

12 June 2018

**Environmental Impact Classification - Pursuant to Section 98 of the Petroleum and Geothermal Energy Act 2000 – *Riverland Pipeline (Pipeline Licence 6) and Berri to Mildura Pipeline (Pipeline Licence 11) - Statement of Environmental Objectives (SEO), APA Group, August 2017.***

Pursuant to section 98 of the *Petroleum and Geothermal Energy Act 2000* (the Act) the Minister must classify the regulated activities covered by a prepared Environmental Impact Report (EIR) as either of low, medium or high environmental impact.

The classification must be made on the basis of:

- The prepared EIR;
- Criteria established for classifying the level of environmental impact of regulated activities, a copy of which is found on the Department of the Premier and Cabinet (DPC) Petroleum web page:  
[http://petroleum.statedevelopment.sa.gov.au/legislation\\_and\\_compliance/environmental\\_register](http://petroleum.statedevelopment.sa.gov.au/legislation_and_compliance/environmental_register); and
- Comment received from relevant Government departments in accordance with established administrative arrangements between these departments and DPC-Energy Resources Division (DPC-ERD).

This document summarises the classification made by DPC-ERD on the *Riverland Pipeline (Pipeline Licence 6) and Berri to Mildura Pipeline (Pipeline Licence 11) - Statement of Environmental Objectives (SEO), APA Group, August 2017*. This classification is based on information provided in the EIR prepared by APA Group.

## **ACTIVITY CLASSIFICATION SUMMARY**

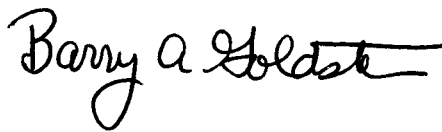
1. From an analysis of the environmental significance of the events and potential impacts associated with the proposed activities against the classification criteria referred to above (assessment provided as Attachment 1), these regulated activities have been classified as **low impact**.
2. The majority of events associated with the PL 6 & 11 pipelines SEO were deemed to be of low environmental significance. This is due to the fact that appropriate management measures will be implemented by APA Group to avoid or mitigate any potential environmental consequences.

## **CONSULTATION**

1. For a low impact classification, DPC-ERD consults with the Department of Environment, Water and Natural Resources (DEWNR) and the Environment Protection Authority (EPA) in accordance with relevant administrative arrangement's dated 11 November 2005 and 25 June 2012 respectively.

2. Comments received from DEWNR and the EPA on 30 May and 17 January 2018 respectively agreed with the classification of **low impact**.
3. In accordance with Section 101 of the Act, activities classified as low impact require DPC-ERD to undertake consultation with relevant government agencies. This consultation period was for at least 20 business days.
4. Comments received from this consultation are tabled in the appendix of the EIR whereby all reasonable comments within scope need to be adequately addressed. DPC-ERD are satisfied that all comments raised during consultation have been adequately addressed.
5. In accordance with Section 103A of the Act the Minister for Sustainability, Environment and Conservation approved the revised SEO insofar as it relates to petroleum activities undertaken in the River Murray Protection area and within the Murray Darling Basin on 30 May 2018.

Pursuant to delegated powers, I classify this regulated activity as **low impact**.

A handwritten signature in black ink, reading "Barry A Goldstein". The signature is written in a cursive, flowing style with a horizontal line extending from the end.

Barry Goldstein

**Executive Director  
Energy Resources Division  
Department of the Premier and Cabinet  
Delegate of the Minister for Mineral Resources and Energy**



