



Independent Environmental Audit 2008-2010 Camden Gas Project

24 AUGUST 2011

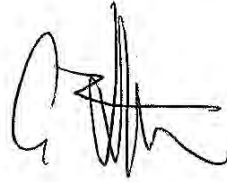
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Abbreviations

Abbreviation	Description
AEPR	Annual Environmental Performance Report
AGL	AGL Upstream Investments Pty Ltd
BL	Borewater Licences
CBNTAC	Cubbitch Barta Native Title Claimants Aboriginal Corporation
CGP	Camden Gas Project
CoC	Conditions of Consent
DA	Development Application
dB(A)	Decibel (A – Scale)
OEH	Office of Environment and Heritage, NSW Government (formerly, Department of Climate Change and Water) (DECCW))
DII	Department of Industry and Investment, NSW Government
DoP	Department of Planning, NSW Government (now DoPI)
DoPI	Department of Planning and Infrastructure, NSW Government (formerly DoP)
DPI	Department of Primary Industries, part of DII (now TIRIS), NSW Government
EMAI	Elizabeth MacArthur Agricultural Institute
EM	Elizabeth MacArthur
EMS	Environmental Management System
EMP	Environmental Management Plan
EPA	Environmental Protection Authority
EPL	Environmental Protections Licence(s)
GL	Glenlee
ISO	International Organisation for Standardisation
Ha	hectare
HSE	Health Safety and Environment(al)
kg/h	kilograms per hour
Km	kilometres
KP	Kay Park
L	Litres
mg/m ³	milligrams per cubic meter
MP	Menangle Park
NO _x	nitrogen oxides
NSW	New South Wales
PA	Project Approval
PEL	Petroleum Exploration Leases
PPL	Petroleum Production Leases
RB	Razorback
RBGP	Ray Beddoe Gas Plant
RPGP	Rosalind Park Gas Plant
SF	Spring Farm
SL	Sugarloaf Farm
SO _x	sulfur oxides
TIRIS	Trade and Investment, Regional Infrastructure and Services, NSW (formerly DII)
TLALC	Tharawal Local Aboriginal Land Council
VOC	Volatile organic compound

Executive Summary

The Camden Gas Project (CGP) produces gas from Petroleum Production Lease (PPL) 1, 2, 4, 5 and 6 and explores for gas under Petroleum Exploration Licence (PEL) 2 in the Macarthur region, 60 kilometres (km) southwest of Sydney, New South Wales (NSW). The CGP currently consists of 130 gas wells, low-pressure underground gas gathering lines and the Rosalind Park Gas Plant (RPGP).

URS Australia Pty Ltd (URS) was engaged by AGL Upstream Investments Pty Ltd (AGL) to carry out an independent environmental compliance audit of the CGP. The audit aims to provide independent advice to the Director-General (DG) of NSW Department of Planning and Infrastructure (DoPI) (formerly Department of Planning (DoP)) and other regulatory authorities and stakeholders as to whether AGL developed and operated the CGP in accordance with the relevant condition of approval during the audit period between 1 July 2008 and 30 June 2010.

This independent environmental audit aims to assess compliance with the consent conditions within the relevant planning approvals issued by the NSW DoP, including:

- DA 15-1-2002i issued 23 July 2002;
- DA 246-8-2002i issued 20 September 2002;
- DA 282-6-2003i issued 16 June 2004;
- DA 183-8-2004i issued 16 December 2004;
- DA 9-1-2005 issued 26 May 2005;
- DA 171-7-2005 issued 7 October 2005;
- DA 75-4-2005 issued 25 March 2006;
- PA06_0137 issued 9 December 2006;
- PA06_0138 issued 9 December 2006; and
- PA06_0291 issued 4 September 2008.

The audit assessed compliance with statutory approvals, permits and licences, adequacy of management plans and overall environmental performance of the development. The audit findings are based on evidence gained through documentation, site inspection (31 January, 1 February and 7 February 2011) and interviews with site personnel. As part of the audit process, documentation relevant to the assessment of consent conditions was reviewed, including refracting management plans; however a review of the fracture stimulation process, agents used and related impacts was not completed as part of the audit. Issues relating to health, safety and community are outside the scope of this audit, except where they directly relate to environmental issues.

Overall, compliance of the development to the key project approvals considered in this audit was found to be of a high standard. A summary of the compliance status of each planning approval is summarised in Table 1. It is noted that some of the consent conditions were finalised and closed out during past audits and were not assessed further as part of this audit. The compliance score was calculated on the basis of the remaining conditions not categorised as previously closed out, not applicable or noted.

During the audit period, environmental incidences reported included noise-related complaints and air emissions of fine particulates and sulfur acid mist/sulfur trioxide exceeding discharge limits. Appropriate measures were taken by AGL to rectify these incidences and further monitoring has demonstrated that the development has since complied with noise and discharge limits.

Executive Summary

Table 1 Summary of compliance status with planning approvals

Planning Approval	Total consent conditions	Number of consent conditions				Compliance score*
		Closed out previously	Not applicable	Noted	Non-compliant	
DA15-1-2002i	92	34	1	3	1	98%
DA246-8-2002i	37	0	2	0	1	97%
DA282-6-2003i	254	49	19	33	16	90%
DA183-8-2004i	29	6	3	1	3	84%
DA9-1-2005	45	9	4	2	4	87%
DA171-7-2005	69	0	0	63	0	100%
DA75-4-2005	63	2	2	2	7	88%
PA06_0137	35	0	0	3	4	88%
PA06_0138	37	0	0	4	5	85%
PA06_0291	52	0	1	7	5	89%

* Compliance score calculated as a percent of remaining conditions not categorised as previously closed out, not applicable or noted.

The audit process has recognised a number of opportunities to improve compliance status of the CGP development with regard to relevant statutory approvals, permits and licences. The majority of identified non-compliances related to administrative requirements and the inability to provide adequate records to verify compliance. There were no significant ongoing environmental issues identified.

Introduction

1.1 Outline

URS Australia Pty Ltd (URS) was engaged by AGL Upstream Investments Pty Ltd (AGL) to carry out an independent environmental compliance audit of the Camden Gas Project (CGP) operations, near Camden, New South Wales (NSW).

This report aims to provide independent advice to the Director-General (DG) of NSW Department of Planning and Infrastructure (DoPI) (formerly Department of Planning (DoP)) and other regulatory authorities and stakeholders as to whether AGL developed and operated the CGP in accordance with the relevant condition of approval during the audit period. The relevant audit period is from 1 July 2008 to 30 June 2010. The appointment of Greg Loftus to the role of Lead Auditor was approved by the DG (refer to letter dated 17 September 2010).

1.2 Scope of Work

The independent environmental audit is to meet the requirements of development consents applicable to the CGP (refer to Appendix A), which include:

- DA 15-1-2002i Schedule 3, Condition 37;
- DA 246-8-2002i Schedule 3, Condition 17;
- DA 282-6-2003i Schedule 5, Condition 10;
- DA 183-8-2004i Schedule 2, Condition 25;
- DA 9-1-2005 Schedule 2, Condition 44;
- DA 171-7-2005 Schedule 4, Condition 7;
- DA 75-4-2005 Schedule 2, Condition 58;
- PA06_0137 Schedule 4, Condition 5;
- PA06_0138 Schedule 4, Condition 5; and
- PA06_0291 Schedule 4, Condition 5

There are minor differences in the wording of each of the conditions listed above; however the intent of the scope of work can be described as follows.

