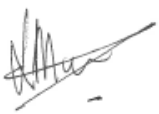






CPP.2373-PL-HSE-0002

**CAPE PRESTON PIPELINE OPERATIONS
ENVIRONMENT PLAN SUMMARY**

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1.0	15/08/2018	5 yearly review, alignment with DMIRS guidelines and APA pilot EPs.			
			L.Graham	M.Morel	E.Mott
			Environment Advisor	Environment Advisor	Regional Manager Pilbara

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1. Introduction

This Operations Environment Plan (OEP) Summary provides an overview of the environmental management requirements for the operation of Pipeline Licence (PL) 77 Cape Preston Pipeline (CPP) (herein referred to as The Pipeline).

1.1 Purpose and Scope

The purpose of this OEP Summary is to provide information to the public regarding environmental considerations and management requirements.

The scope of this OEP Summary is limited to operational works associated with The Pipeline.

1.2 Objectives

The overall environmental objectives of the OEP are to:

- Minimise environmental impacts resulting from pipeline operations
- Mitigate all identified environmental risks to a level that is As Low As Reasonably Practicable (ALARP)
- Comply with all relevant legal and regulatory environmental requirements
- Minimise disturbance to surrounding landholders.

1.3 Corporate Environmental Policy

APA is committed to responsible environmental management and believes that all environmental aspects associated with the operation of the pipelines can be effectively managed. In addition, APA is committed to reducing all environmental risks subsequent to site based operational activities to ALARP.

All works will be conducted in accordance with the APA Corporate Health Safety and Environment (HSE) Policy.

All contractors and sub-contractors must comply with the OEP. This requirement is specifically addressed within contractual arrangements. Regardless of this, APA takes full responsibility for the application and administration of the OEP at all times.

1.4 Abbreviations

Table 1: Abbreviations

AHIS	Aboriginal Heritage Information System
ALARP	As Low as Reasonably Practicable
APA	APA Group
CP	Cathodic protection
CPP	Cape Preston Pipeline
DAA	Department of Aboriginal Affairs
DBCAs	Department of Biodiversity Conservation and Attractions
DG	Dangerous Good
DMIRS	Department of Mines, Industry Regulations and Safety
DPIRD	Department of Primary Industries and Regional Development
DPLH	Department of Planning, Lands and Heritage
DWER	Department of Water and Environmental Regulation
EP	Environment Plan
ERA	Environmental Risk Assessment
ERP	Emergency Response Plan
ESA	Environmentally Sensitive Area
GGP	Goldfields Gas Pipeline
HAZOP	Hazard and Operability Study
HSE	Health Safety and Environment
IOC	Integrated Operations Centre
IBRA	Interim Biogeographic Regionalisation for Australia
JHA	Job Hazard Analysis
KP	Kilometre Point
OEP	Operations Environment Plan
OSCP	Oil Spill Contingency Plan
PL	Pipeline Licence
PTW	Permit to Work
ROW	Right of Way
SDS	Safety Data Sheet
SWMS	Safe Work Method Statement
TPC	Third Party Contractor

2. Facility Area and Activity Description

The CPP starts at Kilometer Point (KP) 82.497 on the Dampier to Bunbury Natural Gas Pipeline (DBNGP) and runs west for 12.0 km to a point north of the Cape Preston Power Station location where it turns south and then runs generally south for approximately 1.2 km and then turns west for approximately 300 m, terminating in the Power Station Delivery Station.

The CPP is located within a Miscellaneous Licence (ML L008/20) situated entirely within the Mardie pastoral lease (retained by Pastoral Management Pty Ltd, a wholly owned subsidiary of CITIC Pacific Ltd; Pastoral Lease Lot 1501 on Plan 074341 and Lot 531 on Plan 221145) and is operated under PL 77. The Miscellaneous Licence provides for access to the pipeline for maintenance and operation. Temporary access or work areas outside the easement require landholder consent and appropriate regulatory approvals. The Pipeline also traverses Mining Lease M 08/123-I and M 08/124-I.

