

# Sturt Plateau Pipeline

Application Number: 02426

Commencement Date:  
29/05/2024

Status: Locked

## 1. About the project

### 1.1 Project details

#### 1.1.1 Project title \*

Sturt Plateau Pipeline

#### 1.1.2 Project industry type \*

Energy Generation and Supply (non-renewable)

#### 1.1.3 Project industry sub-type

Natural Gas pipeline

#### 1.1.4 Estimated start date \*

01/07/2025

#### 1.1.4 Estimated end date \*

01/07/2065

### 1.2 Proposed Action details

#### 1.2.1 Provide an overview of the proposed action, including all proposed activities. \*

APA SPP Pty Ltd (APA), a subsidiary of APA Group Limited, operates gas pipelines across the Northern Territory and Australia. APA proposes the construction of the underground Sturt Plateau Pipeline (SPP). The SPP will transport gas from Tamboran B2 Pty Ltd’s Sturt Plateau Compression Facility (SPCF) to the Amadeus Gas Pipeline (AGP). For clarity, the SPCF does not form part of the Proposed Action.

The AGP, a bidirectional pipeline owned by APA Group, runs from southern NT to Darwin, supplying natural gas to Darwin, Alice Springs, and regional centres, primarily for power generation. The Proposed Action will involve the construction, installation, operation and maintenance of the SPP, along with the development of associated surface infrastructure, approximately 50 kilometers (km) south of Daly Waters, and 80 km north of Elliott, in the Roper Gulf Region of the Northern Territory. A detailed description of the Proposed Action is provided in **Attachment 1: Supporting Information**, and a summary is provided below.

The Proposed Action will occur within the 2,002 hectare (ha) Project Area, which includes a 500 metre (m) wide corridor for the pipeline, land for surface facilities, and a temporary construction camp. The Project Area is shown in Figure 3 of **Attachment 1: Supporting Information**.

The Disturbance Footprint within the Project Area consists of a 146 ha area, comprising:

- The construction right of way (CROW) for the SPP transmission pipeline
- Construction sites for the Shenandoah and Sturt Plateau facilities
- The temporary construction camp, and
- Additional workspaces for truck turnarounds, vegetation storage, horizontal bore entry/exit points, and pipe storage areas needed for construction.

This referral seeks assessment and approval for a nominally 30 m wide CROW within a 500 m wide pipeline corridor, to accommodate deviations in the alignment required to address site constraints. The pipeline will either be constructed from east to west or west to east. Consequently, two potential Disturbance Footprints have been identified and assessed as a part of this referral. Further detail is provided in Section 2.3.1.1 of **Attachment 1: Supporting Information**. Spatial data uploaded to Section 2.1 includes both options. It should be noted that the total Disturbance Footprint associated with the Proposed Action is approximately 146 ha, including 12 ha of previously disturbed land. The key features and activities associated with Proposed Action are described below.

### **Construction phase**

- Preliminary survey works, including installation of temporary gates
- Vegetation clearing of up to 134 ha of native vegetation for the construction footprint (including CROW). The site preparation for construction will include creating laydown areas, cleared vegetation stockpiles, truck turnarounds, and trenched/bored crossings
- Maintenance or upgrade of existing access tracks to an all-weather standard for heavy vehicles, typically with a 6 m wide surface and gravel sheeting in areas prone to inundation. This includes access tracks through pastoral properties, equipment and personnel to the CROW and worksites.
- Construction of the Shenandoah Facility and construction of the Sturt Plateau Facility)
- Development and utilisation of ancillary surface infrastructure, including:
  - Establishment of a temporary construction camp for up to 150 people, including diesel storage, wash-down facilities, wastewater treatment, and waste management
  - Development of additional work areas, such as construction laydown areas
  - Sourcing gravel from borrow pits within the Project Area, including a proposed 50 m by 50 m pit at the Sturt Plateau Facility laydown area; additional material may come from the temporary construction camp area, with final locations determined after geotechnical assessment, and
  - Sourcing of water for dust suppression, trench compaction, hydrostatic testing, and potable use from existing Tamboran bores and new APA SPP Pty Ltd bores near the Shenandoah Facility. At least two new bores are planned for the temporary campsite.
- Construction and installation of pipeline:
  - Two potential construction footprints have been identified, but only one will be selected based on the construction direction.
  - The pipeline extends from kilometre point (KP) 0) at the Shenandoah Facility (NT Portion 7026) to the KP 37 at the Sturt Plateau Facility (NT Portion 1077). Construction will either proceed from KP 0 to KP 37 or in reverse, depending on weather and site conditions. If construction

starts at KP 0, the working side of the ROW will be north of the alignment; if starting at KP 37, it will be to the south.

- The construction sequence will involve clearing of vegetation from the CROW and stripping of topsoil to conserve for use in rehabilitation, delivering pipe lengths to the ROW, bending and welding the pipe lengths to follow landforms, non-destructive testing, coating welds, excavating the trench, lowering and welding the pipeline, and backfilling with excavated material. Horizontal boring at KP 27 will cross the Stuart Highway. Additional activities include hydrostatic testing, installing markers and gates, and rehabilitation of the CROW .
- The 37 km pipeline, with a nominal diameter of up to 300 mm and operational capacity of up to 50 terajoules per day (TJ/day), will be constructed in accordance with Australian Standard (AS) 2885.
- The pipeline will be buried at a minimum depth of 750 millimetres (mm), with 3,000 mm cover, from the road crown, at the sealed road crossing (Stuart Highway) and 1,200 mm at unsealed roads, drainage lines, and floodplains.

### **Operation phase**

The estimated duration of pipeline operation is 40 years. The operational footprint for the Proposed Action, defined as, the area of land required to operate and maintain the Project is approximately 112 ha.

The activities associated with the operation phase of the SPP includes implementation of a routine inspection and maintenance program for the ROW and pipeline. The inspection and maintenance program includes:

- ROW inspection for erosion, weeds, security and success of revegetation through ground inspections and aerial surveys.
- Pipeline integrity testing through cathodic protection surveys, internal pipeline inspections, ICCP system inspections and pigging.
- The potential for automation of the Shenandoah Facility and Sturt Plateau Facility will be confirmed during detailed design. Inspections will be undertaken on the facilities for erosion, weeds and security.

### **Decommissioning and Rehabilitation Phase**

A decommissioning and rehabilitation plan for the Project and related infrastructure will be developed in advance of pipeline decommissioning, in consultation with regulatory authorities and landholders, following relevant legislation, best practices, and the Australian Pipelines and Gas Association (APGA) Code of Environmental Practice (2022). Decommissioning may involve either suspension or abandonment. Suspension would depressurise, cap, and fill the pipeline with inert gas or water with corrosion inhibitors, while maintaining cathodic protection. Surface facilities may be removed or retained for future use. Abandonment would disconnect the pipeline from hydrocarbon sources, purge it of gas, and either remove or fill sections with water or cement. Surface facilities would be dismantled. Both options would cause minimal disturbance and environmental impact.

### **Timing**

Mobilisation for construction is proposed to commence in July 2025. Construction and final commissioning are anticipated to take 6 months. The design life of the pipeline is 40 years.

### **Micro-siting Change Management Procedure**

It is prudent to note that the locations of the pipeline, surface facilities and additional work areas may be subject to change following additional investigation, preclearance surveys, unexpected finds or due to requirements of statutory approvals or agreements. A Micro-siting Change Management Procedure has been developed to accommodate any unexpected findings or changes. The Change Management Procedure is detailed in Section 2.5 of **Attachment 1: Supporting Information**.

### **Potential for Significant Impacts to Matters of National Environmental Significance**

Under the EPBC Act, ministerial approval is required for actions likely to significantly impact Matters of National Environmental Significance (MNES). APA considers the Proposed Action unlikely to be deemed a 'Controlled Action' as it is not expected to significantly impact MNES. The basis for this assessment is outlined in the relevant sections of this referral.

A list of acronyms and references used within this online form is provided at **Attachment 8: Acronyms and References**.

### 1.2.2 Is the project action part of a staged development or related to other actions or proposals in the region?

Yes

### 1.2.3 Is the proposed action the first stage of a staged development (or a larger project)?

No

### 1.2.4 Related referral(s)

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### 1.2.5 Provide information about the staged development (or relevant larger project).

The Proposed Action is related to the Tamboran Beetaloo Basin Shenandoah South Exploration and Appraisal (E&A) Program. The Beetaloo Basin Shenandoah South E&A Program has not been referred to the Department of Climate Change, Energy, the Environment and Water (DCCEEW) under the EPBC Act for actions likely to significantly impact MNES.

The Proposed Action involves the construction, installation, and operation of the 37 km SPP to connect Tamboran's Sturt Plateau Compression Facility (SPCF) to the existing AGP. Tamboran has signed a deal with the Northern Territory (NT) Government to supply 40 TJ/day to the NT starting in 2026. The SPP will facilitate the transport of gas from the Sturt Plateau Compression Facility to the AGP. The AGP, owned by APA Group, is a bidirectional major transmission pipeline extending from the Amadeus Basin to Darwin, transporting natural gas to Darwin, Alice Springs, and regional centres primarily for power generation.

The relationship between the Proposed Action and the Beetaloo Basin Shenandoah South E&A Program is noted in Section 1.1 of **Attachment 1: Supporting Information**.

### 1.2.6 What Commonwealth or state legislation, planning frameworks or policy documents are relevant to the proposed action, and how are they relevant? \*

#### Northern Territory Government

##### Energy Pipelines Act 1981

The *Energy Pipelines Act 1981* provides for the construction, operation, maintenance and cessation or use or abandonment of pipelines for the conveyance of energy-producing hydrocarbons. The Act is administered by the NT Department of Mines and Energy (DME). Under this Act the proponent is required to obtain a Permit and a Licence prior to constructing a pipeline.

### Environment Protection Act 2019

NT *Environment Protection Act 2019* regulates the environment impact assessment process for all proposed developments that have the potential to cause significant environmental impacts. The Act requires proponents to refer a proposed development to the NT Environment Protection Authority if there is an identified potential for significant impact or it meets a referral trigger and undertake a self-assessment. SLR Consulting Pty Ltd (SLR) is currently preparing a referral on behalf of APA.

### Northern Territory Aboriginal Sacred Sites Act 1989

It is an offence to interfere with or desecrate an Aboriginal sacred site under the *Northern Territory Aboriginal Sacred Sites Act 1989*. APA has applied for an Authority Certificate under the *Northern Territory Aboriginal Sacred Sites Act 1989*. Construction and operation of the Proposed Action will comply with conditions of the Authority Certificate.

