KING OF THE HILLS GAS PIPELINE

Construction Environment Plan Summary

Pipeline Licence PL126

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1. Introduction

This Environment Plan (EP) Summary provides an overview of the environmental management requirements for the construction of the King of the Hills Gas Pipeline (KOTHGP), located in the Eastern Murchison Interim Biogeographic Region of Western Australia. The KOTHGP will lie within Pipeline Licence area for PL126 on miscellaneous licence L37/248 and will connect to the Goldfields Gas Pipeline (GGP) to supply the King of the Hills power station at the King of the Hills (KOTH) gold mine. The KOTHGP will include other associated infrastructure such as extra workspace areas for construction, turning bays, laydown areas and a pipeline service road for operations.

The pipeline tenure overlies Sturt Meadows and Tarmoola Pastoral Stations, and a portion of the Peak Hill Stock Route.

The KOTHGP will be operated by APT Operations Pty Limited (APA). The pipeline will be approximately 13 km long; beginning approximately 26 km northwest of Leonora and run in a north-easterly direction, crossing under Sullivan's Creek and terminating at the Tarmoola delivery station. (**Figure 2-1**).

1.1 Purpose and Scope

The purpose of this EP Summary is to provide information to the general public regarding KOTHGP environmental considerations and management requirements. This CEP Summary outlines the construction works and management defined in the King of the Hills Construction Environmental Management Plan (CEP) (21008-PL-HSE-0001).

1.2 Objectives

The overall environmental objectives of the CEP/MP are to:

- Outline proposed measures to manage potential environmental impacts associated with construction of the KOTHGP.
- Facilitate approvals under the *Pipelines Petroleum Act 1969* (Pipelines Act) and *Mining Act 1978* (Mining Act).
- Ensure compliance with project approval, pipeline licence, tenement, and other conditions.

2. Site Description

The KOTHGP will begin (KOTHGP KP 0) at a hot tap onto the existing GGP (at GGP KP 1131). A sub-surface offtake will be installed at this point. The KOTHGP will terminate at KP 13.028, on L37/248 where a metering and delivery station, the Tarmoola Delivery Station, will be installed at the King of the Hills gold project. Selected pipeline coordinates and kilometre points (KPs) are summarised in **Table 1**.

Table 1: Pipeline coordinates

	GPS Coordinates (GDA 1994/51)	
Feature / Kilometre Point (KP)	**Easting (mE)**	**Northing (mN)**
Start Point – buried hot tap connection at GGP KP1131	312687.418	6815111.578
KOTHGP KP 0	312691.673	6815117.589
End Point – Tarmoola delivery station	320261.689	6825469.844

The pipeline will be designed for a minimum operating life of 40 years, with the surface stations designed for a minimum operating life of 25 years.

APA has selected a route for the KOTHGP to, as far as practicable, avoid:

- Topographic features, including hills, ridges, sand dunes, and watercourses that present difficult, risky, or costly challenges for construction or reinstatement.
- Disruption to third party infrastructure and services, such as roads, other pipelines, or cables.
- Disturbance to places of environmental or social significance, such as Aboriginal heritage sites, or priority flora.

The pipeline will lie within Pipeline Licence PL 126 area, which occupies a corridor within existing Miscellaneous Licence 37/248 held by Greenstone Resources (WA) Pty Ltd, a subsidiary of Red 5 Limited. APA will be the sole holder of Pipeline Licence PL 126, granted under the *Petroleum Pipelines Act 1969*.

The boundary of Pipeline Licence PL 126 forms the disturbance envelope for construction of the KOTHGP; this boundary also forms the limits of the native vegetation clearing permit (NVCP) area. All new disturbance associated with construction will be confined to this envelope. The Project will also make use of existing cleared areas and infrastructure such as third-party access roads and laydown yards where possible.

In this document the "construction right-of-way" (CROW) refers to a subsection of the pipeline envelope (the pipeline licence area) where vegetation clearing will be required for pipeline construction. APA expects the majority of the CROW to be approximately 25m wide, with the width reduced in some sections to avoid or minimise disturbance to areas of particular environmental (e.g. Priority flora) or heritage value.

The location of ancillary disturbances along the construction ROW, such as access roads, vehicle turnaround bays, temporary storage and laydown areas are yet to be finalised

however they will be placed to utilise existing cleared or degraded areas where possible, and to avoid areas of higher environmental or social value, as far as practicable. Turnaround bays will be located approximately every 2 km along the corridor and where practical, connect the CROW with existing roads.

Provision for one "turkey's nest" dam has been made for the storage water sourced from existing licenced water sources for construction.

The construction workforce will be accommodated within the KOTH mine worker's camp on mining licenses L37/457 and L37/400 with overflow capacity at commercial accommodation within the Leonora townsite as required.

Total disturbance for the project will not exceed 80 ha.

Disturbance will be temporary, with reinstatement and rehabilitation to follow closely behind construction. The only exceptions to this will be a 4 m wide access track along the pipeline corridor (10 ha), which will remain for the life of the asset.

There are a number of recognised Aboriginal groups with interests in the KOTH mine project area. As such, Red 5 has a responsibility under the Aboriginal Heritage Act 1972 to consult with the relevant Aboriginal groups prior to undertaking any land disturbance to ensure no heritage sites are disturbed without prior authority. Greenstone Resources (WA) Pty Ltd, with support from APA, will continue to engage with the Traditional Owner group, including the Darlot in respect of Native Title Claim WC2018/005. The pipeline licence area and pipeline route have been amended to minimise disturbance to areas of heritage significance.

Section 18 Notice for disturbance of Registered Aboriginal Heritage Sites ID 1741 and ID 38313 was submitted 03 April 2020 and Section 18 consent approved on 19 August 2020. This will allow APA access the CROW via the Sullivan Creek Causeway.

Figure 2-1 KOTHGP Route

3. Construction Activities

The KOTHGP construction Project has an estimated construction duration of 4 months (November 2021to February 2022), with commissioning to follow shortly after.

Works associated with the KOTHGP construction are summarised in Table 2.