PROJECT: ACTIVITY:	PIPELINE LICENCE 6&11- Riverland Gas and Berri to Mildura Gas OPERATIONS AND MAINTENANCE																																				
Date:	November 2017			ABBREVIATIONS: H = High certainty																																	
REF	TYPE OF IMPACT	EVENTS	POTENTIAL CONSEQUENCES	PREDICTABILITY						MANAGEABILITY						COMMENTS	ENVIRONMENTAL SIGNIFICANCE																				
				SIZE	SCOPE	DURATION	FREQUENCY	STAKEHOLDERS	SIGNIFICANCE	AVOIDANCE	PROBABILITY	DURATION	SIZE AND SCOPE	CUMULATIVE EFFECTS	STAKEHOLDERS			SIGNIFICANCE																			
		Maintaining "line of sight" and permanent access along easement, vegetation disturbance	Reduced water quality due to sediment run-off, surface water sedimentation	H	H	H	M	H	2	No	Low	Short	Confined	N/A	N/A	2	Routine aerial surveillance and on ground patrols for soil mobility and erosion. Reporting of any incidences via company Incident system. Maintain minimum ground vegetation cover levels (e.g. 150 to 300mm) for soil and ground stability. Replanting, reseeding, fencing of easement undertaken where poor vegetation cover occurs for rehabilitation purposes. Revegetation areas monitored and results and photo records reported. Traffic exclusion zones placed where practicable around revegetated areas. Revegetation areas monitored and results and photo records reported.	Low																			
5.2		Stress, cracking, corrosion repair projects.	Asbestos contamination of water	H	H	H	H	H	1	No	Med	Short	Confined	N/A	N/A	2	Licensed contractors undertake any suspected asbestos removal. Asbestos is only disposed of at appropriately licenced landfill. Inert and putrescible wastes removed from site and disposed of at licenced landfill. Easements monitored for the presence of illegally dumped rubbish. Rubbish is removed where practicable and disposed in an appropriate manner. Safe storage areas are provided for any potentially hazardous wastes that ensure no potential for human or environmental exposure and contamination of land, air, soil, water.	Low																			
3.4.6; 4.2.2.2; 4.3Vegetation Impacts																			The pipeline generally traverses a disturbed and almost entirely modified landscape (greater than 95%) consisting mostly of non-native pasture grassland and cereal crop areas. Vegetative cover varies throughout the length of the pipeline alignment. Whilst large mature Blue Gums and Peppermint Box dominate the mostly cleared landscape in the Angaston region, mallee species of Eucalyptus dominate the undulating plains, which surround the River Murray. Stands of remnant mallee vegetation dot the landscape. Riparian vegetation communities dominated by large River Red Gums and River Box, with understoreys of lignum and reeds, dominate river and creek banks and floodplains. One significant Iron-Grass community was noted along the route and specific site management protocols have been developed to ensure long term sustainability. Other species of note is Menzel's Wattle and Peep Hill hop-bush being nationally threatened plant species. Since the alignment of the pipeline has generally been constructed within existing, disturbed areas (i.e. areas without major conservation significance or status), no environmental impacts were evident to species with significant conservation status, during field surveys conducted along the length of the pipeline during 2002. The pipeline alignment has been adjusted on a number of occasions to avoid numerous communities of high conservation value. Notable weeds declared under the NRM Act 2004 along the pipeline corridor include Branched Broomrape along the Murray Bridge lateral.																		
5.7		Easement or facility operations	Riparian, aquatic and water dependant flora damage	M	H	H	H	H	2	No	Low	Short	Confined	N/A	N/A	2	Soil and ground stability issues along the easement and access tracks due to erosion and instability of watercourse crossings as well as erosion and sediment controls. The condition of the easement, including watercourse crossings and banks are inspected and monitored during routine surveillance for water related damage and potential water contamination. Any fuels, oils or chemicals are stored, transported and handled to prevent contamination of land or water. Surface waters are diverted around storage areas and stockpiles to prevent water contamination. All wastes are stored to prevent contamination of land or water. Prior to any non-routine maintenance activities occurring within National Parks, Nature reserves, Water catchment areas relevant senior personnel for these areas are contacted and consulted as to requirements prior to work commencing.	Low																			
5.3		Maintaining "line of sight" and permanent access along easement	Vegetation clearing (loss of habitat and biodiversity)	H	H	H	H	H	1	No	High	Short	Confined	N/A	N/A	2	Majority of easement cleared when initially constructed, low vegetation cover retained over easement as per 3.3 above to retain soil cover and stabilise. Vegetation removed only for access and "line of sight" requirements. Any fauna found during these activities either relocated to sides of easement or relocated by specialist trained wildlife. rAeesscuaeessr str acks are maintained to the minimal practicable width. Inductions for company employees and contractors and advanced driver training for company employees. Vehicles remain on existing roads/tracks or within designated areas at all times. Easement only accessed where necessary. Night driving is only to be undertaken where absolutely necessary.	Low																			