“Within two years of the date of this consent and every two years thereafter, unless the Director-General directs otherwise, the Proponent shall commission and pay the full costs of an Independent Environmental Audit. The Independent Environmental Audit shall:

- (a) be conducted by a suitably qualified, experienced, and independent person(s) whose appointment has been approved by the Director-General;*
 - (b) be consistent with ISO 19011:2002 – Guidelines for Quality and/or Environmental Management Systems Auditing, or updated versions of these publications;*
 - (c) assess the environmental performance of the development, and its effects on the surrounding environment;*
 - (d) assess whether the development is complying with the relevant standards, performance measures, and statutory requirements;*
 - (e) review the adequacy of the Applicant’s Environmental Management Plan; and*
 - (f) recommend measure or actions to improve the environmental performance of the development, and/or its environmental management and monitoring systems”.*
-

1 Introduction

1.3 Audit Objective

The objective of the audit is to assess compliance with the consent conditions within the relevant development and project approvals issued by the NSW DoP (now DoPI). The relevant approvals are described in Table 1-1. In addition, the audit will:

- Assess the environmental performance of the project and its effects on the surrounding environment;
- Assess whether the project is complying with the relevant standards, performance measures and statutory requirements;
- Review the adequacy of the Operational Environmental Management Plans; and
- Recommend actions to improve the environmental performance of the Project and/or its environmental management and monitoring systems.

As part of the audit process, documentation relevant to the assessment of consent conditions was reviewed, including refracting management plans; however a review of the fracture stimulation process, agents used and related impacts was not completed as part of the audit. Issues relating to health, safety and community are outside the scope of this audit, except where they are directly related to environmental issues.

Table 1-1 Description of relevant approvals

Approval	Issue Date	Description	Included in past audits
DA15-1-2002i <ul style="list-style-type: none"> • Apap • Joe Stanley • Johndilo • Loganbrae • Lipscombe • Mahon 	23/07/2002	Project approval granted for the continued operation of the Camden Coalbed Methane project, including: <ul style="list-style-type: none"> • Operation of the existing 20 production wells; • Operation of 5 additional wells not yet completed and/or drilled; • Operation of the existing and proposed gas gathering system; • Operation of the existing gas treatment plant; • Production of up to 93,000 GJ/month from the treatment plant; • Sale and distribution of gas to the AGL gas network; and • Operation of the existing site office and pipe yard depot. 	Yes
DA15-1-2002i MOD53-4-2006	16/05/2006	Modification of DA 15-1-2002i granted for: <ul style="list-style-type: none"> • Construction, drilling and operation of a directional well from LB09. 	Yes
DA15-1-2002i MOD24-3-2007	04/07/2007	Modification of DA 15-1-2002i granted for: <ul style="list-style-type: none"> • Construction, drilling and operation of two surface to in-seam wells (AP02/AP03) at AP01. 	Yes
DA15-1-2002i MOD3	07/2008	Modification of DA 15-1-2002i granted for: <ul style="list-style-type: none"> • Modification Application DA 15-1-2002i MOD 3 and "Camden Gas Project: Kay Park and Loganbrae Gas Gathering Line Modification Project Statement of Environmental Effects", dated July 2008. 	No

1 Introduction

Approval	Issue Date	Description	Included in past audits
DA246-8-2002i Kay Park	20/09/2002	Project approval granted for: <ul style="list-style-type: none"> Construction of a gas gathering system and access roads; Connection of the wells to the Stage 2 Camden Gas Project – Gas Treatment Plant; and Production of methane gas. 	Yes
DA246-8-2002i MOD25-3-2007	04/07/2007	Modification of DA 246-8-2002i granted for: <ul style="list-style-type: none"> The connection of 3 existing wells (KP1, KP2, and KP3) to the Ray Beddoe Treatment Plant (in accordance with the attached plan), and the continued production and sale of methane gas from the 3 wells. The construction, drilling and operation of 2 Surface to in-seam wells (KP05 and KP06) from KP01. 	Yes
DA246-8-2002i	04/07/2007	Modification of DA 246-8-2002i granted for: <ul style="list-style-type: none"> Construction and drilling of 9 wells, including surface to in-seam wells at SL03. 	No
DA246-8-2002i MOD2	07/2008	Modification of DA 246-8-2002i granted for: <ul style="list-style-type: none"> Modification Application DA 246-8-2002i MOD2 and “Camden Gas Project: Kay Park and Loganbrae Gas Gathering Line Modification Project Statement of Environmental Effects”, dated July 2008. 	No
DA282-6-2003i RPGP, Rosalind Park, Wandinong, EMAI	16/06/2004 (expires 05/10/2025)	Project approval for the Camden Gas Project Stage 2, including: <ul style="list-style-type: none"> Construction and drilling of 20 wells located on the EMAI Site; Operation and production of gas from the existing (drilled) 23 wells and 20 wells to be constructed (a total of 43 wells); Construction and operation of the gas gathering system; Construction and operation of the gas treatment plant, associated workshop and office facilities; and Production of up to 14.5 petajoules per annum from the gas treatment plant. 	Yes
DA282-6-2003i MOD72-7-2004i	20/08/2004	Modification of DA 282-6-2003i granted for: <ul style="list-style-type: none"> Limiting term of production lease approval to 21-years; Land omitted from development consent; Requirement for EMP for works in Campbelltown City Council road reserve; and Works to commence prior to granting of production lease. 	Yes
DA282-6-2003i MOD5-1-2005	02/2005	Modification of DA 282-6-2003i granted for: <ul style="list-style-type: none"> Amendment to EMAI Access Road (refer Figure 3 - Sydney Gas Camden Gas Project Stage 2 (18-11-2004 Map Ref M240329); and Amendment to EMAI Gathering System – refer Figure 4 - Sydney Gas Camden Gas Project Stage 2 (18-11-2004 Map Ref M240328). 	Yes

1 Introduction

Approval	Issue Date	Description	Included in past audits
DA282-6-2003i MOD42-3-2005	06/2005	Modification of DA 282-6-2003i granted for: <ul style="list-style-type: none"> Modification Application 42-3-2005 and the letter from Sydney Gas Operations Pty Ltd to the Department dated 14 March 2005 titled <i>Camden Gas Project Stage I&I – Modification Application</i>, and the accompanying attachments. 	Yes
DA282-6-2003i MOD52-4-2006	16/05/2006	Modification of DA 282-6-2003i granted for: <ul style="list-style-type: none"> Location of the directional well from GL07; and The modification application submitted to the Department on 11 April 2006 and the accompanying document "<i>Camden Gas Project Joint Venture Proposed Multiple Gas Well Modifications</i>" prepared by AGL Gas Production (Camden) Operations Pty Ltd and Sydney Gas (Camden) Operations Pty Ltd, April 2006. 	Yes
DA282-6-2003i MOD119-10-2006	22/10/2006	Modification of DA 282-6-2003i granted for: <ul style="list-style-type: none"> Location of the Surface to In-seam well (GL14); The modification application submitted to the Department on 29 September 2006 and the accompanying document "<i>Camden Gas Project Joint Venture Statement of Environmental Effects Proposed SIS Well Project</i>" prepared by AGL Gas Production (Camden) Operations Pty Ltd and Sydney Gas (Camden) Operations Pty Ltd, and dated September 2006; The Applicant shall not produce gas from GL14 until a Production Lease under the <i>Petroleum (Onshore) Act 1991</i> has been obtained for the entirety of the well. Additional limits on hours of operation and sound pressure levels. 	Yes
DA282-6-2003i MOD124-10-2006	01/11/2006	Modification of DA 282-6-2003i granted for: <ul style="list-style-type: none"> Construction, drilling and operation of 1 directional well (GL16) from GL7, and 2 Surface to in-seam wells (GL14 and GL15) from GL10. 	Yes
DA282-6-2003i MOD11-2-2007	02/05/2007	Modification of DA 282-6-2003i granted for: <ul style="list-style-type: none"> Modification Application MOD 11-2-2007 and Statement of Environmental Effects Section 96AA Modification of DA No 282-6-2003i Relocation of an Existing Internal Road at Rosalind Park Gas Plant (RPGP) off Medhurst Road, Menangle, dated February 2007. 	Yes
DA282-6-2003i MOD26-3-2007	04/07/2007	Modification of DA 282-6-2003i granted for: <ul style="list-style-type: none"> Construction, drilling and operation of 1 Surface to in-seam well (EM38) at EM20, and upgrading (twinning) of the gas gathering line between MP14-GL10, GL10-GL05, GL05-GL07 and RP03-RP08. 	Yes
DA282-6-2003i MOD9	11/04/2008	Modification of DA 282-6-2003i granted for: <ul style="list-style-type: none"> Construction, drilling and operation of 2 Surface to in-seam wells - EM39 (from EM02) and GL17 (from GL05), upgrading (twinning) of the gas gathering line from EM39 to the junction of the gas gathering line and road to the EM03 well, and connection of the new wells to the existing gas gathering system. 	Yes