Table 2: KOTHGP Activity Summary

Activity	Description
Mobilisation	Transport of construction machinery, plant and equipment to site, establishment of laydown and site support workspaces including temporary construction camp.
Survey	The pipeline centreline, limits of the CROW and any ancillary workspaces will be surveyed and marked out ahead of ground-disturbing works.
Clear and grade	Removal of vegetation in accordance with the NVCP. Topsoil stripped to a minimum depth of 100 mm and pushed into windrows. Vegetation will be stockpiled separately.
Excavation and trenching	Excavation of trenches including those for the pipeline, the hot tap to the GGP, the offtake station and the Tarmoola Station. Trench spoil will be placed on the trench side of the construction ROW, separate to the topsoil and vegetation stockpiles from clear and grade
Blasting	Where material cannot be removed with conventional rock breaking plan and equipment, targeted blasting may be required. Blasting will be carefully controlled, and carried out by a specialist team
Horizontal Directional Drilling	In order to avoid heritage areas at Sullivan's Creek, horizontal directional drilling (HDD) methods will be the preferred means of trenchless construction.
Wet trenching	Depending on rainfall, saturated or inundated ground may be encountered, particularly in lower-lying areas. In such areas, the trench may be dug into wet ground, and allowed to flood, without dewatering.
Dewatering	In some inundated areas, dewatering methods may be used in preference to wet trench methods.
Hot Tapping	Safely drilling and welding a new fitting to allow connection of the off-take into the operating GGP.

Activity	Description
Pipe Assembly	Pipe will be delivered to the CROW and laid out end-to-end alongside the trench. Individual pipe segments will be placed on raised timber skids or sandbags to protect them from damage and facilitate welding into continuous lengths (pipe strings). The pipeline will be bent in places to follow the pipeline route, and/or conform to the terrain. Pipe segments are welded into continuous lengths before being laid in the trench. Welded joints will be x-ray tested and garnet-blasted to remove surface scale and rust, and then coated with a high build epoxy (HBE) to provide a continuous external coating and prevent corrosion. Installation of the Cathodic Protection cables to the pipeline will be completed in advance of pipe lower-in by welding the cables to the pipeline, applying the necessary coating and then the pipe can be lowered into the trench.
Pipe Lowering	Once welded, the pipe strings will be placed into the trench by side-boom pipe-layers (or equivalent). Fine bedding and padding sand will be placed around the pipe to prevent any sharp objects (such as rocks in the trench spoil) from damaging the pipe coating. Bedding and padding material will be sourced from the trench spoil itself by screening, wherever possible.
Backfilling	Suitable stockpiled trench spoil will be returned to the trench and compacted after the pipe is lowered in. If required, clean, approved locally-sourced fill will be imported to make up any shortfall where trench spoil is deemed unsuitable for backfill. Topsoil removed during clear and grade will then be re-spread and contours reinstated.
Construction of Permanent Above-ground Facilities	Civil works including: • Pad construction, installation of control hut and meter and filter skids, piling works and placement of concrete slabs; • Installation of underground conduits and earth cable; • Placing aggregate over the ground, to prevent vegetation regrowth, and erection of site security fencing. • Assembling equipment and lifting into position; • Installing free-standing equipment and structural steel work, interconnected piping and cable trays and gas utility lines; and • Installing electrical power distribution and control components, power and control cables between the equipment and a Remote Terminal Unit (RTU) or Control Hut.

Activity	Description
Testing	Non-destructive testing, functional testing of all manual valves, hydro-testing of pipework; hazardous area checks, earthing compliance checks and continuity point to point testing of circuits.
Commissioning	Pre-testing all mechanical and electrical equipment and instrumentation. Commissioning communications and control systems prior to introduction of gas. Progressive introduction of gas and commissioning each item of equipment sequentially until the whole system is capable of operating as a unit.
Demobilisation	Disassembly of any temporary infrastructure, machinery, and equipment.
Site reinstatement and Clean- up	Removal of waste and stockpiled materials, scarification of disturbed areas, replacement of topsoils over disturbed areas, redistribution of stockpiled vegetative material removed for construction.

Supporting services required for the activity include water supply, power generation and chemical storage and waste management. These aspects of the Project are summarised in the sections below.

3.1 Water Supply

Water will be mainly required for dust suppression, and hydrotesting.

It is anticipated that water for the Project will sourced from existing licenced water sources in the immediate vicinity. Any groundwater abstraction (not anticipated) will occur in accordance with relevant licence/s to take water, issued under the *Rights in Water and Irrigation Act 1914*.

To facilitate the supply of water for hydrotesting, APA may construct a "turkey's nest" dams at KP0. Turkey's nests will typically be 60 m x 60 m x 2 m (length x width x depth), lined with low density polyethylene and fenced to prevent fauna ingress.

3.2 Power Generation, Fuels and Chemical Storage

Electricity will be supplied at construction areas by diesel generators.

Diesel storage for power generation and automotive use will incorporate:

- Double-walled (self-bunded) transportable fuel tanks, no more than 60,000 L, put in place at the construction camp laydown areas.
- Mobile heavy rigid fuel trucks containing no more than 7,000 L, travelling the CROW daily, to refuel vehicles and mobile and fixed plant.

- Miscellaneous jerry cans, each up to 20 L.

Other hydrocarbon and chemical storage for the construction will incorporate:

- Engine, gearbox, hydraulic and other oil and greases, in a variety of containers, including 1,500 L intermediate bulk containers (IBCs), 200 L drums, and 20 L containers.
- Various other chemicals for construction use, including brake and radiator fluids paints, concrete retarders, formwork release agents, paints, solvents, thinners, acetone, anti-seize, cleaning agents, and others, in containers of less than 50 L.

3.3 Waste

Project wastes are expected to principally comprise:

- Inert waste, including packaging, wooden pallets, steel (e.g. pipe off-cuts), builder's rubble, formwork, waste garnet, welding rods etc., and minor quantities of waste concrete.
- Putrescible waste, predominantly food scraps.
- Small quantities of contaminated waste, including fuel, oil, and chemical containers with residual material, and coating / sand blasting wastes (including garnet, and coating residues).

Collection points for waste will be established at the camp. Wastes will be brought back from construction areas along the ROW, daily. Wastes will be appropriately contained (with bins, skips, etc.) classified and segregated for collection by waste contractors licensed for the classes of waste. Putrescible wastes will be contained in bins with secure lids to so that feral animals are not encouraged to forage. Contaminated or hazardous wastes will be kept in secondary containment.

4. Existing environment

4.1 Biographic Region and Land Use

The project is located Eastern Murchison subregion of the Murchison Bioregion (Department of the Environment, 2012). This sub-region is characterised by its internal drainage and extensive areas of elevated red desert sandplains and minimal dune development. Salt lake systems are present, associated with the occluded Paleodrainage system.

