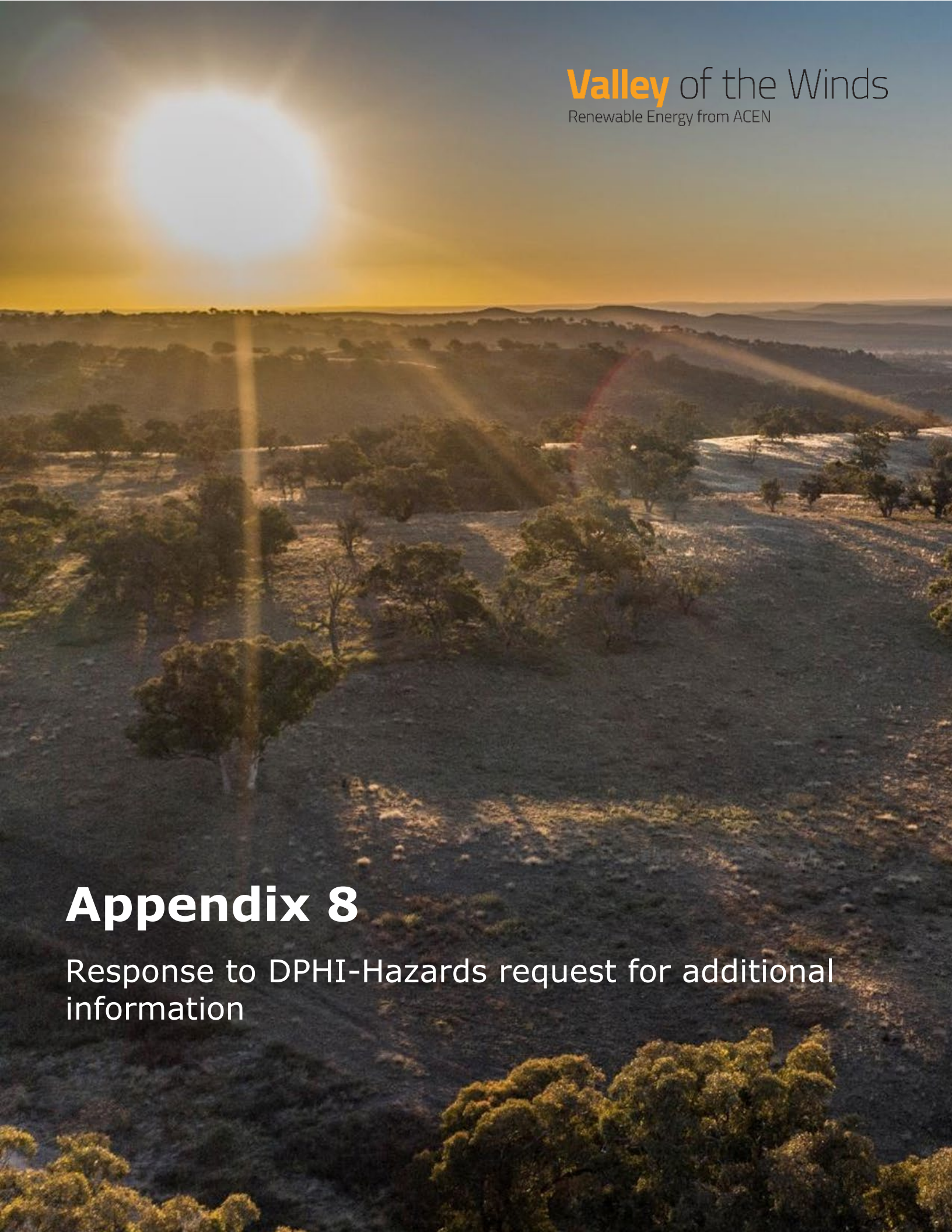

Appendix 8

Response to DPHI-Hazards request for additional information

East Australian Pipeline Pty Ltd (EAPL) ABN 33 064 629 009
Level 1, 121 Wharf Street
Spring Hill, QLD 4000
GPO Box 1390. QLD 4001
APA Group | apa.com.au

29 February 2024

Department Ref: SSD-10461
APA Ref: 503582

Sedat Erol
ACEN Australia
Suite 3, Lvl 21, 25 Bligh Street
Sydney NSW 2000

EMAIL: Sedat.erol@acenrenewables.com.au

Dear Sedat,

RE: Submission on Valley of the Winds Windfarm

Thank you for the opportunity to provide comment on Valley of the Winds Windfarm Project (the Project).