1 Introduction

Approval	Issue Date	Description	Included in past audits
DA282-6-2003i MOD11	18/09/2009	Modification of DA 282-6-2003i granted for: <ul style="list-style-type: none"> Rerouting damaged gas gathering line at Glenlee-06. 	No
DA282-6-2003i MOD 119-10-2006	16/03/2009	Modification of DA 282-6-2003-I granted for: <ul style="list-style-type: none"> Construction of an access road to the existing Rosalind Park 09 (RP09) gas well and the upgrading (twinning) of a small section of the existing gas gathering line between the existing RP08 gas well and the existing Rosalind Park Gas Plant (RPGP) on the Rosalind Park Property. 	No
DA183-8-2004i Mt Taurus and Menangle Park	16/12/2004	Project approval granted for: <ul style="list-style-type: none"> Connection of 15 existing coal seam methane wells to the previously approved Stage 2 Camden Gas Project – Gas Treatment Plant for the production of methane gas; and Construction of a dam at the MT1 gas well site. 	Yes
DA183-8-2004i MOD27-3-2007	04/07/2007	Modification of DA 183-8-2004i granted for: <ul style="list-style-type: none"> Construction, drilling and operation of 1 Surface to in-seam well (MP30) at MP13 and upgrading (twinning) of the gas gathering line between MP13 and MP14. 	Yes
DA9-1-2005 Glenlee Wells	26/05/2005	Project approval granted for: <ul style="list-style-type: none"> Construction and drilling of well GL11; Construction of a gas gathering system between four wells at Glenlee and two wells at EMA1; Connection of 6 coal seam methane wells to the previously approved Stage 2 Camden Gas Project – Gas Treatment Plant, for the production of methane gas. 	Yes
DA9-2005 MOD51-4-2006	16/05/2006	Modification of DA 9-2005 granted for: <ul style="list-style-type: none"> Construction, drilling and operation of a directional well from each of GL02 and GL11. 	Yes
DA9-1-2005 MOD28-3-2007	04/07/2007	Modification of DA 9-1-2005 granted for: <ul style="list-style-type: none"> Construction and drilling of well GL12 and G13; and Upgrading (twinning) of gas gathering line between GL02 and GL05. 	Yes
DA75-4-2005 Sugarloaf Farm	07/10/2005	Project approval granted for: <ul style="list-style-type: none"> Construction and drilling of 7 wells; Construction of a gas gathering system and access roads; Connection of the wells to the Stage 2 Camden gas Project – Gas Treatment Plant; and Production of methane gas. 	Yes
DA75-4-2005 MOD29-3-2007	04/07/2007	Modification of DA 75-4-2005 granted for: <ul style="list-style-type: none"> Construction and drilling of 9 wells, including 2 Surface to in-seam wells (SL08 and SL09) at SL03; and Additional limits on hours of operation and sound pressure levels. 	Yes
DA75-4-2005 MOD2	01/2010	Modification of DA 75-4-2005 granted for: <ul style="list-style-type: none"> Modification Application DA 75-4-2005 MOD 2 and letter dated 18 December 2009. 	No

1 Introduction

Approval	Issue Date	Description	Included in past audits
DA171-7-2005 EI Bethel	25/03/2006	Project approval granted for: <ul style="list-style-type: none"> Construction and drilling of 10 wells; Construction of a gas and water gathering system and access roads; Connection of the wells to the Stage 2 Camden Gas Project – Gas Treatment Plant; and Production of methane gas. 	Yes
PA06_0137 Razorback	09/12/2006	Project approval granted for: <ul style="list-style-type: none"> Construction and drilling of wells RB03-RB12 and gas gathering lines. 	Yes
PA06_0138 Elizabeth Macarthur	09/12/2006	Project approval granted for: <ul style="list-style-type: none"> Construction and drilling of wells EM23-36 and gas gathering lines. 	Yes
PA06_0138 MOD1	06/07/2007	Modification of PA06_0138 granted for: <ul style="list-style-type: none"> Construction and drilling of wells EM23-37 and gas gathering lines. 	Yes
PA06_0291 Spring Farm and Menangle Park	04/09/2008	Project approved granted for: <ul style="list-style-type: none"> Construction and drilling of wells in 4 locations in Spring Farm and 12 locations in Menangle Park, as well as gas gathering lines. 	No

The audit will also make a brief assessment of compliance with other environmental requirements, including:

- Petroleum Exploration Licence (PEL) authorised by NSW Department of Industry and Investment (DII), now Department of Trade and Investment, Regional Infrastructure and Services (TIRIS);
- Petroleum Production Leases (PPL) authorised by DII (now TIRIS);
- Environmental Protection Licences (EPL) authorised by NSW Environmental Protection Authority (EPA), within the Office of Environment and Heritage (OEH) (formerly Department of Environmental, Climate Change and Water (DECCW));
- Pipeline Licences authorised by DII (now TIRIS); and
- Bore Water Licences (BL) authorised by DII (now TIRIS).

A description of relevant environmental approvals is provided in Table 1-2. However, it is considered that the majority of the environmental requirements would be incorporated into the consent conditions.

Table 1-2 Description of other relevant environmental approvals

Approval	Issue Date	Description	Authority
PEL2	27/03/2006	Licence granted under Part 3 of <i>Petroleum (Onshore) Act 1991</i> to carry out exploration activities for a term until 28/03/2011.	DII (now TIRIS)
PEL2	20/04/2010	Licence granted under Part 3 of <i>Petroleum (Onshore) Act 1991</i> to carry out surface exploration activities at Elderslie 1, Raby 2, Campbelltown 12 and Currans Hill 18 sites for a term until 28/03/2011.	DII (now TIRIS)
PPL1	02/09/2002	Lease granted under <i>Petroleum (Onshore) Act 1991</i> to carry out production operations for a term until 01/09/2023.	DII (now TIRIS)

