



Our ref: MBP-0005

16 July 2020

**Attention: Business Support Officer**

Mining Regulation  
Department for Energy and Mining  
Mineral Resources Division

Sent via email to dem.miningregrehab@sa.gov.au

Dear Sir/Madam,

**APPLICATION AND MINING PROGRAM SUBMISSION FOR A MINING LEASE**

Your letter reference 2020D016529 dated 29 May 2020 in the above regard refers.

Thank you for the opportunity to provide a written submission in relation to Hanson Construction Materials Pty Ltd's (Hanson) Mining Proposal.

APT O&M Services Pty Ltd forms part of the APA Group, who has been supporting Australian Gas Networks Limited (AGN) with the Front End Engineering Design (FEED) study of the proposed gas pipeline between Murray Bridge and Mount Barker. The proposed alignment of the Mount Barker Pipeline runs outside and alongside the north-eastern boundary of Retention Lease (RL) 132 held by Hanson Construction, in an unmade road (i.e. Ding Dong Road).

AGN is the holder of Preliminary Survey Licence (PSL) 37 formally renewed by the Department for Energy and Mining on 15 January 2020.

We hereby submit the following comments *in seriatim* to specific sections in the Mining Proposal.

**Section 2.11 Land Use and Section 2.12 Proximity to Infrastructure and Housing**

The proposed Mount Barker gas pipeline is proposed to follow an alignment along the north-eastern boundary of RL 132, outside of the boundaries of RL 132, inside an unmade road (Ding Dong Road).

**Section 3.2 General Description and Maps / Plans of Operation**

Hanson requested its legal representative to advise AGN and APA in writing that it does not want the proposed gas pipeline near its quarry operations and that it should be relocated further away where the pipeline cannot be impacted by quarrying activities from the furthest future operating area of the quarry proposed within RL132, so that there is no conflict with and no need to further consult with Hanson about the future quarry activities and any effects on the pipeline. This was in response to APA serving a Notice of Entry on Hanson in accordance with PSL 37 to conduct low impact investigations / surveys of the proposed pipeline route, and subsequent exchange of letters between the parties with APA's view to demonstrate that the pipeline could co-exist with the nearby future quarry operations of Hanson.

It does not appear that the Mining Proposal acknowledges the possible future context of the proposed pipeline alongside the outside boundary of RL 132 or further away. It is submitted that the Mining Proposal should include the relevant level of detail of the proposed pipeline to assist in the regulator's assessment of all impacts of the Mining Proposal on existing and proposed future infrastructure.

AGN and APA are of the opinion that the proposed gas pipeline can co-exist with the future quarry operations proposed by Hanson if a fit-for-purpose blast management plan and engineering procedures are formulated between the parties and put in place for operation of the pipeline and future quarry operations.

It is not clear if a technical vibration or 'seed hole vibration' analysis has been undertaken by Hanson over the application area to model predicted vibration levels that can be expected at the proposed gas pipeline along the north-eastern boundary of RL 132.

Similarly, it is not clear from the Mining Proposal if an offset distance between the proposed gas pipeline and the future quarry operations has been contemplated or proposed.

### **Section 5 Consultation**

We submit that further consultation and discussion between APA, AGN and Hanson should be undertaken to explore the co-existence of the proposed pipeline and future quarry operations. To date, Hanson has advised it does not want the proposed pipeline near its quarry operations. As part of the FEED study, APA relocated the proposed alignment for the pipeline to be outside of the boundaries of RL 132, and welcomes further detailed discussion with Hanson regarding blast management plans and engineering procedures that the parties could put in place.

### **Section 7.13 Protection of Third Party Property and Section 7.14 Blasting**

These sections are silent on the proposed Mount Barker gas pipeline in the unmade road (Ding Dong Road) alongside the north-eastern boundary of RL 132. Also, no mention is made of control and management strategies for protection of the proposed gas pipeline. The sensitivity to change of assumptions does not mention or take into account the proposed gas pipeline which Hanson has been made aware of.

### **General comment regarding the proposed gas pipeline in proximity to the future quarry operations / blasting activities**

Mines, quarries and high pressure gas transmission pipelines safely co-exist across Australia and the world. In fact, gas pipelines are an important source of energy supply to such mines and quarries.

Explosives are frequently used for blasting in construction of pipelines, mining, quarrying, highway construction, seismic exploration, and utility construction in the vicinity of in-service pipelines. Blasting near a pipeline create vibrations that will result in stress on the pipeline; this stress is added to the normal operating stress on the pipeline. Pipeline operators therefore have a need to ensure that blasting activities do not compromise the integrity of the pipelines, and have effective engineering procedures for use in developing realistic blasting procedures / guidelines for specific blasting situations near pipelines.

Typical factors that can impact the integrity of a pipeline are energy of the blast, distance from the blast, local geology and the integrity of the pipeline. It is submitted that agreed procedural controls to minimise impact on the respective parties operating the quarry and the proposed pipeline to enable the parties to co-exist, include:

1. Conducting a blast modelling study;
2. Performing trial blasting coupled with monitoring;
3. Maintaining a safe interface between activities of both parties;
4. Defining vibration limits such as Maximum PPV (peak particle velocity) during blasting; and
5. Conducting ongoing vibration monitoring during blast operations.

In accordance with section 7.3.2 and 7.4.2 of Australian Standard AS 2885.3 (Pipelines – Gas and liquid petroleum), a pipeline licence holder / pipeline operator must take all reasonable steps to manage specific activities near the pipeline, including blasting.

It is submitted that a responsible pipeline operator, such as AGN and APA, will work with Hanson to develop blasting procedures / guidelines and implement the necessary controls to minimise impact on the quarry activities and ensure the integrity of the gas pipeline.

APA and AGN have successfully managed similar interfaces with mines and quarries on other pipeline assets across their respective business operations in Australia, and the same would apply to the proposed Mount Barker Pipeline near Hanson's Kanmantoo Quarry.

We request that the above comments be taken into consideration in the assessment of the Mining Proposal.

Regards



Snyman Van Straaten  
Manager Access and Approvals WA

Phone: (08) 6189 4386

Email: [snyman.vanstraaten@apa.com.au](mailto:snyman.vanstraaten@apa.com.au)