APA Group (APA) is a leading Australian owned and operated energy infrastructure business with a $22 billion portfolio of assets, delivering essential energy services across all of Australia. Our focus is on providing safe, reliable, affordable, and low emissions energy to Australian communities. Our investments are also critical to supporting Australian jobs, manufacturing and industry. APA is a trusted owner and operator of a range of energy infrastructure – from renewable energy, to electricity interconnectors and transmission, through to gas generation plants and transmission pipelines.

APA (APT Pipelines (NSW) Pty Ltd) is the Pipeline Licensee for the Central Ranges High Pressure Gas Transmission Pipeline that traverses the subject area.

Table 1: Transmission pipeline detail

Pipeline	Pipeline Licence	Easement Width (m)	Diameter (mm)	Measurement Length (m)
Central Ranges Pipeline	27	15	200	191
Note: Measurement Length is applied to either side of the pipeline.				

The Central Ranges pipeline forms part of a broader pipeline commencing in Marsden in the west (off-take from the Roma to Wilton HPGTP) extending 295 kilometres, generally north-east, to Tamworth and servicing communities along the alignment.

APA's Role

As a Licensee under the Pipelines Act 1967, APA is required to operate High Pressure Gas Transmission Pipelines (HPGTP) in a manner that minimises environmental impacts and protects the public and property from health and safety risks. Once a HPGTP is in place, APA is required to monitor both the pipeline easement and a broader area within which we are required to consider land use changes and development and to assess what such changes mean to the risk profile of the HPGTP.

APA has a number of responsibilities and duties to perform under a complex framework of legislation, standards and controls across Federal, State and Local Government landscapes. In particular, our HPGTPs are required to be operated in accordance with Australian Standard 2885 (Pipelines – Gas and Liquid Petroleum) (AS2885). In discharging our regulatory responsibilities, APA is required to monitor

what is happening around its assets including land use change and development. This allows APA to ensure it remains in a positon to comply with applicable operational and safety standards and legislation whilst meeting community expectations and contractual mandates on energy supply.

Pipeline Risk Profile and the Measurement Length

In managing HPGTP's and considering land use changes, APA must focus on that area geographically defined by AS2885 as the Measurement Length (**ML**). The ML area is the heat radiation zone associated with a full-bore pipeline rupture. APA is mandated to consider community safety in the ML due to the high consequences of pipeline rupture to life, property and the economy.

The ML is determined by the pipeline diameter and the pipelines Maximum Allowable Operating Pressure (**MAOP**). APA must consider any changes of land use within the ML area to determine the effect of a new use on the risk profile of the pipeline. For reference, the ML of the Central Ranges pipeline is 191m. Note that the ML is a radial dimension, and therefore applies to both sides of the pipe.

Easement Management

APA's pipeline and associated easement are located on an east-west alignment through the Central-West Orana Renewable Energy Zone and specifically the subject Valley of the Winds Windfarm site.

To ensure compliance with the safety requirements of AS2885, APA needs to ensure our easement is managed to appropriately including the following:

- The easement is maintained free of inappropriate vegetation and structures.
- Place warning markers at various mandated points along the pipeline route, including any change in property description/boundaries.
- Maintain a constant line of sight between warning markers.
- Undertake program of visual monitoring of the easement,
- Manage any crossing of the easement by other infrastructure or development.

APA will not accept outcomes that do not enable us to achieve our safety responsibilities to the surrounding community.

Proposed works within the easement must be approved by APA prior to commencement through our Third Party Works Authorisation process. This process will ensure all works are undertaken in a safe manner that does not physically impact the pipeline.

Proposed development

The proposed windfarm is located across APA's Central Ranges Pipeline approximately 7kms south of Coolah as shown in Figure 1- EIS Locality Plan and pipeline.

- The proposal includes:
  - Construction, operation and decommissioning of up to 148 turbines across three clusters that are conne electrically.
  - Electricity infrastructure including three substations (one in each cluster) connected by overhead transm lines,
  - Battery system.
  - Construction of access track network.
  - Construction of permanent operation and maintenance facilities.