1 Introduction

Approval	Issue Date	Description	Authority
PPL2	10/10/2002	Lease granted under <i>Petroleum (Onshore) Act 1991</i> to carry out production operations for a term until 09/10/2023.	DII (now TIRIS)
PPL4	6/10/2004	Lease granted under <i>Petroleum (Onshore) Act 1991</i> to carry out production operations for a term until 05/10/2025.	DII (now TIRIS)
PPL5	28/02/2007	Lease granted under <i>Petroleum (Onshore) Act 1991</i> to carry out production operations for a term until 27/02/2028.	DII (now TIRIS)
PPL6 (PPLA8)	17/04/2008	Lease granted under <i>Petroleum (Onshore) Act 1991</i> to carry out production operations for a term until 17/04/2029.	DII (now TIRIS)
EPL12003	Application: 04/09/2003 Anniversary: 22/12 Review: 23/06/2013	Licence granted under <i>Protection of the Environment Operations Act 1997</i> and the Regulations made under the Act to carry out Petroleum and fuel production – Sydney Basin (200,000 – 500,000 tonnes produced) at Rosalind Park Gas Plant.	OEH
EPL 11713	Application: 06/06/2003 Anniversary: 17/09 Review: 12/09/2011	Licence granted under <i>Protection of the Environment Operations Act 1997</i> and the Regulations made under the Act to carry out Petroleum and fuel production – Sydney Basin (0 – 10,000 tonnes produced) at Ray Beddoe Treatment Plant. EPL 11713 has now been surrendered.	OEH
Pipeline Licence No. 30	19/05/2004	Licence granted under <i>Pipelines Act 1967</i> and <i>Pipeline Regulation 2000</i> to operate a pipeline to convey Coal Seam Methane between Rosalind Park Gas Plant and AGL Gas Networks Natural Gas Pipeline No. 1.	DII (now TIRIS)
10BL159415	24/09/2009	Bore water licence granted for Johndilo (Lot 62, DP 735555) for a term until 23/09/2014.	NSW Office of Water
10BL160600	09/06/2010	Bore water licence granted for Loganbrae (Lot 6, DP 808569) for a term until 08/06/2015.	NSW Office of Water

1.4 Audit Methodology

The Audit was carried out in accordance with ISO 19011:2003 Guidelines for quality and/or environmental management systems auditing (ISO, 2002), which superseded the ISO 14000 series. It was designed to assess compliance with relevant conditions of applicable approvals, licences and permits and review the effectiveness of the environmental management aspects of the development.

The audit methodology comprised the following tasks.

- Preliminary review of documentation and preparation of a compliance register, including consent conditions from relevant approvals;
- Site inspections (31 January 2011, 1 February 2011 and 7 February 2011) attended by the audit team and accompanied by AGL personnel;
- Interviews of site personnel;
- Review of documentation provided by AGL;
- Preparation of a draft report documenting the audit findings; and
- Preparation of a final report, with consideration of AGL comments on the draft report.

1 Introduction

1.5 Personnel

The audit team comprised:

- Greg Loftus, Senior Principal, Lead Auditor (URS/Clear Environment);
- Elisha Keighley, Senior Environmental Engineer, Auditor (URS); and
- Peter Marshman, Environmental Scientist, Auditor (URS).

AGL personnel interviewed comprised:

- Aaron Clifton, Field Environment and Safety Officer (AGL);
- Tom Lawler, Environmental Operator (AGL);
- Pardip Kumar, Gas Plant Supervisor (AGL);
- Alex Secerbegovic, Health and Safety Business Partner (AGL); and
- Dan Wilkins, AGL Company Man (AGL) located on drill rig site.

1.6 Format of Report

The format of this report is as follows.

- Section 1 is introductory and defines the scope and nature of the audit.
- Section 2 describes CGP development and operations.
- Section 3 presents the assessment of the environmental performance of the Project and its effects on the surrounding environment.
- Section 4 presents a summary of the assessment of compliance with relevant standards, performance measures and statutory requirements, including observations of non-compliance and recommendations to improve the environmental performance of the Project and/or the environmental management and monitoring systems. A detailed assessment of compliance with consent conditions is presented in Appendix A.
- Section 5 provides a review of the adequacy of Environmental Management Plans.

Site Description

2.1 Overview

The existing CGP is located 60 kilometres (km) southwest of Sydney within the Macarthur region, in the Wollondilly, Camden and Campbelltown Local Government Areas. The CGP has been producing gas for the Sydney market since 2001 and currently supplies about 6% of the NSW gas market. It produces gas from Petroleum Production Leases (PPL) 1, 2, 4, 5 and 6 and explores for gas under Petroleum Exploration Licence 2 (PEL 2). The CGP currently consists of 130 gas wells, low-pressure underground gas gathering lines and the Rosalind Park Gas Plant (RPGP).

The Spring Farm and Menangle Park expansion is the next phase in the development of the CGP. AGL prepared and submitted a Development Application and Environmental Assessment (HLA Envirosciences, 2007) for the Spring Farm and Menangle Park expansion to the NSW DoP (now DoPI), which it placed on public exhibition during September and October 2007. The NSW Minister for Planning approved the Spring Farm and Menangle Park Project Application on 4 September 2008 and the Project is now being implemented.

On 1 April 2009, the CGP changed from a Joint Venture between AGL and Sydney Gas (Camden) Operations to become wholly owned by AGL.

2.2 Description of Operations

The activities that make up the development and operation of the existing CGP include:

- Civil earth works to construct well sites and access roads;
- Excavation of trenches and installation of gas gathering lines;
- Drilling, fracture stimulation and installation of gas wells (vertical and in-seam) to intersect the coal seam;
- Extraction of coal seam gas and separation of water from the gas at the wellhead location;
- Collection, storage and removal of production waters;
- Transmission of the gas to the RPGP via the gas gathering system;
- Treatment, pressurising and odourising of the gas to achieve marketable quality;
- Water treatment at the RPGP, including oil-water separation;
- Delivery of the gas by pressurised pipeline to the Jemena reticulation network;
- Rehabilitation after well and gas gathering line construction activities; and
- Final rehabilitation after decommissioning of wells and gas plants.

Ancillary activities take place at the administrative facilities, maintenance workshop and vehicle wash-bay located at RPGP.

2.3 Summary of Operations (July 2008 – June 2010)

AGL reported that during the audit period, the following development occurred within the CGP.

Drilling

- Thirteen new wells were drilled in the audit period under the following approvals:
 - GL17 and EM39 (DA282-6-2003i); and
 - SF01- 03, SF05, SF07-09 and MP05, MP07-08 and MP23 (PA06_0291).

The status of wells to 30 June 2010 is presented in Table 2-1.

2 Site Description

Table 2-1 Status of wells to June 2010

Well Name	Date Completed	Status June 2010
AP01	2000	Drilled
EB01-10	Incomplete	Approved, not drilled
EM01	Incomplete	Plugged and abandoned
EM02, 05, 07, 09, 10, 11, 12, 13, 14, 15, 17, 18, 19 and 20	2005	Drilled
EM03, 04, 06, 08 and 16	2005	Drilled
EM21 and 22	2002	Drilled
EM23	2007	Drilled
EM24, 25, 27, 28, 30, 33, 34, 37, 38	2007	Drilled
EM26, 29, 35, 36	Incomplete	Approved, not drilled
EM31, 32	2007	Drilled
EM39	2008	Drilled
EM 40	2006	Drilled
GL01	Incomplete	Approved, not drilled.
GL02, 04, 05*, 06*, 07, 08, 09 and 10.	2003	Drilled
GL03	2003	Plugged and abandoned
GL11	2005	Drilled
GL12, 13, 14, 15 and 16	2007	Drilled
GL17	2008	Drilled
JD01 and 11	1999	Drilled
JD02, 03, 06, 07A, 09 and 10	1999	Plugged and abandoned
JD04 and 05	1999	Drilled
JD08	Incomplete	Approved under PEL 2, not drilled
JS01, 03 and 04	2000	Drilled
JS02	2000	Plugged and abandoned
KP01*, 02 and 03	2002	Drilled
KP06	Incomplete	Approved, not drilled
KP05	2008	Drilled
LB01, 02, 03, 04 and 08	Incomplete	Approved, not drilled
LB05 and 07	2001	Drilled
LB06, 09 and 10	2001	Drilled
LB11	2007	Drilled
LP01	Incomplete	Not completed
MH01	Incomplete	Not completed
MP14, 15, 16 and 17	2003	Drilled
MP13	2003	Drilled
MP30	2008	Drilled
MT01 02, 03, 04, 06, 07, 08, 09 and 10	2004	Drilled
MT05	2004	Drilled
Ray Beddoe Treatment Plant*	2008	Decommissioned and rehabilitated
RB03, 04 and 05	Incomplete	Approved, not drilled
RB06, 07*, 08*, 09, 10, 11 and 12	2007	Drilled

