



9 April 2019

Department of Environment and Natural Resources
Level 1, Goyder Centre
25 Chung Wah Terrace
Palmerston NT, 0830

Attention: Paul Purdon, Executive Director DENR

Dear Paul,

Re: Notice for the removal of regrowth in a previous disturbed area to allow for the construction of a 4mx4m bell hole as part of the PV13 flowline construction project

The construction of the PV-13 flowline requires an underground road crossing to connect the flowline to the rest of the Palm Valley gathering network as was approved in the Construction EMP. During detail planning of the road crossing it was identified that an additional area is required for a 4mx4m bell hole. The location for the required bell hole is next to the road in a previously disturbed location (see GIS map with the location of the bell hole). The re-growth that will be impacted are all common species in the area and could include Witchetty Bush, Broom Bush, and Melville's Spinifex (e-mail correspondence from Bill Low at Low Ecological Services).

The approved Environmental Management plan for the project called "PV-13 Connection and PV-02 Reinjection System Upgrade EMP" allows for installation of the flowline on the inside of the existing road but does not allow for any additional clearance or land disturbance beyond the existing footprint (Appendix 2). The existing Palm Valley FEMP also states that only civil maintenance is allowed including road, track and lease maintenance (Appendix 3)

This letter is to notify the DENR of the described activity as required under Division 4 Section 22 of the Petroleum (Environmental) Regulations "Minister must be given notice of any proposals to modify the regulated activity to which the plan relates in a manner that will not require a revision of the plan"

The pipeline crossing and bell hole construction is currently on the critical path for the on-time execution of the project and your urgent review and reply would be highly appreciated.

Please let me know if you have any further questions

Regards

A handwritten signature in black ink, appearing to read "Ben Visser", is written over the typed name. The signature is stylized and cursive.

Ben Visser

GM Operations

Central Petroleum

Appendix 1: GIS map indicating proposed area for the bell hole and access corridor



Appendix 2: Extract from the PV-13 Connection and PV-02 Reinjection System Upgrade EMP (Table 1-1 and Table 5-2)

Disturbance of indigenous artefacts	<p><i>Cultural Heritage and Sacred Sites Preservation</i></p> <ul style="list-style-type: none"> • Activities do not require any new disturbances. • All activities to stay within the approved areas within OL3 (per the Sacred Site Clearance Certificate (ref. C2015-035 and C2018-091)). • Adhere to permit to work system, which ensures that all activities stay within the approved operating areas • No unauthorised clearing • No unauthorised third-party access • Exclusion zones • Drive on existing authorised tracks only 		
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	<i>Landforms</i>	No erosion and sedimentation	The Works will not require land disturbance beyond the existing footprint. Erosion potential for soils in the PVGF area are low to moderate. Risks to soils and landform have been classified as low with management measures in place.
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Appendix 3: Extract from the Palm Valley FEMP (Operational activities covered under the FEMP)

The operational activities covered by this FEMP include:

- Civil maintenance including road, track and lease maintenance (including maintenance of existing infrastructure);
- Repair, replacement and maintenance of gathering flowlines and associated equipment (gathering network is above ground (exception is road crossings));
- Produced water management within existing facilities
- Shutdown maintenance activities including cold venting;
- Routine well head maintenance and function testing (not include the removal of any permanent barriers);
- Routine wireline activities as identified in the approved Reservoir Management Plan (RMP)
- Operations repair and maintenance of existing facilities;
- Pipeline and flow line operations, maintenance and repair including pigging (does not include pipelines as defined under the *Energy Pipelines Act*);
- Maintenance and repairs of existing processing facilities including the direct replacement of obsolete or irreparable equipment
- Grey water and waste water system maintenance;
- Fuel and chemical storage, handling and transportation;
- General waste management;
- Weed control; and
- Maintenance of erosion and sediment controls.