The facility area covered by the OEP comprises the pipeline corridor, various facilities as well as communication systems from the CPP offtake facility on the DBNGP (KP 82.5) to the CPP Delivery Station at the Cape Preston Power Station. Note that this does not include the entire Miscellaneous Licence area; part of which is intended for use by additional infrastructure. The operational area coordinates of the CPP are as follows:

- Commencement point: -21.073737° 116.281382°
- Termination point: -21.079650° 116.160534°.

The CPP traverses previously disturbed agricultural land and the mining tenement, which has been largely cleared of native vegetation for pastoral use. The pipeline does not traverse any nature reserves or Environmentally Sensitive Areas (ESAs). The location of the CPP is shown within Figure 1.

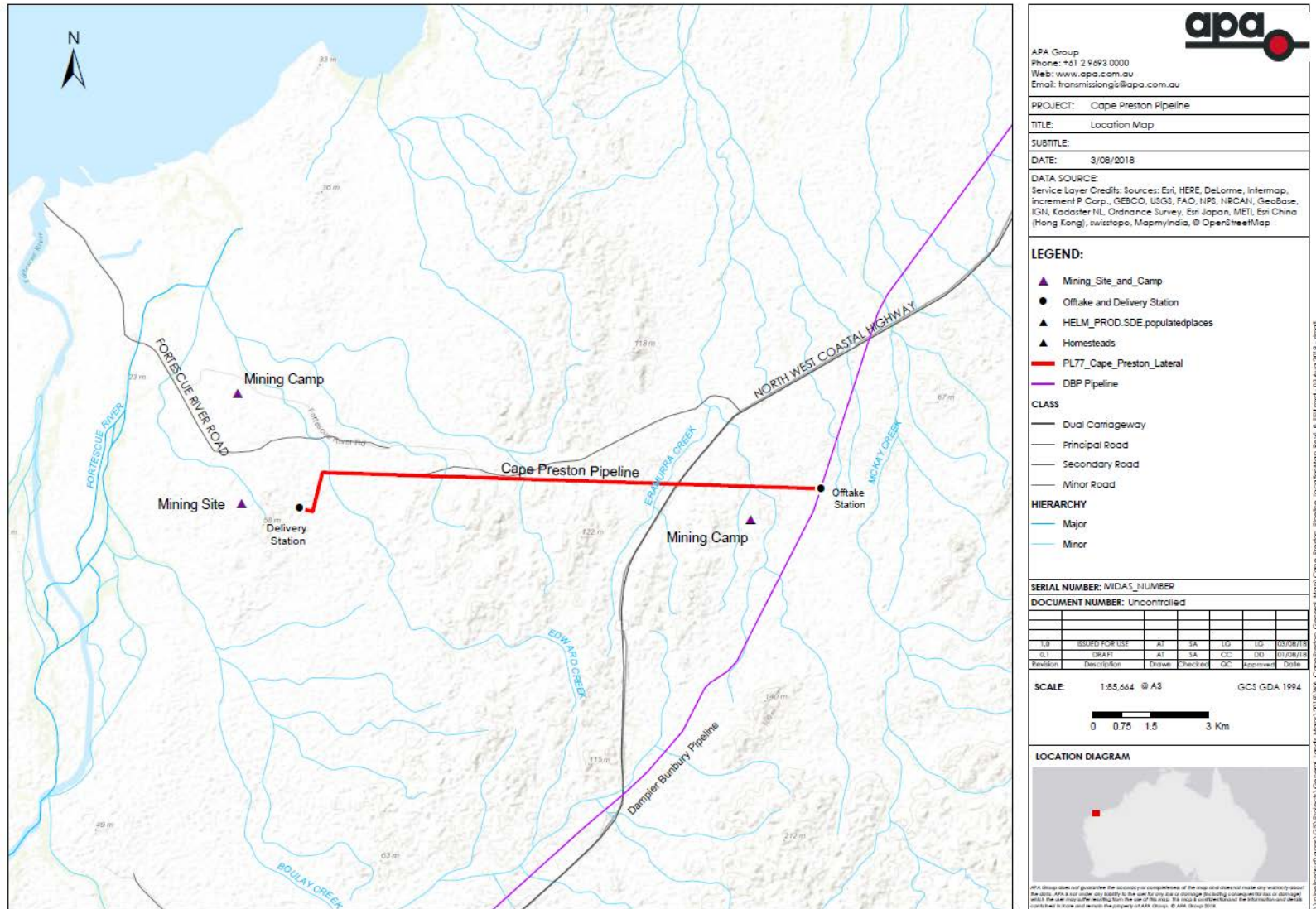


Figure 1 CPP Locality Map

2.1 Pipeline Operations and Maintenance

The CPP is operated as part of the Pilbara Region and managed from the Karratha Maintenance Base.

Specific pipeline operations and maintenance activities to which this OEP applies include:

- General equipment and facility maintenance;
- Filter changes;
- Cathodic protection surveys;
- Pipeline excavation;
- Venting;
- Pipeline pigging;
- Pipeline patrols;
- Line of sight clearing;
- Easement, facility and equipment inspections; and
- Breakdown and emergency response exercises.

Work activities carried out will be monitored and controlled as per the requirements of the Permit to Work (PTW) System. Further details are provided in the Gas Transmission Permit to Work Procedure (320-PR-HS-0005).

2.1.1 General Equipment & Facility Maintenance

General equipment and facility maintenance typically includes but is not limited to the following:

- Servicing and overhauls of machinery and equipment;
- Equipment inspections and testing;
- Monitoring;
- Safety inspections and follow up;
- Filter inspections and replacement;
- General housekeeping (i.e. as per safety requirements and this EP); and
- Small-scale facility works.

The above activities involve various mechanical and electrical tasks which are undertaken by appropriately qualified trades people. Regular monitoring and safety inspections are also undertaken to identify unplanned maintenance requirements as they arise.

Filter inspections are undertaken at regular intervals and filters are replaced as required. Filter replacement involves filter removal, wash down with water and transfer to a secure container for transfer to offsite disposal facilities.

