



EPBC Ref: 2021/8900

Snyman Van Straaten
Manager Access and Approvals West
APA Northern Goldfields Interconnect Pty Ltd
Level 25, 580 George Street
Sydney NSW 2000

Dear Mr Van Straaten

**Request for additional information
Northern Goldfields Interconnect pipeline, Western Australia**

Thank you for submitting a referral under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) concerning the above proposed action.

Our initial examination of your referral indicates that there is insufficient information to allow us to consider all the relevant issues and make an informed decision on whether the proposal is a controlled action (ie whether the impacts of the proposal are likely to have a significant impact on matters of national environmental significance). To enable an informed decision, I am requesting further information from you (identified in Attachment A) in accordance with s 76 of the EPBC Act.

As discussed with Departmental officers on 24 March 2021, the information requested relates in part to how the proposal will be carried out. This information may support a decision that the proposed action is a Not a Controlled Action – Particular Manner (NCA-PM). If we determine that the proposal is a controlled action the additional information will expedite the assessment process.

Please note that if the additional information provided gives sufficient clarity to support an NCA-PM decision, then the Department will need to consult with you on the content/drafting of the particular manners that will be attached to that decision. This additional consultation is included in the information requested at Attachment A

In any correspondence with the Department please quote the title of the action and EPBC reference, as shown at the beginning of this letter. You can send information to us:

by letter Environment Assessments West (WA, SA, NT) Branch
 Department of Agriculture, Water, and the Environment
 GPO Box 858
 CANBERRA ACT 2601

by email [s. 22\(1\)\(a\)\(ii\)@awe.gov.au](mailto:s.22(1)(a)(ii)@awe.gov.au)

Please note, under subsection 520(4A) of the EPBC Act and Regulation 5.19 of the *Environment Protection and Biodiversity Conservation Regulations 2000* your project is subject to cost recovery for the request to provide specific information. Further details

on cost recovery are available on the Department's website at:
<http://www.environment.gov.au/epbc/cost-recovery>.

An invoice for \$1,701.00 is enclosed.

You may qualify for an exemption under section 520(4C)(e)(v) of the EPBC Act or apply under Schedule 1 5.21A of the EPBC Regulations for a waiver of the contingency fees.

An exemption/waiver from fees form is enclosed.

If you qualify for an exemption or would like to apply for a waiver, please return this form completed to me within 10 business days of the date of this letter. Further details regarding waivers and exemptions can be found on the Department's website at:
<http://www.environment.gov.au/epbc/cost-recovery>.

Please note that the timing for us to make a decision on your referral stops on the date of this letter, and restarts once we have received a satisfactory response to all elements of our information request and, if not exempt or waived, the invoice has been paid. In the event that the project is determined to be a controlled action, the timing for us to make a decision on an assessment approach also stops on the date of this letter.

We will let you know whether or not approval is required under the EPBC Act as soon as a decision is taken.

If you have any questions about the process, please contact the project manager, s. 22(1)(a)(ii) by email to [s. 22\(1\)\(a\)\(ii\)@awe.gov.au](mailto:s.22(1)(a)(ii)@awe.gov.au) or telephone s. 22(1)(a)(ii) and quote the EPBC reference number shown at the beginning of this letter

Yours sincerely

s. 47F(1)

Kylie Calhoun
Assistant Secretary
Environment Assessments West (WA, SA, NT) Branch

24 March 2021

Horizontal Directional Drilling (HDD)

- The referral documentation notes that geotechnical works required to support the potential utilisation of HDD had not been completed at the time of referral submission. Can you please confirm that the use of HDD to minimise impacts to listed threatened species and communities is possible for all known occurrences of the listed critically endangered Eucalypt Woodland of the Western Australian Wheatbelt Threatened Ecological Community (EW TEC) and listed vulnerable Beard's Mallee (*Eucalyptus beardiana*).
- Please discuss further the potential impacts of HDD on the root architecture of the EW TEC and the Beard's Mallee and the consequential impacts any damage to these systems would have on overall plant health. To this end please also provide further information regarding:
 - depth of drilling
 - drilling procedure
 - buffer distance between the surface entry and exit points and any protected matter
 - known or anticipated depth of root architecture for the EW TEC and Beard's Mallee in all areas proposed for HDD
 - proposed monitoring measures to track plant health post drilling.

