriginal sites, objects or remains discovered during construction. The relevant SEO Assessment Criteria (6.1 and 16.1) also require that new sites are "reported to the appropriate authority" The SEO has been amended to explicitly mention the <i>Aboriginal Heritage Act 1988</i> (refer to response 12 below).
2.	Department for Environment and Heritage	No concerns raised.	
3.	Department of Health	No concerns raised.	
4.	Environment Protection Authority	No comments provided.	
5.	Limestone Coast Regional Development Board	No concerns raised.	
6.	Lower South East Soil Conservation Board	Whilst we feel the objects and assessment criteria have been addressed well in the reports, our main concern is that ground staff and contractors carrying out the works are fully aware of the objectives. If all work is undertaken as detailed, particularly through sandy soil types and water courses, then our Board feels there should be minimal environmental impact.	Construction crew will undergo induction and training to ensure they are aware of the objectives and the required environmental management. These requirements are set out in the Construction Environmental Management Plan. Origin will maintain a high level of on-site supervision to ensure ground staff and contractors meet the requirements.
7.	PIRSA Petroleum Group	Further details regarding horizontal directional drilling and boring (P20) would assist stakeholder understanding. i.e. what does it involve. If possible include a layout drawing showing scale of the activity.	Provided in Section 3 of this document.

No.	Agency or Individual	Issues Raised or Comments Made	Response
8.		Typical photos for each aspect of construction, eg. clear and grade, trenching, would also assist stakeholder understanding.	Provided in Section 3 of this document. Note: Prior to publication of the SEO, each potentially affected landholder over the entire pipeline route was provided with a booklet detailing the development process and construction of the proposed pipeline which contained such photographs.
9.		Comments on SEO - to be included in a revised SEO document	The following changes have been included in the revised SEO.
10.		Section 4.1 - Regarding dot point 3 in reportable incident definition - remove as a reportable incident and insert as a note to the serious incident definition of "interruption or imminent risk of interruption of the natural gas supply". Note: As administrative policy, PIRSA interprets this as follows: after taking into account relevant factors on a day and its rights and obligations under contracts, a significant curtailment of firm service to a shipper that may be necessary and may detrimentally impact upon the security of electricity supply to the South East of South Australia, or gas supply to a significant number of gas users in the South East of South Australia.	Changed.
11.		General comment - ensure consistent tense for criteria, i.e. use "is" not "was". (Eg. criteria 2 of goal 11.1 should be "is consistent").	Corrections made.
12.		Consider adding a note that "approval" refers to approval under the relevant legislation listed in Table 2.3 of the EIR, and include this table in the SEO.	Where "approval" is used in the SEO, a reference to the relevant legislation has been added, as follows: <ul style="list-style-type: none"> ▪ Criteria for goals 6.1 and 16.1 - added "under the <i>Aboriginal Heritage Act 1998</i> or the <i>Heritage Act 1993</i>" ▪ Criteria for goal 14.2 - added "under the <i>Native Vegetation Act 1991</i>" following "...unless prior regulatory approval obtained" "Approval" has been added to the "Definitions" section and is defined as: <i>Refers to approval under the relevant legislation.</i>
13.		Criteria for goals 1.3 & 11.3 - Provide examples of visual evidence in brackets, eg. hard soil, local water pooling.	Added "(e.g. hard soil, local water pooling)".
14.		Criteria 1 for goal 2.1 - Need to specify adverse impacts - examples include impacts to downstream ecology and land use.	Added "(for example to downstream ecology or land use)". Also added "following reinstatement" to clarify the second criteria "No evidence of altered watercourse flows" as discussed with PIRSA.
15.		Criteria 1 for goal 2.2 - Suggest that the first criteria is applied to situations "where EPA guidelines do not apply". Origin to check when EPA policy applies.	The EPA Environment Protection (Water Quality) Policy applies to all surface waters and underground waters; therefore this first criterion is redundant and has been deleted.
16.		Criteria 2 for goals 3.3 & 13.3 - Replace i.e. with eg.; include soil salinity as evidence in brackets.	Replaced. Included "soil salinity".

No.	Agency or Individual	Issues Raised or Comments Made	Response
17.		Criteria for goal 4.1 - Replace current criteria with "All areas of remnant vegetation avoided, and where clearance required, significant environmental benefit approved by the Native Vegetation Council" or similar.	Replaced criterion with "All areas of remnant vegetation avoided, or where clearance required, significant environmental benefit approved by the Native Vegetation Council". Also replaced corresponding criterion for goal 14.2.
18.		Criteria 1 for goal 4.3 - Remove "reasonably".	Removed.
19.		Criteria 3 for goal 4.3 - insert "on [the easement]".	Inserted.
20.		Note in criteria for goals 4.3 & 14.1 - Replace wording of note with the wording used for goal 9.3.	Replaced.
21.		Criteria for goals 6.1 & 16.1 - Include reference to the Heritage Act and Aboriginal Heritage Act, following comments by DAARE.	Included - see response 12 above.
22.		Criteria for goals 7.1 & 17.1 - Remove reference to Victorian publication.	Removed.
23.		Criteria for goals 8.1 & 18.1 - Origin to check if EPA guidelines for dust exist. If so, criteria should be compliance with EPA guidelines.	No guidelines for dust management exist. However, the <i>Stormwater pollution prevention code of practice for the building and construction industry</i> states that "Dust emissions from the site should be controlled so as to minimise any adverse effect on an amenity value of an area." The stated criterion is considered to be a practical measure of effects on amenity values and has been left unchanged.
24.		Goal 11.3 - Delete "if necessary by remedial action" from the goal, as this relates to construction not operation. Any remedial action required is covered by the measure/how column.	Deleted.
25.		Goal 13.1 - Delete "and if they occur minimise their impact"; Include management/clean up procedures in the measure/how column (eg. dot points that were in original version of SEO).	Deleted "and if they occur minimise their impact". Added to measure/how column for goal 13.1 and also goal 3.1: <i>Spill response/cleanup procedures, requiring spills to be:</i> <ul style="list-style-type: none"> ▪ <i>Reported</i> ▪ <i>Contained</i> ▪ <i>Cleaned-up</i> ▪ <i>Cause investigated and corrective and/or preventative action implemented</i>
26.		Goal 18.1 - Need to define "uncontrolled" and incorporate this into the criteria, eg. due to misoperation/malfunction. Also include definition in glossary; Add "Maintenance procedures designed for controlled venting" to measure/how column (incident reports is only a measure).	Added "(e.g. due to malfunction or mis-operation)" to criteria "Uncontrolled emission" is defined in the <i>Definitions</i> section of the SEO. Added to measure/how column: <ul style="list-style-type: none"> ▪ <i>Maintenance procedures</i> ▪ <i>Design for controlled venting</i>
27.	Planning SA	No concerns raised.	