Operations utilise maintenance base wash-down facilities. A wash-down register is kept and maintained as part of these activities. Water from the wash-down facilities flow into an oily water separator, which are regularly inspected. Contents are emptied by a licensed contractor and disposed of to an appropriately licensed facility, as required.

Small scale upgrades may be required intermittently to allow for increased services or changes in pipeline requirements. Works will be restricted to the facility boundary.

General housekeeping includes numerous tasks typically associated with health, safety and / or environmental management. Specific items may include general tidying / cleaning, waste management, maintenance of firebreaks, spraying of weeds and numerous other duties.

2.1.2 Cathodic Protection Surveys

Cathodic protection (CP) refers to the use of electrical current to protect steel pipework against corrosion. Detailed CP surveys are undertaken annually to monitor pipeline integrity and ensure the CP system itself remains functional. Routine spot checks are conducted six monthly by accessing CP test points at approximately 5 km intervals along the pipeline and connection to a meter which measures corrosion. The CP is monitored continuously through the APA SCADA system.

2.1.3 Pipeline Excavation

Small-scale pipeline excavations are undertaken on an infrequent, ad-hoc basis, typically for pipeline repairs and crossing installations. Pipeline excavations are strictly controlled for safety reasons via risk assessment, work permits and procedures. The scales of excavations are generally single defect dig-ups of a few metres.

Pipeline excavations are managed through Gas Transmission Excavation Procedure (SP-APAT-101-OP-0030) and Excavation Guidelines (SP-APAT-101-OP-0034). These documents state that top soil removed shall be kept separately from any backfill materials taken from the trench. The pipe must be covered all round with a minimum of 150 mm of clean bedding material/sieved natural backfill before any un-sieved natural backfill material can be used. After padding the trench the remaining backfill can be performed using previously excavated material. Once backfilling is complete the segregated top soil is re-spread over the area.

Dewatering is sometimes required where the water table is present at less than a few metres from the ground surface however this is not expected on the CPP.