Landforms comprise broad plains of red-brown soils and breakaway complexes as well as red sandplains. Vegetation is dominated by Mulga Woodlands often rich in ephemerals; hummock grasslands, saltbush shrublands and Halosarcia shrublands. The dominant land uses are grazing of sheep, cattle and goats on native pasture (Cowan 2001).

4.2 Climate

Climate in the KOTH project region is characterised as arid. Mean annual rainfall is approximately 236.4 mm, with annual rainfall recorded at the closest meteorological station (Leonora) ranging from 57.8 mm to 552.2 mm. Rainfall is influenced by decaying tropical cyclones which originate off the north-west coast in summer, and anticyclonic

systems in winter. Evaporation greatly exceeds rainfall with annual average pan evaporation rate for the Leonora region at 2.8 m. The hottest month is January with an average maximum temperature of 37°C; however, temperatures above 40.0°C occur frequently when the hot and dry, north to north easterly winds prevail. Winters tend to be cool and July is the coldest month with average maximum and minimum temperatures of 18.4°C and 6.1°C, respectively (BOM 2021).

4.3 Topography and Soils

Landforms associated with the Salinaland Plains Zone include plains (with hardpan wash plains and some mesas, stony plains and salt lakes) on granitic and minor greenstone rocks of the Yilgarn Craton. The area within 40 km of KOTH mine has topography with elevations in the range 380 to 500 mAHD, with low hills of bedrock occurring to the east and west of the mine (BDH 2019)

The route intersects three soil systems as described by DPIRD 2020a (Table 3).

Table 3: Soil Systems Intersected by the KOTHGP

Soil & Land Systems	Description
Jundee System	Hardpan plains with variable gravelly mantles and minor sandy banks supporting weakly groved mulga shrublands.
Monk System	Hardpan plains with occasional sandy banks supporting mulga tall shrublands and wanderrie grasses.
Wilson System	Large creeks with extensive distributary fans, supporting mulga and chenopod shrublands.

Soils and geology along the KOTHGP route have been reviewed in context with potential for acid sulphate soils (ASS), and the likelihood of proposed works intersecting ASS is considered to be extremely low. Similarly, there are no known or suspected contaminated sites in the vicinity of the route.

4.4 Surface Water and Groundwater

The project area traverses the Sullivan's Creek which flows infrequently after periods of heavy rainfall. Sullivan's Creek is of significance to the local Traditional Owners and is a registered heritage site. An unnamed minor creek also occurs north east of the Sullivan's Creek pipeline crossing. Both features will be traversed by the KOTHGP, with Sullivan's Creek being crossed via HDD.

No wetlands occur within the project area or surrounds and the project area does not occur within a proclaimed surface water area under the *Rights in Water and Irrigation Act 1991* (RIWI Act).

The Leonora Water Reserve occurs immediately to the south of the KOTH mine area, as proclaimed under the *Country Areas Water Supply Act 1947*. It is a Priority 1 (P1) public

drinking water source area (PDWSA), which has a water quality objective of risk avoidance (DoW 2010).

Groundwater quality in the area is generally fresh to brackish, however bores near the existing Tarmoola Pit have previously intercepted saline to hypersaline groundwater. Groundwater quality ranges from potable in recharge areas to hypersaline in discharge areas (DoW 2010).

4.5 Conservation Reserves and Environmentally Sensitive Areas

There are no wetlands of international importance (Ramsar Wetlands), national importance, Australian Nature Conservation Agency (ANCA) Wetlands or conservation category wetlands within or near the KOTHGP tenement. There are no national parks, conservation reserves or DBCA Managed Lands within or adjacent to NVCP Area. The nearest DBCA managed land is an unnamed Reserve 46847, located approximately 75 km south of the KOTHGP (DBCA 2020).

No Environmentally Sensitive Areas (ESA) as declared in the *Environmental Protection (Environmentally Sensitive Areas) Notice 2005* occur within or surrounding the Purpose Permit Area. The closest ESA is Lake Ballard, located approximately 80 km south of the project.

4.6 Vegetation and Flora

Fifteen vegetation communities occur within the KOTHGP pipeline corridor, most of which are dominated by Acacia species and considered to be well represented in the region.

Based on Keighery vegetation condition rating scale, vegetation condition within the project area ranged from ‘very good’ to 'excellent' and was on average 'very good' (Mattiske 2019) and associations were considered to be well represented in the region.

There are no Threatened Ecological Communities (TECs), or Priority Ecological Communities (PECs) listed at Commonwealth or State level within the KOTHGP Project area or surrounds.

A Level 2 flora and vegetation survey undertaken by Mattiske (2019) identified no introduced flora species or Declared Pest species pursuant to Section 22 of the *Biosecurity and Agriculture Management Act 2007* (BAM Act).

4.7 Fauna and Habitat

Two broad fauna habitats are present within the KOTHGP project area.

The assessment concluded the majority of the project area is disturbed as cattle and probably goats have foraged on both stations for many years and much of the grasses and lower-level vegetation has either been lost, depleted or altered. The consequence is that the vertebrate fauna assemblage will differ significantly from what existed prior to it becoming pastoral lease. There are limited areas of fauna habitat as the majority of the proposed disturbance footprint of the Project is existing disturbance.

A database search of the Department of Agriculture, Water and Environment (DAWE) Protected Matters Search Tool (PMST) identified three Threatened fauna species as listed under the EPBC Act as potentially occurring in the project area, these being:

- Malleefowl (*Leipoa ocellata*) – Vulnerable under both the EPBC Act and BC Act.
- Chuditch (*Dasyurus geoffroii*) – Vulnerable under both the EPBC Act and BC Act.
- Princess Parrot *(*Polytelis alexandrae*)* – Vulnerable under the EPBC Act and Priority 4 as listed by DBCA

No Threatened or significant species as defined by the EPBC Act or BC Act were recorded during a Level 2 fauna survey, including the three species identified by database searches as potentially being present.

It is considered unlikely that any conservation significant fauna species are reliant on habitat in the pipeline corridor. The conservation status of these species is not likely to be impacted by the Project.

4.8 Native Title and Heritage

There are a number of recognised Aboriginal groups with interests in the KOTH project area. As such, Red 5 and APA have a responsibility under the *Aboriginal Heritage Act 1972* to consult with the relevant Aboriginal groups prior to undertaking any land disturbance to ensure no heritage sites are disturbed. Greenstone Resources (WA) Pty Ltd, with support from APA, will continue to engage with the Traditional Owner group, including the Darlot in respect of Native Title Claim WC2018/005.