No.	Agency or Individual	Issues Raised or Comments Made	Response
28.	Setonix Pty Ltd	<p>The alignment of the pipeline gives scant priority to the future needs of the farming enterprise. It seems to me that too much emphasis is given to protection of remnant trees, and too little emphasis is placed upon the needs and rights of primary producers. The pipeline is run through primary production land with little thought to the long term consequences.</p>	<p>The process of pipeline route selection involves balancing a number of competing factors to achieve a route that is as direct as possible while minimising disturbance to landholders, minimising clearance of remnant vegetation and maximising engineering efficiency of both pipeline construction and operation.</p> <p>Possible long term consequences to primary production land are a major consideration. Extensive consultation is undertaken with landholders during alignment selection and easement negotiations to discuss current and future land-use. The pipeline alignment and depth of cover are then designed to minimise, as far as practicable, disruption to current primary production activities and to allow planned future activities to be carried out with minimal restrictions.</p>
29.		<p>The pipeline should travel in a north-south line along the Border Road until it reaches Tower Road, and it should then run west until it comes into the Katnook Gas Plant. The adoption of this route would avoid disruption to existing agricultural / horticultural and grazing land. Tower Road, for a great deal of its length, has wide open spaces that can accommodate the pipeline; and the Border Road is somewhat similar.</p>	<p>A route following Border Road and Tower Road is extremely indirect, and was not considered feasible.</p> <p>It is noted that this route would still require that agricultural / horticultural and grazing land is traversed for several kilometres.</p>
30.		<p>From what I can gather, it appears that undue emphasis is placed upon roadside trees. The surveyors seem at pains to avoid removing any roadside tree, instead preferring to find a gap in the vegetation as a passage for the pipeline. This can lead to a greater intrusion into farmland, with the consequent risk that future farming activities will be hindered by the presence of the pipeline.</p> <p>The proposed pipeline will have a perpetual title in the nature of an easement. This needs to be balanced with that of a roadside gum tree which will have a life of decades, or perhaps a century.</p> <p>We should also recognize that many roadside trees are mis-shapen and of poor form, and likely to break, snap, or fall, before reaching full maturity.</p>	<p>Avoiding or minimising removal of roadside trees is one factor which is considered during alignment selection. As indicated in response 28 above, future farming activities are also a major consideration.</p> <p>Origin is in the process of finalising appropriate land tenure for the pipeline alignment on all properties along the selected route. This includes obtaining easements that are intended to allow planned future farming activities to be undertaken with minimal restrictions and also avoid clearing roadside trees.</p>
31.		<p>I submit that it should be in order for the pipeline authority to remove roadside vegetation, and in turn, provide a fenced-off area on nearby land for a re-vegetation project. If the re-vegetation project is on privately owned land, it could perhaps be a requirement that it be fenced-off until the trees are of reasonable height, and the landowner be paid rent or other compensation until the trees have reached sufficient height to be "stock proof".</p>	<p>A process exists under the <i>Native Vegetation Act 1991</i> to allow vegetation clearance and planting of offset areas where there is no alternative to vegetation clearance. However, Origin's preference is to avoid removing roadside vegetation where a suitable and acceptable alternative is available.</p> <p>It is noted that offset areas under the Native Vegetation Act are generally required to be permanently protected from stock and would not be able to be grazed in the short or long term.</p>