Prior to conducting any pipeline excavations a desktop assessment is conducted by qualified personnel to ensure relevant approvals have been obtained and risks are mitigated (e.g. acid sulfate soils) (Land Disturbance Management Form APA HSE EF 01).

2.1.4 Venting

Venting of gas from the pipelines is undertaken to purge pipelines and / or facilities for maintenance or emergency response purposes. Venting for maintenance purposes under normal operating pressure could typically release approximately 10 m³ of gas. Venting is managed through APA's maintenance management system (MAXIMO) in accordance with the site maintenance schedule. Due to the numerous types of filters it is not possible to accurately estimate annual venting discharges. Quantities of vented gas are recorded by the APA Integrated Operations Center (IOC) and reported in the quarterly emissions and discharges report to DMIRS.

2.1.5 Pigging

Cleaning pigs are run between pipeline scraper stations containing pig launching and receiving facilities. This is conducted on an infrequent ad-hoc basis. Particulate matter separated from the gas stream is a common by-product of pigging (removal of which is the ultimate goal in the case of a cleaning pig run), these are caught in the pig receiver trap along with the recovered pig and contained for offsite disposal.

2.1.6 Right of Way (ROW) patrols

The pipeline owner has a gazetted easement registered under the *Land Administration Act 1997* which allows for legal access for maintenance, operation and emergency response.

Pipeline ROW is sighted monthly by Pipeline Technicians during monthly metering. Formal vehicle patrols are completed by Pipeline Technicians on a six monthly basis. Corridor condition inspection are conducted annually. This work is conducted from light vehicles and managed through APA's maintenance management system MAXIMO with work orders being generated for completion. The ground patrols are completed in accordance with work instruction WI-L-20143. Any issues identified are documented and where necessary additional work orders raised for corrective action to be completed.

Patrols may identify issues such as:

- Third Party encroachment;
- Vegetation growth;
- Line of sight;
- Presence of weeds;
- Erosion, subsidence or stability issues;
- Exposed pipe; and
- Condition of signage and aerial markers.

Aerial patrols are completed monthly. The monthly aerial patrol is undertaken via a contractor and any issues / occurrences that are recorded during the flight are uploaded into X-Info directly by the contractor for APA to action. The contractors follow the Aerial Surveillance Procedure 320-PR-HEL-0001.

3. Receiving Environment

3.1 Climate

The Pilbara coast has hot, humid summers from December to March and warm, dry winters from May to November. Summer temperatures are usually extreme and there is a high evaporation rate (Pilbara Energy Limited 1993). Tropical cyclones regularly occur between November and April, with April storms historically being the most severe (Epic Energy 2003). The wettest months tend to be from January to June with mean monthly rainfall between 21.1 mm and 68.2 mm. To date there have been no instances of meteorological and atmospheric conditions impacting the operational ability of the pipeline.

3.2 Physical Environment

3.2.1 Topography, Geology and Soils

The landform and vegetation is generally described as low hills and slopes with mainly hummock grassland and small shrubs (Austeel, 2000).

The main topographic features of the Pilbara Region are the Hamersley Ranges and the Fortescue River valley floodplain. The surficial geology consists of a granite and greenstone base, overlain by Achaean sediments and volcanics of the Fortescue Group, capped by Proterozoic sediments of the Hamersley Group. Tertiary and quaternary deposits are common in water courses as well as colluvium at the base of scarps and hills. Soils include plastic clays, brown red clays and red brown earths as well as areas of calcareous soils associated with hardpans.

The Pilbara contains some of the oldest rocks on earth which formed during the Archaean period, approximately 3,600 million years ago. The land surface varies from flat sand plains overlying granitic rocks with ridges of dolerite, to dissected ridges of metamorphic stone and eroded tablelands comprised of a mix of Proterozoic volcanics and sedimentary rocks (DBNGP 2009). The Roebourne sub-region that the pipeline covers is characterised by Quaternary alluvial (river-eroded) and older colluvial (gravity-eroded) coastal and sub-coastal plains. Basalt ranges also occur across the coastal plains.