2 Site Description

Well Name	Date Completed	Status June 2010
Rosalind Park Gas Plant	2005	Operating
RP01	Incomplete	Approved, not drilled
RP02, 07, 08, 10 and 12	2003	Drilled
RP03, 04, 05, 06, 09 and 11	2003	Drilled
SL01, SL04, SL05, SL06, SL07, SL08	Incomplete	Approved, not drilled
SL02 and SL03	2006	Drilled
SL09	2008	Drilled
WG01 – 05	2003	Drilled
WG06	Incomplete	Not completed
SF04A, 10,	Incomplete	Approved, not drilled
MP05*, 07*, 08*	2009	Drilled
MP02, 03, 04, 06, 11, 19, 21, 22, 24, 33	Incomplete	Approved, not drilled
MP23	2010	Drilling in progress
SF17 (01*,02*,03*)	2010	Drilled
SF20 (05*, 07*, 08, 09*)	2010	Drilled

*Wells (or areas) marked with an asterisk were inspected during the audit.

Fracture stimulation

- Fracture stimulation of SL09 (DA 75-4-2005).
- Refracking of RB08 and RB10 at Razorback gas field (PA06_0137).
- Refracking of EM27 and EM31 (PA06_0138).
- Fracture stimulation of EM34 (PA06_0138).
- Fracture stimulation of MP08 at Menangle Park (PA06_0291).

Installing gas gathering lines

- Approximately 3.5 km constructed and commissioned across the Rosalind Park (DA282-6-2003i) Sugarloaf fields (DA75-4-2005).
- Approximately 5.3 km constructed and commissioned across Spring Farm / Menangle Park (PA06_0291) and Kay Park fields (DA246-8-2002i).

Rosalind Park Gas Plant

- Ongoing operation of the RGP (DA282-6-2003i), including:
 - Compressor No.1 operated for 16,540 hours during the audit period;
 - Compressor No.2 operated for 5,889 hours during the audit period; and
 - Compressor No.3 operated for 13,473 hours during the audit period;
- General site maintenance and environmental management such as landscaping and rehabilitation activities completed along the RGP access road.

Ray Beddoe Treatment Plant Shutdown and Decommissioning

- Decommissioning and rehabilitation of Ray Beddoe Treatment Plant (RBTP) in accordance with the Rehabilitation Management Plan approved by the DoP (now DoPI) and DECCW (now OEH) and to

2 Site Description

the satisfaction of the landowner. The land was handed back to the landowner and EPL 11713 was surrendered in June 2009 as per Notice of Approval (reference: 1103759).

Land Access and Approvals

- Approval (PA06_0291) granted for construction and operation of gas wells within the Spring Farm and Menangle Park area (September 2008).
- Modification granted for development of Kay Park (DA 246-8-2002i MOD2) and Loganbrae (DA 15-1-2005-I MOD3) gas gathering line modification project (July 2008).
- Modification (DA 282-6-2003i MOD10) granted for construction of an access road to the existing RP09 gas well and the twinning of a small section of the existing gas gathering line between RP08 and the RPGP (March 2009).
- Controlled activity approval (Part 3A permit) granted for works to cross an existing drainage line at Kay Park as part of the gathering line installation works (December 2008).
- Modification (DA 282-6-2003i MOD 11) granted for the Glenlee gas gathering line re-routing (September 2009).
- Modification (DA 75-4-2005 MOD 2) granted for the twinning of a gas gathering line from well surface locations SL03 and SL09 to the RPGP (January 2010).

Environmental Performance

3.1 Summary of Environmental Performance

This section addresses the requirement to assess the environmental performance of the development, and its effects on the surrounding environment as required by relevant development and project approvals. The environmental performance is reviewed on the basis of consideration of applicable environmental aspects, including:

- Air quality (section 3.1.1);
- Noise (section 3.1.2);
- Erosion and sedimentation (section 3.1.3);
- Surface/ground water pollution (section 3.1.4);
- Contaminated land and hydrocarbon management (section 3.1.5);
- Rehabilitation (section 3.1.6);
- Visual amenity and light (section 3.1.7);
- Landscape management (section 3.1.8);
- Threatened flora and fauna (section 3.1.9);
- Weeds (section 3.1.10);
- Aboriginal and cultural heritage (section 3.1.11);
- Bushfire management (section 3.1.12); and
- Community (section 3.1.13).

Environmental performance of the development was assessed by reviewing results of monitoring for the audit period and observations made by audit personnel during site visits on 31 January 2011, 1 February 2011 and 7 February 2011.

Overall, there were no significant ongoing environmental issues resulting from the development or operation of the CGP identified during the audit period.

3.1.1 Air Quality

Observations made during site inspections indicated that activities were carried out in a manner that minimised the emissions of dust, including traffic generated dust. The control measures identified in the Air Quality Management Sub Plan (dated 10/09/2008) within the CGP EMP (dated 10/09/2008) were observed to be implemented effectively. There were no incidents reported or complaints received regarding uncontrolled dust emissions during the audit period.

Overall, air emissions performance improved with trends of decreasing air emissions from RGP. Monitoring records indicate that the RGP was operated within its specified pollutant load limits (set out in EPL12003, condition L3-3 and DA282-6-2003, condition 5-55), with the exception of:

- Fine particulates, which exceeded the 460 kg/year load limit of 799 kg/year during the 2007/08 Annual Return reporting period; and
- Sulfur acid mist/sulfur trioxide (1.3 mg/m^3), which exceeded the 1 mg/m^3 concentration limit at monitoring point no. 4 (reboiler unit) during the October 2009 quarterly monitoring period.

Monitoring results showed compliance with EPL limits for nitrogen dioxide, which had been exceeded during previous audit periods.

In response to elevated levels of fine particulates, AGL performed a major service on Compressor 1 (e.g. replacement of cylinder heads, piston rings, turbo charges, repair of internal coolant leaks and other major service items). Following the service, monitoring of emissions discharged from

3 Environmental Performance

Compressor 1 recorded fine particulate emissions of less than 1.4 mg/m³ in June 2009 compared to 7.7 mg/m³ recorded in October 2008. In the 2008/09 Annual Return reporting period, the total annual load was less than the permitted 460 kg/year load.

In response to elevated levels of sulfuric acid mist/sulfur trioxide emissions, the TEG Fire Tube and Burner Unit were subject to a detailed inspection and clean. Subsequent monitoring in December 2009 and March 2010 showed that emission levels were below the EPL limit of 1 mg/m³.

AGL has made a request to OEH for the EPL to be reviewed to increase the applicable limits to:

- 3.5 mg/m³ for the reboiler unit (Licence Discharge and Monitoring Point 4); and
- 5 mg/m³ for compressor engines (Licence Discharge and Monitoring Points 1, 2, and 3).

