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20 July 2026

Director
Development Assurance Division
Planning Group
Department of State Development, Infrastructure and Planning
GPO Box 15009
Brisbane QLD 4000

Attention: Mr Darren Brewer

RE: Response to Requirement Notice – RPI26/041 APA Bulloo Interlink Pipeline
Item 3 – Wilson River HDD Crossing

We refer to the Requirement Notice dated 9 July 2026 issued under section 44 of the *Regional Planning Interests Act 2014* in relation to the APA Bulloo Interlink Pipeline application. This response provides the information requested in Attachment A of the Requirement Notice in relation to Items 1 to 4 of the application assessment.

Item 1

The requested shapefiles have been provided with this response.

The spatial datasets supplied include:

- Planned temporary surface impact areas. Note there is no permanent above ground infrastructure except for required AS2885 signage in the Channel Country Strategic Environmental Area (SEA)
- Infrastructure locations, including HDD work areas, sumps, access tracks and associated construction infrastructure
- Ground-truthed ecological survey data relevant to the proposed activity within the SEA.

The spatial dataset identifies the full extent of temporary disturbance associated with the project within the SEA, including the northern HDD entry pad and associated construction work areas. The spatial information reflects the current project design and provides the full extent of the surface impact area relevant to this application.

Item 2

The technical assessments referenced within the GHD Regional Interests Development Approval Report were prepared for the broader Bulloo Interlink Pipeline Project and informed the environmental assessment undertaken for the project as a whole.

The application, as submitted, contains sufficient information to enable assessment of the proposed Regional Interests Development Approval (RIDA) within the SEA. Relevant findings, impact assessments and mitigation measures from the supporting technical studies were incorporated into the application documentation to provide an understanding of the environmental values present within the proposed impact area and the potential effects of the proposed activities.

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Notwithstanding in response to the Requirement Notice, APA has provided the following technical reports for further information and to assist the Department's consideration of the application:

a) Terrestrial Ecology Assessment Report
b) Aquatic Ecology Environmental Assessment Report
c) Water Technical Report.

These reports provide the broader technical context and supporting analysis that informed the conclusions presented in the application documentation. The reports should be read in conjunction with the application and supporting material previously submitted.

Item 3

The proposed Wilson River HDD remains subject to geotechnical investigations (separate from the RIDA), detailed engineering design, and fracture analysis, which will be undertaken as the design progresses. The information provided below reflects the current level of design maturity and will be refined as further investigations are completed. Importantly, the current design information is sufficient to define the extent of disturbance within the SEA and to assess the associated environmental impacts. The remaining investigations and detailed design activities will principally support refinement of the HDD construction methodology and management measures, including fracture risk management, and are not expected to change the identified disturbance footprint within the SEA.

a) Depth of the Wilson River riverbed below ground level at the proposed crossing location

A detailed survey of the crossing location is currently being undertaken. Final survey data has not yet been received and is required to definitively establish the riverbed profile and depths across the crossing.

Based on preliminary observations, the riverbed is estimated to be approximately 4 metres below the adjacent bank surface at its deepest point. This estimate will be confirmed and updated following completion of the detailed survey.

b) Proposed depth of the HDD borehole below ground level

The final HDD alignment and borehole profile are subject to detailed geotechnical investigations and engineering design.

Based on current design assumptions, the HDD borehole is expected to pass beneath the Wilson River channel at a depth of approximately 10 to 20 metres below the invert of the riverbed, subject to confirmation through the detailed engineering design process.

c) Investigations undertaken or proposed to identify groundwater conditions

To inform the detailed design of the HDD crossing, APA is undertaking geotechnical investigations.

These investigations are expected to include:

- Geotechnical borehole drilling and core-hole sampling
- Subsurface characterisation to a depth of approximately 20 metres
- Identification and recording of groundwater occurrence during drilling

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- Assessment of geological and geotechnical conditions relevant to HDD construction
- Collection of data to support HDD design, bore stability assessment and fracture risk analysis.

The results of these investigations will inform the final HDD design and the assessment of groundwater interaction risks, if any. These investigation outcomes will not change the location or size of activities within SEA.

d) Assessment of the likelihood of groundwater intersection and potential impacts

The precise likelihood of the HDD borehole intersecting groundwater will be confirmed through the geotechnical investigations and detailed HDD design process. While groundwater may occur within a few metres of the ground surface adjacent to watercourses, the extent, depth and characteristics of groundwater at the crossing location are not yet known.

The geotechnical investigations will establish groundwater depth and groundwater-related site conditions relevant to the HDD crossing.

Following completion of the geotechnical investigation program and engineering design, the project will undertake a detailed assessment of:

- Potential groundwater occurrence within the HDD alignment
- Risks associated with groundwater ingress to the borehole
- Borehole stability considerations
- Potential migration of drilling fluids
- Any consequential impacts on the Wilson River and adjacent floodplain environments.

