







PARMELIA GAS PIPELINE

ENVIRONMENTAL BRIDGING PLAN

PUBLIC DISCLOSURE SUMMARY

PGP Section 1 Pig Launcher Upgrade Project

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1. Introduction

1.1 Purpose and Scope

APT Parmelia Pty Ltd (APA Group) submits this Bridging Document (BD) under the Parmelia Gas Pipeline System (PGP) Operations Environment Plan (OEP) (PGP.2373-PL-HSE-0001 Rev 2.4) and Mondarra Gas Storage Facility (MSF) OEP (MON.MOND-PL-HSE-0001 Rev 3.4) in accordance with the Petroleum Pipelines (Environment) Regulations 2012 for pigging operations on the Parmelia Gas Pipeline, Pipeline Licence 1 and Mondarra Storage Facility Production Licence 1. Although pipeline pigging activities are described in sections 2.2 and 3.6.5 in the PGP EP, the installation of new pipework and the construction and installation of a new pig launcher and associated environmental risks, have not been disclosed in either PGP OEP or MSF OEP.

1.2 Objective

The overall environmental objectives of the BD are to:

- Minimise environmental and social impacts resulting from the works;
- Mitigate all identified environmental risks to be as low as reasonably practicable (ALARP) and acceptable;
- Comply with all relevant environmental regulations and adopted standards; and
- Minimise disturbance to surrounding landholders.

2. Activity Description

2.1 Location

The new pig launcher facility will be installed upstream of MLV0 which is located at approximately KP 11.9 (approximately 317054m Easting and 6755895m Northing) on the PGP, adjacent to the MSF, located 20km south east of Dongara (Figure 1).



Figure 1: Pig Launcher Location

2.2 Project overview and justification

APA own and operate the PGP, designed for transporting gas from the Perth Basin near Dongara to customers in the Perth area and the south west of Western Australia. The PGP transports gas from the Dongara Production Facility (DPF) (now shut in) and interconnects, associated with the Xyris field (KP 9.5), MSF at KP 11.9 and Beharra Springs at KP 27.5 to Perth. An intelligent pigging campaign is due for the PGP Section 1 (from DPF to Compressor Station no.3 (CS3) or Main Line Valve no. 6).

This project has been initiated to construct new pig trap facilities to allow intelligent pigging runs to obtain data to demonstrate the pipeline remains safe to operate and to comply with regulatory requirements for pipeline inspections.

The recent shut in of the Dongara Gas Field, due to low production volumes, has resulted in the pipeline section between the DPF and Compressor Station 3 (CS3) being un-piggable as a result of no gas being available at Dongara to propel the intelligent inspection tool. Additionally, Xyris Production Facility to be isolated and disconnected from the PGP at the end of 2019.

As a result of the above, scraper facilities will be constructed for pigging from MLV0 at Mondarra to MLV6 at CS3.



2.3 Timing

The planned works is expected to commence on the 17 February 2020 and expected to occur until approximately 15 April 2020.

2.4 Overview of activity

The following activities for the project will be undertaken as follows:

- Install visible demarcation of work area using bunting or similar; relocation or installation of new fencing;
- Prepare the work site and any access tracks required for construction including modification of existing access tracks where applicable;
- Mobilisation of temporary site office, (including ablutions, storage and crib).
- An area of 0.32 hectares of native vegetation will be cleared for the installation of a valve station and fire break. Vegetation clearing will be undertaken under an exemption under the *Environmental Protection (Clearing of Native Vegetation) Regulation 2004*. The specific exemption that applies to the project is provided for under Regulation 5 Item 1 "clearing to construct a building or structure".
- Removal of redundant piping, pipe supports and footings then excavate¹ and install, inspect and test the MLV0 bypass line allowing MSF to continue to supply gas to PGP whilst MLV0 is isolated. APA will vent MSF Sales Gas Line allowing for contractor to complete the tie-in of the bypass line;
- Upon commissioning of MLV0 bypass and subsequent venting of PGP section to the north of MLV0, the Contractor will excavate the pipeline to the north of MLV0 in preparation for installing the pipeline assembly (Induction bends, Monolithic Joint and Pig trap isolation valve) and capping the northern section of the pipeline;
- Following installation, inspection and testing of the pipeline assembly and cap on the northern section of the pipeline will occur;
- Following backfilling of the trench, road base will be installed on the surface and compacted to minimise soil erosion;
- Precast pipe support foundations are to be installed along with the pipe supports and launcher slab;
- Contractor will install and test the pig launcher and associated pipework;
- The area around the pig launcher and aboveground pipework will be topped with blue metal;

¹ Construction of bypass: 29m long and 1.5m deep. Kicker line: (21m+8.5m) long and 1.5m deep.