It was reported that OEH had indicated that the proposed limits were acceptable; however the EPL cannot be varied until the consent conditions are modified.

Air monitoring was not undertaken at RBTP (as required by DA15-1-2002) during the audit period, as the RBTP was shut down in February 2007, fully decommissioned and rehabilitated with EPL11713 surrendered in June 2009.

3.1.2 Noise

Planning and implementation of measures to minimise impacts of noise from construction and operation of the development were explained, including:

- Lower sound pressure levels of plant and equipment;
- Orientation of plant and equipment on site;
- Installation of barriers and shields;
- Use of quieter pumps;
- Timing of noise-generating activities to avoid quieter periods; and
- Consultation with nearby sensitive receivers.

These management strategies were consistent with those outlined in the Noise Management Sub Plan (dated 10/09/2008) within the CGP EMP (dated 10/09/2008) and site-specific Protocols.

During drilling operations, both unattended and attended monitoring was carried out at sensitive receiver locations by acoustic consultants Wilkinson Murray and Heggies. Attended field monitoring was carried out by AGL as part of environmental operations in the vicinity of wells MP05, MP07, MP08 MP17, EM27, EM24-25, EM27-28, EM30-37, EM39, KP05, RB08, RB10, SF17 and SF20. Monitoring results and records obtained during the audit indicated that noise limits were occasionally exceeded by 1-9 dB(A) at sites SF20 and RB08. AGL reported that it took reasonable steps to mitigate noise, including:

- Installing signage on the perimeter of the well site lease to advise the community about the project e.g. estimated duration and contact details for further information;
- Face to face consultation with potentially affected residents;
- Installing temporary noise walls on the site perimeters nearest to the closest residence;
- Modifying operations to reduce heavy vehicle movements;
- Modifying existing drill rig equipment to reduce source noise;
- Orientation of equipment to emit noise away from the closest residence;
- Using silenced equipment wherever available; and
- Reducing / eliminating louder operations during the Evening and Night periods wherever possible.

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Noise monitoring, conducted by Wilkinson Murray and Heggies, adjacent to RGP (locations R1 and R7) recorded noise levels that complied with relevant criteria (background noise levels dominate), with the exception of one occasion on 29 June 2009 when levels exceeded the limit by one decibel in extreme weather conditions (i.e. strong temperature inversion, wind direction). Subsequent monitoring, also by Wilkinson Murray and Heggies, on 13 July 2009 indicated that noise levels did not exceed limits. It was reported that generally, background noise is dominated by traffic noise from Hume Highway and insect noises.

An application to modify DA282-6-2003-1 was made to DoP (now DoPI) on 31 May 2010, which included a request to modify condition 42 to remove the need for continuous monitoring at Mount Gilead homestead (R7). The modification application was made on the following basis:

- Between January 2006 and February 2010, all attended measurements at R7 demonstrated that RGP operations complied with the relevant noise limits when using two compressors (i.e. typical operations).
- Quarterly attended noise measurements taken in July 2008 and September 2008 with all three compressors running (full operational capacity) demonstrated compliance with noise limits.

The approval of the modification application was not granted during the audit period.

Site observations and records indicate that the noise monitoring carried out at operational wells during the audit period was not consistent with the monitoring program outlined in the Noise Management Sub Plan (dated 10/09/2008); therefore it is recommended that the noise monitoring program is reviewed and updated to reflect practices adopted on site and submitted to DG for approval.

The site of the former RBTP was observed to be effectively rehabilitated and returned to the landowner; therefore noise monitoring was not carried as required by DA15-1-2002i during the audit period. There were no noise-related complaints or incidents reported in relation to this site.

Two community complaints were received relating to noise during the reporting period. Both complaints were received via OEH's complaints line and related to works at the SF20 site. AGL reported that it took additional steps to consult with affected landowners and mitigate noise to address the complaints.

3.1.3 Erosion and Sedimentation

During the audit, a number of well sites and the RGP were inspected. There were no significant erosion and sediment control issues observed. Erosion and sediment control measures identified in the Soil and Water Management Sub Plan (dated 10/09/2008) within the CGP EMP (dated 10/09/2008) were observed to be implemented effectively to prevent soil erosion. Site-specific Soil and Water Management Plans are developed for each well site prior to drilling. There were no incidents reported relating to soil disturbance during the audit period.

3.1.4 Surface and Groundwater

Production water from the wells is collected onsite in storage tanks. Production water that is not reused on site for new drilling programs was disposed of to the Campbelltown City Council Sanitary Depot during 2008/09 and recycled by Worth Recycling in 2009/10. There were no recorded incidents or complaints relating to surface or groundwater contamination during the audit period. AGL is currently investigating alternative options for beneficial reuse of produced water.

3 Environmental Performance

Oily water generated from the compression of gas at the RGP is treated onsite to separate oil and water, and is transferred to the evaporation/flare pond onsite. During the audit period, no water was removed from the pond; however monthly water sampling was completed in accordance with the requirements of condition 4-69 of DA 282-6-2003i. A water evaporation unit was installed to accelerate evaporation.

To reduce the potential for groundwater contamination during construction and operation of the wells, AGL use pressure-rated steel casing and cement in the drilling of wells, in accordance with requirements set out by Department of Primary Industries (part of DII (now TIRIS)). This technique was adopted in the directional drilling of MP03 inspected as part of the audit site inspection. The Environmental Assessment (HLA Envirosciences, 2007) confirmed that this technique ensures wells remain isolated within the geological formation and considered it unlikely that groundwater cross-contamination would occur.

Fracture stimulation

Fracture stimulation (also known as 'frac' or 'fracking') is used to increase the surface area of a coal seam in the wellbore. It involves the injection of sand and water based slurry with chemical additives (when required) at high pressure to stimulate the reservoir by providing a highly conductive flow path for gas and water that extends away from the wellbore and into the seam. The frac-sand is locked in place by the pressure of the coal formation, whereas the injected water and formation water is able to flow back out. Once this water is extracted, pressure in the well reduces and gas begins to desorb from the coal into the wellbore.

Recently, coal seam mining and coal seam gas extraction has come under scrutiny particularly where gas production areas encroach on populated centres. The attention has primarily focussed on fracture stimulation and the composition of the fracture stimulation slurry. Local media reports (SMH, dated 19/10/2010) have suggested that Australian mining companies are using toxic chemicals in the fracture stimulation processes to extract coal seam gas.

Fracture stimulation methods and composition of the fracture stimulation slurry were discussed during the audit and it was indicated that no BTEX (i.e. benzene, toluene, ethylene and xylene) chemicals were used in the fracture stimulation process at AGL. It was reported that pressurised sand and water with minor quantities of chemical additives (when required) are injected to fracture stimulate the coal seams. However the composition of materials used in the fracture stimulation process could not be reviewed or verified as it is considered commercial in confidence by the fracture stimulation contractors and information on chemicals was not made available to URS.

Fracture stimulation was not occurring at CGP during the site inspection; however it did occur during the audit period. Site-specific management plans for drilling and refracking were reviewed through the audit process, including Refracking Management Plan (EM27, EM31, EM34, SL09) (July 2008, approval by DOP (now DoPI) dated 20 August 2008) and Razorback (RB08, RB10) Refracking Management Plan (October 2009, approval by DOP (now DoPI) dated 12 October 2009). These management plans appeared to be site-specific documents that were approved and implemented at relevant well locations in accordance with the conditions of the planning approval.