### Pastoral Land Act 1992

The Proposed Action is located on Shenandoah and Hayfield perpetual pastoral leases. Pastoral leases and sub-leases are administered by the Department of Lands, Planning and Environment (DLPE). The clearing of native vegetation on pastoral lease is regulated under the *Pastoral Land Act 1992*. Non pastoral uses of pastoral land may also be subject to the requirement for a non-pastoral use permit. Pastoral lessees have been consulted for the Proposed Action.

### Territory Parks and Wildlife Conservation Act 1976

The NT *Territory Parks and Wildlife Conservation Act 1976* (TPWC Act) is administered by the NT DLPE. The TPWC Act makes provisions for the establishment of Territory Parks and other Parks and Reserves and promotes the study, protection, conservation and sustainable utilisation of wildlife. This Act also covers the classification and management of wildlife, classification and control of feral animals, permits for taking wildlife, and designation and management of protected areas and private sanctuaries. The TPWC Act covers threatened species at the territory level which may be affected by the Proposed Action.

### Water Act 1992

DLPE administers the *Water Act 1992*. The Act provides for the investigation, use, control, protection, management and administration of water resources within the Northern Territory. The Act legislates the extent to which both surface and ground water can be used and for what purpose. Waste discharge to natural waters is prohibited unless licensed under the Act. Engagement with the regulator regarding a permit to interfere with a waterway and water extraction licence under this Act has been undertaken.

### Weeds Management Act 2001

The *Weeds Management Act 2001* is an Act to prevent the spread of weeds in and out of the NT and to ensure that the management of weeds is an integral part of land management. The Weed Management Branch in the Rangelands Division of the DLPE has administrative responsibility for the *Weeds Management Act 2001*. It is an offence under the *Weeds Management Act 2001* to spread weeds. The Act mandates that landowners and occupiers must take reasonable steps to prevent the spread of declared weeds, and it prohibits actions such as transporting or spreading weeds to other areas. As such, weed hygiene protocols will be incorporated into the Proposed Action to prevent the introduction and spread of invasive species.

## **Commonwealth Government**

### Environment Protection and Biodiversity Conservation Act 1999

The EPBC Act provides protection of the environment, heritage and biodiversity conservation. Under the EPBC Act, actions that are likely to cause a significant impact on MNES will require formal assessment by the Commonwealth Environment Minister through a referral process. This referral is the initiation point for formal consideration of the Proposed Action by the DCCEEW.

### Native Title Act 1993

The Proposed Action is located within the Shenandoah Pastoral Lease Native Title Determination (Native Title Tribunal file no. DCD2012/007) and Hayfield Pastoral Lease Native Title Determination (Native Title Tribunal file no. DCD2012/011). APA has engaged the Northern Land Council to facilitate consultation with Native Title Holders with a view to entering into an Indigenous Land Use Agreement (ILUA) with Native Title Holders. The ILUA will establish consent for the Proposed Action as well as an agreed process for ongoing consultation between the parties in respect of the Proposed Action.

*Aboriginal and Torres Strait Islander Heritage Protection Act 1984*

The *Aboriginal and Torres Strait Islander Heritage Protection Act 1984* (ATSIHP Act) can be used by Aboriginal and Torres Strait Islander people to make applications to protect places and objects from injury or desecration. The places or objects in question must be of particular significance in accordance with Aboriginal tradition. The ATSIHP Act also enables the Australian Government to protect cultural heritage under threat, if state or territory laws have failed to protect it. The Australian Government can make special orders, called declarations, to protect traditional areas and objects of significance to First Nations peoples from threats of injury or desecration. The ATSIHP Act protects and preserves areas and objects within Australia that are of particular importance to Aboriginals in accordance with Aboriginal traditions. The ATSIHP Act applies where NT laws (or State laws) or actions under those laws, in the opinion of the Commonwealth Minister for Indigenous Affairs, have not adequately protected sites and objects of particular significance to Aboriginals under Aboriginal tradition. The Act serves as a "last resort" for emergency protection of heritage sites. While not directly relevant to the Proposed Action, this Act has been considered for completeness and due diligence.

**1.2.7 Describe any public consultation that has been, is being or will be undertaken regarding the project area, including with Indigenous stakeholders. Attach any completed consultation documentations, if relevant. \***

APA implemented a targeted consultation program designed to engage key stakeholders while acknowledging unique characteristics of the Proposed Action. The consultation approach followed APA's stakeholder engagement plan and was tailored to the Project's relatively small scale, isolated location, and self-sufficient nature, recognising that it would have minimal interactions with the broader community due to its situation on private property. Stakeholders were identified through stakeholder mapping and included local communities, First Nations People, government agencies, and other relevant parties. Consultation methods included online introductory meetings to establish initial contacts, in-person regional engagements, and targeted information dissemination through fact sheets, a dedicated project webpage, email address and project telephone number.

Consultation with Native Title Holders is currently being undertaken by APA through a formal consultation process with the Northern Land Council (acting as the agent for the Top End Prescribed Body Corporate (PBC)).

While no formal consultation with Native Title Holders has occurred outside of this process, local First Nations people have been included in broader community consultations. As members of the communities where APA has been engaging, First Nations residents have had equal opportunities to access information and raise questions, just like any other community member. The wider First Nations community that in proximity to the Project region remains informed and engaged through general community consultation efforts. Formal consultation through the Northern Land Council with Native Title Holders are in process.

Key consultation activities undertaken to date for the Proposed Action included the following:

- Introductory online meetings which aimed at introducing the Proposed Action and establish initial connections with relevant stakeholders. These meetings provided a foundation for subsequent in-person engagements and helped identify key areas of interest or concern.
- A regional engagement road trip took place during the week of 19 August 2024 which covered Darwin (engagement with government agencies and broader regional stakeholders), Katherine (engagement

with local authorities and service providers) and Elliot (engagement with the local community most likely to be impacted and/ or benefit from the Project).

- A community barbeque and information session was held on the 21 August 2024 and was advertised on the Elliott Community Facebook page and through pinned notices on the local community notice board. The session was attended by 36 people and provided an opportunity to engage directly with local residents, answer questions, and gather community feedback.
- Information dissemination included the digital distribution of the project fact sheet to consulted stakeholders, the distribution of bulk physical copies to Councils and other interested parties, a dedicated project webpage (<https://www.apa.com.au/about-apa/our-projects/sturt-plateaupipeline-project/>), and a dedicated project phone number (1800 413 200). Additionally, APA monitors and responds to enquiries via the project email address ([beetaloo@apa.com.au](mailto:beetaloo@apa.com.au)).

Further details on the consultation activities and feedback received are provided in the Social Impact Assessment (SIA) completed by SLR (2024) for the Proposed Action. The SIA is included as **Attachment 2: Social Impact Assessment**.

## 1.3.1 Identity: Referring party

### Privacy Notice:

Personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable.

By completing and submitting this form, you consent to the collection of all personal information contained in this form. If you are providing the personal information of other individuals in this form, please ensure you have their consent before doing so.

The Department of Climate Change, Energy, the Environment and Water (the department) collects your personal information (as defined by the Privacy Act 1988) through this platform for the purposes of enabling the department to consider your submission and contact you in relation to your submission. If you fail to provide some or all of the personal information requested on this platform (name and email address), the department will be unable to contact you to seek further information (if required) and subsequently may impact the consideration given to your submission.

Personal information may be disclosed to other Australian government agencies, persons or organisations where necessary for the above purposes, provided the disclosure is consistent with relevant laws, in particular the Privacy Act 1988 (Privacy Act). Your personal information will be used and stored in accordance with the Australian Privacy Principles.

See our Privacy Policy to learn more about accessing or correcting personal information or making a complaint. Alternatively, email us at [privacy@awe.gov.au](mailto:privacy@awe.gov.au).

☒ **Confirm that you have read and understand this Privacy Notice \***

### 1.3.1.1 Is Referring party an organisation or business? \*

Yes

Referring party organisation details

**ABN/ACN** 29001584612

**Organisation name** SLR CONSULTING AUSTRALIA PTY LTD

**Organisation address** Tenancy 202 Submarine School Sub Base Platypus, 120 High Street, North Sydney NSW 2060

Referring party details

**Name** Natalie Calder

**Job title** Associate Consultant

**Phone** 0889980100

**Email** natalie.calder@slrconsulting.com

**Address** 21 Parap Road, Parap NT 0820

## 1.3.2 Identity: Person proposing to take the action

### 1.3.2.1 Are the Person proposing to take the action details the same as the Referring party details? \*

No

### 1.3.2.2 Is Person proposing to take the action an organisation or business? \*

Yes

Person proposing to take the action organisation details

**ABN/ACN** 679801819

**Organisation name** APA SPP PTY LTD



**Organisation address** Level 25, 580 George Street, Sydney NSW 2000

Person proposing to take the action details

**Name** Warren Twist

**Job title** Principal Access and Approvals Specialist

**Phone** 0410541391

**Email** warren.twist@apa.com.au

**Address** Level 25, 280 George Street SYDNEY NSW 2000

**1.3.2.14 Are you proposing the action as part of a Joint Venture? \***

No

**1.3.2.15 Are you proposing the action as part of a Trust? \***

No

**1.3.2.17 Describe the Person proposing the action's history of responsible environmental management including details of any proceedings under a Commonwealth, State or Territory law for the protection of the environment or the conservation and sustainable use of natural resources against the Person proposing to take the action. \***

The proponent of the Action is APA SPP Pty Ltd (APA) which is a subsidiary of APA Group Limited (APA Group). APA was established on 9 August 2024 for the purpose of delivery of this project. APA has not undertaken any development since it was established therefore it does not have a record of environment management. APA has not previously referred an action under the EPBC Act.

APA is committed to responsible environmental and heritage management and undertakes operations in compliance to the APA Group Environmental and Heritage Policy (**Attachment 3: Environmental and Heritage Policy**).