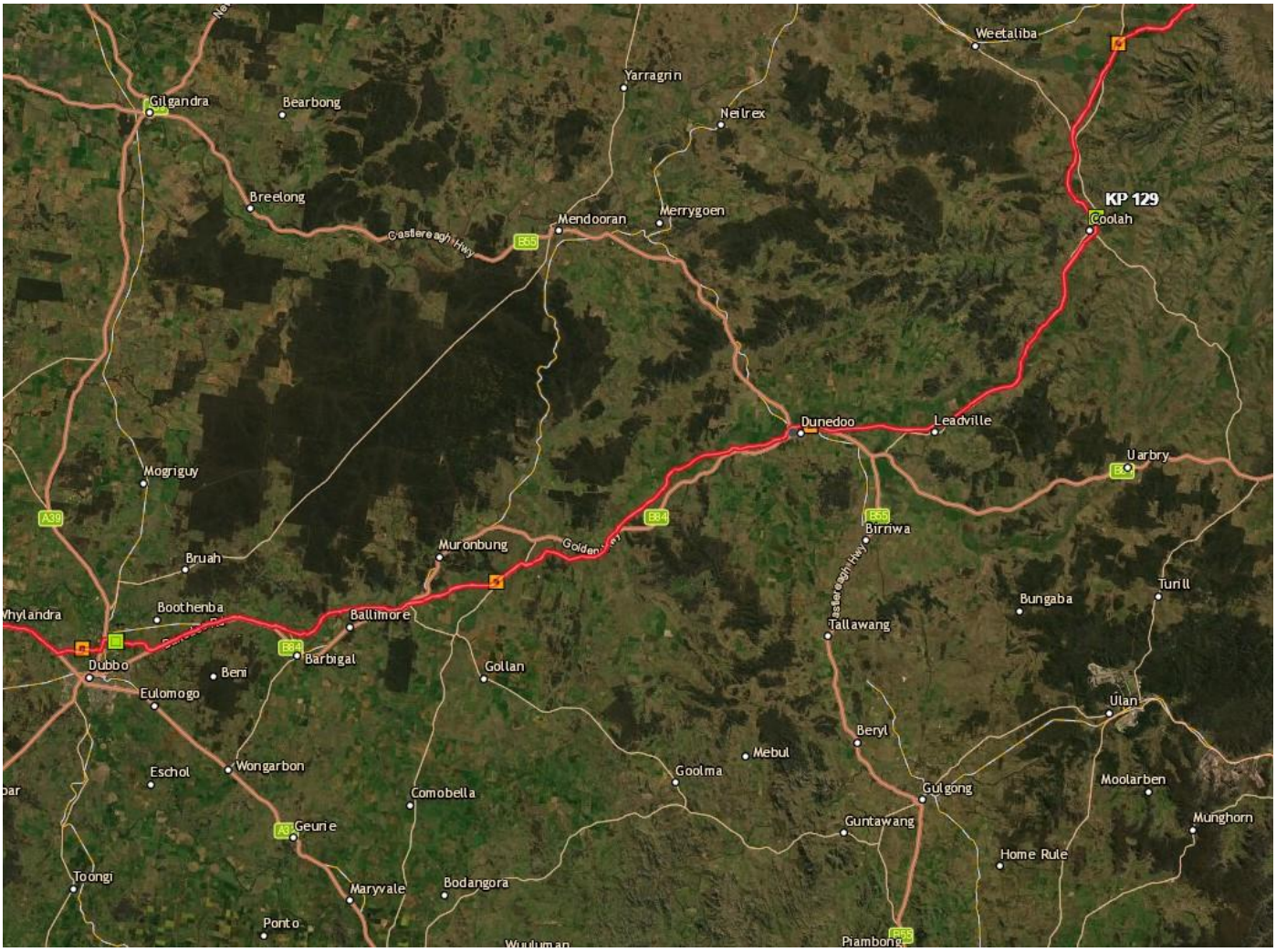

Figure 1 – EIS locality plan and pipeline

The Project will include the establishment of new, and upgrade of some existing, access tracks and other ancillary works such as laydown and staging areas, earthwork material sites with crushing and screening plants, concrete batching plants, site offices and workforce accommodation camps.