The CPP is located within the Harding Hills and Plains Zone of the Fortescue Soil-Landscape Province (Tille 2006). Geology of northern portion of the Fortescue Province is characterised by Archaean rocks of granite-greenstone terranes. The Harding Hills Plains Zone comprises sedimentary, granitic and volcanic rocks of the Pilbara Craton (Tille 2006).

Soils of the inland portions of the Fortescue Province include:

- Stony soils on hilly terrain where red shallow loams and red shallow earths also occur;
- Hard cracking clays on basaltic plateau surfaces;
- Red shallow loams, red deep sandy duplexes and red sandy earths on granitic stony plains;
- Red shallow loams and red/brown non-cracking clays on stony footslopes and beneath basaltic hills;
- Stony soils, red deep sandy duplexes and red loamy earths on stony plains;
- Red loamy earths, red/brown non-cracking clays, hard cracking clays, self-mulching cracking clays, red deep loamy duplexes and red shallow sandy duplexes on alluvial plains; and
- Alluvial deposits of red deep sands on river terraces and active floodplains.

3.2.2 Acid Sulfate Soils

Desktop assessment (July 2018) showed that the CPP is located in an area of Extremely Low Probability (1 - 5%) of ASS based on the Atlas of Australian Acid Sulfate Soil database.

3.2.3 Hydrology

Pilbara fractured rock aquifer (a regional aquifer) comprises rocks of low permeability, and local aquifers of fractured and weathered rocks. This aquifer comprises Precambrian granite greenstone terrain overlain by superficial sediments in the river valleys (DOW Hydrogeological Atlas 2008). The water table is generally within 5-10 m of the surface in the granitic areas, but may be deeper below the greenstone hills. Groundwater salinity is marginal to brackish. Regional aquifers have low permeability and annual rainfall is low, therefore recharge rates are very minor so it is unlikely that any excavations will lead to changes in groundwater hydrology.

The CPP traverses a small number of ephemeral Fortescue River tributaries. Most notable are the Edward and Eramura Creeks

3.3 Biological environment

3.3.1 Flora and Vegetation

A desktop assessment conducted in July 2018, confirmed the pipeline does not intersect any Environmentally Sensitive Areas (ESAs) declared by the Minister for Environment under section 51B of the *Environmental Protection Act 1986* (EP Act).

The CPP is located within the Fortescue Botanical District of the Eremaean Botanical Province of Beard (1975), within the Abydos Plain Vegetation Unit. The CPP is located within the Pilbara Interim Biogeographic Regionalisation for Australia (IBRA) Region traversing three Land Systems, as follows:

- Horseflats: Extensive, weakly gilgaied clay pans with tussock grasslands;
- Rocklea: Rugged basalt hills and plateau remnants with hard Spinifex grasslands;
- Paraburdoo: Stony plains derived from basalt, supporting snakewood shrublands and Spinifex grasslands.

The Pilbara IBRA region vegetation communities comprise:

- Mulga low woodland over bunch grasses on fine textured soils;
- Salt marsh, Mulga bunch grass and short grass communities on alluvial plains;
- Shrub steppe characterised by *Acacia pyrifolia* over *Triodia pungens* hummock grasses over archaean granite and basalt plains;
- Snappy gum tree steppes on ranges;
- Grass savannah of mixed bunch and hummock grasses over quaternary alluvial plains;
- Dwarf shrub steppe of *Acacia translucens* over *Triodia pungens* over quaternary alluvial plains; and
- Sapphire Sprobolus and Mangal on marine alluvial flats.

Detailed flora studies of the greater Cape Preston area were completed by Halpern Glick Maunsell Pty Ltd with Biota Environmental Sciences, and M E Trudgen & Associates, on behalf of Austeel Pty Ltd during April 2000. The study found no species listed under the EPBC Act or Declared Rare Flora species listed under the *Wildlife Conservation Act 1950*.

3.3.2 Disease

Phytophthora Dieback is found in areas receiving more than 400 mm annual rainfall between Jurien and east of Esperance. *Phytophthora* Dieback is not an issue in the Pilbara or due to the mean annual rainfall ranging between only 250 mm and 320 mm per annum.

