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To whom it may concern,

FORTESCUE RIVER GAS PIPELINE; PROPOSED EXTENSION AND AMENDMENT TO NATIVE VEGETATION CLEARING PERMIT (CPS 6013/2)

AGI Fortescue River (AGIFR) is the proponent for CPS 6013/2 which authorises up to 881 ha of clearing for the construction, installation and operation of the Fortescue River Gas Pipeline (FRGP) and associated access tracks.

Clearing for the construction of the FRGP was undertaken in 2014-15 and totaled 821 ha. Approximately 768.5 ha of the construction corridor was progressively rehabilitated during that same period (following backfill of the pipeline trench). In 2016, a total of 46 rehabilitation monitoring sites were established; and by 2017 all sites satisfied each of the four minimum standards outlined in the flora and vegetation completion criteria. On 8 March 2019, DWER issued correspondence confirming that the requirements of Condition 8 on CPS 6013/1 had been adequately met.

CPS 6013/1 was subsequently extended in 2019 with the issue of CPS 6013/2. Condition 5 of CPS 6013/2 restricts any clearing beyond 12 July 2024. Accordingly, AGIFR is seeking renewal of CPS 6013.

Clearing Requirement

Associated with the safe and compliant operation of buried gas pipeline infrastructure, AGIFR is required to undertake ongoing management of vegetation within the rehabilitation footprint. This predominantly includes:

- raised blade clearing over the buried pipeline in areas where vegetation growth is (or is likely to) impede line of sight visibility of above ground danger signage;
- clearing around above ground infrastructure to maintain adequate fire breaks;
- clearing to maintain established access tracks; and
- clearing to dig up sections of the pipeline to conduct coating inspection and repair works.

The table below sets out the details of all clearing conducted under CPS 6013 in association with operational requirements, since the completion of construction in 2015. This level of activity is broadly reflective of the forecast ongoing clearing requirement for the life of the pipeline.

Table 1: CPS6013/2 Clearing Records for Calendar Year 2023

| Calendar Year | Total Ha | Details |
|---------------|----------|--|
| 2016 | Nil | |
| 2017 | Nil | |
| 2018 | 300 ha | Line of Sight maintenance |
| 2019 | Nil | |
| 2020 | 0.06 ha | Pipeline condition inspection and coating repair works |
| 2021 | Nil | |
| 2022 | 12 ha | Line of Sight maintenance |

2023

0.4 ha

Pipeline condition inspection and coating repair works

Condition Review

AGIFR has reviewed the conditions specified within CPS 6013/2 to evaluate their effectiveness and relevance to the operations phase of AGIFR's activity. In conducting this review AGIFR has considered CPS 6199/4 (attached), issued by DWER in 2024 for the ongoing operation of the Ashburton Onslow Gas Pipeline (AOGP). Key observations arising from this review are as follows:

- Conditions 7 b) and 8 c) – e) are interpreted to only apply where large scale clearing is undertaken and left unrehabilitated for prolonged periods. It is understood that these conditions do not apply to the following operational phase activities:
 - vegetation management where root stock is left intact (e.g. line of sight and firebreak maintenance);
 - vegetation clearing for dig ups where the footprint is less than 0.1 ha in size and respread within 14 days.

This is consistent with CPS 6199/4 which omits these conditions but limits clearing to that required for ongoing maintenance of a gas pipeline.

- Condition 9 references the CEO approved FRGP Construction EP (FRGP CEP), which was prepared in 2014 and makes no provision for subsequently approved revisions. The FRGP CEP predominantly comprises completed conditions that are not a best fit for the minor scale, lower impact operational activities. It is noted that CPS 6199/4 does not condition upon compliance to an Environment Plan. It is suggested that if required, the DEMIRS approved Environment Plan prepared in accordance with the *Petroleum Pipelines (Environment) Regulations 2012* may offer a more appropriate reference.

Noting the above, AGIFR is seeking to renew CPS 6013/2 and amend all conditions to align to those set out in CPS 6199/4. An NV-F04 Application for an Amendment under Section 51KA of the *Environmental Protection Act 1986* (WA) has been submitted to support this request.