No.	Agency or Individual	Issues Raised or Comments Made	Response
32.		<p>If the pipeline is to pass within some two kilometres of the Penola township, then one would expect there to be a community or social obligation to provide benefit to the citizens of Penola by way of a take-off from the gas main to provide reticulated gas to the Penola town. Likewise, there ought to be facilities to allow a take-off of gas for domestic or industrial use for those residences and workshops that are in close proximity to the proposed pipeline, it surely cannot be too difficult to devise a relatively easy strategy to provide small quantities of gas at the appropriate quality and to do so at the standard "town price".</p>	<p>As the SESA Pipeline will operate under high pressure, it is subject to strict engineering and safety standards. As a consequence, construction of off-takes and lateral pipelines is not simple or inexpensive. Construction of an off-take and lateral is generally only economically feasible where there is a very high demand for gas or energy such as a large industrial user. Currently there are no industries in the Penola township or along the route that would make this feasible. Reticulation of natural gas for the township of Penola would be subject to assessment by gas distribution companies and the local community.</p> <p>The SESA pipeline has been designed to enable "hot-tap" connections for creation of future off-take points with suitable pressure reducing facilities, should a user or distribution company find it economic to do so.</p>
33.	Transport SA	<p>Transport SA appreciates the efforts made to select an alignment that avoids the removal of any trees. However, the situation at the crossing of the railway for each of the optional alignments under consideration is not so clear. It is requested that the report be amended to provide greater clarification at each crossing option of the railway and be forwarded to Transport SA for further comment</p>	<p>The construction right-of-way does not impact native vegetation at either crossing of the railway (i.e. Option A or B). The vegetation in these locations is dominated by grassy weeds (e.g. <i>Phalaris</i>) and ecological inspections have not detected any vegetation of significance.</p> <p>Native vegetation is present inside the rail reserve to the north of the Option B crossing point (Table A4-6, KP 40.8) and this vegetation is avoided by the alignment.</p>
34.		<p>It is requested that the report include a requirement that any disturbance within the road and railway corridors be appropriately rehabilitated, including the return of topsoil, mulching and respreading of any removed vegetation.</p>	<p>These requirements apply for the entire pipeline alignment. They are specified in the Construction Environmental Management Plan.</p> <p>Any site-specific details for rehabilitation / revegetation of sites where native vegetation is to be removed are recorded in the Environmental Line List. However, as native vegetation is not present at the Transport SA road and railway crossings, there are no specific requirements listed for these sites.</p>
35.		<p>It is considered that the report should specifically state that the proposed mitigation measures for the prevention of soil erosion and the spread of weeds and pathogens shall also apply to road and railway corridors.</p>	<p>These measures apply to road and railway corridors.</p> <p>The EER/EIR discusses these measures in relation to the right of way and landholders; the right-of-way encompasses Transport SA land and Transport SA is considered to be a landholder.</p>

No.	Agency or Individual	Issues Raised or Comments Made	Response
36.		<p>Whilst not of an environmental nature, I would like to take this opportunity to draw attention to requirements that Transport SA will have in relation to the construction of the pipeline.</p> <p>(1) The crossing of the railway is to be in accordance with the requirements of AS4799 -2000.</p> <p>(2) The crossing of the two roads maintained by Transport SA is to be achieved by boring to avoid disturbance of the road pavement and to minimise disruption to traffic. Boring shall extend beyond the road shoulder and any table drains and be at right angles to the road.</p> <p>(3) All works on Transport SA roads are to be conducted in accordance with enclosed Standard Specification "Excavation and Reinstatement of Road Pavement". This document details Transport SA's requirements for notification of works, traffic management, excavation (including trenchless methods) and reinstatement.</p>	These requirements have been noted.

2.1 Changes to the Statement of Environmental Objectives

The changes included in the responses to PIRSA Petroleum Group comments (responses 10 to 26) have been included in the revised SEO. No additional changes to the SEO were required to address stakeholder comments.

3 Additional Information for the EIR

The information in this section is provided in response to comments made by PIRSA Petroleum Group (see comments 7 and 8 in Table 1).

3.1 Horizontal Directional Drilling and Boring

The following descriptions and figures replace the text under the headings of “Horizontal Directional Drilling (HDD)” and “Boring” on Page 20 of the EER/EIR.

Horizontal Directional Drilling (HDD)

Horizontal directional drilling is generally used to cross major watercourses where standard open cut methods are not feasible. It may also be used for road or railway crossings. The feasibility of using HDD is strongly limited by site conditions such as soil stability, slope, access, available workspace and the nature of subsurface rock. It is not expected that HDD will be used to cross any of the watercourses on the SESA Pipeline route.

The installation of the pipeline by HDD involves drilling a hole at a shallow angle beneath the surface, then pulling the welded pipe string pipe back through the drill hole (Figure 3-1). Drilling is conducted by a specially designed drill rig, operated by a specialist contractor. A variety of associated equipment and infrastructure is required (refer to Figure 3-2). Excavations are typically required for a cuttings settlement pit and drilling mud containment pits at the drill entry and exit points.

The size of the HDD rig and its associated footprint depends on the size of the pipe, subsurface geology and the length of the drill. A typical layout for a medium to large HDD rig is shown in Figure 3-2. Smaller rigs are often used, particularly for short drills such as road crossings and these are often self-contained (e.g. on the back of a semi-trailer).