3.4 Social Environment

3.4.1 Heritage

A heritage survey of the Miscellaneous Licence (L 08/20) area within which CPP is located was completed prior to pipeline construction. The survey identified a number of heritage areas within the licence boundary and this was confirmed by a search of the Department

of Planning, Lands and Heritage Aboriginal Heritage Inquiry System. During construction the sites were pegged and avoided by both the pipeline and pipeline access track.

4. Implementation Strategy

Implementation of the EP is via the APA Safeguard Environmental Management System and in compliance with the Petroleum Pipelines (Environment) Regulations 2012 requirements, including:

- communication of policies, objectives and roles and responsibilities
- inductions, training and competency of personnel
- monitoring, auditing, record keeping and reporting, including a 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 as a result of pipeline operation. This process involved initial identification of environmental interactions (aspects) resulting from operational activities followed by an ERA workshop attended by personnel from a range of qualifications. 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 primary environmental hazards, control measures and mitigating factors identified for the pipelines have been provided in Table 2.

It is important to note that Table 2 is intended to be indicative of major hazards and controls only and is not comprehensive of all commitments made by APA in the OEP.

Table 2: Primary Operations Environmental Hazards and Controls / Mitigating Factors

Environmental Hazard	Control Measures and Mitigation Factors
All hazards	<ul style="list-style-type: none"> • HSE inductions communicating Environment requirements • Competent personnel – training and procedures / guidance materials provided • Hazard and incident reporting via APA hazard and incident database • Management, PTW*, maintenance and emergency response systems in place • Regular audits, inspections and other EP compliance checks • TPC* compliance with EP commitments via contractual requirements • JHAs* for tasks presenting specific environmental hazards • Strict controls on vehicles and access implemented via Operations Manuals • Reporting as per Regulatory requirements • Compliance with all relevant legislation and regulatory requirements
Air emissions	<ul style="list-style-type: none"> • HAZOP* undertaken specifically addressing uncontrolled gas release • Assets designed as per standards of the day (failure prevention) • Physical protection (i.e. cordoning and signage) of live pipework

Environmental Hazard	Control Measures and Mitigation Factors
Chemical use	<p><u>All</u></p> <ul style="list-style-type: none"> • Procedures for chemical use • Chemical register and SDS* maintained for all hazardous substances onsite <p><u>Storage & handling</u></p> <ul style="list-style-type: none"> • Storage of hazardous substances as per SDS and safety specifications • Storage receptacle sizes and types defined and controlled • Use of bunds and drip trays • Capacity of bunds sufficient to contain quantity of largest stored container • Minimise onsite chemical storage and use via off-site storage where possible <p><u>Transport</u></p> <ul style="list-style-type: none"> • Use of licensed contractors for (large quantities) DG* Transport • Strict access controls and maintenance of road condition • Double skinned tank on diesel transport vehicles <p><u>Spill prevention and response</u></p> <ul style="list-style-type: none"> • Spill response equipment available at site • ERP* and OSCP* to ensure adequate preparedness for spill response • Regular checks and maintenance of machinery, plant and equipment • Use of self bunded equipment where practicable <p><u>Chemical waste</u></p> <ul style="list-style-type: none"> • Chemical waste treated as per other chemicals for management purposes • Waste chemicals clearly marked and disposed of in accordance with regulations
Weed introduction and / or spread	<ul style="list-style-type: none"> • Vegetation clearing and earthworks limited where possible (disturbed areas prone to weed proliferation) • Strict hygiene measures for digging equipment and • Access and vehicle controls imposed; as per existing roads and tracks • Weed identification information available to personnel • Timely response to declared weed occurrences as per DBCA/DPIRD* recommendations
Disturbance to local vegetation (both native and other desirable plants i.e. feedstock)	<ul style="list-style-type: none"> • Native vegetation clearing limited and in compliance with WA Environmental Protection (Native vegetation Clearing) Regulations 2004 • Vegetative material from clearing retained for use during site remediation • Disturbed (by APA) areas to be remediated as follows: <ul style="list-style-type: none"> - Stockpiled topsoils re-spread evenly to a maximum depth of approximately 10 cm - Surfaces reprofiled and scarified to assist seed and water trapping - Stockpiled vegetative material spread over topsoils to aid vegetation re-establishment
Soil erosion	<ul style="list-style-type: none"> • Strict controls on vehicles and access imposed • Topsoil removal limited and controlled • Topsoils removed for construction reused during post construction remediation • Topsoil stockpiles maintained to minimise erosion • Remediation of disturbed areas as described above