5.2		Integrity dig ups, trenching and excavations associated with maintenance	Vegetation clearing (loss of habitat and biodiversity)	H	M	H	H	H	2	No	High	Short	Confined	N/A	N/A	2	Access to easement and on easement by vehicles limited to prevent erosion due to vehicular movements. Vegetation clearing within the easement or on land adjacent to the easement is limited to previously disturbed areas. Potential soil erosion and ground stability issues reviewed during Job Hazard and Environment Analysis when undertaking any works on easement. Minimise vegetation control, slashing etc. to achieve line of site objectives.	Low																			
			Soil inversion	H	H	H	H	H	2	Yes	Low	Short	Confined	N/A	N/A	1	During integrity dig up, topsoil and subsoil area removed and stored in separate piles. Subsoil is backfilled first and then the topsoil is spread over the excavation to aid in restoration and revegetation of disturbed the area.	Low																			
			Mobilisation of acid sulphate soils leading to soil contamination	M	M	M	H	H	2	No	Low	Medium	Localised	N/A	N/A	3	Records kept of areas prone to acid sulphate soils. Site specific investigation in areas of suspected acid sulphate soils. Management of acid sulphate soils as per state regulations/requirements. Specific staff training for operational staff involved with any earthworks in areas prone to acid sulphate soils. Management of contaminated soils as per state regulations/requirements and specific staff training for operational staff involved with any earthworks. Backfill of trenches with clean fill and treatment of lime if required and or where necessary. Mapping of any known contaminated soils areas on company GIS system. Employee and contractor inductions address waste disposal obligations of company and personnel. According to Australian Soil Resource Information System, the pipeline is situated in low risk area for acid sulfate soils (ASS). Excluding a small section of the pipeline, located directly underneath the Murray River (2.5km north east of Berri), which is located in an area of high risk of ASS. Should works be conducted within the high risk area an ASS Management Plan will be developed in line with appropriate EPA Guidelines.	Low																			
5.4		Weeds on easement or adjacent land	Weed infestations. Reduction in diversity of native plant species due to competition	H	M	M	H	H	2	No	Low	Medium	Localised	N/A	N/A	3	Pipeline technicians trained in identification of declared noxious and environmental weed species and techniques for their eradication. Reporting to authorities where applicable of noxious weed outbreaks. Records of known infestations. Vehicles to remain on designated roads and access tracks with minimal off road driving. Project specific weed management programs – targeting specific weeds and management treatments developed and implemented. Ensure any technician spraying chemicals is suitably licenced and is familiar with specific issues such as chemical use near watercourses. All excavating machinery and other equipment to be received on site free of soil and organic matter and a record kept of all inspections. Clean slashing equipment after using in known weed infestation areas and before moving to a weed free area. Record wash-downs and inspections. Only conduct weed control within 20m/50m of watercourse following consultation with Environment Officer/s and in accordance with state regulations. Special considerations/consultation may be required where pipeline/s pass through national parks, water catchment areas, nature reserves. In this instance liaison to occur with parks manager as to weed management strategy.	Low																			
5.4		Import and/or spread of pathogens, disease or pests along or form activities on the easement	Damage to native vegetation, fauna and habitats. Loss of biodiversity Impaired visual amenity.	H	M	M	M	H	2	No	Low	Short	Confined	N/A	N/A	2	Ensure excavation machinery received on site for pipeline works is received free of soil and/or organic matter and record all inspections. Clean any demountable buildings used on the easement or work site prior to entry and removal from site by brushing and washing floors to ensure no foreign seeds are introduced. In areas where the easement is frequently accessed by vehicles e.g. urban areas, and above weed control such as for example "wash down" are impractical, other suitable controls should be considered, such as stabilised area of gravel or cattle grid to remove sediment from tyres. Machinery and vehicles cleaned prior to entering and exiting disease or pest areas, with either high pressure water or cleaning solutions as per government hygiene advice. Cleaning should remove all soil and vegetative material from the interior and exterior of vehicles, personnel clothing, boots and PPE.	Low																			