Malleefowl (*Leipoa ocellata*) – vulnerable

- Please provide further detail regarding the area of Malleefowl habitat to be cleared. In particular, please clarify the area of clearing near known populations/locations of the Malleefowl as compared to the clearing of potential Malleefowl habitat (e.g., areas with no known records of the species in proximity).

Eucalypt Woodland of the Western Australian Wheatbelt Threatened Ecological Community (EW TEC) – critically endangered

- Please provide further discussion on the potential fragmentation effects of proposed clearing within known occurrences of the EW TEC. In particular:
 - will the proposed clearing remove any large Eucalypts intrinsic to the ecological functioning of this particular community
 - will the proposed clearing result in or exacerbate existing vegetative clearing such that it will fragment or isolate any area of community into two or more distinct patches with regards to patch size characteristic described in the *Approved Conservation Advice (including listing advice) for the Eucalypt Woodlands of the Western Australian Wheatbelt*.

Western Spiny-tailed Skink (*Egernia stokesii badia*) – endangered

- Please discuss potential impacts to the Western Spiny-tailed Skink with regards to faunal entrapment in open trenches (particularly near high density skink population areas). Please discuss the efficacy of the proposed faunal egresses in mitigating potential entrapment risk to skinks including further discussion on the suitability of the proposed design, placement and number of egresses planned.

Consultation

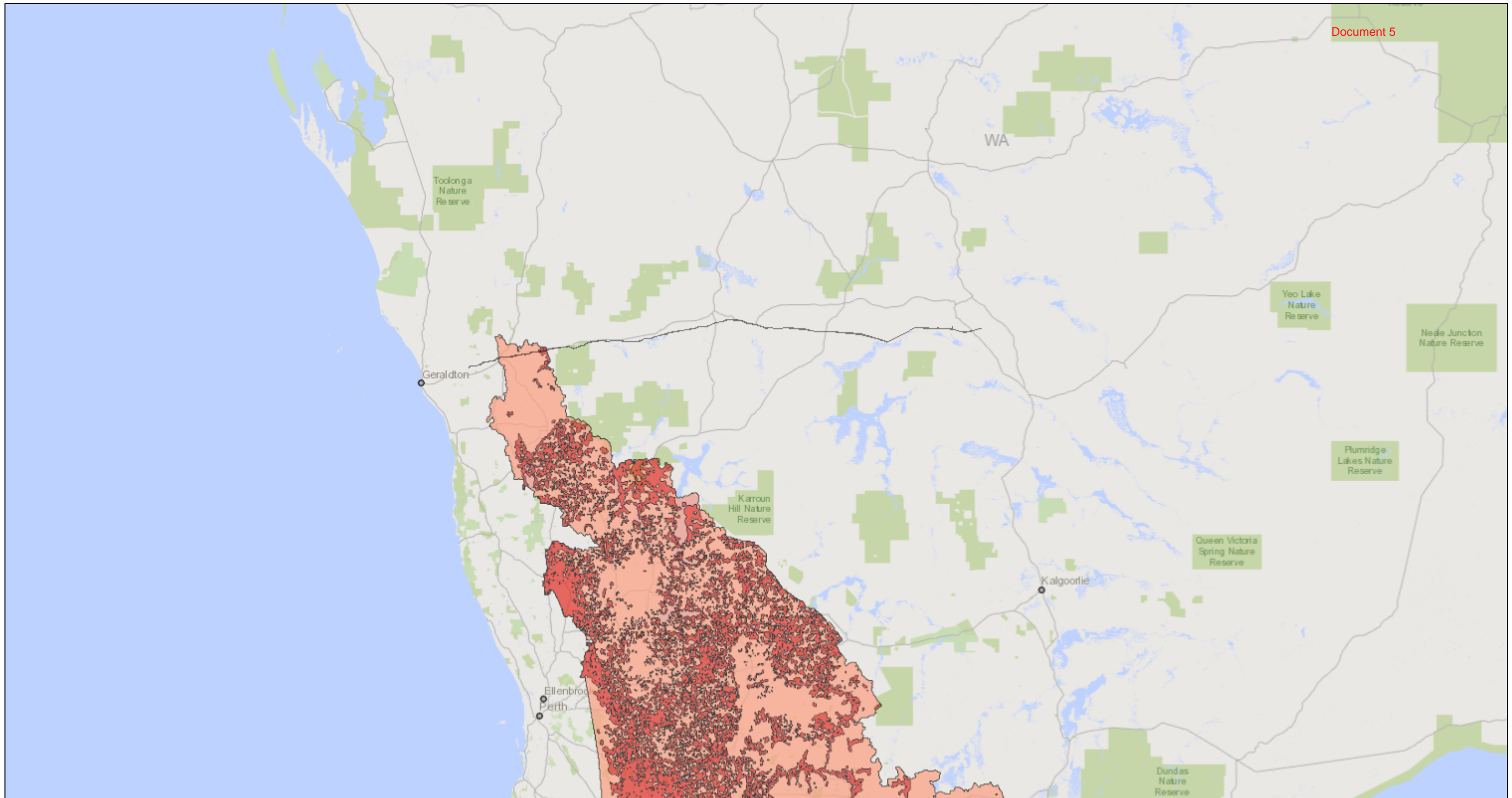
Subject to our findings on the referral the information you provide in response to the above information request, we may need to consult with you in drafting our decision on this proposal, for example in considering particular manners that might be attached to a Not controlled action-Particular Manner decision