Ethnographic and archaeological surveys of the project area were undertaken in December 1999 and January 2000 (Australian Interaction Consultants (AIC) 2000). These surveys identified several archaeological and ethnographical sites. Ethnographically, it was noted that the areas inspected fall within an important Dreaming track that extends from Leonora through to areas to the north. Most if not all of the topographical features within this track have greater or lesser significance for Traditional Owners that warrants them being acknowledged and protected. Waterways, creeks and soaks hold significance for Traditional Owners as the embodiment of Creation Beings. Clumps of trees, ridges, mounds, hills and rock holes were also noted to likely hold a spiritual significance for Traditional Owners. As a result of this survey, several of the identified sites were registered with the Department of Planning, Lands and Heritage (DPLH).

An ethnographic and archaeological survey undertaken in November 2019 (Daniel de Gand 2020) identified no new Aboriginal sites or heritage places under the AH Act 1972.

A search of the DPLH Aboriginal Heritage Inquiry System (AHIS) in March 2021 identified one registered Aboriginal heritage sites located within the KOTHGP licence area.

The KOTHGP crosses Sullivan's Creek heritage site (ID 1741). Ethnographic surveys conducted in 2020 noted that a 100 m buffer on either side of Sullivan's Creek was considered sufficient to protect the registered heritage Site.

Further ethnographic and archaeological surveys were undertaken in mid-late 2020, (Appendix 5) targeting the pipeline corridor and the Sullivan Creek heritage site (Site ID 1741). These surveys undertaken with the Traditional Owners specifically defined the boundaries of the three sites in proximity to the Tarmoola Creek crossing (Tarmoola Creek 1, Tamoola Creek 2, and Tarmoola Creek 3). Buffers to these sites were also defined during the surveys. The site boundaries and buffers are presented in Figure 8 of the report

Archaeological survey of 5 areas at Darlot Mine & King of the Hills Mine, Northeast Goldfields (de Gand, 2020), which is Appendix 5 to this report.

The survey identified a previously unreported site of significance ('Women's Site', Tarmoola Creek 3) and two archaeological scatter finds (Error! Reference source not found.). The Tarmoola Creek 3 site and buffer are wholly outside the survey area boundary, but the site was of interest to the Traditional Owners, so it was recorded during the survey.

During the survey, options for pipeline construction were reviewed and the Consultants made several recommendations:

- Requested no impact to the areas of either side of Sullivan Creek (within the 100m buffer zone of newly identified 'Women's Site' – Tarmoola Creek 3)
- Were adamant that trenching across Sullivan Creek not occur
- Requested that the pipeline be tunnelled under the Creek, with entry and exit points 100m from the creek, and no construction works between these two points
- Endorsed the tunnelling alternative for crossing Sullivan's Creek
- No disturbance to any of the large trees along either side of Sullivan Creek.

These recommendations have been agreed between all parties involved and informed the design of the pipeline route. The HDD for pipeline installation will not intersect the boundaries or buffers of any of the sites identified in the survey. Aboriginal heritage monitors will be present during the HDD works.

A Notice was submitted under Section 18(2) of the AH Act 1972 on 3 April 2020, and consent to disturb Registered Aboriginal Heritage Sites ID 1741 and ID 38313 was approved with conditions on 19 August 2020. This consent shows APA have permission, via Red 5, to cross the Sullivan Creek Causeway which intersects the heritage site.

APA has recent experience submitting a Section 18 application for a HDD drilling envelope intersecting with Aboriginal heritage values. Advice received from DPLH recommended that the Section 18 application be withdrawn as the proposed works under the Aboriginal heritage site would not impact the heritage values.

In the case of the KOTH pipeline, the heritage values are surface artefact scatters in the top alluvial layers. These are not vulnerable to impacts from HDD below the surface. As such a Section 18 clearance is not required for the HDD drilling beneath Tarmoola Creek and associated heritage sites.

5. Environmental Management

Environmental management will be implemented in compliance with the APA ISO14001 accredited Health, Safety and Environmental (HSE) Management System which provides for:

- Communication of policies, objectives and roles and responsibilities.
- Inductions, training and competency of personnel.
- Monitoring, auditing, record keeping and reporting, including dedicated hazard and incident reporting system.
- Management of non-conformances and corrective actions.
- Development, tracking and ongoing maintenance of documentation.
- Emergency preparedness and response.
- Toolbox talks.

A risk-based approach has been adopted to manage potential threats to the environment. This process involved initial identification of environmental interactions (aspects) resulting from Project activities followed by an environmental risk assessment (ERA) workshop attended by key personnel. The ERA process involved:

- Assessment of environmental risks in terms of likelihood and consequence.
- Identification of mitigating factors and management measures to reduce environmental risks to ALARP.
- Risk ranking according to severity.

A summary of the key environmental hazards, control measures and mitigating factors identified for the KOTHGP has been provided in Table 4. Table 4 only provides an indication of major hazards and controls and is not a comprehensive summary of all commitments associated with the KOTHGP.