5.3		Bushfire on easement due to company activities	Damage or loss of vegetation	M	M	M	H	H	2	No	Med	Medium	Localised	N/A	N/A	3	All equipment used complies with relevant fire safety standards to ensure that explosion, ignition of gas or other substances does not occur, (e.g. use of spark arrestors). Any slashing, welding, grinding or cutting works are undertaken following Job Hazard and Environment Analysis which includes Ignition sources, fire, and explosion review, under the Permit to Work system. Dedicated observer's monitor for sparks etc. when welding or cutting works are being undertaken. Vehicles are regularly checked to ensure that combustible materials such as grass and debris do not build up in critical areas where ignition could occur. Where flammable or combustible chemicals are required to be stored, appropriate fire - fighting equipment is available and they are stored in accordance with AS 1940: Storage and handling of flammable and combustible liquids and as per SDS. Machinery and vehicles on the easement but not in use are parked in areas of low fire risk e.g. away from long grass, shrubs etc. Pipeline Technicians are trained in fire prevention and safety, personal responsibilities and basic fire suppression. All observed fires are reported to Triple zero (000) regardless of whether caused by company activities or not. Firebreaks are maintained on the easement around any above ground facilities. All Hazards and incidents reported through company incident reporting system.	Low																			
4.2.1.4, 4.2.2.3, 5.4, 5.6Native Fauna Impacts																			This region contains habitats that support a variety of native mammal, bird and reptile species. Many species are now confined to isolated areas of remnant vegetation. Listed endangered, vulnerable or rare fauna species under the SA National Parks and Wildlife Act 1972 and/or the Commonwealth Environment Protection and Biodiversity Conservation Act 1999 are likely to be found in this region.																		
5.6			Disturbance or injury to fauna, localised reduction in biodiversity	H	H	H	H	H	1	No	Med	Short	Confined	N/A	N/A	2	Majority of easement cleared when initially constructed, low vegetation cover retained over easement as per 3.3 above to retain soil cover and stabilise. Vegetation removed only for access and "line of sight" requirements. Any fauna found during these activities either relocated to sides of easement or relocated by specialist trained wildlife. rAeesscuaeessr str acks are maintained to the minimal practicable width. Inductions for company employees and contractors and advanced driver training for company employees. Vehicles remain on existing roads/tracks or within designated areas at all times. Easement only accessed where necessary. Night driving is only to be undertaken where absolutely necessary.	Low																			
		Maintaining access along the easement	Injury to fauna, damage to or degradation of habitat	H	H	H	M	H	2	No	Low	Short	Confined	N/A	N/A	2	Site inductions, JHEA, JSA and Permit to Work sign on at site include vehicle speed restrictions, access to site routes when any maintenance undertaken on easement/facilities, and flora and fauna damage. Integrity digs undertaken in smallest footprint possible. Area's barricaded/fenced if open overnight. Any fauna found during these activities either relocated to sides of easement or relocated by specialist trained wildlife rescuers. Movement of fauna across and along the easement is in no way restricted, apart from existing agricultural or residential fencing already in place. The majority of easements are within agricultural/residential disturbed land areas, liaison with specified personnel where easements traverse National Parks, Nature reserves and Water catchments in relation to specific controls or fauna issues, or in areas where known vulnerable or at risk fauna populations exist. Construction activities only occur during daylight hours, unless emergency situation.	Low																			
			Localised reduction in biodiversity	H	H	H	M	H	2	No	Low	Short	Confined	N/A	N/A	2	Low vegetation cover on easement provides cover and interconnection for fauna movement, along and across easement.	Low																			
5.7		Easement or facility operations	Riparian, aquatic and water deepndant flora damage	M	H	H	H	H	2	No	Low	Short	Confined	N/A	N/A	2	Soil and ground stability issues along the easement and access tracks due to erosion and instability of watercourse crossings as well as erosion and sediment controls. The condition of the easement, including watercourse crossings and banks are inspected and monitored during routine surveillance for water related damage and potential water contamination. Any fuels, oils or chemicals are stored, transported and handled to prevent contamination of land or water. Surface waters are diverted around storage areas and stockpiles to prevent water contamination. All wastes are stored to prevent contamination of land or water. Prior to any non-routine maintenance activities occurring within National Parks, Nature reserves, Water catchment areas relevant senior personnel for these areas are contacted and consulted as to requirements prior to work commencing.	Low																			
5.6		Vibration form machinery and equipment	Potential for vibration of machinery/equipment in compounds to create disturbance to fauna and fauna movements outside the compound.	H	M	H	M	H	2	No	Med	Short	Confined	N/A	N/A	2	Vibration levels of machinery/equipment used in compounds restricted so as not to create disturbance to neighbours, personnel working on machinery/equipment. All compounds are security fenced, so any fauna is fenced out of compound, outside movements are not restricted in any way.	Low																			

