

Camden Gas Project

Independent Environmental Audit

Audit Period 2012-2014

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Agenda

- Background
- Audit Scope and Methodology
- Compliance Criteria
- Audit Findings
- Conclusions



Background

- Camden Gas Project
 - 96 operating gas wells
 - 38 suspended gas wells
 - Low pressure underground gas gathering lines
 - Rosalind Park Gas Plant (RPGP)
 - High pressure supply line to the NSW gas grid
 - 10 former gas wells have been plugged and abandoned and are no longer part of the Camden Gas Project
- Audit Period
 - 1 July 2012 to 30 June 2014



Audit Scope and Methodology

- Audit Scope
 - Scope is defined by specific conditions in development approvals
 - Assess environmental performance of the development and its effects on the surrounding environment
 - Assess compliance with relevant standards, performance measures, and statutory requirements
 - Review adequacy of the EMP

- Audit Methodology
 - Consistent with ISO 19011:2002 – Guidelines for Quality and/or Environmental Management Systems Auditing
 - Site visits, interviews and document reviews
 - Evaluation of compliance against each approval condition



Audit Scope – Relevant Approvals

- Audit scope defined in relevant approvals:
 - Condition 37 of Schedule 3 of DA 15-1-2002-i (Apap, Joe Stanley, Johndilo, Loganbrae, Lipscombe and Mahon)
 - Condition 17 of Schedule 3 of DA 246-8-2002-i (Kay Park)
 - Condition 10 of Schedule 5 of DA 282-6-2003-i (RPGP, Rosalind Park, Wandinong, EMAI (EM01–22, 39, 40))
 - Condition 25 of Schedule 2 of DA 183-8-2004-i (Mt Taurus and Menangle Park (MP13-17, 25, 30))
 - Condition 44 of Schedule 2 of DA 9-1-2005-i (Glenlee)
 - Condition 58 of Schedule 2 of DA 75-4-2005-i (Sugarloaf)



Approvals not included in this Audit

The following approvals for the Camden Gas Project were not required to be addressed by this audit

- PA 06_0137 (Razorback)
- PA 06_0138 (Elizabeth Macarthur)
- PA 06_0291 (Spring Farm and Menangle Park)
- DA 171-7-2005 (El Bethel)
- Petroleum Exploration Licence No. 2
- Petroleum Production Leases No. 1, No. 2, No.4 No. 5 and No. 6
- Environment Protection Licence Number 12003



Compliance Criteria

Criteria developed by AGL and approved by the DoPE

Colour Code	Finding	Definition
	Compliance	<p>The intent and requirements of the condition have been met. The inability to provide formal written verification (letter, fax, email, meeting minutes etc.) that a requirement has been met does not necessarily result in a non-compliance. If verification that a condition has been met can be provided by other means (visual inspection, personal communication, etc.) the operation should be considered in compliance for that condition.</p> <p>Where an opportunity for improvement was identified, this was included in the audit findings.</p>
	Compliance - Improvement Recommended	<p>The intent of the condition has been met; however it is considered that either:</p> <ul style="list-style-type: none"> ■ The issue has the potential to deteriorate to a non-compliance if not further addressed; or ■ Further improvement is recommended.
	Observation	A finding which is not likely to significantly affect the operation, which does not strictly relate to the scope of the audit of compliance and which could lead to performance improvement.
	Not triggered	A condition or requirement has an activation or timing requirement which had not been triggered or completed at the time of the audit and therefore an assessment of compliance could not be made.
	Non-Compliance Level 1 (NC1)	<p>Specific requirements of the condition have not been met.</p> <p>A total absence of planning or implementation of a required operations element which presents an immediate risk or an isolated lapse in control in the implementation of an operations element which will lead to a significant risk.</p>
	Non-Compliance Level 2 (NC2)	An isolated lapse or absence of control in the implementation of an operations element which may not be of significant risk.



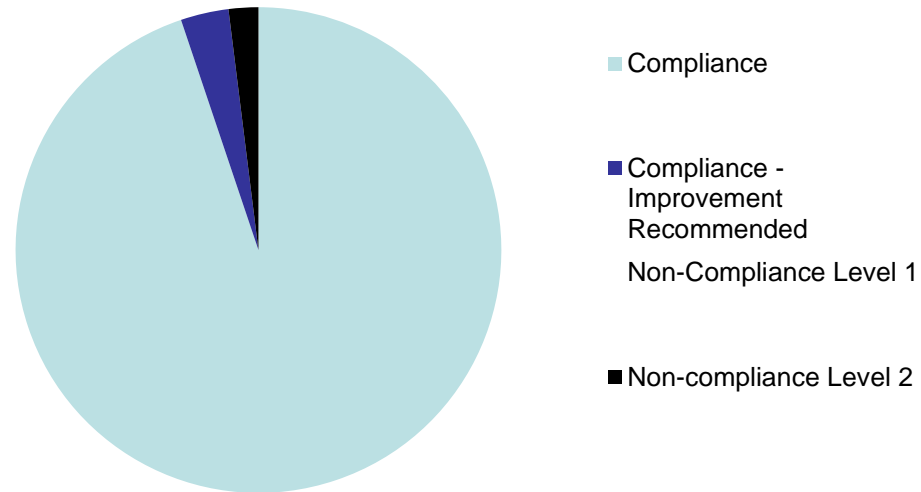
Audit Findings

Summary of Compliance with Conditions

- 1163 Conditions
- 505 Conditions Not Triggerged (43%)
- 658 Conditions Triggerged (57%)