Environmental Hazard	Control Measures and Mitigation Factors
Ignition source for Fire	<ul style="list-style-type: none"> • Fire response equipment maintained at site and in vehicles and machinery • Operations sites maintained to minimise fuel availability and fire risk • Localised fire emergency response covered in ERP • Emergency contact details available to all operations personnel • Dedicated containers for chemicals classed as flammable • Smoking within designated areas only • Fire awareness to be reinforced at toolbox meetings
Waste Generation (excluding chemicals – see above)	<ul style="list-style-type: none"> • All wastes to be removed from site and disposed of to the appropriate class landfill facility • Adequate waste receptacles maintained onsite and waste segregated as appropriate
Dust generation	<ul style="list-style-type: none"> • Strict controls on vehicles and access • Dust suppression assistance to be sought as required
Disturbance to local fauna	<ul style="list-style-type: none"> • Fauna movement not restricted – can move away from sources of disturbance • Trenching and excavation activities controlled • Escape ramps for fauna installed in open trenches and morning visual trench inspections undertaken • Trained and competent handlers engaged for fauna removal from site if required
Third party disturbance	<ul style="list-style-type: none"> • Regular landholder consultation undertaken • Lighting at site to be concentrated in required areas only • Strict controls on Operations vehicle movement imposed
Disturbance to heritage values	<ul style="list-style-type: none"> • Works to cease and DPLH to be notified immediately if suspected heritage artefacts identified • Strict controls on Operations vehicle movement imposed • All site works contained within easement boundary

5. Stakeholder Consultation

A summary of operations stakeholders and consultation undertaken by APA is provided in Table 3.

Table 3: Stakeholder Consultation

Stakeholder	Consultation to date	Ongoing commitment
Shire of Roebourne	<ul style="list-style-type: none"> Regular contact with the Shire via third party works process 	<ul style="list-style-type: none"> Consultation as necessary as part of pipeline operations consultation program
Landholders	<ul style="list-style-type: none"> Ongoing liaison since prior to pipeline construction Ongoing operations specific consultation 	<ul style="list-style-type: none"> Notification of activities planned for sites Ongoing liaison throughout the course of the operations
Surrounding owners / pipeline licensees	<ul style="list-style-type: none"> Ongoing commercial liaison Operations specific consultation ongoing Pipeline awareness 	<ul style="list-style-type: none"> Notification of activities planned for the pipeline Ongoing liaison throughout operations
DFES: Local emergency services provider	<ul style="list-style-type: none"> Liaison throughout ERP development and implementation 	<ul style="list-style-type: none"> Notification of risk activities as agreed (i.e. venting) Ongoing liaison throughout site operations
DMIRS: Regulator	<ul style="list-style-type: none"> Liaison ongoing throughout operations 	<ul style="list-style-type: none"> Reporting monthly, 3 monthly, annually and at operations close out General liaison as required i.e. due to Operations changes, audits etc.
DWER & DBCA: Regulator	<ul style="list-style-type: none"> Liaison / advice ongoing throughout operations 	<ul style="list-style-type: none"> General liaison regarding vegetation, flora, fauna and water management as required
DPLH: Regulator	<ul style="list-style-type: none"> Liaison / advice ongoing throughout operations 	<ul style="list-style-type: none"> DPLH to be contacted if heritage areas / artefacts encountered during operations

6. APA Contact Details

For further queries regarding the CPP Operations EP please contact the APA Environment Advisor on (08) 6189 4300 or via the APA website at <https://www.apa.com.au/contact/>.

7. References

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