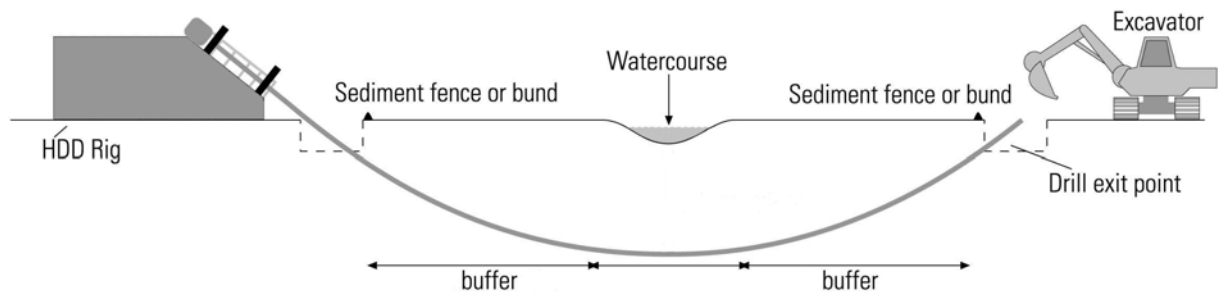


Figure 3-1: Schematic profile of HDD

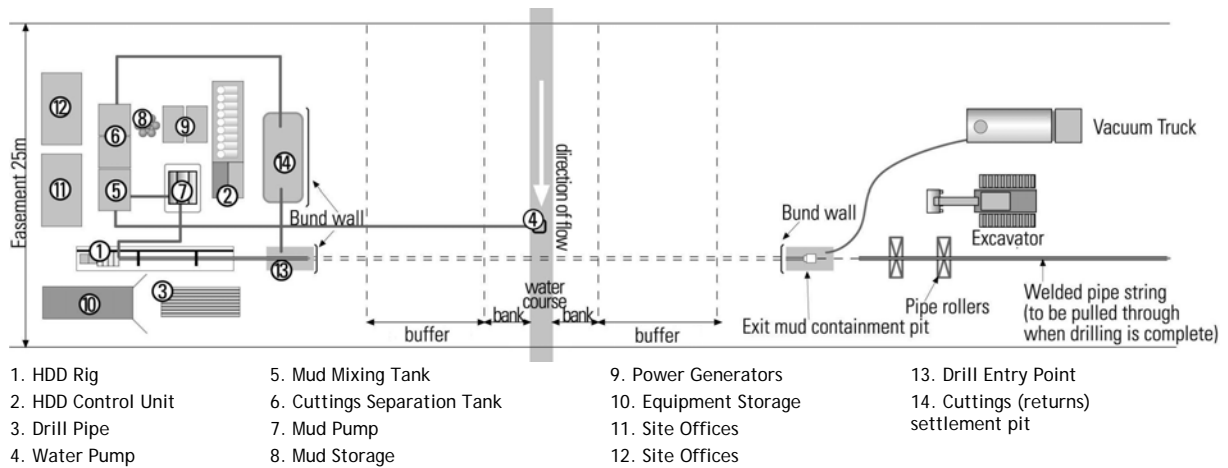


Figure 3-2: Plan view showing typical HDD layout

Although horizontal directional drilling may reduce above ground impacts, the technique introduces additional environmental considerations such as drill site sediment control, waste management, noise and increased duration of construction and workforce numbers. To address these issues, site specific management procedures are prepared prior to drilling.

Boring

The technique of boring is commonly used to install pipelines beneath infrastructure such as roads, railways, buried utilities and in some circumstances for watercourse crossings. It is a low impact technique involving drilling short distances from below ground within an enlarged trench area, or bellhole, located inside the construction easement (see Figure 3-3). Bellholes are required on either side of the road or railway (or watercourse). The bell-hole that accommodates the thrust bore rig is typically 25 m or more long and 4-5 m wide to allow it to hold the rig plus a full length of pipe. The receiving bellhole is typically 4-5 m long and 3 m wide.

The feasibility of a bore is limited by site conditions, including geology, landform and soil type and depth and width of the watercourse crossing.

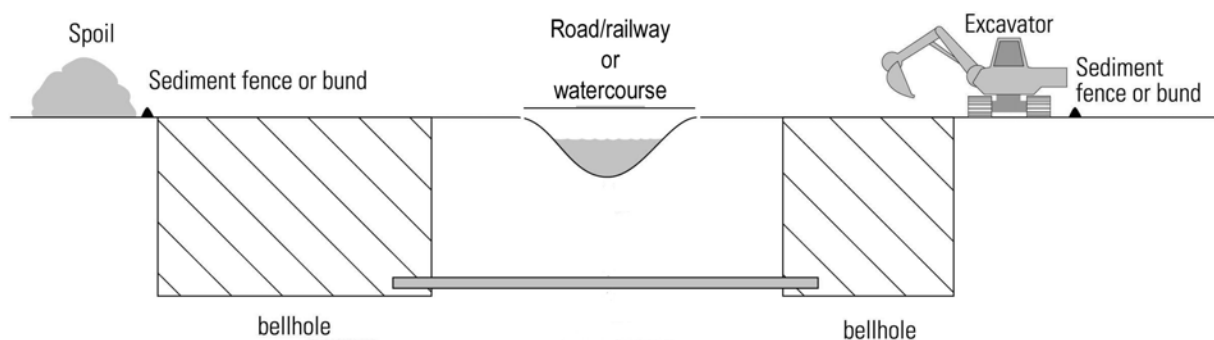


Figure 3-3: Schematic profile of a bored crossing

3.2 Photographs of Construction Activities

The following photographs are provided to accompany the description of construction activities in Section 3.5.1 of the EER/EIR.



Plate 3-1: Clear and grade
(before and after)



Plate 3-2: Trenching



Plate 3-3: Stringing a small diameter pipe



Plate 3-4: Welded small diameter pipe ready for lowering-in



Plate 3-5: Lowering-in



Plate 3-6: Backfill



Plate 3-7: A newly reinstated easement



Plate 3-8: An easement a year after reinstatement

4 Conclusion

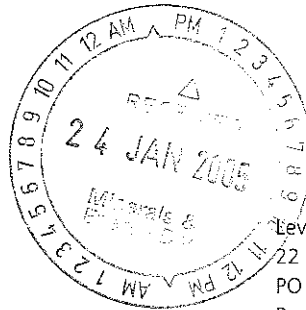
This document provides additional information and clarifications in response to public submissions made in South Australia on the Environment Effects Report / Environmental Impact Report (EER/EIR) and Statement of Environmental Objectives (SEO) for the proposed SESA Pipeline. Minor changes have been made to the SESA Pipeline SEO in response to submissions from PIRSA Petroleum Group and are detailed in this document.

