

24 November 2004

Mr Nick Parkhurst  
Manager Projects  
Economic Regulation Authority  
Level 6, Governor Stirling Tower  
197 St Georges Terrace Perth WA 6000

Dear Nick

**EXTENSION OF THE REVISIONS SUBMISSION DATE AND THE REVISIONS COMMENCEMENT DATE - DAMPIER TO BUNBURY NATURAL GAS PIPELINE ACCESS ARRANGEMENT**

In response to the Economic Regulation Authority's ("ERA") request for submissions on the above matter, Apache Energy Ltd ("AEL") provides the following comments.

We note that the term of the current DBNGP Access arrangement is 13 January 2004 to 1 January 2005 but that on 30 June 2004 the ERA agreed to extend the revisions submission and commencement dates to 1 December 2004 and 1 July 2005 respectively.

We have also noted the points raised by DBNGP (WA) Transmission Pty Ltd in seeking further extensions of these dates in its letter to the ERA of 12 November 2004. Given the resources and workload that have undoubtedly been required to facilitate and conclude the DBNGP sale process, Apache is agreeable to the submissions date being extended to 31 January 2004 but only on the basis that the Revisions Commencement Date remains as at 1 July 2005.

It has always been Apache's understanding that the gas specification for the DBNGP would be changed as of 1 July 2005 to the "Schedule 1 – Broadest Specifications" as set out in the Dampier to Bunbury Pipeline Regulations 1998. We believe this timetable must be adhered to ensure a standard gas specification for the DBNGP, notwithstanding the amendment of existing contracts referred to in DBNGP (WA) Transmission Pty Ltd's letter. We note DBNGP (WA) Transmission Pty Ltd's other comments on this matter but maintain that the original schedule should be upheld.

Yours faithfully

**Russell Stephenson**  
Gas Marketing Manager  
Apache Energy Limited