A list of EPBC referral applications submitted to date by the APA Group is provided below:

**Northern Territory**

- 2020/8672 - Channel Island Bridge Pipeline Replacement Project
- 2008/4309 – Develop the Wickham Point Interconnect gas pipeline at Wickham Point

**New South Wales**

- 2021/9113 – Kurri Kurri Lateral Pipeline Project
- 2017/7894 - Western Slopes Pipeline

**Queensland**

- 2022/9382 – Moomba to Wilton Pipeline - MW433 Compressor Station
- 2022/9378 – South West Queensland Pipeline - SS6 Compressor Station
- 2021/9104 – APA Mica Creek Renewable Energy Facility
- 2013/6776 – Leichardt Power Station
- 2012/6288 – Transmission Line and Switchyard Project
- 2010/5790 - Develop a gas fired Combined Cycle Gas turbine power station at Mt Isa
- 2018/8168 - Beelbee Solar Farm and Transmission Connection
- 2021/9032 - East Coast Grid Expansion -Stage 1 MW880 & SS2
- 2017/7888 - Reedy Creek to Wallumbilla Pipeline
- 2008/3963 - Develop a gas compressor station at the location of the existing Davenport Downs Scraper Station on the Carpentaria Gas Pipeline at Davenport Downs

## **Victoria**

- 2019/8569 - Western Outer Ring Main (WORM) High Pressure Gas Pipeline
- 2018/8297 - Cribb Point to Pakenham Gas Pipeline
- 2015/7580 - Victorian Northern Interconnect Expansion (VNIE) Looping 6 -7
- 2014/7186 - Victorian Northern Interconnect Expansion (VNIE) Looping 2-5 Project
- 2011/6159 - Sunbury Pipeline Looping Project
- 2009/5036 - Wollert Compressor Station
- 2006/3093 - Brooklyn to Lara Pipeline Project

## **Western Australia**

- 2021/8900 – Northern Goldfields Interconnect Pipeline

There have been no proceedings under a Commonwealth, State or Territory law for the protection of the environment or the conservation and sustainable use of natural resources against APA SPP Pty Ltd within the NT and the rest of Australia to date. The list below provides a history of proceedings against the APA Group in Australia.

## **National**

- An audit identified non-compliance at two facilities by APT Pipelines Limited (now APA Infrastructure Limited) in 2020 with no further action taken.
- The APT Pipelines Limited (now APA Infrastructure Limited) was issued with a request for additional greenhouse energy reporting data, which was provided to the Clean Energy Regulator in 2019.

## **New South Wales**

- In 2017 the East Australian Pipeline Pty Ltd was issued with two penalty infringement notices for uncontrolled sediment releases, for which a fine was paid.

## **Queensland**

- In 2022 Kogan North Asset Pty Limited was issued with a formal warning for failure to provide efflux velocity, the information was subsequently provided.
- In 2022 Kogan North Asset Pty Limited was issued with a penalty infringement notice for failure to apply for Estimated Rehabilitation Cost (ERC) decision before expiry. The ERC application was completed and fine paid.
- APA (SWQP) Pty Ltd received a penalty in 2022 for failing to apply for an ERC decision on time. The application was completed, and the fine paid. In 2023, they received a formal warning for emissions non-compliance, and an Environmental Authority amendment was sought. In 2024, a warning was issued for a diesel spill, which was cleaned up.
- Roverton Pty Ltd and APT Petroleum Pipelines Pty Limited were issued with a penalty infringement notice for failure to apply for ERC decision before expiry in 2022. The ERC applications were

completed, and fines paid.

- In 2020, APA WGP Pty Ltd was issued with a warning related to land rehabilitation for which rectification works were completed.
- In 2023, APA Kogan North Gas Processing Facility was issued with an Environmental Protection Order for the failure to meet General Environmental Duty. This proceeding is still open, and requirements are being implemented.

#### **Victoria**

- APA Orbost Gas Plant Pty Ltd was issued with a notice to produce documents related to polyfluorinated alkyl substances (PFAS) contamination documents in 2019 for which the documents were provided. In 2020, the entity was issued a Pollution Abatement Notice for PFAS contamination site assessment for which the Investigation and monitoring are completed.
- APA VTS Australia (Operations) Pty Ltd was fined for an oil spill in 2020. In 2022, an Improvement Notice for failing to implement a site monitoring plan was revoked after compliance. In 2023, they received a warning for breaching a Cultural Heritage Management Plan, which was updated. Later that year, they were issued an Improvement Notice for Risk Management and Monitoring Program non-compliance, with the case still open after a plan was resubmitted.

#### **Western Australia**

- A warning was issued to APT Parmelia Pty Ltd in 2020 because the Annual Environmental Return did not include assessment, for which the information was subsequently provided.

### **1.3.2.18 If the person proposing to take the action is a corporation, provide details of the corporation's environmental policy and planning framework**

The APA Group is committed to responsible environmental and heritage management, ensuring compliance with regulatory and social obligations while promoting transparency, leadership, and continuous improvement. APA Group environmental policy aims to minimise impacts on the environment and cultural heritage, foster responsibility and awareness, consult stakeholders, and respect the past while protecting the future.

APA adheres to the APA Group environmental policy and is committed to the protection of the environment and the preservation of cultural heritage through the following measures:

- Promoting a strong environment and heritage culture, led by visible leadership and empowered employees.
- Compliance with all relevant legislative and social obligations through effective risk identification and management controls.
- Conducting thorough due diligence and risk assessments during the planning, execution, and operation phases of projects.
- Adherence to an Environment Management System that aligns with International Standards.
- Engaging in early, transparent, and consistent consultation with stakeholders and impacted groups.
- Delivering proactive education and training for employees and contractors to enhance awareness of risks, management systems, standards, and responsibilities.
- Reporting all environmental and cultural hazards and incidents to encourage transparency, prompt responses, learning, and continuous improvement.
- Implementing all reasonable measures to prevent environmental and heritage incidents and taking swift and appropriate action when incidents occur.
- Continuously improving environmental and heritage performance through data reporting, target reviews, and open discussions.

Further detail is provided in **Attachment 3: APA Group Environmental and Heritage Policy**.

### 1.3.3 Identity: Proposed designated proponent

#### 1.3.3.1 Are the Proposed designated proponent details the same as the Person proposing to take the action? \*

Yes

Proposed designated proponent organisation details	
ABN/ACN	679801819
Organisation name	APA SPP PTY LTD
Organisation address	Level 25, 580 George Street, Sydney NSW 2000
Proposed designated proponent details	
Name	Warren Twist
Job title	Principal Access and Approvals Specialist
Phone	0410541391
Email	warren.twist@apa.com.au
Address	Level 25, 280 George Street SYDNEY NSW 2000

### 1.3.4 Identity: Summary of allocation

☒ **Confirmed Referring party's identity**

The Referring party is the person preparing the information in this referral.

ABN/ACN	29001584612
Organisation name	SLR CONSULTING AUSTRALIA PTY LTD

Organisation address	Tenancy 202 Submarine School Sub Base Platypus, 120 High Street, North Sydney NSW 2060
Representative's name	Natalie Calder
Representative's job title	Associate Consultant
Phone	0889980100
Email	natalie.calder@slrconsulting.com
Address	21 Parap Road, Parap NT 0820

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### **✔ Confirmed Person proposing to take the action's identity**

The Person proposing to take the action is the individual, business, government agency or trustee that will be responsible for the proposed action.

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ABN/ACN	679801819
Organisation name	APA SPP PTY LTD
Organisation address	Level 25, 580 George Street, Sydney NSW 2000
Representative's name	Warren Twist
Representative's job title	Principal Access and Approvals Specialist
Phone	0410541391
Email	warren.twist@apa.com.au
Address	Level 25, 280 George Street SYDNEY NSW 2000

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### **✔ Confirmed Proposed designated proponent's identity**

The Person proposing to take the action is the individual or organisation proposed to be responsible for meeting the requirements of the EPBC Act during the assessment process, if the Minister decides that this project is a controlled action.

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Same as Person proposing to take the action information.

## **1.4 Payment details: Payment exemption and fee waiver**

### **1.4.1 Do you qualify for an exemption from fees under EPBC Regulation 5.23 (1) (a)? \***

No

**1.4.3 Have you applied for or been granted a waiver for full or partial fees under Regulation 5.21A? \***

No

**1.4.5 Are you going to apply for a waiver of full or partial fees under EPBC Regulation 5.21A?**

No

**1.4.7 Has the department issued you with a credit note? \***

No

**1.4.9 Would you like to add a purchase order number to your invoice? \***

No

## 1.4 Payment details: Payment allocation

**1.4.11 Who would you like to allocate as the entity responsible for payment? \***

Proposed designated proponent

## 2. Location

### 2.1 Project footprint





Project area: 2009.38 Ha

Disturbance footprint: 294.1 Ha

Maptaskr © 2024 -16.363629, 134.154772

Powered By Esri - Sources: Esri, TomTom, Garmin, F...

## 2.2 Footprint details

### 2.2.1 What is the address of the proposed action? \*

14981 Stuart Highway, Birdum NT (Shenandoah Perpetual Pastoral Lease - NT Portion 7026)

## 2.2.2 Where is the primary jurisdiction of the proposed action? \*

Northern Territory

## 2.2.3 Is there a secondary jurisdiction for this proposed action? \*

No

## 2.2.5 What is the tenure of the action area relevant to the project area? \*

The land tenure details for the Proposed Action are as follows:

- KP 0 (start of the SPP): Located on NT Portion 7026 (tenure type Perpetual Pastoral Lease (PPL), title CUFT 752), owned by A.P.N Pty Ltd (survey ID S2009/182A).
- Stuart Highway and NT Portion 7513: The SPP crosses the Stuart Highway and NT Portion 7513 (PPL, title CUFT 823), owned by A.P.N Pty Ltd (survey ID CP005573) and the Stuart Highway road corridor, managed by the DLI
- KP 37 (end of the SPP): Located on NT Portion 1077 (PPL, title CUFT 823), owned by A.P.N Pty Ltd (survey ID S811108).

Options to secure land tenure and access for the Proposed Action include:

- easement (for the SPP transmission pipeline)
- sub-lease for the fenced areas at either end of the SPP alignment, and
- deed of agreement for the Stuart Highway road reserve.

# 3. Existing environment

## 3.1 Physical description

### 3.1.1 Describe the current condition of the project area's environment.

The current condition of the Project Area is largely undisturbed except for existing pastoral roads, access tracks, gas exploration and appraisal activities conducted by Tamboran, the existing AGP, the Stuart Highway and borrow pits previously used to source road building materials.