Compliance with Triggerged Conditions

Finding	Number	%
Compliance	624	95
Compliance – Improvement Recommended	21	3
Non-Compliance Level 1	0	0
Non-compliance Level 2	13	2
TOTAL	658	





Audit Findings

- Positive Findings
 - Most EMP Sub-Plans updated during the audit period
 - Increase in compliance status from 92% to 98% since previous audit for 2010-2012 period (previous audit addressed more approvals)
 - No Level 1 Non-Compliances identified for the audit period
 - No environmental complaints during the audit period
- Incidents and non-compliances with performance standards
 - Generally administrative in nature, unlikely harm to environment or human health
 - Three Penalty Infringement Notices issued by the NSW EPA during the audit period - AGL entered into an Enforceable Undertaking with the NSW EPA, no outstanding matters
 - Non-compliances with CGP's EPL reported in the Annual Returns and Annual Environmental Performance Reports to the NSW EPA



Non-Compliances Level 2

- Traffic Management Plan does not include measures to reduce the transportation of plant material and/or dirt off site (DA-15-1-2002-I, Schedule 2, Condition 22(d))
- Annual Return for EPL due in February 2013 was submitted four days past the due date (DA-15-1-2002-I, Schedule 4, un-numbered condition; DA 282-6-2003-I, Schedule 6, un-numbered condition) – No further action required
- Exceedance of NOx emission limits on four occasions (DA 282-6-2003-I, Schedule 3, Condition 48) – No further action required
- CEMS not fully implemented during the audit period (DA 282-6-2003-I, Schedule 3, Condition 58)
- EMP was not reviewed and updated annually (DA 282-6-2003-I, Schedule 5, Condition 4; DA 183-8-2004-I, Condition 23)



Non-Compliances Level 2 (cont.)

- Digital survey of well site and gas gathering lines for MP25 not provided to Council within two months of completion of wells/lines (DA 183-8-2004-I, Schedule 2, Condition 6) – No further action required
- Wellhead configuration for MP25 not provided to Council within two months of completion/consent (DA 183-8-2004-I, Schedule 2, Condition 7) – No further action required
- Compliance Report was not submitted to the Director-General within three months of commencement of operations (DA 183-8-2004-I, Condition 33; DA75-4-2005, Schedule 2, Condition 30) – No further action required
- Wellhead design confirmation report not prepared prior to wellhead construction (DA75-4-2005, Schedule 2, Condition 28) – No further action required



Non-Compliances Level 2 (cont.)

- No consultation was undertaken with Council or the Rural Fire Service during preparation of the Bushfire Management Plan (DA75-4-2005, Schedule 2, Condition 44)



Opportunities for Improvement

- CMO (Compliance Register) did not have full wording of consent conditions nor supporting documents for all conditions (DA-15-1-2002-I, Schedule 2, Conditions 1 and 11; DA 246-8-2002-I, Schedule 3, Conditions 1 and 8; DA 282-6-2003-I, Schedule 3, Condition 1; DA 183-8-2004-I, Schedule 2, Condition 1; DA 9-1-2005, Condition 1; DA 75-4-2005, Condition 1)
- Lack of evidence of consultation with some of the nominated authorities during preparation of EMP (DA-15-1-2002-I, Schedule 2, Conditions 15)
- 40% of currently pending planned maintenance activities are overdue (DA-15-1-2002-I, Schedule 4, un-numbered condition; DA 282-6-2003-I, Schedule 6, un-numbered condition; DA75-4-2005, Schedule 2, Condition 17)
- Landscape and Lighting Audit Report lacked clarity as to how it addressed each sub-section of Condition 14 (DA 282-6-2003-I, Schedule 3, Condition 14)



Opportunities for Improvement (cont.)

- No evening or night-time noise monitoring has been undertaken to verify compliance (DA 282-6-2003-I, Schedule 3, Condition 29)
- Noise monitoring reports do not quantify events of “no wind” or “low wind” relative to criteria (DA 282-6-2003-I, Schedule 3, Condition 33)
- Section 5.4 of the Noise Management Sub-Plan does not state that the AEPR is submitted to the Director-General (DA 282-6-2003-I, Schedule 3, Condition 38(d))
- Spreadsheet justifying compliance of 2013/2014 emission testing results with criteria for the nearest residence not prepared (DA 282-6-2003-I, Schedule 3, Condition 47)
- Recommend annual notification to Campbelltown Fire Management Committee of information in the AEPR (DA 282-6-2003-I, Schedule 3, Condition 119(b))



Opportunities for Improvement (cont.)

- Recommend that the ERP states that it addresses the relevant bushfire hazard measures and policies of the three Councils (DA 282-6-2003-I, Schedule 3, Condition 119(c))
- Linkages between objectives/targets in EMP and performance reported in the AEPR could be more clearly stated (DA 282-6-2003-I, Schedule 5, Condition 2(d))
- Commitment to notify nearby residents and appropriate authorities of a leak of mercaptan odourant on the “same day” could be changed to “as soon as practicable” (DA 282-6-2003-I, Schedule 5, Condition 20)



AGL Actions

- AGL Corrective Actions Register 2012 – 2014 Independent Environmental Audit addresses non-compliances and improvement opportunities



Conclusions

- Substantial compliance with relevant standards, performance measures and statutory requirements
- Improvement in environmental performance and compliance since previous audit
- Action Plan addresses identified non-compliances and opportunities for improvement
- Improvements to Compliance Management System and periodic tracking of compliance may further improve performance