The project includes the connection of a substation within the Mount Hope cluster to a central substation within the Girragulang Road cluster. This connection is proposed via an aboveground electrical transmission connection at 132kv, 220kv or 275kv. This electricity transmission connection will cross the Central Rangers HPGTP.

Comments

- Central Ranges HPGTP

Plans within the Environmental Impact Statement prepared by Ramboll, dated 28/04/2022 do not identify the Central Ranges HPGTP and there is no consideration of it within the Scoping Report. It is appropriate for this process to identify and recognise the existence of the pipeline considering any future crossing of the pipeline will require consideration, assessment and management. The recognition of the pipeline in this process should ensure any issuing approval would identify and articulate the need for detailed consideration of working around and across a HPGTP including the approval of the licensee.

The primary concern is the potential for induced current to be attracted the HPGTP (which is steel) from the electricity transmission lines traversing above. Induced current represents a significant safety risk to operators of the pipeline and must be managed accordingly. It is standard practice for an electrical risk study in accordance with AS4853 and AS2832 to be undertaken and risk mitigation measure implemented prior to the operation of the lines.

Based on the information provided, APA does not object to the proposed development subject to the following matters being considered and identified in the assessment of the proposal and included in any approval issued for the proposal:

Conditions of Approval

1. **No Improvements within Easement**
   Buildings, structures, roadway, pavement, pipeline, cable, fence, on-site waste water treatment (or irrigation area), or any other improvement on or under the land within the gas transmission pipeline easement must not be constructed without prior consent in writing from APA. No structure or vegetation will be permitted on the easement that prohibits maintenance of line of sight along the pipeline easement.

2. **Risk Assessment Required**
   Prior to development near or over APA's pipeline commencing, and to inform detailed design, an electrical hazard study in accordance with the requirements of Australian Standard 4853-2012 (for Low Frequency Induction and Earth Potential Rise) must be undertaken by the applicant. The applicant must address any relevant requirements, recommendations or actions, which must be implemented to the satisfaction of APA. The applicant must complete validation testing upon completion of construction.
   All costs associated with the study and implementation of outcomes are to be borne by the applicant.

3. **Easement Delineation On Plans**
   All plans that include the gas pipeline easement must have the easement clearly identified with hatching and labelled as *'high pressure gas pipeline easement – no works to occur without the prior authorisation of the pipeline operator'*.

Notes

It is recommended the following notes be included in any issuing approval.

a) If you are planning on undertaking any physical works on property containing or proximate to a pipeline, or are seeking details on the physical location of a pipeline, please contact Before you Dig Australia on 1100 or https://www.byda.com.au/, or APA directly on APAprotection@apa.com.au.

b) An early works agreement from APA is required for any assessments/approvals that require greater than 3 days assessment or supervision. Lead in times for agreements can be up to 12 weeks. Please contact APA at APAprotection@apa.com.au or 1800 103 452.

c) Any improvements within the transmission gas pipeline easement undertaken by third parties is at the risk of the proponent who will remain liable. APA will not be liable for any costs associated with the reinstatement of any vegetation and/or infrastructure constructed on the easement.

d) Where access to the pipeline will not be readily available because of the proposed development e.g. significantly obstructed by pavement etc an assessment of the condition of

the pipeline coating will be required prior to development commencing. Any re-coating works required because of this assessment, due to future inaccessibility or as an outcome of an SMS will be at the developer's expense and to the satisfaction of the pipeline licensee/operator.

e) APA has a suite of standard engineering drawings to assist with detailed design. These are available upon request. Please contact APA at APAprotection@apa.com.au or 1800 103 452.

APA does not seek to inhibit future development proximate to our assets and is happy to work with the Department and development proponents to achieve mutually acceptable and compliant outcomes. Any interested parties are strongly encouraged to contact APA early to discuss the project and establish working processes.

Should you wish to discuss the contents of this correspondence, or have any further queries, please contact me on 07 3223 3385 or the Urban Planning team at planningnsw@apa.com.au.

Yours faithfully

John Lawson
Senior Urban Planner
Infrastructure Planning and Approvals