As stated previously, a review of the fracture stimulation process and agents used was not completed as part of the audit and impacts related to fracture stimulation were not assessed by URS.

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3.1.5 Contaminated Land and Hydrocarbon Management

Land used for the CGP has not been identified as polluted or contaminated by previous audit reports or AGL. No further contamination issues were identified during this audit process.

3.1.6 Rehabilitation

Management strategies identified in the Rehabilitation and Landscape Management Sub Plan (dated 10/09/2008) within the CGP EMP (dated 10/09/2008) were observed to be implemented effectively. As construction and operations activities were completed, areas were cleaned up and rehabilitated in consultation with the landowner in order to return the land in a state that is consistent with surrounding land use and values or better. Approximately 139 hectares (ha) have been rehabilitated to date. Rehabilitation works at different stages were observed during the site visit.

The Site Rehabilitation Management Plan for the RBTP was developed in early 2008 in consultation with the landowner, reviewed by DECCW (now OEH) and approved by DoP (now DoPI) on 21 April 2008. Rehabilitation was completed during the audit period and has been approved and handed over to the original landowner as per Landowner/Occupier Rehabilitation Statement signed and dated on 24 September 2009.

Minor trench settlement and erosion was observed around a rehabilitated area of the gas gathering line near GL06. Rehabilitation of a former exploration well site (ED01) was inspected during the audit site inspection. Rehabilitation of the well site is consistent with that of the surrounding area and no issues were identified. Rehabilitation of other areas sighted during the inspection was observed to be effective. It was reported that an inspection of the full length of the gathering system was completed annually with identified trench settlement and erosion repaired.

3.1.7 Visual Amenity

There was one complaint relating to lighting from a surface to in-seam well (SF20) drilling operation during the audit period. Upon receipt of the complaint AGL spoke with the landowner and advised of the nature of the operations requiring continuous drilling and that everything was being done to minimise disturbance. AGL advised that the drilling would cease within two weeks and the landowner was reported to be satisfied. AGL provided contact details should they have further complaints, but they did not contact AGL again. AGL contacted the landowner at the end of the drilling program to advise that continuous drilling operations were complete. The landowners were appreciative of the notification.

Flaring at the RPGP was conducted for approximately 113 minutes over the audit period. Records maintained onsite correlate with the details of flare events and reasons published in the Annual Environmental Performance Report (AEPR). No complaints regarding lighting issues have reportedly been received by AGL in relation to the RPGP.

3.1.8 Landscape Management

Observations made during the audit indicated that AGL has generally complied with the landscaping requirements set out in the consent conditions; however were not up to date with monitoring requirements. Corkery Consulting had conducted a landscape audit report (December 2008) assessing the implementation of the Vegetation and Landscape Management Plan relevant to Rosalind Park under DA282-6-2003i. Overall, the audit results indicated satisfactory compliance

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across the implementation and maintenance of the vegetation and landscape management measures. Supplementary planting was recommended in some areas to achieve the intended visual screening outlined in the landscape planting guides. The next two-yearly audit was due in December 2010 but had not been conducted at the time of the audit. It is recommended that the landscape audit is scheduled and the results and recommendations of the landscaping monitoring reports be submitted to the DG with records of their submission kept on file.

Approval was granted (letter from DoP, dated 3 June 2008) to remove two mature trees from the vegetation screening the RGP to the western boundary, due to the operational risks they presented to gas plant operations. These were removed during July 2008; however the trees have not yet been replanted, as required by the approval. The trees should be replanted to screen the quarry from the Mount Gilead Homestead as per the letter of approval.

3.1.9 Threatened Flora and Fauna

Significant threatened flora and fauna impacts were not identified as a result of the audit process. Management strategies identified in the Rehabilitation and Landscape Management Sub Plan (dated 10/09/2008) within the CGP EMP (dated 10/09/2008) were effectively implemented to minimise the loss of remnant native vegetation and adverse impacts on fauna. It was reported that through careful planning, the development of the CGP (i.e. well sites and gas gathering system route alignment) avoids significant flora and fauna habitats.

The Elizabeth MacArthur Agricultural Institute (EMAI) is an area where preservation of significant stands of Cumberland Plains Woodland provides a suitable breeding area for numerous raptor species. AGL conducted fracture stimulation of the EM27 well in the EMAI field on 07/10/2008 which is within the raptor breeding season (June – January). Whilst there were no reported impacts on the raptors, sufficient evidence was not provided to indicate that approval was granted for this activity and as such it is considered non compliant with the terms of PA06_0138.

3.1.10 Noxious Weeds

Details of weed spraying (e.g. dates, areas sprayed, chemicals used etc) are kept on file at the RGP site office. The main herbicides used were Round Up and Kamba-M (selective herbicide). Approximately 49.95 litres (L) of herbicides were used during the audit period. There were no reported incidents or community complaints related to activities associated with weed control.

3.1.11 Aboriginal and Cultural Heritage

Aboriginal and cultural heritage identified at the CGP was managed and maintained to comply with the EMP and associated Aboriginal Heritage Management Sub Plan. It was reported that, as far as practical, well locations and route alignment is planned in previously disturbed areas.

Monitoring of aboriginal and cultural heritage identified at SF20 and SF17 during the construction of well sites and the interconnecting gas gathering line was conducted by Tharawal Local Aboriginal Land Council (TLALC) and Cubbitch Barta Native Title Claimants Aboriginal Corporation (CBNTAC). Management and mitigation measures specific to the Spring Farm and Menangle Park areas were included within the Aboriginal Cultural Heritage Management Plan for the CGP. AGL changed its gas gathering line construction method from open trenching to underboring in order to avoid impacts to one of the identified Aboriginal archaeological sites.

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Aboriginal heritage assessments were also undertaken by Biosis Research in consultation with the TLALC and CBNTAC for proposed gas gathering line twinning at Rosalind Park (September 2008) and Glenlee (June 2009). No artefacts were identified during the site visits by the heritage assessment team. AGL's Environmental Operator also reported that no previously unidentified items of Aboriginal cultural heritage significance were uncovered during construction activities.

3.1.12 Bushfire Management

Bushfire management response for the CGP is addressed in the Emergency Response Management Plan. Bushfire control measures appear to have been implemented, with the exception of the provision of a 20 m asset protection zone at the RPGP as required by the consent conditions. The area adjacent to the RPGP is a riparian zone with vegetation protection requirements and is currently beyond the AGL lease. AGL maintains a water storage reservoir with fire fighting equipment in place in the event of a fire. AGL has also recently consulted with the NSW Fire Brigade which was reported to accept the alternative arrangements.

One bushfire-related incident was reported during the audit period. On 29 April 2010 a small grass fire established after an excavator struck an overhead powerline. Onsite fire extinguishers were used to extinguish the fire; and the fire services also attended. No injuries were reported to be sustained.

3.1.13 Community

During the audit period, two community complaints were recorded via EPA complaints line and subsequently actioned. The details of the complaints and actions taken are summarised in Table 3-1. The action taken in response to the complaints was considered appropriate by AGL to close out the complaint. AGL continues to maintain the complaints register.

Table 3-1 Community complaints and actions

Complaint	Date	Action Taken
Complaint received from nearby landowner during drilling at SF20 claiming vibration from drilling was causing disturbance (ref: 119312).	28/02/2010	AGL spoke with the landowner to discuss his concerns and confirm that there was no drilling onsite at the time of his complaint. AGL provided contact details so that in the event of any future vibration disturbance, AGL could respond promptly.
Public enquiry from nearby landowner at SF20 regarding drilling as noise and lighting was causing minor disturbance. Complaint made via EPA pollution line (ref: 121299).	24/05/2010	AGL immediately spoke with the landowner and advised of the nature of the operations requiring 24/7 drilling and that everything was being done to minimise disturbance. AGL advised that the drilling would cease within 2 weeks and the landowner was reported to be satisfied. AGL provided contact details should they have further complaints, but they did not contact AGL again. AGL contacted the landowner at the end of the drilling program to advise that 24/7 operations were complete. The landowners were appreciative of the notification.