- Commissioning² and performance testing will be carried out by APA;
- Upon completion of activities, fences will be reinstated, signage installed and the area will be restored to minimise potential erosion/subsidence. No vegetation rehabilitation works will be undertaken;
- Demobilise site hut, machinery and equipment. Contractor shall clean up and dispose of all rubbish.
- Equipment utilised during the project are as follows:
 - Excavator/skid steer loader/wheeled loader
 - Tip truck/flatbed trucks
 - Crane
 - Welding machines
 - Generator
 - Grinders,
 - Hand and power tools
 - Low loader
 - Vehicles (light vehicles)
 - Site hut and ablution
 - Lighting tower (if required)
- The project will occur 7 days a week, 12 hours per day, with a crew of approximately 6-8 people. Night works will occur as required, such as for Non-Destructive Testing (NDT).

NB. A total of 0.04 hectares of native vegetation was cleared and an earth pad constructed in preparation for installation, between 29th July 2019 and 9th August 2019, outside of the scope of this BD.

3. Description of the Environment

A detailed description of the existing environment is provided in Section 4 of the PGP OEP (PGP.2373-PL-HSE-0001 Rev 2.4) and in Section 4 of the MSF OEP (MON.MOND-PL-HSE-0001 Rev 3.4). As the project location is located within the same area, no additional information has been provided.

² Energisation of all components and/or gas is introduced for final verification of the operational and safety functions of the pipeline, prior to handover of operational control.



4. Environmental Management

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

- Communication of policies, objectives and roles and responsibilities;
- APA National HSE Induction, site induction (MSF-AP-3289 Rev 4), training and competency of personnel;
- Development, tracking and ongoing maintenance of documentation;
- Emergency preparedness and response;
- Toolbox talks; and
- Regular housekeeping inspections, record keeping and reporting, including dedicated hazard and incident reporting system.

4.1 Risk Assessment

A risk based approach has been adopted to manage potential impacts to the environment. An environmental risk assessment (ERA) of the risks in Section 5 of the PGP and MSF OEP has been undertaken, considering the risks relevant to the project. The ERA involved:

- Assessment of environment risks in terms of likelihood and consequence; and
- Identification of mitigating factors and management measures to reduce environmental risks to ALARP and acceptable

Risks associated with the project identified in the ERA currently covered in existing OEPs are as follows:

- Noise, odour, dust generation
- Spread/introduction of weeds
- Disturbing surrounding landholders
- Surface erosion
- Chemical spills
- Fauna entrapment
- Imported fill not from clean supply
- Waste generation
- Fire

Additional risks identified in the ERA that are not currently covered in the existing OEPs are demonstrated in Table 1.



Table 1: Additional risks and associated management and mitigating measures.

Additional Risk	Management Measures & Mitigating Factors
Waste generation associated with concreting	<ul style="list-style-type: none"> *Correct collection and disposal of concreting waste *Relevant Safeguard EP procedures and processes *Trained and competent operators
Spills associated with hydro-testing	<ul style="list-style-type: none"> *Contractor hydro-testing plan include contingency regarding leaks provided to APA *APA National HSE Induction and MSF Site Induction. *Spill response equipment (spill kits) including containment and recovery equipment, available on site which caters for release of both liquids and solids *Testing to be completed off site where possible *If testing to be completed on site, then potable water to be used *No additives to be added to hydro-test waster. If additives required, dispose by regulated waste contractor *NDT test prior to hydro-testing by specialised contractor *Water quality / testing records to be maintained
Spills associated with fuel storage failure (500L to 1000L)	<ul style="list-style-type: none"> *National APA HSE Induction and MSF site Induction *Spill kits available, located in close proximity to areas where chemicals are stored * Fuel storage equipped with drip tray *Relevant Safeguard EP procedures and processes *SDS available onsite for all stored (liquid) hazardous substances and online through Chemwatch register
NORMs (Naturally Occuring Radioactive Material)	<ul style="list-style-type: none"> *Controls for NORM as per APA HSE ENV GDE 005 NORMs waste general guidance *Notify Environment Team *Environment Team to provide guidance on testing requirements *If NORMs is detected, each end of the pipe will be sealed. *Identify/label as potential NORM contaminated waste *Segregate from other waste
Starting a fire	<p>Covered in PGP EP – however additional management controls have been added</p> <ul style="list-style-type: none"> *National APA HSE Induction and MSF site Induction. *Competent welder companies * Designated smoking area with cigarette butt disposal bins * Fire suppression equipment (complying with relevant Australian Standard) on site at all times