Origin believes that this document adequately addresses all the issues raised during the public consultation period.

The construction of the SESA Pipeline is essential to ensure continuity of natural gas supply to the South East region of South Australia and maintain deliverability to the Ladbroke Grove Power Station. Origin is committed to ensuring that the environmental impact of this Project is appropriately managed and that potential environmental impacts are minimised.

Appendix A: Submissions to PIRSA

South Australian Department for Aboriginal Affairs and Reconciliation



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22 Pulteney Street Adelaide
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Rundle Mall Adelaide
South Australia 5000

telephone +61 8 8226 8900
facsimile +61 8 8226 8999
www.daare.sa.gov.au

Reg No. 2004/06903
File No. AA/03/0262

Mr Barry A. Goldstein
Director, Petroleum
Minerals and Energy Division
Delegate of the Minister for Mineral Resources Development
PIRSA
GPO Box 1671
ADELAIDE SA 5001

Dear Mr Goldstein

Thank you for your correspondence dated 16 December 2004, your file reference 28/01/00378, regarding draft statement of environmental objectives for proposed SESA pipeline.

I advise that the Central Archive, which includes the register for Aboriginal Sites and Objects, administered by the Department for Aboriginal Affairs and Reconciliation (DAARE), has no entries for Aboriginal heritage sites on the land in question.

The Register of Aboriginal Sites and Objects does not purport to be a comprehensive record of all Aboriginal sites, objects and remains in South Australia and it is possible that there are sites of significance to Aboriginal heritage, which have not yet been discovered in the area of interest. Under Section 20 of the *Aboriginal Heritage Act 1988* (the Act), an owner or occupier of private land, or an employee or agent of such an owner or agent, must report the discovery on the land of any Aboriginal sites, objects and remains to the Minister for Aboriginal Affairs, as soon as practicable, giving the particulars of the nature and location of the Aboriginal sites, objects or remains. Penalties may apply for failure to comply with the Act.

Should you require any further information or assistance regarding interpretation of the Act, contacting local Aboriginal heritage groups or other general Aboriginal heritage matters, please do not hesitate to contact Margaret Hess, Senior Project Officer, Heritage on telephone (08) 8226 8930.

Yours sincerely

Lange Powell
DIRECTOR, HERITAGE TASKFORCE

20 January 2005



Government
of South Australia

From: Close, Belinda (PIRSA) [close.belinda@saugov.sa.gov.au]
Sent: Wednesday, 2 February 2005 4:52 PM
To: Waining, Ben (DEH)
Cc: Moore, Keith
Subject: SESA Pipeline consultation

Ben,

To confirm your conversation with Richard yesterday, I note that DEH will not be providing any formal comments on the SESA Pipeline Environmental Impact Report and draft Statement of Environmental Objectives.

Your participation in the workshop held on 19th January was appreciated.

Cheers,
Belinda

Belinda Close
Project Engineer

Petroleum Group, Minerals and Energy Division
Primary Industries and Resources SA
Level 7, 101 Grenfell St, Adelaide
Ph: (08) 8463 3239
Mob:
Fax: (08) 8463 3229
Email: close.belinda@saugov.sa.gov.au

From: Close, Belinda (PIRSA) [close.belinda@saugov.sa.gov.au]
Sent: Friday, 4 February 2005 10:05 AM
To: Stephen Milne (E-mail); Keith Moore (E-mail)
Subject: FW: SESA Pipeline consultation

Keith, Steve,
Below are some additional comments from DEH, for your information.
Belinda

> -----Original Message-----
> From: Waining, Ben (DEH)
> Sent: Friday, 4 February 2005 9:48 AM
> To: Close, Belinda (PIRSA)
> Subject: RE: SESA Pipeline consultation
>
> Belinda,
>
> response would be only that we appreciate Origin's efforts in avoiding
> where possible areas of high habitat value - eg swamps and native
> vegetation. However we have no issues of concern regarding the planned
> route.
>
> I was planning on putting that in formally but may not get a chance.
>
> Cheers
>
> Ben

> -----Original Message-----
> From: Close, Belinda (PIRSA)
> Sent: Wednesday, 2 February 2005 4:52 PM
> To: Waining, Ben (DEH)
> Cc: Keith Moore (E-mail)
> Subject: SESA Pipeline consultation
>
> Ben,
> To confirm your conversation with Richard yesterday, I note that DEH will
> not be providing any formal comments on the SESA Pipeline Environmental
> Impact Report and draft Statement of Environmental Objectives.
>
> Your participation in the workshop held on 19th January was appreciated.
>
> Cheers,
> Belinda
>
> Belinda Close
> Project Engineer
>
> Petroleum Group, Minerals and Energy Division
> Primary Industries and Resources SA
> Level 7, 101 Grenfell St, Adelaide
> Ph: (08) 8463 3239
> Mob:
> Fax: (08) 8463 3229
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>
>

EHB 003/04/0300
EH 00304/1360

31 January 2005

Ms Belinda Close
Petroleum Group
Primary Industries and Resources SA
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Dear Ms Close

**Re: SESA Pipeline Environmental Effects Report / Environmental Impact Report
(EIS) & Statement of Environmental Objectives- Origin Energy**

Thank you for the opportunity to comment on the above documents which have been reviewed for public and environmental health impacts. The comments below are made in the context of the following definition of health by the World Health Organisation (WHO):

Health is the state of complete physical, mental and social well-being and not merely the absence of disease and infirmity. (WHO, 1948).