Table 4: Key environmental hazards and control measures

Environmental Hazard	Control Measures and Mitigation Factors
Disturbance of Heritage Site or Exclusion Zones	• Heritage stakeholders consulted. Consultation with relevant stakeholders to continue during construction. • Construction boundaries clearly delineated to prevent encroachment of works on heritage sites or associated exclusion zones, including flagging and/or fencing, on advice from heritage stakeholders; exclusion measures checked and maintained for duration of works in each area. • Cultural heritage monitors to attend earthworks in high risk areas. • Works to cease and DPLH notified immediately if suspected heritage artefacts identified. • KOTHGP Traffic Management Plan (TMP) to address CEP/MP requirements, including access along specific approved routes only. • Inductions, toolbox talks, training, and site procedures address heritage, including protection of sites and exclusion zones, requirement to stop work if suspected artefacts found. • Implementation of APA Cultural Heritage Procedure. • Adherence to s18 Ministerial consent, agreement and ongoing guidance from traditional owners in relation to Heritage values and avoidance areas.
Loss of vegetation, habitat, biodiversity or land use from disturbance to vegetation	• Pipeline alignment, construction ROW, access roads, extra workspace and other Project infrastructure laid out via internal clearing procedures to minimise clearing and use existing disturbance as far as practicable. • Pipeline alignment, construction ROW, access roads, extra workspace and other Project infrastructure laid out via internal clearing procedures to avoid Priority flora and heritage sites and maintain exclusion zones. • Construction boundary clearly marked out to prevent over-clearing. • Vegetation and topsoil cleared for construction and stockpiled separately in adjacent areas for use in rehabilitation. At completion of works, all disturbed areas (with exception to plant sites and a 4 m wide access track for operations) to be scarified, stockpiled topsoils re-spread, then stockpiled vegetation respread to encourage regrowth. • Rehabilitation progress will be monitored as part of regular monitoring. Quantitative vegetation monitoring of the dominant vegetation types, by a specialist ecologist using recognised standard techniques, will be undertaken after 5-years of rehabilitation of construction areas being completed to assess performance against native species diversity and cover, and bare ground targets. • Inductions, toolbox talks, pre-starts, and site procedures address vegetation, including remaining within construction boundaries, and locations of Priority flora. • Hazard and incident reporting to include disturbance beyond marked or approved boundaries or damage to vegetation/ habitat marked for retention; substantial incidents reported to DMIRS.
Injury or disturbance to native fauna or stock from vehicle and mobile plant movements	• Traffic Management Plan (TMP) to control vehicle movements to reduce likelihood / severity of injury / disturbance to fauna, including access along approved routes only; speed limits; restrictions on night driving; IVMS in vehicles to track speed and location. • Established roads used for access where practicable. • Night works limited, and subject to additional risk assessment including hazards to nocturnal fauna. • Inductions, toolbox talks, training, and procedures address vehicle/ plant hazards to fauna, including TMP requirements; drivers to be properly licensed and trained.

Death of native fauna or stock from entrapment in pipeline trench, other excavations, turkey nests or pipe strings	• Gaps left in trench every 1 km or less with ramps at ~45 degrees providing fauna egress points. • Fauna shelters (e.g. hessian bags) placed every 50 m or less in open trench. • Trench inspected in the morning, within three hours of sunrise, and in the evening between 3-6 pm. • During extreme temperatures (35°C or above) consideration will be given to undertaking an additional inspection at midday. • Trench inspected immediately before pipe laying and backfilling; any entrapped fauna retrieved and released. • Trench inspections, and fauna retrieval and release, by licensed handlers meeting training requirements of DBCA. • Trench backfilled (to at least cover pipe) as soon as practicable after pipe laying. • Open trench to be kept to length that can be inspected within three hours by trained and licensed fauna handlers available on site at that time, including during construction breaks. • HDD entry and exit pits will be bunded, ramped and fenced, and inspected (inclusive of the bunded area) for fauna at the start of each workday. • Retrieved fauna released into suitable habitat near point of rescue, at appropriate (as determined by trained fauna handlers) distance from trench/HDD entry and exit pits and bunded area, as soon as practicable, except where they need to be held for treatment (dehydration, hypothermia, etc.), or are a nocturnal species best released in the evening. • Fauna unfit for release referred to qualified carers; carer contact details maintained on site; severely ill/ injured fauna to be euthanised on advice from carers or other qualified persons. • Pipe sections inspected for fauna before welding; end caps kept on pipe strings (sections of 2 or more welds) to prevent fauna entering before pipe laying. • Landholders with stock consulted; gates to be left open/closed and cattle grids installed as required. • Turkey nests will be fenced to limit fauna access and potential death of larger animals. • Turkey nests will have fauna egress ramps to allow smaller fauna to escape.
Disturbance to native fauna from light spill	• Night works generally limited to hydrotesting and occasional movement of equipment along ROW; lighting generally only required at camp. • Lighting directed to minimise spill. • Inductions, toolbox talks, training, and procedures address fauna including hazards to fauna, incident reporting, and procedures for injured fauna.
Loss or degradation of topsoil resources from earthworks, vehicle movements, wind or water erosion	• Topsoils stripped from construction areas and stockpiled adjacent, for use in rehabilitation. • Topsoils stockpiled away from vehicle access points, watercourses, and areas prone to flooding; stockpile heights limited to 2 m to minimise erosion; breaks left in stockpiles to allow surface water flows. • At completion of works, topsoils to be re-spread over disturbed areas (with exception to plant sites and a 4 m wide access track for operations), then cleared vegetation re-spread over topsoil to promote revegetation and prevent erosion. • No driving / parking permitted over soil stockpiles / windrows; signs placed to protect stockpiles/windrows. • Inductions and toolbox talks address topsoil management and preservation. • Hazard and incident reporting to include loss of or damage to topsoil resources. • Other measures to prevent water erosion as set out under “water”.

Soil erosion from inadequate drainage control on disturbed surfaces or uncontrolled release of water from hydrotesting	• Watercourse crossing procedure and dewatering procedure developed and implemented as required to manage erosion hazards, including drainage / sediment controls, and controlled release of water, to be supervised by contractor environmental personnel. • Hazard and incident reporting to include substantial observations of erosion, poorly controlled discharge, or poorly controlled drainage on construction areas. • Flush / hydrotest water captured for re-use off-site (KOTH Mine) or returned to a lined turkey's nest dam for controlled release. • If disposal of flush / hydrotest water is necessary, discharge managed by: releasing via turkey's nest to control rate of release; use of flow diffusers to prevent erosion; release within construction boundary only; monitoring of erosion and remediation where necessary.
Impacts to soils from unplanned exposure of contaminated materials due to trenching	• Hazard and incident reporting to include unexpected contamination identified during earthworks.
Impacts to soils from spills or leaks from drilling fluids/ grouting used in boring	• Specific HDD environmental management plan to be developed, and project-specific HDD procedures to be followed. • Drilling materials to be contained within entry /exit pits or other containment; additional containment equipment kept on hand. • Earthen bunds to be established around HDD entry and exit pits. • Bentonite mud-mixes will be prioritised; any additional chemicals used only with approval from DMIRS. • Experienced specialist HDD contractor to be engaged. • Bore and drilling mud to be continuously monitored during procedure; watch kept for spills, unplanned releases and leaks, works stopped immediately if they occur. • Incident reporting to include substantial spills of HDD grouting / drilling mud.
Impacts on land use / third parties from road / land degradation due to site access	• TMP to manage vehicle movements to reduce likelihood / severity of road / land damage, including access along approved routes only; speed limits (reduced in wet conditions); IVMS in vehicles to track speed and location. • Site assessments to determine additional controls for specific access routes (upgrade / maintenance/ repairs, specific speed limits, vehicle restrictions, etc.) • Consultation with landholders and other relevant stakeholders to determine requirements / restrictions for use of access routes including maintenance; consultation to continue for duration of works. • Access route maintenance / repairs carried out as required. • Inductions, toolbox talks and site procedures address access including approved routes, speed limits, restrictions, and driving to conditions; drivers trained and competent; pre-starts to address road conditions. • Hazard and incident reporting to include damage to roads / lands from access.
Impacts on surface water quality from release of sediment due to earthworks	• Cleared vegetation stockpiled away from drainage lines. • Construction corridor rehabilitated as soon as practicable to stabilise disturbed surfaces and restore resistance to erosion. • Incident reporting to include substantial observations of sediment transport, or poorly controlled drainage on construction areas.