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PROJECT:	PIPELINE LICENCE 6&11- Riverland Gas and Berri to Mildura Gas																	
ACTIVITY:	OPERATIONS AND MAINTENANCE																	
Date:	November 2017	ABBREVIATIONS: H = High certainty, L = Low certainty, M = Medium certainty, N/A = Not Applicable																
REF	TYPE OF IMPACT	EVENTS	POTENTIAL CONSEQUENCES	PREDICTABILITY						MANAGEABILITY						COMMENTS	ENVIRONMENTAL SIGNIFICANCE	
				SIZE	SCOPE	DURATION	FREQUENCY	STAKEHOLDERS	SIGNIFICANCE	AVOIDANCE	PROBABILITY	DURATION	SIZE AND SCOPE	CUMULATIVE EFFECTS	STAKEHOLDERS			SIGNIFICANCE
		Pipe rupture	Injury to public or personnel	H	H	H	H	M	2	No	Low	Short	Confined	N/A	N/A	2	the appropriate senior personnel are advised of its occurrence and allows for an investigation into the cause of the incident to be completed. Any improvements identified in the investigation will be tracked and implemented in the same system. Should incidents need to be reported to an authority it will be identified through this process.	Low
		Stress, cracking, corrosion repair projects.		H	H	H	H	H	1	Yes	Low	Short	Confined	N/A	N/A	1		Low
5.12		Pipe rupture	Loss of gas supply	H	H	L	H	M	4	No	High	Medium	Localised	N/A	N/A	3	The Pipeline is operated through a Pipeline Management System which ensures compliance with all aspects of AS2885 and regulatory requirements to maintain pipeline integrity.The implementation of the System will ensure the Pipeline is operated and maintained to industry standards. In the event that security of gas supplies is compromised due to an incident along the pipeline, procedures in accordance with the Networks Emergency Response Plan (ERP) shall be initiated. The ERP shall provide the basis for ensuring that incidents do not compromise worker or public safety, coupled with ensuring that minimum disruptions to gas supplies are experienced, through expeditious reinstatement of the gas supply. Emergencies are expected to be very rare, however, emergency preparedness is taken very seriously and all incidents and situations likely to develop into incidents are reported to management immediately for further investigation. An emergency is defined as an incident so serious that site resources are not able to cope and specialised resources and management plans are required to effectively combat the incident. Emergencies, such as full-bore rupture, are likely to impact on gas supplies. All potentially hazardous areas, such as the Inlet and Outlet Stations, are fenced with security fencing to prevent unauthorised access. Regular ground and aerial patrols to identify third party activity. Implement pipeline awareness program with all land owners, occupiers and stakeholders (LGA, utilities). Provision of 24 hour 'Dial Before You Dig' contact number and free pipeline location service. Installation and maintenance of pipeline warning signs along the pipeline route. Safety Management Study and location class review to identify and manage external threats. Install physical protection measures and buried markers as per AS2885 and location class (i.e. slabbing, depth of cover, marker tape).	Medium
		Third Party or External Interference to the pipeline causing it to rupture		H	H	L	H	H	4	No	High	Short	Localised	N/A	N/A	2		Medium
		Stress, cracking, corrosion repair projects.		H	H	H	H	M	2	No	Low	Short	Localised	N/A	N/A	2		Low