The Project Area wholly occurs within the Sturt Plateau bioregion, which occupies an area of approximately 98,575 km<sup>2</sup> in central NT. The bioregion comprises flat to gently undulating plains, with little local relief, and the vegetation is mainly eucalypt forests and woodlands dominated by bloodwoods over perennial grasses. The northwesternmost portion of the Mitchell Grass Downs bioregion occurs approximately 6.5 km to the south of the western portion of the Project Area. A review of spatial imagery suggests that sections of the Project Area intersect habitat units (i.e. seasonally inundated black soil plains) that are characteristic of the Mitchell Grass Downs bioregion (**Attachment 4: Ecological Assessment**, Section 2.1, pp 12).

Regional fire history and fire scar mapping obtained through the Northern Australia and Rangelands Fire Information (NAFI) website indicated that there have been 11 fire events in the past 20 years. According to NAFI fire data, the largest percentage of the Project Area burned in the past 20 years occurred in 2006



(40%), 2012 (41.44%), 2014 (35.53%), 2015 (40.43%) and 2016 (35.42%). Significant fire scarring within proximity to the Project Area occurred in 2001, 2004, 2012 and 2015, as shown in **Attachment 4:**

**Ecological Assessment**, Section 2.5, pp 16.

Seasonal fire impacts were observed across all vegetation communities during the 2024 field assessment. Two vegetation communities in particular, were observed to be heavily influenced by fire. The dominance of flora species and relative structure of these communities varied considerably, with extensive areas of dense *Acacia* dieback and recruitment (**Attachment 4: Ecological Assessment**, Section 5.2.1 pp 43).

Seven introduced flora species were identified within the Project Area during the 2024 field assessment – Caribbean Stylo (*Stylosanthes hamata*), Shrubby Stylo (*Stylosanthes scabra*), Mimosa Bush (*Vachellia farnesiana*), Hyptis (*Mesosphaerum suaveolens*), Flannel Weed (*Sida cordifolia*), Passion Flower (*Passiflora foetida*) and Sabi Grass (*Urochloa mosambicensis*). In general, the occurrence of introduced flora species was limited to previously disturbed areas such as access tracks and other previously cleared areas. Caribbean Stylo and Shrubby Stylo (*Stylosanthes hamata* and *Stylosanthes scabra*, respectively) formed a notable component of groundcover in *Acacia shirleyi* and *Corymbia dichromophloia* dominated vegetation communities to the west of the Stuart Highway (**Attachment 4: Ecological Assessment**, Section 5.2.2.2, pp 45).

Two introduced fauna species were observed within the study area during the 2024 field assessment – Cattle (*Bos taurus*) and Feral Cat (*Felis catus*) (**Attachment 4: Ecological Assessment**, Section 5.3.1.2, pp 52).

### 3.1.2 Describe any existing or proposed uses for the project area.

Shenandoah and Hayfield Stations are pastoral properties primarily used for cattle grazing and commercial farming. There is no land use zoning, and no zoning change required to facilitate the development.

Most of the surrounding land is either Perpetual Pastoral Leases or Aboriginal freehold land. The neighbouring stations are Kalala station, Hidden Valley station and Buchanan Downs. The Aboriginal freehold land (NT Portion 3637) is located approximately 26 km south west of the Project Area and is managed by Murrniji Aboriginal Land Trust.

The Stuart Highway is a major Australian highway. It runs from Darwin, in the NT, via Tennant Creek and Alice Springs, to Port Augusta in South Australia.

The Project Area spans two Native Title Determinations, divided by the Stuart Highway:

- Shenandoah Pastoral Lease Native Title Determination (Federal Court No: NTD21/2010, NNTT No: DCD2012/007), held by members of the Kinbininggu and Bamarrngganja groups.
- West of Stuart Highway: Hayfield Pastoral Lease Native Title Determination (Federal Court No: NTD26/2010, NNTT No: DCD2012/011), held by members of the Kinbininggu, Warrananku, and Marlinja groups.

The Top End (Default PBC/CLA) Aboriginal Corporation registered native title body corporate (RNTBC) serves as the RNTBC for both determinations, as per Subsection 203AD(1) of the *Native Title Act 1993*. This corporation holds the statutory obligations for the Project Area under the terms of the Act.

### 3.1.3 Describe any outstanding natural features and/or any other important or unique values that applies to the project area.

The Project Area occurs in a localised sub-catchment of the Victoria River - Wiso basin. The Project Area intersects one first and one second order stream (**Attachment 4: Ecological Assessment**, Section 4.3, pp 30).

The Project Area does not overlap with any wetlands identified in the Directory of Important Wetlands. The nearest mapped important wetland is Lake Woods, which occurs approximately 100 km to the south of the Project Area. The Project Area does not occur within a catchment that flows to Lake Woods.

The nearest RAMSAR wetland is associated with the Kakadu National Park and is located >300 km to the north of the Project Area. The nearest NT Site of Conservation Significance is located around Lake Wood Conservation Covenant, which is approximately 100 km to the south of the Project Area. The nearest Site of Botanical Significance is located approximately 180 km to the south of the Project Area and is associated with the Mitchell Grass Dows Bioregion.

The Frew Ponds Historical Reserve is the only park or reserve that occurs within 30 km of the Project Area. This reserve is a memorial to the Frew Ponds Overland Telegraph Line and is located approximately 9.6 km to the south of the proposed camp and approximately 19 km southwest of the proposed alignment.

#### **3.1.4 Describe the gradient (or depth range if action is to be taken in a marine area) relevant to the project area.**

The elevation of the Dunmarra area is between about 224 m to 282 m above sea level. The area is dominated by a gently undulating erosional plain of the lower Sturt Plateau with higher elevations in the north with relatively level slopes <1%. The higher plains gradually slope down through gravelly lateritic gently undulating plains, which are dissected by colluvium-infilled drainage lines and dotted with isolated depressions. The sloping plains and drainage lines then meet a major drainage area of lower elevation that dissects the study area, known as the Sturt Plain (DENR, 2019)

The Sturt Plain drainage area is a vast level plain (<0.5% slope) consisting of grey cracking-clays with gilgai microrelief. The plain generally drains in a southerly direction. Part of the plain in the north-east of the study area is partially enclosed resulting in seasonal inundation. The Sturt Plain proper, in the south-west of the study area, is typical of the treeless Mitchell Grass Plains of the Barkly Tableland (DENR, 2019).

## **3.2 Flora and fauna**

#### **3.2.1 Describe the flora and fauna within the affected area and attach any investigations of surveys if applicable.**

Desktop and field survey assessments were undertaken by SLR (2024) to identify and assess the relevant terrestrial ecology MNES and determine the likelihood of significant impact to MNES.

The full ecological assessment is included in **Attachment 4: Ecological Assessment** and a summary of the findings are provided below.

##### **Native Flora**

A total of 158 native flora species were identified within the Project Area over the field assessment period. A full list of these species is included in **Attachment 4: Ecological Assessment**, Appendix D. No threatened flora species, as listed under the TPWC or EPBC Acts, or regionally significant flora species, as listed in Young *et al.* (2022), were identified to occur within the Project Area during the field assessment (**Attachment 4: Ecological Assessment**, Section 5.2.2.1, pp 44).

## Native Fauna

A total of 119 native fauna species were identified within the Project Area over the field assessment period; four amphibian, 92 bird, nine mammal and 14 reptile species. A full list of these species is provided in **Attachment 4: Ecological Assessment**, Appendix E. Native fauna identified within the Project Area included at least four and up to five Microchiroptera species; two species (*Scotorepens greyii* and *Chalinolobus nigrogriseus*) could not be differentiated via call detection methods. None of the identified species are listed under the EPBC Act or the TPWC Act. Refer to **Attachment 4: Ecological Assessment**, Appendix F for the microbat call interpretation report.

## Introduced Flora and Fauna

1. Very few introduced flora and fauna species were identified within the Project Area during the field assessment. Introduced flora species generally occurred in low abundance and were generally isolated to sections of existing access tracks and prior disturbance.
2. No WoNS were identified within the Project Area and only two WM Act declared weed species (Class B) were identified; Hyptis and Flannel Weed. These two species are also listed under DEPWS (2021a) as Category 4 weeds. All remaining introduced flora species are not afforded a relevant class under the WM Act or category under DEPWS (2021a). Regarding introduced fauna species, Feral Cats (*Felis catus*) were observed within the Project Area during the field assessment.

### 3.2.2 Describe the vegetation (including the status of native vegetation and soil) within the project area.

#### Vegetation

**Attachment 4: Ecological Assessment**, Section 5.2.1, pp 43 provides details of vegetation within the Project Area. A summary of the vegetation types found within the Project Area is provided below.

The Project Area intersects a total of seven distinct ground-truthed vegetation communities:

1. Mixed *Acacia* shrubland to variable grassland with variable emergent *Eucalyptus* and *Corymbia*
2. *Melaleuca viridiflora* and *Acacia torulosa* low closed shrubland with *Triodia bitextura* hummock grassland
3. *Eucalyptus microtheca* open woodland on floodplains
4. *Corymbia dichromophloia* open woodland with variable tussock/hummock grassland
5. *Acacia shirleyi* open to closed woodland
6. *Macropteranthes keckwickii* closed woodland
7. *E. microtheca* and *Lophostemon grandiflorus* open woodland on floodplain fringes.

Three ground-truthed vegetation communities align with Strategic Regional Environmental and Baseline Assessment (SREBA) moderate-value floodplain broad vegetation groups (BVGs) (Young *et al.*, 2022). These ground-truthed communities are:

- *Melaleuca viridiflora* and *Acacia torulosa* low closed shrubland with *Triodia bitextura* hummock grassland
- *Eucalyptus microtheca* open woodland on floodplains; and
- *E. microtheca* and *Lophostemon grandiflorus* open woodland on floodplain fringes.

No ground-truthed vegetation communities align with SREBA BVGs that equate to high-value vegetation, as described in Young *et al.* (2022).

The Project Area intersects one first and one second order Department of Environment, Parks and Water Security (DEPWS) (2024a) mapped minor watercourses. Native vegetation within and immediately surrounding these DEPWS (2024a) mapped watercourses equates to 'riparian vegetation' which is considered to be significant vegetation under the NT Land Clearing Guidelines (DEPWS, 2021b). Potential riparian vegetation within the Project Area includes:

- 20 ha of *E. microtheca* open woodland on floodplains
- 2 ha of *E. microtheca* and *Lophostemon grandiflorus* open woodland on floodplain fringes.