Document 2 - s 47E(d)

Document 3 - s 47E(d)

Document 4 - s 47E(d)

Wheatbelt TEC



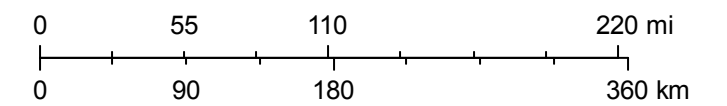
Document 5

March 17, 2021

Eucalypt Woodlands of the Western Australian Wheatbelt

- may occur
- likely to occur
- known to occur

1:4,622,324



s. 22(1)(a)(ii)

From: s. 22(1)(a)(ii)
Sent: Wednesday, 17 March 2021 12:03 PM
To: s. 22(1)(a)(ii)
Subject: Goldfields Gas Pipeline - Notes [SEC=OFFICIAL]

Background

- Length of pipeline: 580km
- Development footprint: 12,404 ha
- Max disturbance footprint: 2,286 ha

Impacts

- EWTEC
 - 0.74 ha of EWTEC
 - TEC occurs in three patches within the development envelope – totaling 31 ha see pg. 46 supporting information
 - Proponent will use HDD under the largest patch and have narrowed the clearing width to smallest possible though the other two patches (elsewhere they note that Geotech surveys to determine if HDD is possible were still in progress at the time of writing of the referral – CHECK STATUS (key measure))
 - Need to find out whether the splitting of the other two patches will reduce the size of remaining patches blow threshold listing criteria – 15 m clearance width
 - There is some confusion on patch identification in Figure 2-1 (two different occurrences are mapped and overlap – may represent a refinement of survey results over time)
 - Questions to ask
 - Is HDD possible (now that Geotech surveys are finished) for EWTEC and Beards Mallee population
 - Will HDD occur deep enough to avoid impacts to root zone of these large eucalypts
 - Will HDD change hydrological pressures/gradient such that there is a risk of water logging of root zones
- Malleefowl
 - 1298 ha of Malleefowl habitat
 - Suitable breeding habitat (dense Acacia shrubland) represents a small area of the development (60-ish ha)
 - Pg. 11 of supporting information for location of inactive mounds
 - Scattered tracks identified near inactive mounds
 - Most inactive mounds will be avoided but one will be cleared
 - Pipeline thus intersects with a small known breeding area
 - Faunal survey notes that most habitat within the development envelope is fragmented and degraded in nature and will likely only support intermittent Malleefowl
 - Pre-clearance surveys proposed
- Beards Mallee

- Pg. 11 or 47 for location
- Beards Mallee – 55 individuals recorded – will use HDD to go under the trees
- No clearing of any individual but will need to check to see if 1. HDD is still a go noting Geotech works only just finished and 2. If HDD will be deep enough to avoid impacts to root stock