Contamination of surface waters	• Bulk and intermediate hydrocarbon and chemical storage / containment areas sited well away from drainage lines. • Refuelling carried out as far as practicable from drainage lines, and not permitted within 100 m. • Vehicles and mobile plant to be parked up away from drainage lines when not in use. • JHAs to consider any specific hazards to surface water in tasks involving hydrocarbon or chemical transport, storage, handling, or transfers. • Hydrocarbon and chemical waste storage / containment areas sited well away from drainage lines.
Impacts on surrounding land use, vegetation, habitats, and fauna from improper disposal of inert wastes	• Bins, skips and other appropriate containment with lids used for holding wastes till collection. • Wastes removed from CROW frequently (daily) and returned to collection points at main laydown. • Wastes classified and segregated, then removed by licensed waste collection contractor; industrial wastes stockpiled in designated areas. • Wastes collected progressively from site collection points by licensed contractor for disposal off-site. • All remaining wastes removed from site at completion of works; confirmed by practical completion checklist. • Wastes segregated and collected for recycling where practicable. • No disposal of wastes (e.g. sawdust bags) to trench. • Incident reporting to include substantial observations of uncontained / poorly contained wastes or poorly segregated waste.
Attraction / encouragement of feral pests from improper disposal of food wastes	• Rubbish bins with lids for putrescible waste. • All putrescible wastes (including fruit scraps/ decomposable material) brought back from CROW daily for disposal in bins at camp/laydown. • Putrescible wastes frequently removed from site by contractor for disposal at a licensed landfill. • Inductions and toolbox talks address management of food wastes, including no feeding of animals. • Incident reporting to include substantial observations of pests / improperly contained food wastes.
Pollution of soil or water, bacterial health risk, and odour from improper disposal of sewage	• Portable toilets placed along CROW and moved with workfront on trailer; emptied and maintained by supplier weekly or as required. • Inductions and toolbox talks address use of toilets.
Contamination of soils and/or surface water from improper management of contaminated wastes and residues	• Contaminated wastes including empty containers with hydrocarbon or chemical residues, or contaminated materials from spills, kept in dedicated, bunded containment, segregated from other wastes; empty containers managed as for full containers until removed from site, including storage and labelling. • Hydrocarbon and chemical wastes to be removed from site progressively and at completion of works, confirmed in practical completion checklist; wastes to be removed by contractor licensed for class of waste. • Incident reporting to include substantial observations of improperly segregated contaminated or hazardous wastes.

Impacts on flora, fauna, land use, and third parties from unnatural bushfire due to unguarded / uncontained source of ignition	• Fire response equipment maintained on site; 1000L firefighting trailers located close to higher-risk works (clear and grade; welding); fire extinguishers in or on all vehicles or mobile plant; construction equipment (grader, dozer, water truck) to be commandeered for firefighting (clearing firebreaks, pushing up bunds, wetting surfaces, etc.) where practicable and safe to do so. • All vehicles and plant parked up in designated areas when not in use; all stockpiled equipment, materials and waste stored in areas of low fire risk. • Flammable materials to be removed from areas around ignition sources, such as welding or grinding; site housekeeping to keep potentially flammable materials stored away from hot work areas or other fire hazards. • Local fire response addressed in ERP; additional services at Leonora and KOTH site; emergency contact details available to all Project personnel. • Permit system in place for hot works (including welding and grinding), hot tapping, and commissioning works; fire spotter in place for hot / higher fire risk works, • JHAs and pre-starts to consider fire risks; weather monitored for fire risk (hot, dry, and/or windy conditions); DFES alerts and fire bans monitored, exemptions from fire bans sought where necessary, • Hydrocarbons and flammable chemicals kept in dedicated, marked containers and storage areas, • Smoking only permitted at designated areas at camp, laydown, and ROW; bins and "butt bags" provided for safe disposal; no open / camp fires permitted. • Construction works confined to CROW and other areas cleared of vegetation. • Inductions, toolbox talks, training, and procedures address fire hazards, fire response, and use of firefighting equipment. • Incident reporting to include any accidental fires started.