The value of riparian vegetation within the Project Area is considered to be low on the basis that:

- the riparian community is not extensive and that the key indicator species in *Eucalyptus microtheca*, which is typified as a facultative phreatophyte and not highly dependent of groundwater sources for survival
- there was no known presence or likelihood of occurrence of threatened or otherwise significant plants or animals within the riparian vegetation communities
- there was no known occurrence of high density phreatophytic vegetation
- the local and regional impact to the riparian communities is likely to be low.

In regard to the assessment of impact based on the Proposed Action, the following outcomes can be confidently determined:

- low value riparian vegetation
- the Project Area is located at the top of the catchment therefore has minimal influence to the overall community
- there will be short-term localised impact on riparian vegetation within the additional work areas (~5 ha) and a long-term localised impact on riparian vegetation communities where pipeline and access track ROW will be required during operation (17 ha). Timing of the disturbance, for the short term impact, will be during the dry season when it is highly unlikely that these communities will be inundated from seasonal rainfall
- the area of disturbance will be rehabilitated with native flora
- the disturbance footprint is linear with minimal proposed disturbance to native vegetation and interruptions to surface water flow paths
- the riparian communities are both 1st and 2nd order streams which are at the lower end of significance.

The potential occurrence of Groundwater Dependent Ecosystems (GDEs) within the Project Area was assessed through the combination of desk- and field-based assessments. A review of Strategic Regional Environmental and Baseline Assessment (SREBA) GDE modelling layer available on NR Maps indicated the potential presence of a terrestrial GDE within the western portion of the Project Area. However, ground-truthing vegetation assessments identified that western portions of the Project Area are dominated by phreatophytic vegetation (*Eucalyptus microtheca*), which is not reliant upon groundwater. Furthermore, a review of SREBA bore water level and groundwater level raster layers indicated that groundwater depth in the vicinity of the Project Area is >70 meters below ground level. Therefore, vegetation within the Project Area does not have capacity to interact with groundwater due to the depth of the water table. Furthermore, the GDE Atlas indicated that no aquatic or subterranean GDEs are present within the Project Area. Overall, the Project Area does not interact with any known or potential GDEs (**Attachment 4: Ecological Assessment**, Section 6.1.2, pp 56)

## Soil

The Project is situated in an area with low to moderate erosion risk, where the land is generally well-drained and has moderately to highly permeable soils. The slopes across the Project Area are typically less than 2%, resulting in slow to very slow runoff. The soils in the area are primarily categorised as red, yellow, and brown clayey soil with residual sand and some ferruginous rubble (Czs), as well as dark grey and brown clayey soil (Czb). Additionally, the pH, salinity, and sodicity levels of the topsoil fall within the optimal range for promoting successful revegetation. The historic land use in the area was predominantly pastoral, contributing to a low risk of contamination.

## 3.3 Heritage

### 3.3.1 Describe any Commonwealth heritage places overseas or other places recognised as having heritage values that apply to the project area.

There are no National heritage places or Commonwealth heritage places located within or adjacent to the Project Area. Kakadu National Park is located 480.37 km north-east of the Project Area, while Uluru-Kata Tjuta National Park is 979.61 km to the south. RAAF Base Tindal is situated 264.10 km north-west of the Project Area.

### 3.3.2 Describe any Indigenous heritage values that apply to the project area.

The Project crosses two areas with native title determinations: the Shenandoah Pastoral Lease (Native Title Tribunal file no. DCD2012/007) and Hayfield Pastoral Lease (Native Title Tribunal file no. DCD2012/011). Traditionally, the lands encompassing the Project Area have been inhabited and utilised by several First Nations peoples occupying much of the land around the Sturt Plateau. The Native Title Holders and claimants under the determinations are:

- Shenandoah:
  - The Kinbininggu Group
  - The Bamarrnganja Group
- Hayfield:
  - The Kinbininggu Group
  - The Marlinja Group
  - The Warranangku Group.

Consultation with Native Title holders is ongoing and will increase the understanding of the extent of Indigenous heritage value.

1. A desktop cultural heritage assessment was completed by Remote Heritage Consultants (2024), and is included as **Attachment 5A: Cultural Heritage Desktop Assessment**.

A field assessment was also completed by Remote Heritage Consultants (2024), and is included as **Attachment 5B: Cultural Heritage Field Assessment**. This document is not publicly available as it contains culturally sensitive information and third-party personal information.

Based on the survey results and Traditional Owner consultation, the risk of encountering archaeological sites within the area surveyed was assessed as low (**Attachment 5B: Cultural Heritage Field Assessment**, Section 4.1, pp 28). However, the assessment should be considered in light of the following factors that may influence the visibility and preservation of archaeological materials:

- Lithic resources:

- Risk: Low. The absence of suitable knappable stone in the Survey Area significantly reduces the likelihood of finding stone artefacts, including within the wider Project Area. The only known stone outcrop consists of highly weathered and friable/alterd sandstone, unsuitable for knapped stone tools or grindstones. This lack of raw material suggests a low probability of stone artefact manufacture or stone artefact related sites within the construction footprint.
- Riparian occupation areas:
  - Risk: Low. Despite the presence of numerous claypan swamps, lakes, and floodplains, no artefacts or other archaeological sites were recorded around these features. This absence may be due to the following factors:
    - a) High levels of bioturbation in black soil surfaces, coupled with erosion caused by cattle activity
    - b) The general lack of suitable artefact raw materials locally. This may have reduced evidence of occupation to isolated artefacts or low-density artefact scatters which can be easily impacted by bioturbation or obscured by ground surface visibility constraints at the time of survey.
    - c) The variable nature of surface water in the Project Area, primarily driven by wet season events, results in inconsistent high-water marks and a lack of distinct lake edges. This variability reduces the likelihood of finding concentrated camping areas typically associated with permanent water sources. However, it does not entirely preclude the likelihood of sporadic use by First Nations people in the past.
    - d) Ground visibility was low (<30%) in the high bank margins around key water features such as the claypan swamps, which may have obscured archaeological features.
- Traditional knowledge:
  - Traditional Owner consultation provided insights into the use of local vegetation for material culture items, such as Cooktown Ironwoods for implements and bloodwood sap for medicinal purposes. While this information suggests potential past activity in the area, it does not necessarily indicate the presence of durable archaeological materials within the construction footprint.
  - Traditional Owners indicated that there were no known stone artefact sites within the proposed Right of Way and that such sites were unlikely to be found during the survey.

An Abstract of Records from the Aboriginal Areas Protection Authority under regulation 7 of the *Northern Territory Aboriginal Sacred Sites Regulations 2004* identified no registered or recorded sacred sites or restricted work areas within 500 m of the Project Area. The closest recorded archaeological site, Dunmarra Site 1 (a flaked telegraph insulator), is located 2.2 km north of the SPP corridor near the Dunmarra Roadhouse. APA has applied for Authority Certificate under the *Northern Territory Aboriginal Sacred Sites Act 1989*.

A search of the National Indigenous Australians Agency returned no results for Indigenous Protected Areas within the Project Area.

## 3.4 Hydrology

### 3.4.1 Describe the hydrology characteristics that apply to the project area and attach any hydrological investigations or surveys if applicable. \*

The existing surface water environment is described in section 2, pp 8 of the Surface Water Assessment completed by WRM Pty Ltd (2024) included as **Attachment 6: Surface Water Assessment**. Topography in the region is slightly undulating with low surface gradients. Drainage paths in the Project Area are poorly defined with no identifiable bed or banks. Surface runoff typically moves as shallow overland flow with

ponding observed at numerous locations along the minor drainage paths. The Proposed Action will traverse a 2nd order non perennial stream east of the Stuart Highway and 1st order non perennial stream west of the Stuart Highway.

There is no permanent surface water feature within the Project Area. The Proposed Action crosses the southern extent of a large ephemeral waterbody within the Newcastle Creek catchment (**Attachment 6: Surface Water Assessment**, Section 2.1, pp 8)..

The Proposed Action is located in Cretaceous fractured and karstic aquifer consisting primarily of dolostone, sandstone, and siltstone. The aquifer is classified as highly productive fractured aquifer with typical yields between 5 L/s – 10 L/s and low salinity (<1,500 mg/L).

No ground-truthed vegetation communities within the Study area equate to SREBA BVGs described as GDEs. However, the Project Area intersects a SREBA 'low potential' terrestrial GDE, which coincides with DEPWS (2024a) mapped watercourses. DEPWS (2024c) states that “*Generally, where groundwater is within 20 m of the land surface some species of native plant may access and use groundwater*”. A review of DEPWS (2024a) SREBA mapped GDEs, bores, and water table depth raster information indicates that the water table below the Project Area is >70 mbgl. Therefore, it is unlikely that vegetation within the Project Area equates to a terrestrial GDE as depth to groundwater is beyond the rooting depth of native species(Canadell et al., 1996; Schenk & Jackson, 2002). This is supported by SLR ground-truthed data within the vicinity of the SREBA mapped GDE. The key indicator species in this general area was *Eucalyptus microtheca*, which is typified as a facultative phreatophyte and not highly dependent of groundwater sources for survival. Overall, it is unlikely that development of the Project Area will impact upon a terrestrial GDE (**Attachment 4: Ecological Assessment**, Section 6.1.2, pp 56).

## 4. Impacts and mitigation

### 4.1 Impact details

**Potential Matters of National Environmental Significance (MNES) relevant to your proposed action area.**

EPBC Act section	Controlling provision	Impacted	Reviewed
S12	World Heritage	No	Yes
S15B	National Heritage	No	Yes
S16	Ramsar Wetland	No	Yes
S18	Threatened Species and Ecological Communities	Yes	Yes
S20	Migratory Species	No	Yes
S21	Nuclear	No	Yes
S23	Commonwealth Marine Area	No	Yes

EPBC Act section	Controlling provision	Impacted	Reviewed
S24B	Great Barrier Reef	No	Yes
S24D	Water resource in relation to large coal mining development or coal seam gas	Yes	Yes
S26	Commonwealth Land	No	Yes
S27B	Commonwealth Heritage Places Overseas	No	Yes
S28	Commonwealth or Commonwealth Agency	No	Yes

### 4.1.1 World Heritage

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

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#### 4.1.1.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? \*

No

#### 4.1.1.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact. \*

The nearest World Heritage property is Kakadu National Park which is located approximately 300 km to the north of the Project Area.

### 4.1.2 National Heritage

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.