The outcomes of this assessment will be incorporated into the final HDD design and construction methodology.

e) Proposed mitigation measures to avoid or minimise groundwater interaction risks

The final suite of mitigation measures will be informed by the outcomes of the geotechnical investigations and detailed HDD design.

Notwithstanding the need for further geotechnical information, APA intends to adopt a conservative HDD design and construction methodology that minimises the potential for interaction with groundwater systems. The proposed HDD works will utilise a closed-loop recirculating drilling fluid system designed to minimise the potential for loss of drilling fluids and interaction with surrounding soils and groundwater, should it occur.

Additional measures are expected to include:

- Selection of drilling parameters appropriate for the encountered geological conditions
- Management of drilling fluid properties to maintain bore stability
- Continuous monitoring of drilling pressures and returns
- Implementation of HDD construction procedures consistent with industry practice
- Adoption of design controls identified through the geotechnical and fracture analysis assessments.

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f) Contingency measures for borehole collapse, frac-out events and drilling fluid release

A project-specific HDD management procedure will be implemented during construction.

Drilling fluid losses will be monitored through visual observations and drilling fluid loss indicators. Any abnormal loss of drilling fluid volume will trigger suspension of drilling activities while the cause is investigated.

Where drilling fluid migration to the surface is identified, contingency measures will include:

- Immediate cessation of drilling activities, where required
- Implementation of containment and clean-up measures
- Isolation and recovery of released drilling fluids where practicable
- Investigation of the source and pathway of fluid loss
- Use of loss-circulation materials to seal fractures or permeable zones if necessary
- Adjustment of drilling fluid characteristics and operating parameters
- Reconditioning of drilling fluids prior to recommencement of drilling activities.

Borehole collapse is considered a low-likelihood event. Should instability occur, construction methods would be reviewed and modified as required to maintain the integrity of the HDD crossing while preventing impacts to the surrounding environment.

g) Assessment of potential impacts of geotechnical investigations within the Channel Country SEA

To support the detailed design of the proposed Wilson River HDD crossing, APA is undertaking a geotechnical investigation program comprising up to five (5) boreholes within the SEA to a depth of approximately 20 metres in the vicinity of the proposed HDD location. These investigations are required to characterise subsurface conditions, identify groundwater occurrence, and inform the final HDD design, alignment and depth.

The geotechnical investigations will be temporary in nature and will involve a small footprint. Four of the borehole locations have been selected within existing disturbed areas associated with previous resource holders' seismic data acquisition activities to prevent disturbance to environmental values. The fifth borehole is in vegetation free area of the proposed HDD pad. Existing access tracks and disturbed areas will be utilised.

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Figure 1: Four borehole locations (red) on existing seismic disturbance lines (black)

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Figure 2: Fifth borehole (HDD site) in vegetation free area

Investigations may be undertaken using a compact geotechnical drilling rig mounted on a Toyota Landcruiser (or similar four-wheel-drive platform) or a semi-trailer mounted drill rig.

The compact ute mounted rig is a lightweight and highly mobile drilling unit that can access constrained or remote locations with minimal disturbance and is suitable for undertaking shallow subsurface investigations where required.

The semi-trailer-mounted drill rig provides higher-capacity drilling capability while maintaining a relatively small operational footprint. Any drill rig selected for the investigation program will be operated in accordance with standard environmental controls and site-specific management measures, again within existing disturbed areas.

The drilling process typically results in minimal ground disturbance, with small-diameter boreholes (generally up to 100 mm in diameter) and low-impact vehicle access requirements. Due to the limited surface footprint, only minor site rehabilitation i.e. filling 100mm hole in, is generally required following completion of the investigation works. The compact nature of the equipment also minimises the potential for soil compaction, rutting, erosion and vegetation disturbance around the boreholes.

Based on the limited scale and duration of the proposed investigations, APA considers the potential impacts on riparian processes, wildlife corridors, water quality and ecological values to be negligible.

Riparian Processes

The proposed boreholes will not alter channel morphology, floodplain function or surface water flow paths. Disturbance will be limited to temporary access and drill pad establishment. Upon completion of the investigations, borehole locations will be reinstated and any temporary disturbance rehabilitated as required.

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Wildlife Corridors

The investigations are not expected to create barriers to fauna movement or adversely affect ecological connectivity. Activities will be of short duration and confined to a small footprint.

Water Quality

Potential impacts to water quality are expected to be negligible. Standard environmental controls will be implemented, including the management of drill cuttings, containment of fuels and lubricants, and appropriate waste management practices. Investigations will be undertaken in a manner that avoids contamination of surface waters and surrounding floodplain environments.

Ecological Values

The investigation footprint will be limited to the minimum area required to safely undertake the works. Disturbance to vegetation and habitat values will be avoided through careful site selection, utilisation of existing access routes and existing disturbed areas. No impacts to ecological values are anticipated.