Contamination of soils by hydrocarbons or chemicals	• Diesel fuel storage ≤60,000L within a bunded compound or self-bunded (double-hulled) tank; mobile fuel trailer double-skinned; generators self-bunded. • Hydrocarbons, chemicals, and other hazardous material kept in dedicated, ventilated area, away from busy construction areas and sensitive environments; all hydrocarbons; containment bunds have capacity >110% of largest container and >25% of total storage (whichever greater). • Portable bunded containers (spill pallets) used when handling hydrocarbons and chemicals outside of bunded areas; hydrocarbons, chemicals, and other hazardous materials returned to designated central storage area when not in use. • Bulk fuel storage incorporates lined and bunded refuelling pad; drip trays used for transfers/ refuelling on CROW (except tracked vehicles); transfers/refuelling to be attended; refuelling on CROW only. • Spill response equipment kept on site, including containment and recovery equipment; spill kits strategically located and clearly identified for easy access; light spill, spill kits replenished after use, kits kept with light vehicles and all mobile plant; substantial spill kits and drip trays kept with fuel and service trucks, driver /operator trained in use. • SDS and register kept for all hydrocarbons, chemicals and hazardous substances on site. • Inductions, toolbox talks, training, and procedures address hydrocarbon and chemical transport, storage, handling, transfers, inspections, maintenance, spill response, and waste disposal; additional training for higher-risk roles (e.g., fuel and service truck operators). • Hydrocarbon and chemical spills addressed in ERP and OSCP, including spills from transport. • JHAs to consider any tasks involving hydrocarbon or chemical transport, storage, handling, or transfers, and address associated hazards, including management of any wastes / contaminated materials. • Tanks inspected as part of daily pre-starts; suppliers check tanks before refilling; large tanks have lockable valves (pin code or other) to limit access. • Vehicles and fixed and mobile plant inspected before mobilisation, checked daily as part of pre-starts, and maintained according to manufacturer's specifications. • Traffic Management Plan (TMP) to control vehicle movements to reduce likelihood / severity of collision resulting in spill, including access along approved routes only; speed limits observed (10kph around equipment and working areas, or as set in TMP); IVMS in vehicles to track speed and location; fatigue and journey management plans to reduce risk of incident; access roads maintained to remain safe; inductions and training to address safe driving; all driving to conditions. • Contracts require compliance with CEP/MP and TMP, including requirements for hydrocarbon and chemical transport, storage, and handling; hydrocarbon and chemical suppliers / transporters properly licensed, drivers and operators properly licensed and trained. • Weld coating applied with reasonable care to minimise overspray/ drips; plastic sheeting placed to capture overspray/ drips; substantial loss to ground recovered with shovels and material disposed of at facility licensed for class of waste; delivery hoses to be correctly rated for use; spill kits to hand in case of hose failure. • Pre-cast slabs to be used for civil works / pipeline protection; procedures / training for use of minor quantities of quickset concrete for post installation. • Hazard and incident reporting to include leaks and spills, including location, size, and nature of spill, and details of cleanup/ remediation; substantial spills reported to DMIRS. • Other measures for management of contaminated and hazardous wastes, as set out under "wastes".

Impacts on native flora, vegetation, habitats, and land use from Introduction and/or spread of weeds	• Construction footprint kept as small as practicable to minimise disturbed area prone to colonisation by weeds. • Vehicles to be declared clean of soil clumps and vegetative matter before entry to site; requirement included in contracts; vehicles to be cleaned often (included in pre-start checks). • Number of vehicles travelling to and through site reduced through use of buses. • TMP to control vehicle movements, including access along approved routes only; IVMS in vehicles to track speed and location; movements minimised where practicable (e.g. use of crew bus/ shared vehicles). • Landholders and other relevant stakeholders consulted on weed management requirements / expectations; requirements dictated to construction contractor. • Known weed locations marked on ELLs. • Schedule managed to clear and grade into rather than out of known weed areas (if possible); clear and grade mobile plant and vehicles cleaned down often, and after working through known weed locations, certified by suitably qualified personnel. • Washdown bays to be established and properly maintained. • Fill material to be certified clean and free of weeds, brought from local source, if practicable. • Inductions and toolbox talks address weeds, including vehicle hygiene and information on weeds known to occur in Project area.
Impacts on native flora, vegetation, habitats, and land use from Introduction and/or spread of pest animals / vermin	• Buildings, containers, and other structures to be certified clean and free of pests before mobilisation to site. • Buildings, containers, and other structures to be sourced locally as far as practicable. • Incident reporting to include substantial observations of pests; pests to be dealt with promptly. • Other measures for management of pest species as set out in "wastes" and "reinstatement".
Impacts on vegetation and/or third parties from dust	• Water truck on site for dust suppression as required; site supervisors to direct additional dust suppression as required by conditions (hot, dry, and/or windy). • Speed limits as set out in TMP, including driving to conditions; access along approved routes and CROW only; IVMS to track vehicle locations and speeds; pre-starts to address road conditions; drivers trained and competent; vehicle and plant movements minimised where practicable. • Gravel placed on access roads to minimise dust in sandy areas as determined site by site. • Ongoing consultation with landholders/ other stakeholders for duration of works. • Inductions, toolbox talks, training, and procedures address dust, including speed restrictions, driving to conditions, and dust suppression. • Incident reporting to include unreasonable/ excessive dust generation.
Contribution to global greenhouse effect from unplanned / accidental gas release	• Fuel use and estimated venting volumes recorded; emissions estimated for reporting to DMIRS, NPI, and NGER. • Vehicles and fixed and mobile plant inspected and maintained according to manufacturer's specification to minimise emissions; daily pre-start checks and regular servicing kept up. • Inductions, toolbox talks, training, and procedures address emissions, including vehicle and plant inspections and maintenance. • Incident reporting to include unreasonable/ excessive exhaust / gas emissions.

Local air pollution and contribution to global greenhouse effect, from vehicle and plant operation, and pipeline venting / gas release	• Specific excavation and hot-tap procedure developed for connection onto GGP • Commissioning risk assessment (HAZID) completed and Project commissioning plan developed to minimised risk of unplanned release during commissioning; • Valves, pipework, and connected systems tested prior to installation. • Permit system in place for working on / near live line, including JHA, isolation, and tagging. • Venting for commissioning kept to practicable minimum; surrounding landholders and other stakeholders notified before venting (if likely to be affected). • Live above-ground pipework fenced and signed according to AS2885. • Reporting DMIRS, NPI, and NGER to include unplanned / accidental releases. • Incident reporting to include unplanned/ accidental release of gas.
Disturbance to native fauna and third parties from noise and vibration	• All vehicles and fixed and mobile plant equipped with noise reduction measures such as mufflers or enclosures, maintained according to manufacturer specifications. • Works generally limited to daytime hours; night works subject to site-specific risk assessment. • Venting for commissioning kept to practicable minimum; surrounding landholders and other stakeholders notified before venting (if likely to be affected). • Extent and size of blasts (if required) limited to the minimum practicable for pipeline corridor excavations. • All blasting carried out by licensed and experienced specialist contractor. • Incident reporting to include unreasonable/ excessive noise or vibration, and any third-party complaints.

Erosion of soils, weed proliferation, and impacts to land uses due to inadequate reinstatement	• At completion of works, rehabilitate disturbed areas not required for operations, except where otherwise agreed with landholders:
	  ○ Scarified across contours, to trap seed and water, aiding reestablishment of vegetation.
	  ○ Evenly respread with stockpiled topsoils to a depth representative of that which was stripped.
	  ○ Respread with stockpiled vegetation over topsoils, to encourage vegetation re-establishment (except directly over trench line and inspection track).
	• Rehabilitation requirements and responsibilities included in contracts and access agreements.
	• Practical completion checklist to include rehabilitation acceptance; 12 months contractor defects liability period.
	• Ongoing monitoring / inspection during operations according to OEP – aerial monthly or on ground corridor inspections annually.