A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

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**4.1.2.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? \***

No

**4.1.2.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact. \***

The Proposed Action is not located within or near a declared National Heritage place.

**4.1.3 Ramsar Wetland**

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

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**4.1.3.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? \***

No

**4.1.3.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact. \***

The nearest RAMSAR wetland is associated with the Kakadu National Park and is located approximately 300 km to the north of the Project Area.

#### 4.1.4 Threatened Species and Ecological Communities

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

##### Threatened species

Direct impact	Indirect impact	Species	Common name
No	No	<i>Calidris acuminata</i>	Sharp-tailed Sandpiper
No	No	<i>Calidris ferruginea</i>	Curlew Sandpiper
No	No	<i>Chloebia gouldiae</i>	Gouldian Finch
No	No	<i>Erythrorchis radiatus</i>	Red Goshawk
Yes	Yes	<i>Erythrura gouldiae</i>	Gouldian Finch
Yes	Yes	<i>Falco hypoleucos</i>	Grey Falcon
No	No	<i>Falcunculus frontatus whitei</i>	Crested Shrike-tit (northern), Northern Shrike-tit
Yes	Yes	<i>Grantiella picta</i>	Painted Honeyeater
No	No	<i>Macroderma gigas</i>	Ghost Bat
No	No	<i>Macrotis lagotis</i>	Greater Bilby
No	No	<i>Pristis pristis</i>	Freshwater Sawfish, Largetooth Sawfish, River Sawfish, Leichhardt's Sawfish, Northern Sawfish
Yes	Yes	<i>Rostratula australis</i>	Australian Painted Snipe
No	No	<i>Saccolaimus saccolaimus nudicluniat</i>	Bare-rumped Sheath-tailed Bat, Bare-rumped Sheathtail Bat
Yes	Yes	<i>Tiliqua scincoides intermedia</i>	Northern Blue-tongued Skink

Direct impact	Indirect impact	Species	Common name
No	No	<i>Trichosurus vulpecula arnhemensis</i>	Northern Brushtail Possum
No	No	<i>Tyto novaehollandiae kimberli</i>	Masked Owl (northern)
No	No	<i>Varanus mertensi</i>	Mertens' Water Monitor, Mertens's Water Monitor
No	No	<i>Varanus mitchelli</i>	Mitchell's Water Monitor

## Ecological communities

### 4.1.4.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? \*

Yes

### 4.1.4.2 Briefly describe why your action has a direct and/or indirect impact on these protected matters. \*

The following species were determined to have a moderate or high likelihood of occurring within the Project Area based on outcomes of desk- and field-based assessments:

- Gouldian Finch (*Erythrura gouldiae*)
- Grey Falcon (*Falco hypoleucos*)
- Painted Honeyeater (*Grantiella picta*)
- Australian Painted-snipe (*Rostratula australis*), and
- Northern Blue-tongued Skink (*Tiliqua scincoides intermedia*).

The Proposed Action has the potential to result in direct and indirect impacts to these species and their potential habitat. The potential impacts are described in **Attachment 4: Ecological Assessment**, Table 21, pp 62 and summarised below:

#### *Direct Impacts*

- Disturbance of up to 113 ha of potential foraging habitat for Gouldian Finch (~0.05% of that represented within the broader region)
- Disturbance of up to 135 ha of potential foraging habitat for Grey Falcon (~0.05% of that represented within the broader region)
- Disturbance of up to 84 ha of potential foraging habitat, which is defined as habitat critical to the survival of the Painted Honeyeater (~0.04% of that represented within the broader)
- Disturbance of up to 23 ha of potential foraging habitat for Australian Painted Snipe (~0.65% of that represented within the broader region)
- Disturbance of up to 135 ha of potential foraging habitat, which is defined as habitat critical to the survival of the Northern Blue-tongued Skink (~0.05% of that represented within the broader region), and
- Vehicle traffic and earthmoving activities may result in death or injury from vehicle strike (most likely during the construction phase).

#### *Indirect Impacts*

- Clearing of land resulting in favourable conditions for predatory fauna and subsequently, increased predation or competition from introduced fauna
- Vegetation clearing, vehicle traffic, earthworks and operations resulting in alterations to fire regimes, establishment or spread of weed species and hydrocarbon spills
- Introduction of invasive flora species, such as introduced grass species, which may competitively exclude preferred food sources for the Gouldian Finch and Australian Painted-snipe.

#### **4.1.4.4 Do you consider this likely direct and/or indirect impact to be a Significant Impact? \***

No

#### **4.1.4.6 Describe why you do not consider this to be a Significant Impact. \***

Potential impacts to these threatened species were assessed against the MNES Significant impact guidelines (DoE, 2013). These assessments are provided in **Attachment 4: Ecological Assessment**, Table 21, pp 62. The outcomes of these assessments are that none of these species will be significantly impacted by development of the Project.

##### Gouldian Finch

This species has not been observed to occur within the Project Area. Development of the Project may impact up to ~112.14 ha of habitat for this species. This is ~0.05% of that available in the surrounding region, the balance of which will remain unimpacted by the Project. Despite a net loss of habitat, development of the Project will not result in a significant impact to this species.

##### Grey Falcon

The Project Area does not occur in a location that supports an important population of this species. Development of the Project may impact up to ~134.70 ha of potential habitat for this species. This is ~0.05% of that available in the surrounding region, the balance of which will remain unimpacted by the Project. Despite a net loss of potential foraging habitat, development of the Project will not result in a significant impact to this species.

##### Painted Honeyeater

The Project Area does not occur in a location that supports an important population of this species. Development of the Project may impact up to ~83.96 ha of habitat for this species. This is ~0.04% of that available in the surrounding region, the balance of which will remain unimpacted by the Project. Despite a net loss of potential foraging habitat, development of the Project will not result in a significant impact to this species.

##### Australian Painted-snipe

This species has not been observed to occur within the Project Area. Development of the Project may impact up to ~22.57 ha of habitat for this species. This is ~0.65% of that available in the surrounding region, the balance of which will remain unimpacted by the Project. Despite a net loss of habitat, development of the Project will not result in a significant impact to this species.

##### Northern Blue-tongued Skink

This species has not been observed to occur within the Project Area. Development of the Project may impact up to ~134.70 ha of habitat for this species. This is ~0.05% of that available in the surrounding region, the balance of which will remain unimpacted by the Project. Despite a net loss of habitat, development of the Project will not result in a significant impact to this species.

#### 4.1.4.7 Do you think your proposed action is a controlled action? \*

No

#### 4.1.4.9 Please elaborate why you do not think your proposed action is a controlled action. \*

The Proposed Action is unlikely to have significant impacts on threatened species. No threatened ecological communities occur within the vicinity of the Proposed Action. Clearing requirements are narrow, with significant proportions of surrounding remaining habitat, and the pipeline does not present a permanent barrier to fauna movements. The main impacts to fauna will occur during the construction period (estimate 6 months). Impacts to threatened species during operation of the pipeline are minimal.

#### 4.1.4.10 Please describe any avoidance or mitigation measures proposed for this action and attach any supporting documentation for these avoidance and mitigation measures. \*

Industry-standard impact management practices will be implemented during the construction, operation, and rehabilitation phases of the Proposed Action to minimise impacts to environmental and other values described in APGA (2022).

These management practices will form part of an environmental management plan for construction and operation of the Project. Key mitigation measures that will be implemented to reduce and minimise potential impacts to threatened species are:

- Pre-clearance surveys to identify presence of threatened species within the Project Area
- Implementing adaptive management strategies to avoid impacts to threatened species identified during pre-clearance surveys
- Trench ramps and frequent inspections of trenches for fauna
- Equipment and vehicle weed hygiene protocols prior to entering site
- Speed limits for construction vehicles within the Project Area, and
- Rehabilitation of cleared areas, that would include reestablishment of ground surface species.

Measures to avoid, minimise or mitigate potential impacts on protected matters are provided in Section 2.5 and 2.6 of **Attachment 1: Supporting Information Report**.

#### 4.1.4.11 Please describe any proposed offsets and attach any supporting documentation relevant to these measures. \*

An offset is not proposed as the impacts are not considered significant.

#### 4.1.5 Migratory Species

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

Direct impact	Indirect impact	Species	Common name
No	No	Actitis hypoleucos	Common Sandpiper
No	No	Apus pacificus	Fork-tailed Swift
No	No	Calidris acuminata	Sharp-tailed Sandpiper
No	No	Calidris ferruginea	Curlew Sandpiper
No	No	Calidris melanotos	Pectoral Sandpiper
No	No	Cecropis daurica	Red-rumped Swallow
No	No	Charadrius veredus	Oriental Plover, Oriental Dotterel
No	No	Cuculus optatus	Oriental Cuckoo, Horsfield's Cuckoo
No	No	Glareola maldivarum	Oriental Pratincole
No	No	Hirundo rustica	Barn Swallow
No	No	Hydroprogne caspia	Caspian Tern
No	No	Motacilla cinerea	Grey Wagtail
No	No	Motacilla flava	Yellow Wagtail

Direct impact	Indirect impact	Species	Common name
No	No	Plegadis falcinellus	Glossy Ibis
No	No	Pristis pristis	Freshwater Sawfish, Largetooth Sawfish, River Sawfish, Leichhardt's Sawfish, Northern Sawfish
No	No	Tringa glareola	Wood Sandpiper
No	No	Tringa nebularia	Common Greenshank, Greenshank
No	No	Tringa stagnatilis	Marsh Sandpiper, Little Greenshank

**4.1.5.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? \***

No

**4.1.5.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact. \***

The following species were determined to have a moderate or high likelihood of occurring within the Project Area based on outcomes of desk-based assessments:

- Oriental Pratincole
- Glossy Ibis.

These species and potential habitat for these species were not observed within the Project Area during a field assessment in May/June 2024.

Potential impacts to these migratory species were assessed against the MNES Significant impact guidelines (DoE, 2013). These assessments are provided in **Attachment 4: Ecological Assessment**, Table 21, pp 62. The outcomes of these assessments are that neither of these species will be significantly impacted by development of the Proposed Action.

**4.1.6 Nuclear**

**4.1.6.1 Is the proposed action likely to have any direct and/or indirect impact on this protected matter? \***

No

**4.1.6.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact. \***

The Proposed Action is not associated with a nuclear activity.

#### **4.1.7 Commonwealth Marine Area**

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

##### **4.1.7.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? \***

No

##### **4.1.7.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact. \***

The Proposed Action is not near a Commonwealth Marine Area.