The investigations are limited in scale, temporary in duration, and are necessary to inform the final HDD design and associated environmental risk assessments.

Should the investigations identify the need for material changes to the proposed HDD design, crossing methodology or approved development footprint, APA will consult with the Department regarding any consequential assessment or approval requirements.

Item 4

a) Construction During Anticipated Dry Periods

Construction activities, including the Wilson River HDD crossing, will be scheduled, where reasonably practicable and subject to contractor availability and project scheduling constraints, to occur during anticipated dry periods to minimise the risk of flooding, access constraints, environmental impacts and delays to construction activities.

Construction planning will consider seasonal weather forecasts, local rainfall patterns, flood history and prevailing site conditions when determining the timing of works. Prior to commencement of the HDD crossing, the project will review available meteorological and flood forecasting information to confirm that conditions remain suitable for construction activities.

Notwithstanding the intention to undertake the works during anticipated dry periods, the Project acknowledges that the Cooper Creek and Channel Country systems are characterised by highly variable rainfall and episodic flooding events. Accordingly, emergency weather and flood contingency procedures will be implemented throughout the construction period to ensure the safety of personnel, protection of environmental values and preservation of project infrastructure.

b) Emergency Weather and Flood Contingency Procedures

APA and its principal contractor will implement a Weather and Flood Management Procedure for construction activities associated with the Bulloo Interlink Pipeline, including the Wilson River HDD crossing. The procedure will be incorporated into the Construction Environmental Management Plan and contractor management systems.

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The primary objectives of the procedure are to:

- Protect personnel from weather and flood-related hazards
- Minimise environmental impacts associated with flooding or severe weather
- Protect the integrity of construction works, equipment and materials
- Prevent the release of contaminants to watercourses and floodplain environments
- Facilitate the safe suspension and recommencement of construction activities

Weather Monitoring

Throughout construction, weather and flood conditions will be actively monitored using:

- Bureau of Meteorology forecasts and warnings - daily
- Rainfall observations and forecasts for the Cooper Creek Basin and surrounding catchments - daily
- Relevant flood advice and emergency warnings issued by government agencies - daily
- Site inspections and ongoing monitoring of local conditions - weekly

Monitoring frequency will be reviewed where significant rainfall or flood-producing weather systems are forecast.

Pre-Flood Preparedness Measures

Where forecast conditions indicate a potential flood risk, the following actions may be implemented:

- Suspension, resequencing or rescheduling of construction activities
- Removal of non-essential equipment and materials from flood-prone areas
- Securing of drilling equipment, fuel stores and ancillary infrastructure
- Inspection and reinforcement of erosion and sediment controls
- Removal of wastes and hazardous materials from areas susceptible to inundation
- Verification of emergency communication and evacuation arrangements
- Conduct of workforce briefings regarding forecast conditions and response requirements.

Construction Shutdown Procedures

Where conditions present an unacceptable safety or environmental risk, construction activities will be suspended and the site secured.

Shutdown activities may include:

- Ceasing drilling operations
- Securing HDD equipment in accordance with approved procedures
- Isolating fuel, chemical and hazardous substance storage areas
- Removing mobile plant from flood-prone areas where practicable
- Stabilising disturbed surfaces and stockpiles
- Confirming all personnel are accounted for and evacuated where required.

Personnel Safety Measures

Personnel safety will remain the highest priority during severe weather and flood events.

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Measures will include:

- Implementation of site emergency response procedures
- Evacuation of personnel from flood-prone areas where required
- Restriction of travel during unsafe conditions
- Securing buildings and containers
- Maintenance of emergency communications and contact protocols
- Compliance with project and contractor fatigue and safety management requirements.

Post-Event Inspection and Recovery

Following severe weather or flood events, work will not recommence until the affected area has been inspected and deemed safe.

Post-event activities may include:

- Assessment of access tracks, work areas and HDD infrastructure
- Inspection of erosion, sediment and environmental controls
- Assessment of any environmental impacts associated with the event
- Completion of corrective actions where required
- Repair or reinstatement of damaged infrastructure
- Authorisation from the Project Manager prior to recommencement of works.

Recommencement of Construction Activities

Construction activities will only recommence once:

- Floodwaters have receded sufficiently to allow safe access
- Site conditions are considered suitable for construction
- Environmental controls have been reinstated where required
- Any identified environmental impacts have been appropriately managed
- Relevant project and contractor approvals have been obtained.

The implementation of these procedures will minimise risks associated with severe weather and flooding while ensuring the protection of personnel, environmental values and project infrastructure during construction of the proposed Wilson River HDD crossing and associated work.

APA considers that the information provided in this response adequately addresses the matters raised in the Requirement Notice and supports continued assessment of the application.

Should you require any further information regarding this response, please contact the undersigned.

Kind regards,

Brian Connellan

Brian Connellan
Access and Approvals Lead