It is noted that the development will have significant benefits, such as, ensuring the continuity of gas supplies to the Ladbroke Grove Power Station, the reticulated gas supplies in Mount Gambier and several regional industries, as well as providing local employment opportunities. The provision of such community infrastructure and employment are key determinants of (good) health.

The potential negative public and environmental health impacts (eg, noise, adverse effects on soil and water resources and minimising the risk to public health and safety during construction and operations) appear to have been appropriately addressed. The proposed transport of the construction workforce to site by shuttle bus where possible is laudable as it reduces the risk of road trauma to both the workforce and the public (as well as greenhouse gas emissions).

I trust that these comments are beneficial in your review of these documents. However, should you have any queries regarding the above, please do not hesitate to contact me (telephone:8226 7145 or frank.callaghan@dhs.sa.gov.au).

Yours sincerely



31.1.05

Frank Callaghan
SENIOR SCIENTIFIC OFFICER

From: Close, Belinda (PIRSA) [close.belinda@saugov.sa.gov.au]
Sent: Wednesday, 2 February 2005 4:46 PM
To: Montgomerie, Kerin (EPA)
Cc: Moore, Keith
Subject: RE: EPA Comment on draft SEO for proposed SESA Pipeline

Kerin,
To confirm our phone conversation earlier this afternoon, I note that the EPA will not be providing any comments on the SESA Pipeline Environmental Impact Report and Statement of Environmental Objectives.
Cheers,
Belinda

Belinda Close
Project Engineer

Petroleum Group, Minerals and Energy Division
Primary Industries and Resources SA
Level 7, 101 Grenfell St, Adelaide
Ph: (08) 8463 3239
Mob:
Fax: (08) 8463 3229
Email: close.belinda@saugov.sa.gov.au

> -----Original Message-----
> From: Montgomerie, Kerin (EPA)
> Sent: Thursday, 13 January 2005 3:42 PM
> To: Close, Belinda (PIRSA)
> Subject: EPA Comment on draft SEO for proposed SESA Pipeline
>
> Belinda
>
> Thank you for the opportunity to review the draft SEO for the proposed
> SESA Pipeline. I have circulated these documents within the EPA for
> review/discussion.
>
> The EPA has no comment/queries at this time.
>
> Regards
>
> Kerin Montgomerie
> Senior Environmental Adviser
> Environment Protection Authority
> Ph +61 8 8204 1687
> Fax +61 8 8204 2025
> Kerin.Montgomerie@state.sa.gov.au
>
> The information in this email may be confidential and/or legally
> privileged. Use or disclosure of the information by anyone other than the
> intended recipient is prohibited and may be unlawful. If you have received
> this email in error, please advise by return email or by telephoning +61 8
> 8204 1687
>
>



3rd February, 2005

Mr Barry Goldstein
Director, Petroleum
Minerals and Energy Division
Primary Industries & Resources
GPO Box 1671
ADELAIDE SA 5000

Dear Mr Goldstein

Thank you for your letter dated 16th December 2004, inviting comment from the Board, in relation to the Statement of Environmental Objectives for the proposed SESA pipeline.

The environmental objectives, goals and measures are very comprehensive and appear to more than adequately cover the wide range of possible impacts from such a project. We would support the process and measures proposed.

To further support the proposal, we believe that the experience of having the recent SEAGAS pipeline constructed through the region, demonstrated that projects such as this can proceed in harmony with the environment and bring mutually beneficial outcomes to all parties.

In conclusion, the provision of natural gas supplies is a considerable asset in terms of economic development potential for the region and we endorse the construction of the lateral SESA pipeline.

Again, thank you for the opportunity to comment.

Yours sincerely

A handwritten signature in black ink, appearing to read "Grant King".

Grant King
CHIEF EXECUTIVE OFFICER

E:\2005\Admin\03296PIRSA SEAGAS comment.doc



Lower South East
Soil Conservation Board,
"Winteriga"
Box 117,
Kalangadoo, 5278.
S.A.

12-01-05

Att. Belinda Close,
Primary Industries and Resources SA
Petroleum Group
Level 7
101 Grenfell St.
Adelaide SA 5000

Re: Comment on SESA Pipeline.

Dear Ms Close,

The Lower South East Soil Conservation Board would like to thank you for inviting our Board to comment on the proposed SESA Pipeline. We acknowledge the detailed site-work that has been undertaken in preparation of this project and commend the planners on finding a route of least environmental impact.

Whilst we feel the objects and assessment criteria have been addressed well in the reports, our main concern is that ground staff and contractors carrying out the works are fully aware of the objectives. If all work is undertaken as detailed, particularly through sandy soil types and water courses, then our Board feels there should be minimal environmental impact.

Yours sincerely,

Nicholas Hunt

Chairperson,
LSE Soil Conservation Board.

From: Close, Belinda (PIRSA) [close.belinda@saugov.sa.gov.au]
Sent: Thursday, 3 February 2005 4:54 PM
To: Keith Moore (E-mail); Stephen Milne (E-mail)
Cc: McDonough, Richard (PIRSA)
Subject: SESA Pipeline SEO consultation

Keith, Steve,
Richard and I have reviewed the SESA Pipeline EIR and SEO and have the following comments, as discussed with Steve yesterday:

Comments on EIR - to be included in the supplement to the EIR and SEO
* Further details regarding horizontal directional drilling and boring (P20) would assist stakeholder understanding. i.e.. what does it involve. If possible include a layout drawing showing scale of the activity.
* Typical photos for each aspect of construction, eg. clear and grade, trenching, would also assist stakeholder understanding.