6. Stakeholder Consultation

APA is committed to maintaining positive relations with all stakeholders throughout the duration of its activities. A brief summary of engagement to date is provided in Table 5.

Consultation with government has involved meetings with agencies to generally advise them of the Project, and discuss approval requirements (including information requirements), and timeframes. APA notes that no major issues of concern in regard to potential Project environmental impacts have been raised to date.

Liaison with land holders commenced at Project conception and is ongoing. A comprehensive line list will be generated for land holders and occupants to address concerns over land access, potential impacts, and reinstatement. Where applicable, property inspection reports will be prepared to record agreements between APA and land holders or occupants, and to ensure conditions of agreements are met.

Stakeholders will be kept aware of scheduled activities and impacts as the Project progresses. Ongoing consultation will occur for this Project via email/letters, meetings, and circulation of updates to relevant stakeholders.

Feedback from all interested parties will be encouraged and monitored during the entire Project. A register will be maintained to record actions taken to address any issues/feedback received.

Table 5: Summary of stakeholder interactions

Stakeholder	Consultation	Key Dates
Landholders		
DPLH (Old Agnew Road)	Notification of pipeline licence application made to DMIRS. No issues raised to date.	02/03/2021
DPLH / DMIRS (Peak Hill Stock Route)	Notification of pipeline licence application made to DMIRS There are no issues from DPLH around the ingress and egress of the Peak Hill Stock Route. No issues raised to date.	02/03/2021 3 & 4/11/2021
Next Horizon 888 Management Pty Ltd (Tarmoola Station)	Notification of pipeline licence application made to DMIRS Completion of land use survey form to inform design and safety management study for KOTHGP Notification of Contractor Site Visit Notification of Soil Resistivity Testing	02/03/2021 24/05/2021 02/07/2021 03/08/2021
Torian Resources (Tarmoola Station)	Introduction and Notification of pipeline licence application made to DMIRS Sent land use survey form to inform design and safety management study for KOTHGP Use of access tracks on Tarmoola Station Notification of Construction Start No issues or concerns to date	06/08/2021 29/09/2021 03/11/2021

Stakeholder	Consultation	Key Dates
Sturt Meadows Station	Notification of pipeline licence application made to DMIRS	02/03/2021
	Completion of land use survey form to inform design and safety management study for KOTHGP	23/07/2021
	Proposed integrity dig-up works within PL24 licence area	05/07/2021
	Seeking consent under section 20 of the Mining Act 1978 to do works within 400 metres from Hicks Well – consent granted.	20/07/2021
	Notification of Contractor Site Visit	02/08/2021
	Notification of Soil Resistivity Testing	19/08/2021
	Consent given for the use of station tracks to access the pipeline licenced area.	14/10/2021
	Notification of Construction Start	03/11/2021
	No issues or concerns to date	
Mining Tenement holders		
Greenstone Resources (WA) Pty Ltd (Red 5)	Notification of pipeline licence application made to DMIRS	02/03/2021
	Completion of land use survey form to inform design and safety management study for KOTHGP	15/07/2021
	Access Deed for use of L37/248 during construction of KOTHGP	April 2021
	Proposed integrity dig-up works within PL24 licence area	13/7/2021
	Change to Native Title Claim	16/7/2021
	Letter of Authority for NVCP and MP	20/7/2021
	Notification of Contractor Site Visit	30/7/2021
	Haul Road Information	02/8/2021
	Notification of Soil Resistivity Testing	07/08/2021
	Regular KOTHGP project progress meetings	Ongoing

Stakeholder	Consultation	Key Dates
Murrin Murrin Holdings Pty Ltd	Notification of pipeline licence application made to DMIRS Completion of land use survey form to inform design and safety management study for KOTHGP Notification of Contractor Site Visit Notification of Soil Resistivity Testing Access Agreement for intersecting Miscellaneous Licence L 37/129 No issues or concerns to date.	02/03/2021 16/07/2021 20/7/2021 03/8/2021 16/08/2021 27/10/021
St Barbara Limited	Notification of pipeline licence application made to DMIRS Completion of land use survey form to inform design and safety management study for KOTHGP No issues or concerns to date.	02/03/2021 15/07/2021
Government		
DFES	Contact will be made with DFES if there is a need for an exemption on a total fire ban day.	Ongoing
DMIRS	Pipeline licence application Review of draft technical schedule for pipeline licence Application for NVCP CPS 9337/1 Updated spatial coordinates for the Start Point of new pipeline STP-PLA-0049 Discussions around the execution of PL126 & the final grant documentation. Ongoing meetings and emails have taken place with regards to the safety case with the Critical Risk division.	02/03/2021 22/06/2021 24/06/2021 03/08/2021 09/2021 01/10/2021
DPLH	Haul Road (Sullivan Creek Causeway) Section 18 Notice for disturbance of Registered Aboriginal Heritage Sites ID 1741 and ID 38313 was submitted 03 April 2020 and Section 18 consent approved on 19 August 2020. The Section 18 Approval has been attached as Appendix 6. The HDD construction method means that the Sullivan Creek site (ID 1741) will not be disturbed. Traditional owners will be present during HDD works.	03/04/2020 19/08/2020

Stakeholder	Consultation	Key Dates
Shire of Leonora	Notification of pipeline licence application made to DMIRS Proposed crossing of Old Agnew Road and review of APA standard design of special crossing. Confirmed open cut method and traffic management plan requirements. Contact with local emergency services to be made during construction phase.	02/03/2021 14/07/2021
Native Title / Heritage claimants		
Darlot	Notification of pipeline licence application made to DMIRS Discussions with Red 5 confirming that Traditional Owners will be present during the HDD works. No issues or concerns to date.	02/03/2021
Native Title Services Goldfields	Notification of pipeline licence application made to DMIRS No issues or concerns to date.	02/03/2021
Tjupan and Koara Aboriginal Heritage Consultants	Engaged via Red 5 to complete archaeological and ethnographical surveys of the area. As a result of the surveys, recommendations have been made and these have been taken into consideration around the design of the pipeline.	23-26/06/2020
Petroleum Pipeline licence holders		
Southern Cross Pipelines Pty Ltd (PL24)	Notification of pipeline licence application made to DMIRS Application to vary PL24 No issues or concerns to date.	02/03/2021

Contact details:
Madonna Burns
Access & Approvals Lead
APA Group
Madonna.burns@apa.com.au
(08) 6189 4300