	<p>*Relevant Safeguard EP procedures and processes</p> <p>*Flammable materials to be removed from areas around ignition sources</p> <p>*Flammable material to be stored as per SDS</p> <p>*Equipment operated as intended by competent operators</p> <p>*Any rubbish, debris or oil refuse that could constitute a fire hazard securely store for removal/ or removed immediately</p> <p>Additional controls</p> <p>* Fire prevention and control procedure(320-PR-HS-0018)</p> <p>*Implement fire watch protection check sheet as per 320-PR-HS-0018</p> <p>*Notice of Exemption Total Fire Ban for hot works (welding, cutting, grinding and heating) and to enable "off road" vehicle and machinery. This exemption only applies for work which cannot reasonably be postponed to a time with safer weather conditions</p> <p>*If exemption is used:</p> <ul style="list-style-type: none"> - The closest DFES office is to be notified on the day of and prior to these activities occurring during a total fire ban - The applicable local government or their authorised representative is to be informed on the day of and prior to works requiring this exemption commencing - Adhere to the site requirement conditions for hot works - A copy of the exemption to be given to contractors (see Appendix 3) <p>* Evidence of notification to DFES and local government authority if hot works are to occur during a total fire ban day</p>
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4.2 Environmental Performance Objectives, Standards and Measurement

All environmental risks and potential environmental impacts associated with the project will be managed in accordance with this Bridging Document and the PGP OEP and MSF OEP. The additional risks identified for the project are adequately captured by the existing performance objective, standards and measurement criteria (OSMC) provided in Section 6 of the PGP OEP. OSMC relevant to this project are in relation to Emissions to Air, Fuels and Chemicals, General and Regulated Waste, Pests, Weeds and Disease, Soil Quality, Vegetation and Flora, Fauna, Fire, and Third Party Impacts.

4.3 Oil Spill Contingency Plan

Any chemical or hydrocarbon spill incident that may occur in the course of the project will be managed as described in the Oil Spill Contingency Plan (OSCP) set out in



Sections 8 of the PGP OEP and MSF OEP. APA Group has reviewed these OSCPs and found they are appropriate to the nature and scale of the project, and any spill risk that may arise from it. The largest credible spill that could occur in the course of the project is less than 1,000 L.

5. Stakeholder Consultation

The project will be located within already existing tenure held by APT Parmelia Pty Ltd, and therefore the construction works are not expected to directly impact the landholder's activities. However as the project will generate noise, traffic and other potential disturbances, particular stakeholders will be engaged to ensure there is awareness of the project and provide an APA contact person to ensure any issues or complaints are captured and addressed. Key stakeholders to be consulted by APA include:

- Department of Mines Industry Regulation and Safety
- Local Government
- Neighbouring Landholders
- Utilities

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 2.

Consultation with government has involved meetings with DMIRS to generally advise them of the project, seek advice on the variation to Pipeline Licence 1 R1 and discuss approval requirements. No major issues of concern in regard to potential environmental impacts have been raised to date.

Affected stakeholders will be kept aware of scheduled activities and any impacts as the project progresses. Ongoing consultation will occur for this project via email/letters, meetings and circulation of updates to relevant stakeholders. A register will be maintained that records actions taken to address any issues/feedback received. These records will be kept in X-Info connect.

Following the appointment of a construction contractor, further stakeholder engagement will commence.

All third party complaints will be addressed promptly, in accordance with APA corporate procedures. Substantive complaints will be recorded in the project incident register (section 6.5 of PGP OEP), causes will be identified, corrective actions (which may include changes to work practices or additional training or awareness programs, commensurate with the nature and severity of the complaint) determined, assigned, and tracked to completion.

Table 2: Summary of Stakeholder Consultation



Stakeholder	Consultation
DMIRS – Environment	Consultation with DMIRS commenced on 25/09/19 regarding Bridging Plan and reporting requirements. Consultation ongoing.
DMIRS – Native Vegetation Team	Engagement on native vegetation clearing requirements in December 2019 and January 2020.
DMIRS – Resource Tenure	Engagement and lodgement of Variation STP-PLV-0096 on 16 October 2019.
Shire of Irwin	Engagement with on any required approvals for ablutions and construction transportable buildings.
Landholders	The landowners were contacted regarding the upcoming works in June 2019, and further contact made in January 2020. Those who will be affected by the works and those that will be notified given the increased traffic and truck on Pye Road.
Australian Gas Infrastructure Group and Western Power.	Notification of works and increased traffic on Pye Road.

6. Contact Details

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