Rehabilitation

- replacement of stockpiled topsoil
- mulch and spread of vegetative material
- progressive rehabilitation (approx. 80-90% of area cleared) – CHECK exact figure

Other Notes

- Eastern portion of the development envelope (which has the highest overlap with potential habitat for MNES) is mostly sited within largely disturbed areas (cleared farmland for example)
- Western portion of the development envelope is less disturbed and is in better condition but has little overlap with habitat for MNES
- Lots of previous EPBC Act referral in the east coast
- Min groundwater depth 5m (near ephemeral creeks) max burial depth 2m
- Vegetation removed and stockpiled along with topsoil (in windrows) (pg 25)
- One initial veg survey followed by targeted follow up survey in key areas
- Trench egresses and ramps for faunal escape every 1km or less (do we need it more frequently in areas near the skink

s. 22(1)(a)(ii)

From: s. 22(1)(a)(ii)
Sent: Wednesday, 24 March 2021 4:39 PM
To: Kylie Calhoun
Cc: s. 22(1)(a)(ii)
Subject: FOR SIGNATURE (asap) - 2021/8900 Northern Goldfields Interconnect Pipeline [SEC=OFFICIAL]

Importance: High

<input checked="" type="checkbox"/> URGENT / <input type="checkbox"/> ROUTINE	DATE DUE: ASAP. This is an information request (and stop clock) for a referral decision due which will otherwise be due on 30 March
Information request – Referral stage	
ACTION OFFICER: s. 22(1)(a)(ii)	CLEARED BY: s. 22(1)(a)(ii)
ACTION REQUIRED <input checked="" type="checkbox"/> FOR CLEARANCE <input type="checkbox"/> FOR INFORMATION <input type="checkbox"/> FOR COMMENT <input type="checkbox"/> OTHER	RISK <input type="checkbox"/> HIGH <input type="checkbox"/> MEDIUM <input checked="" type="checkbox"/> LOW
BACKGROUND/ KEY ISSUES <ul style="list-style-type: none"> We are seeking more information from the proponent about this referral to facilitate our making the controlled action decision. At this stage, we consider it possible that the referral and additional information will support an NCA PM decision. For this reason we have included in the information request a second stage, for consultation once we have received their information. The information request is being made under s 76 of the Act, and under s88 (4) this has the consequence of stopping the clock until all of the information has been received to a satisfactory quality. 	

[Link to letter seeking further information](#)

s. 22(1)(a)(ii)

From: Van straaten, Snyman <Snyman.Vanstraaten@apa.com.au>
Sent: Thursday, 25 March 2021 11:46 AM
To: s. 22(1)(a)(ii)
Subject: RE: 2021-8900 Northern Goldfields Interconnect Pipeline [SEC=OFFICIAL]

Good morning, s. 22(1)(a)(ii)

Receipt acknowledged of the letter, thanks

Regards

Snyman Van Straaten
Manager Access and Approvals: West

APA Group

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Perth WA 6000

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From: s. 22(1)(a)(ii) @awe.gov.au>
Sent: Thursday, 25 March 2021 7:46 AM
To: Van straaten, Snyman <Snyman.Vanstraaten@apa.com.au>
Subject: [EXT]: 2021-8900 Northern Goldfields Interconnect Pipeline [SEC=OFFICIAL]

Good morning Snyman

Please find the attached request for additional information. This request letter is based on the discussions we had in yesterday's meeting.

Please note hard copy of this letter has not been sent.

I will shortly send an invoice related to this request which is outlined in the attached letter.

Please let me know if you have any further questions.

regards

s. 22(1)(a)(ii)

Assessment Officer
Environment Assessments West (WA, SA, NT) Branch
Project Assessments West Section
Environment Approvals Division

Department of Agriculture, Water and Environment | awe.gov.au

John Gorton Building, King Edward Terrace, Parkes ACT 2600

GPO Box 858, Canberra City, ACT 2601

T: s. 22(1)(a)(ii) | E: s. 22(1)(a)(ii)[@awe.gov.au](mailto:snyman.vanstraaten@awe.gov.au)

s. 22(1)(a)(ii)