#### **4.1.8 Great Barrier Reef**

##### **4.1.8.1 Is the proposed action likely to have any direct and/or indirect impact on this protected matter? \***

No

##### **4.1.8.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact. \***



The Proposed Action will be undertaken entirely within the Northern Territory. The Proposed Action is more than 2,500km from the Great Barrier Reef Marine Park.

#### **4.1.9 Water resource in relation to large coal mining development or coal seam gas**

##### **4.1.9.1 Is the proposed action likely to have any direct and/or indirect impact on this protected matter? \***

Yes

##### **4.1.9.2 Briefly describe why your action has a direct and/or indirect impact on this protected matter. \***

On 15 December 2023, the Water Trigger was amended to include consideration of likely significant impacts on water resources in relation to all types of unconventional gas. At the time of submitting this referral, an updated Significant Impact Guideline 1.3 had not been published. Therefore, the Proposed Action was assessed against the *Significant Impact Guidelines 1.3: Coal Seam Gas and Large Coal Mining Developments – Impacts on Water* (DCCEEW, 2022) as covering all forms of unconventional gas (**Attachment 6: Surface Water Assessment**, Section 6, pp 45). Although the scope of the amended Water Trigger is unlikely to apply to the Proposed Action given this project is a gas conveyance project, rather than an unconventional gas production project, a precautionary referral has been made (this application).

The Proposed Action may be considered associated infrastructure for an unconventional gas development that could impact water resources when cumulative impacts are considered in relation to other current and potential future unconventional gas developments at local, aquifer, catchment, and regional scales.

Direct impacts of the Proposed Action on water resources relate to water consumption. Water will only be required during the construction phase, with minimal and infrequent use during the operational phase.

Approximately 70 megalitres (ML) of groundwater is required during the six month construction phase for dust suppression, construction activities, and hydrostatic testing of the pipeline.

Approximately 30 ML of water will be sourced from existing bores under an existing water extraction licence held by Tamboran or an associated company. Approximately 40 ML of water will be sourced from new bores installed by APA SPP Pty Ltd under a new water extraction licence that APA SPP Pty Ltd will obtain prior to commencing water extraction. Water extraction will only occur for a short period (estimated six months during the construction phase). Essentially, the Proposed Action will require no water during its operational phase, except for minimal and temporary amounts during specific maintenance or testing periods.

The Proposed Action is not integral to the production of unconventional gas; it is a transmission pipeline intended to transport gas following production.

When considering the Proposed Action alongside broader extraction, recovery, and release activities associated with unconventional gas on a local-to-catchment scale, including past, present, or reasonably foreseeable developments, there is a possibility of cumulative impacts on water resources.

**4.1.9.4 Do you consider this likely direct and/or indirect impact to be a Significant Impact? \***

No

**4.1.9.6 Describe why you do not consider this to be a Significant Impact. \***

The construction phase of the Proposed Action is short term, estimated to be complete within six months. It is not expected that the construction activities will result in any significant impact on groundwater quality or quantity. Approximately 70 ML of water in total will be required for dust suppression, compaction, hydrostatic testing, and potable water to service the temporary construction camp during construction of 6 months. This represents 0.88% of the annual volume of water allocated to petroleum activities and 0.04% of the annual beneficial use allocations under the Georgina Wiso Water Allocation Plan 2023-2031 (DEPWS, 2023). Of the 70ML to be used, only 40ML represents “new” extraction.

The intensity, magnitude, and duration of the construction phase is expected to be low. During the operational phase, the Proposed Action will not have any significant impact on groundwater quality or quantity, as the magnitude and intensity of water use will be minimal and infrequent.

The Proposed Action is located in a Cretaceous fractured and karstic aquifer, consisting primarily of dolostone, sandstone, and siltstone. The aquifer is classified as a highly productive fractured aquifer with typical yields between 5 L/s and 10 L/s, and low salinity (<1,500 mg/L). The potential occurrence of Groundwater Dependent Ecosystems (GDEs) within the Project Area was assessed through the combination of desk- and field-based assessments. A review of Strategic Regional Environmental and Baseline Assessment (SREBA) GDE modelling layer available on NR Maps indicated the potential presence of a terrestrial GDE within the western portion of the Project Area. However, ground-truthing vegetation assessments identified that western portions of the Project Area are dominated by phreatophytic vegetation (*Eucalyptus microtheca*), which is not reliant upon groundwater. Furthermore, a review of SREBA bore water level and groundwater level raster layers indicated that groundwater depth in the vicinity of the Project Area is >70 meters below ground level. Therefore, vegetation within the Project Area does not have capacity to interact with groundwater due to the depth of the water table. Furthermore, the GDE Atlas indicated that no aquatic or subterranean GDEs are present within the Project Area. Overall, the Project Area does not interact with any known or potential GDEs. (**Attachment 4: Ecological Assessment**, Section 6.1.2, pp 56).

Groundwater use for dust suppression, compaction, hydrostatic testing, and potable water will be sourced from existing and new groundwater extraction license entitlements during the construction phase. It is expected that registered private bores near the Project Area will not be impacted, as water use will be short-term during construction and minimal and infrequent during the operational phase.

The surface water assessment concluded that due to the relatively small and temporary surface disturbance caused by the Project, it will not have a significant impact on water resources (**Attachment 6: Surface Water Assessment**, Section 6, pp 45). The ecological assessment concluded that due to the relatively small volume of water required for construction and short term nature of the water extraction the Project will not have a significant impact on GDEs (**Attachment 4: Ecological Assessment**, Section 6.1.2, pp 56).

**4.1.9.7 Do you think your proposed action is a controlled action? \***

No

**4.1.9.9 Please elaborate why you do not think your proposed action is a controlled action. \***

The Proposed Action is likely outside the scope of the Water Trigger because it is not integral to the production of unconventional gas. A precautionary assessment against the Significant Impact Guidelines 1.3 shows that the Proposed Action is not a controlled action because:

- Although the use of water during the construction phase is relatively minor but has the potential to cause drawdown, , water use will be short-term during the construction phase and no significant impact on groundwater quality is anticipated.
- During the operational phase of the action no significant amounts of water will be required. The transport process of gas is typically dry, involving gas and mechanical operations without water dependency.
- No sensitive receptors (such as GDEs, boreholes, streams and creeks) have been identified (Section 4.1.9.6).
- Due to the relatively small and temporary surface disturbance caused by the Project, it will not have a significant impact on water resources (**Attachment 6: Surface Water Assessment**, Section 6, pp 45).

**4.1.9.10 Please describe any avoidance or mitigation measures proposed for this action and attach any supporting documentation for these avoidance and mitigation measures. \***

The following mitigation measures are proposed:

- New bores will be installed in sufficiently permeable aquifer with adequate sustainable yield
- New bores drilled for the Proposed Action will meet the minimum requirements for constructing, maintaining, rehabilitating, and decommissioning water bores for the Northern Territory, and
- New bores will have a valid drilling permit and be located and operated such that water extraction for the Proposed Action will not influence any registered private bores or potential GDEs.
- Water extraction will be undertaken in accordance with the conditions of a valid water extraction licence.

**4.1.9.11 Please describe any proposed offsets and attach any supporting documentation relevant to these measures. \***

An offset is not proposed.

#### **4.1.10 Commonwealth Land**

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

—

##### **4.1.10.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? \***

No

##### **4.1.10.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact.**

\*

The Proposed Action is not on, or likely to impact, Commonwealth land.

#### **4.1.11 Commonwealth Heritage Places Overseas**

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

—

##### **4.1.11.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? \***

No

#### 4.1.11.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact.

\*

The Proposed Action is not near, or likely to impact, a Commonwealth Heritage Place Overseas.

#### 4.1.12 Commonwealth or Commonwealth Agency

##### 4.1.12.1 Is the proposed action to be taken by the Commonwealth or a Commonwealth Agency? \*

No

## 4.2 Impact summary

### Conclusion on the likelihood of significant impacts

You have indicated that the proposed action will likely have a significant impact on the following Matters of National Environmental Significance:

*None*

### Conclusion on the likelihood of unlikely significant impacts

You have indicated that the proposed action will unlikely have a significant impact on the following Matters of National Environmental Significance:

- World Heritage (S12)
- National Heritage (S15B)
- Ramsar Wetland (S16)
- Threatened Species and Ecological Communities (S18)
- Migratory Species (S20)
- Nuclear (S21)
- Commonwealth Marine Area (S23)
- Great Barrier Reef (S24B)

- Water resource in relation to large coal mining development or coal seam gas (S24D)
- Commonwealth Land (S26)
- Commonwealth Heritage Places Overseas (S27B)
- Commonwealth or Commonwealth Agency (S28)

## 4.3 Alternatives

### 4.3.1 Do you have any possible alternatives for your proposed action to be considered as part of your referral? \*

No

### 4.3.8 Describe why alternatives for your proposed action were not possible. \*

The Proposed Action involves the construction of infrastructure to facilitate the transport of gas from Tamboran's SPCF to the AGP. The specific purpose of this infrastructure dictates the location and design requirements, limiting feasible alternatives. Since the infrastructure must provide a direct connection between these two fixed points (between Tamboran' Sturt Plateau Compression Facility and the AGP), options for alternative alignments are constrained. The preferred alignment proposed in this referral is the most feasible option and has been informed by desktop and ecological survey conducted in May - June 2024 and archaeological survey conducted September 2024.

APA considered four alternative pipeline alignments for the Proposed Action, but these were eliminated due to constraints related to land tenure, land use, environmental values, Aboriginal sacred sites, and stakeholder engagement.

In the context of a No-Go alternative, i.e. if the Proposed Action should not proceed, there would be a loss of energy benefits from Tamboran's Exploration and Appraisal Program. While flaring the gas at the wellhead would not significantly change GHG emissions compared to using it for heat or electricity generation, the energy benefits would be realised in the latter scenario, rather than being lost to the environment. The emissions benefits associated with the installation of the SPCF have been previously reported by Tamboran in the SPCF EMP documentation submitted to the NTG.

An Air Quality and Greenhouse Gas Assessment was conducted for the Proposed Action and is provided in **Attachment 7: Air Quality and Greenhouse Gas Assessment**.

If the Proposed Action does not go ahead, there would also be missed economic opportunities for local communities. These include employment and supply chain opportunities that would arise during the construction phase of the project.