Comments on SEO - to be included in a revised SEO document
* Section 4.1 - Regarding dot point 3 in reportable incident definition - remove as a reportable incident and insert as a note to the serious incident definition of "interruption or imminent risk of interruption of the natural gas supply". Note: As administrative policy, PIRSA interprets this as follows: after taking into account relevant factors on a day and its rights and obligations under contracts, a significant curtailment of firm service to a shipper that may be necessary and may detrimentally impact upon the security of electricity supply to the South East of South Australia, or gas supply to a significant number of gas users in the South East of South Australia. (Steve - we will need to correct this in PL3&4 SEO).
* General comment - ensure consistent tense for criteria, i.e.. use "is" not "was". (Eg. criteria 2 of goal 11.1 should be "is consistent").
* Consider adding a note that "approval" refers to approval under the relevant legislation listed in Table 2.3 of the EIR, and include this table in the SEO.
* Criteria for goals 1.3 & 11.3 - Provide examples of visual evidence in brackets, eg. hard soil, local water pooling.
* Criteria 1 for goal 2.1 - Need to specify adverse impacts - examples include impacts to downstream ecology and land use.
* Criteria 1 for goal 2.2 - Suggest that the first criteria is applied to situations "where EPA guidelines do not apply". Steve to check when EPA policy applies.
* Criteria 2 for goals 3.3 & 13.3 - Replace i.e.. with eg.; include soil salinity as evidence in brackets.
* Criteria for goal 4.1 - Replace current criteria with "All areas of remnant vegetation avoided, and where clearance required, significant environmental benefit approved by the Native Vegetation Council" or similar.
* Criteria 1 for goal 4.3 - Remove "reasonably".
* Criteria 3 for goal 4.3 - insert "on [the easement]".
* Note in criteria for goals 4.3 & 14.1 - Replace wording of note with the wording used for goal 9.3.
* Criteria for goals 6.1 & 16.1 - Include reference to the Heritage Act and Aboriginal Heritage Act, following comments by DAARE.
* Criteria for goals 7.1 & 17.1 - Remove reference to Victorian publication.
* Criteria for goals 8.1 & 18.1 - Steve to check if EPA guidelines for dust exist. If so, criteria should be compliance with EPA guidelines.
* Goal 11.3 - Delete "if necessary by remedial action" from the goal, as this relates to construction not operation. Any remedial action required is covered by the measure/how column.
* Goal 13.1 - Delete "and if they occur minimise their impact"; Include management/clean up procedures in the measure/how column (eg. dot

points that were in original version of SEO).

* Goal 18.1 - Need to define "uncontrolled" and incorporate this into the criteria, eg. due to misoperation/malfunction. Also include definition in glossary; Add "Maintenance procedures designed for controlled venting" to measure/how column (incident reports is only a measure).

*

Hopefully you can understand these comments - please call me if you need clarification on anything.

Cheers,
Belinda

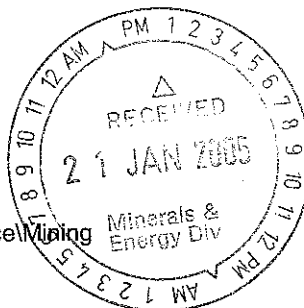
Belinda Close
Project Engineer

Petroleum Group, Minerals and Energy Division
Primary Industries and Resources SA
Level 7, 101 Grenfell St, Adelaide
Ph: (08) 8463 3239
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Email: close.belinda@saugov.sa.gov.au

17th January 2005

Reference: PLN 04/0657 Development Assessment Advice Mining
Contact Officer: Simon Wheaton
Telephone: (08) 8303 0649
Facsimile : (08) 8303 0753

Mr Barry A Goldstein
Director
Petroleum, Minerals and Energy Division
Department of Primary Industries and Resources
GPO Box 1671
ADELAIDE SA 5001



Planning SA

Department
of Transport and
Urban Planning

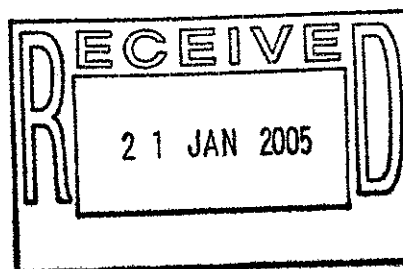
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Dear Mr Goldstein,

Re : Consultation on Draft Statement of Environmental Objectives for the Proposed SESA Pipeline

Your request for comment on the Statement of Environmental Objectives (SOE) and Environmental Impact Report (EIR) for the Proposed SESA Pipeline has been received by this Unit.

The EIR and SOE provided both appear to be adequate for the proposed pipeline.

Yours sincerely

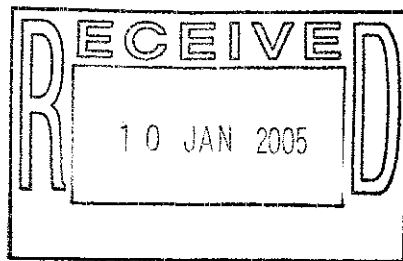
A handwritten signature in black ink, appearing to read "S. Wheaton".