From: Van straaten, Snyman <Snyman.Vanstraaten@apa.com.au>
Sent: Thursday, 18 March 2021 11:24 AM
To: s. 22(1)(a)(ii)
Subject: RE: Meeting 2021-8900 Northern Goldfields Interconnect Pipeline [SEC=OFFICIAL]

Hi s. 22(1)(a)(ii)

Noted thank you

I have forwarded the invite to Kerry McDonald, and also Tim Mitchell, from CDM Smith

Regards

Snyman Van Straaten
Manager Access and Approvals: West

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From: s. 22(1)(a)(ii) @awe.gov.au>
Sent: Thursday, 18 March 2021 7:46 AM
To: Van straaten, Snyman <Snyman.Vanstraaten@apa.com.au>
Subject: [EXT]: RE: Meeting 2021-8900 Northern Goldfields Interconnect Pipeline [SEC=OFFICIAL]

Hi Snyman

Please invite Kerry McDonald to the meeting if you wish, that is fine.
If you have any issues please let me know.

Regards

s. 22(1)(a)(ii)

Assessment Officer
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From: Van straaten, Snyman <Snyman.Vanstraaten@apa.com.au>
Sent: Wednesday, 17 March 2021 3:44 PM
To: s. 22(1)(a)(ii) <@awe.gov.au>
Subject: RE: Meeting 2021-8900 Northern Goldfields Interconnect Pipeline [SEC=OFFICIAL]

Good afternoon, s. 22(1)(a)(ii)

I am available as per your suggestion, yes thanks.

Will it be in order if we also include Kerry McDonald from CDM Smith, who is our environmental consultant who prepared the Referral Document, in the discussion?

Regards

Snyman Van Straaten
Manager Access and Approvals: West

APA Group

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From: s. 22(1)(a)(ii) <@awe.gov.au>
Sent: Wednesday, 17 March 2021 12:30 PM
To: Van straaten, Snyman <Snyman.Vanstraaten@apa.com.au>
Subject: [EXT]: Meeting 2021-8900 Northern Goldfields Interconnect Pipeline [SEC=OFFICIAL]
Importance: High

Good afternoon Snyman

I am working on the Northern Goldfields Interconnect Pipeline (EPBC project 2021-8900) referral at the moment.

I was wondering if you would be available for a brief discussion regarding the project on Friday the 19th of March (this Friday) at 1:15pm (Canberra time) 10:15am (WA time).

Please let me know as soon as you can and I will send a Microsoft teams invite/meeting invite.

regards

s. 22(1)(a)(ii)

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s. 22(1)(a)(ii)

From: s. 22(1)(a)(ii)
Sent: Monday, 22 March 2021 1:12 PM
To: 'Van straatens, Snyman'
Subject: RE: Meeting - 2021-8900 Northern Goldfields Interconnect Pipeline [SEC=OFFICIAL]

Good morning Snyman

I believe some public comments were received but I have not reviewed them yet.

Regards

s. 22(1)(a)(ii)

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From: Van straatens, Snyman <Snyman.Vanstraaten@apa.com.au>
Sent: Monday, 22 March 2021 11:03 AM
To: s. 22(1)(a)(ii) @awe.gov.au
Subject: RE: Meeting - 2021-8900 Northern Goldfields Interconnect Pipeline [SEC=OFFICIAL]

Good morning s. 22(1)(a)(ii)

All good as per the below.

Do you know if any submissions were received by DAWE in response to the public notification of the Referral?

Regards

Snyman Van Straaten
Manager Access and Approvals: West

APA Group

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From: s. 22(1)(a)(ii) <[@awe.gov.au](mailto:s.22(1)(a)(ii)@awe.gov.au)>
Sent: Monday, 22 March 2021 7:06 AM
To: Van straaten, Snyman <Snyman.Vanstraaten@apa.com.au>
Subject: [EXT]: Meeting - 2021-8900 Northern Goldfields Interconnect Pipeline [SEC=OFFICIAL]

Good morning Snyman

Apologies my colleague is unwell today so I have cancelled the meeting for now. The meeting was nothing urgent – it was just an update and quick discussion on where we were at on the referral.

I will be in contact if I need to reschedule

regards

s. 22(1)(a)(ii)

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