## 5. Lodgement

## 5.1 Attachments

### 1.2.1 Overview of the proposed action

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att 1 Sturt Pipeline EPBC Referral Supporting Information Report.pdf Detailed description of the Proposed Action.	05/12/2020	No	High
#2.	Document	Att 8 Acronyms and References.pdf Acronyms and references used in the online form.	21/10/2020	No	High
#3.	Link	<a href="https://apga.org.au/guidelines-and-codes-practice">https://apga.org.au/guidelines-and-codes-practice</a> <a href="https://39713956.fs1.hubspotusercontent-na1.net/">https://39713956.fs1.hubspotusercontent-na1.net/..</a>			High

### 1.2.5 Information about the staged development

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att 1 Sturt Pipeline EPBC Referral Supporting Information Report.pdf Detailed description of the Proposed Action.	05/12/2020	No	High

### 1.2.7 Public consultation regarding the project area

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att 2 Social Impact Assessment.pdf Social impact assessment detailing consultation undertaken to inform the Proposed Action.	15/10/2020	No	High

### 1.3.2.17 (Person proposing to take the action) Proposer's history of responsible environmental management

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att 3 APA HSEH Policy.pdf APA Group's Health, Safety, Environment and Heritage Policy.	01/01/2020	No	High

### 1.3.2.18 (Person proposing to take the action) If the person proposing to take the action is a corporation, provide details of the corporation's environmental policy and planning framework

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att 3 APA HSEH Policy.pdf APA Group's Health, Safety, Environment and Heritage Policy.	31/12/2020	No	High

### 3.1.1 Current condition of the project area's environment

	Type	Name	Date	Sensitivity	Confidence
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#1.	Document	Att 4 Ecological Assessment (REDACTED).pdf Ecological assessment of the Proposed Action.	06/12/2024	No	High
#2.	Document	Att 4 Ecological Assessment.pdf Ecological assessment of the Proposed Action.	06/12/2024	Yes	High

3.1.3 Natural features, important or unique values that applies to the project area

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att 4 Ecological Assessment (REDACTED).pdf Ecological assessment of the Proposed Action.	05/12/2024	No	High
#2.	Document	Att 4 Ecological Assessment.pdf Ecological assessment of the Proposed Action.	05/12/2024		High

3.1.4 Gradient relevant to the project area

	Type	Name	Date	Sensitivity	Confidence
#1.	Link	<a href="https://hdl.handle.net/10070/780402">nt.gov.au https://hdl.handle.net/10070/780402</a>			High

3.2.1 Flora and fauna within the affected area

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att 4 Ecological Assessment (REDACTED).pdf Ecological assessment of the Proposed Action.	05/12/2024	No	High
#2.	Document	Att 4 Ecological Assessment.pdf Ecological assessment of the Proposed Action.	05/12/2024	Yes	High
#3.	Link	<a href="https://hdl.handle.net/10070/900467">nt.gov.au https://hdl.handle.net/10070/900467</a>			High
#4.	Link	<a href="https://nt.gov.au/__data/assets/pdf_file/0006/26..">www.nt.gov.au https://nt.gov.au/__data/assets/pdf_file/0006/26..</a>			High

3.2.2 Vegetation within the project area

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att 4 Ecological Assessment (REDACTED).pdf Ecological assessment of the Proposed Action.	05/12/2024	No	High
#2.	Document	Att 4 Ecological Assessment.pdf Ecological assessment of the Proposed Action.	05/12/2024	Yes	High
#3.	Link	<a href="https://hdl.handle.net/10070/900467">nt.gov.au https://hdl.handle.net/10070/900467</a>			High
#4.	Link				



nt.gov.au		High
<a href="https://nt.gov.au/__data/assets/pdf_file/0007/23..">https://nt.gov.au/__data/assets/pdf_file/0007/23..</a>		
#5.	Link nt.gov.au <a href="https://nrmaps.nt.gov.au/nrmaps.html">https://nrmaps.nt.gov.au/nrmaps.html</a>	High

### 3.3.2 Indigenous heritage values that apply to the project area

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att 5A Cultural Heritage Desktop Assessment (REDACTED).pdf Desktop cultural heritage assessment. Culturally sensitive information has been redacted from this document.	10/09/2024	No	High
#2.	Document	Att 5A Cultural Heritage Desktop Assessment.pdf Desktop cultural heritage assessment.	10/09/2024	Yes	High
#3.	Document	Att 5B Cultural Heritage Field Assessment.pdf Cultural heritage field assessment - addendum to desktop cultural heritage assessment.	10/10/2024	Yes	High

### 3.4.1 Hydrology characteristics that apply to the project area

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att 4 Ecological Assessment (REDACTED).pdf Ecological assessment of the Proposed Action.	05/12/2024	No	High
#2.	Document	Att 4 Ecological Assessment.pdf Ecological assessment of the Proposed Action.	05/12/2024	Yes	High
#3.	Document	Att 6 Surface Water Assessment.pdf Hydrological assessment.	28/08/2024	No	High

### 4.1.4.2 (Threatened Species and Ecological Communities) Why your action has a direct and/or indirect impact on the identified protected matters

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att 4 Ecological Assessment (REDACTED).pdf Ecological assessment of the Proposed Action.	05/12/2024	No	High
#2.	Document	Att 4 Ecological Assessment.pdf Ecological assessment of the Proposed Action.	05/12/2024	Yes	High

### 4.1.4.6 (Threatened Species and Ecological Communities) Why you do not consider the direct and/or indirect impact to be a Significant Impact

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att 4 Ecological Assessment (REDACTED).pdf Ecological assessment of the Proposed Action.	05/12/2024	No	High
#2.	Document	Att 4 Ecological Assessment.pdf Ecological assessment of the Proposed Action.	05/12/2024	Yes	High

4.1.4.10 (Threatened Species and Ecological Communities) Avoidance or mitigation measures proposed for this action

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att 1 Sturt Pipeline EPBC Referral Supporting Information Report.pdf Detailed description of the Proposed Action.	06/12/2024	No	High
#2.	Link	<a href="https://apga.org.au/guidelines-and-codes-practice">https://apga.org.au/guidelines-and-codes-practice</a> <a href="https://39713956.fs1.hubspotusercontent-na1.net/..">https://39713956.fs1.hubspotusercontent-na1.net/..</a>			High

4.1.5.3 (Migratory Species) Why your action is unlikely to have a direct and/or indirect impact

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att 4 Ecological Assessment (REDACTED).pdf Ecological assessment of the Proposed Action.	05/12/2024	No	High
#2.	Document	Att 4 Ecological Assessment.pdf Ecological assessment of the Proposed Action.	05/12/2024	Yes	High

4.1.9.2 (Water resource in relation to large coal mining development or coal seam gas) Why your action has a direct and/or indirect impact

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att 6 Surface Water Assessment.pdf Hydrological assessment.	27/08/2024	No	High

4.1.9.6 (Water resource in relation to large coal mining development or coal seam gas) Why you do not consider the direct and/or indirect impact to be a Significant Impact

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att 4 Ecological Assessment (REDACTED).pdf Ecological assessment of the Proposed Action.	05/12/2024	No	High
#2.	Document	Att 4 Ecological Assessment.pdf Ecological assessment of the Proposed Action.	05/12/2024	Yes	High
#3.	Document	Att 6 Surface Water Assessment.pdf Hydrological assessment.	27/08/2024	No	High
#4.	Link	<a href="http://www.nt.gov.au">www.nt.gov.au</a> <a href="https://nt.gov.au/__data/assets/pdf_file/0007/12..">https://nt.gov.au/__data/assets/pdf_file/0007/12..</a>			High

4.3.8 Why alternatives for your proposed action were not possible

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att 7 Air Quality and Greenhouse Gas Assessment.pdf Air quality and greenhouse gas assessment.	15/10/2024	No	High

## 5.2 Declarations

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### ☒ Completed Referring party's declaration

The Referring party is the person preparing the information in this referral.

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ABN/ACN	29001584612
Organisation name	SLR CONSULTING AUSTRALIA PTY LTD
Organisation address	Tenancy 202 Submarine School Sub Base Platypus, 120 High Street, North Sydney NSW 2060
Representative's name	Natalie Calder
Representative's job title	Associate Consultant
Phone	0889980100
Email	natalie.calder@slrconsulting.com
Address	21 Parap Road, Parap NT 0820

☒ Check this box to indicate you have read the referral form. \*

☒ I would like to receive notifications and track the referral progress through the EPBC portal. \*

☒ By checking this box, I, **Natalie Calder of SLR CONSULTING AUSTRALIA PTY LTD**, declare that to the best of my knowledge the information I have given on, or attached to this EPBC Act Referral is complete, current and correct. I understand that giving false or misleading information is a serious offence. \*

☒ I would like to receive notifications and track the referral progress through the EPBC portal. \*

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### ☒ Completed Person proposing to take the action's declaration

The Person proposing to take the action is the individual, business, government agency or trustee that will be responsible for the proposed action.

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ABN/ACN	679801819
Organisation name	APA SPP PTY LTD

Organisation address	Level 25, 580 George Street, Sydney NSW 2000
Representative's name	Warren Twist
Representative's job title	Principal Access and Approvals Specialist
Phone	0410541391
Email	warren.twist@apa.com.au
Address	Level 25, 280 George Street SYDNEY NSW 2000

☒ Check this box to indicate you have read the referral form. \*

☒ I would like to receive notifications and track the referral progress through the EPBC portal. \*

☒ I, **Warren Twist of APA SPP PTY LTD**, declare that to the best of my knowledge the information I have given on, or attached to the EPBC Act Referral is complete, current and correct. I understand that giving false or misleading information is a serious offence. I declare that I am not taking the action on behalf or for the benefit of any other person or entity. \*

☒ I would like to receive notifications and track the referral progress through the EPBC portal. \*

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### ☒ Completed Proposed designated proponent's declaration

The Proposed designated proponent is the individual or organisation proposed to be responsible for meeting the requirements of the EPBC Act during the assessment process, if the Minister decides that this project is a controlled action.

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Same as Person proposing to take the action information.

☒ Check this box to indicate you have read the referral form. \*

☒ I would like to receive notifications and track the referral progress through the EPBC portal. \*

☒ I, **Warren Twist of APA SPP PTY LTD**, the Proposed designated proponent, consent to the designation of myself as the Proposed designated proponent for the purposes of the action described in this EPBC Act Referral. \*

☐ I would like to receive notifications and track the referral progress through the EPBC portal. \*