Simon Wheaton
ENVIRONMENTAL OFFICER
ENVIRONMENTAL IMPACT ASSESSMENT UNIT

O:\EIA\wheaton\minerals\pior\ep155



Government
of South Australia



Setonix Pty. Ltd.,
ABN 17 179 653 150,
39 Bay Road
Mount Gambier
S.A. 5290

☎ 08/8723 1090

21st December 2004

PIRSA Petroleum Group,
GPO Box 1671,
ADELAIDE. SA 5001

Dear Sirs,

re: SESA PIPELINE

I write for the purpose of making comment on the Statement of Environmental Objectives for this proposed pipeline.

1. Alignment.

The alignment of the pipeline gives scant priority to the future needs of the farming enterprise. It seems to me that too much emphasis is given to protection of remnant trees, and too little emphasis is placed upon the needs and rights of primary producers. The pipeline is run through primary production land with little thought to the long term consequences.

The pipeline should travel in a north-south line along the Border Road until it reaches Tower Road, and it should then run west until it comes into the Katnook Gas Plant.

The adoption of this route would avoid disruption to existing agricultural/horticultural and grazing land.

Tower Road, for a great deal of its length, has wide open spaces that can accommodate the pipeline; and the Border Road is somewhat similar.

2. Trees – an opportunity missed.

From what I can gather, it appears that undue emphasis is placed upon roadside trees. The surveyors seem at pains to avoid removing any roadside tree, instead preferring to find a gap in the vegetation as a passage for the pipeline.

This can lead to a greater intrusion into farmland, with the consequent risk that future farming activities will be hindered by the presence of the pipeline.

The proposed pipeline will have a perpetual title in the nature of an easement. This needs to be balanced with that of a roadside gum tree which will have a life of decades, or perhaps a century.

We should also recognize that many roadside trees are mis-shapen and of poor form, and likely to break, snap, or fall, before reaching full maturity.

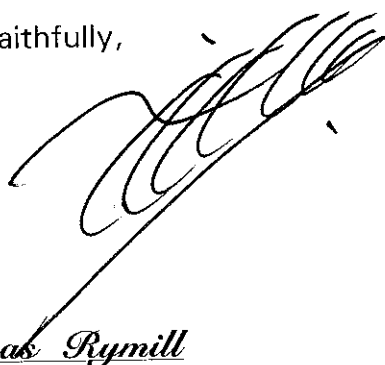
I submit that it should be in order for the pipeline authority to remove roadside vegetation, and in turn, provide a fenced-off area on nearby land for a re-vegetation project. If the re-vegetation project is on privately owned land, it could perhaps be a requirement that it be fenced-off until the trees are of reasonable height, and the landowner be paid rent or other compensation until the trees have reached sufficient height to be "stock proof".

3. Community Benefit.

If the pipeline is to pass within some two kilometres of the Penola township, then one would expect there to be a community or social obligation to provide benefit to the citizens of Penola by way of a take-off from the gas main to provide reticulated gas to the Penola town.

Likewise, there ought to be facilities to allow a take-off of gas for domestic or industrial use for those residences and workshops that are in close proximity to the proposed pipeline. It surely cannot be too difficult to devise a relatively easy strategy to provide small quantities of gas at the appropriate quality and to do so at the standard "town price".

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Thomas Rymill', written in a cursive style. The signature is positioned above the printed name.

Thomas Rymill

*In reply please quote 2002/10254
Enquiries to Mr Peter Cops
Telephone (08) 8343 2073*

3 February 2005

Ms Belinda Close
Primary Industries and Resources SA
Petroleum Group
GPO Box 1671
ADELAIDE SA 5001

Dear Ms Close,

SESA PIPELINE PROJECT

I refer to PIRSA's invitation of 16 December 2004 to comment on the draft Statement of Environmental Objectives and Environmental Impact Report for the proposed SESA Pipeline.

Transport SA has care, control and management of two roads crossed by the proposed pipeline, namely the Penola – Casterton Road and the Riddoch Highway, and is responsible for the Wolseley –Mount Gambier railway corridor.

Table A4.6 of the Environmental Impact Report clearly states the situation with regard to the impact on trees where the pipeline crosses the above roads. Transport SA appreciates the efforts made to select an alignment that avoids the removal of any trees. However, the situation at the crossing of the railway for each of the optional alignments under consideration is not so clear. It is requested that the report be amended to provide greater clarification at each crossing option of the railway and be forwarded to Transport SA for further comment.

It is requested that the report include a requirement that any disturbance within the road and railway corridors be appropriately rehabilitated, including the return of topsoil, mulching and respreading of any removed vegetation.

It is considered that the report should specifically state that the proposed mitigation measures for the prevention of soil erosion and the spread of weeds and pathogens shall also apply to road and railway corridors.

Whilst not of an environmental nature, I would like to take this opportunity to draw attention to requirements that Transport SA's will have in relation to the construction of the pipeline.

- (1) The crossing of the railway is to be in accordance with the requirements of AS4799 –2000.
- (2) The crossing of the two roads maintained by Transport SA is to be achieved by boring to avoid disturbance of the road pavement and to minimise disruption to traffic. Boring shall extend beyond the road shoulder and any table drains and be at right angles to the road.
- (3) All works on Transport SA roads are to be conducted in accordance with enclosed Standard Specification "Excavation and Reinstatement of Road Pavement". This document details Transport SA's requirements for notification of works, traffic management, excavation (including trenchless methods) and reinstatement.

I would appreciate the appropriate person at Origin Energy being alerted to these requirements so that they are taken into consideration during the early stages of development of the project.

If you wish to discuss the above matters further, please contact Mr Peter Cops, Senior Consultant, Road Corridor Management on 8343 2073.

Yours sincerely,

Wayne Buckerfield
MANAGER, TRAFFIC AND ACCESS STANDARDS