Compliance Assessment

4.1 Overview

This section addresses the requirement to assess whether the development has complied with the relevant standards, performance measures, and statutory requirements. The standards, performance measures and statutory requirements that the CGP is to comply with are outlined in Table 1-1 and Table 1-2. This audit focussed on the assessment of compliance with the consent conditions within the relevant planning approvals, which incorporate the majority of the key environmental requirements of the other relevant licences (e.g. EPL12003) and permits (e.g. Part 3A permits or Controlled Activity Approvals).

4.2 Compliance Assessment

Each consent condition from the relevant planning approvals was reviewed and compliance assessed. Where applicable, evidence is listed and commentary is made regarding the auditor's observations, specific compliance issues and the compliance status assigned. The audit findings are based on evidence gained through documentation review, site inspection (31 January, 1 February and 7 February 2011) and interviews with site personnel. Generally, the auditors have not completed a specific or rigorous assessment of documents required to meet the consent condition, particularly where they have been signed off by other parties (e.g. by the DoP).

4.2.1 Assigning compliance status

The status of compliance was defined according to the following performance categories.

- Compliant - in compliance;
- Non-compliant - not in compliance;
- Not applicable (N/A) - condition of consent not applicable at time of audit; and
- Noted - notation condition, assessment of compliance not required.

Note that a number of the consent conditions were finalised and closed out during past audits and were not assessed further as part of this audit. The compliance score was calculated on the basis of the remaining conditions not categorised as previously closed out, not applicable or noted.

4.3 Summary of Compliance

A detailed review of each consent condition and the corresponding compliance assessment is provided in the compliance matrix presented in Appendix A. A summary of the overall compliance performance of the development and relevant non-compliances identified for each planning approval is provided in following sections.

4.3.1 Summary of compliance with DA15-1-2002i

There are 92 consent conditions included in DA15-1-2002i issued by the DoP (now DoPI) on 23 July 2002 of which 38% were previously closed out. The audit identified one incident of non-compliance giving a compliance score of 98%. A summary of conditions that the development was unable to demonstrate compliance with is presented in Table 4-1.

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Table 4-1 Summary of non-compliance with conditions of DA15-1-2002i

Reference	Condition	Audit Finding and Recommended Action
DA15-1-2002i, schedule 3-14	<p>PRODUCTION OPERATIONS PLAN</p> <p>The Applicant shall prepare a Production Operations Plan (POP) for the approval of the Department of Mineral Resources. The POP shall have regard to the conditions of this consent and the licence under the POEO Act. The POP will form the basis for the:</p> <p>a) Ongoing operations and environmental management; and</p> <p>b) Ongoing monitoring of the development.</p> <p>A copy of the POP shall be forwarded to the Department within fourteen days of the DMR's acceptance.</p>	<p>An updated POP (v7) was submitted to DII (now TIRIS) in 2010; however DII (now TIRIS) required changes (e.g. update well numbers) before an approval was granted. AGL was not able to provide evidence to verify the POP (v7) was resubmitted to DII (now TIRIS). As the current/approved POP (v6) does not reflect the current status of operations at Camden Gas Project (i.e. development has progressed without an approved POP (v7)), the development is considered to not comply with this condition.</p>

4.3.2 Summary of compliance with DA246-8-2002i

There are 37 consent conditions included in DA246-8-2002i issued by the DoP (now DoPI) on 20 September 2002. There was one condition with which the development did not comply, giving a compliance score of 97%. A summary of conditions that the development was unable to demonstrate compliance with is presented in Table 4-2.

Table 4-2 Summary of non-compliance with conditions of DA246-8-2002i

Reference	Condition	Audit Finding and Recommended Action
DA246-8-2002i, schedule 3-10	<p>PRODUCTION OPERATIONS PLAN</p> <p>The Applicant shall prepare a Production Operations Plan (POP) for the approval of the DPI. The POP shall have regard to the conditions of this consent and the Environment Protection Licence under the Protection of the Environment Operations Act 1997. The POP will form the basis for the:</p> <p>a) Ongoing operations and environmental management; and</p> <p>b) Ongoing monitoring of the development.</p> <p>A copy of the POP shall be forwarded to the Department within fourteen days of the DPI's acceptance.</p>	<p>An updated POP (v7) was submitted to DII (now TIRIS) in 2010; however DII (now TIRIS) required changes (e.g. update well numbers) before an approval was granted. AGL was not able to provide evidence to verify the POP (v7) was resubmitted to DII (now TIRIS). As the current/approved POP (v6) does not reflect the current status of operations at Camden Gas Project (i.e. development has progressed without an approved POP (v7)), the development is considered to not comply with this condition.</p>

4.3.3 Summary of compliance with DA282-6-2003i

There are 217 consent conditions included in DA282-6-2003i issued by the DoP (now DoPI) on 16 June 2004 of which 23% were previously closed out. The audit identified 16 conditions that the development did not comply with, giving a compliance score of 79%. A summary of conditions that the development was unable to demonstrate compliance with is presented in Table 4-3.

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Table 4-3 Summary of non-compliance with conditions of DA282-6-2003i

Reference	Condition	Audit Finding and Recommended Action
DA282-6-2003i, schedule 3-15	<p>LOCATION OF GAS WELLS AND GAS GATHERING SYSTEMS</p> <p>The Applicant shall provide Camden Council, Campbelltown City Council and Wollondilly Shire Council with the Geographical Positioning System (GPS) co-ordinates and digital survey data for gas well sites and gas gathering systems within their respective Local Government Area, in a format suitable to each of these Councils, within two months of the completion of the gas wells and gas gathering system.</p>	<p>AGL has not provided local councils with location data (GPS coordinates and digital surveys) for gas well sites and gas gathering systems, as required by this condition. It is recommended that GPS coordinates and digital survey data be compiled and issued to local councils and records of transaction retained.</p>
DA282-6-2003i, schedule 3-16	<p>The Applicant shall provide Camden Council, Campbelltown City Council and Wollondilly Shire Council with the wellhead configurations of each gas well within two months of the gas well being completed or two months from the date of this consent, whichever is the later.</p>	<p>It was reported that wellhead configurations were available; however these were not provided to local councils as required by this condition. It is recommended that well head configurations be compiled for new and existing wells and provided to local councils and records of transaction be retained.</p>
DA282-6-2003i, schedule 3-17	<p>The Applicant shall provide written notification to the Director-General that it has fulfilled the requirements of Conditions 15 and 16, within two weeks of the information being provided to the Councils.</p>	<p>As the requirements of condition 15 and 16 were not met, the development can not comply with the requirements of this condition. It is recommended that written notification is provided to the DoP (now DoPI) upon completion of the requirements of condition 15 and 16.</p>
DA282-6-2003i, schedule 4-14	<p>As part of an independent audit required under condition 18, the Vegetation and Landscape Management Plan must make provision for ensuring that landscaping of the Gas Treatment Plant site and surrounds is maintained in an adequate condition by providing details of a monitoring program. Monitoring must be carried out pursuant to the monitoring program every 6 months for the first two years from the commencement of planting and thereafter every 2 years by an independent and suitably qualified and experienced arborist whose appointment has been approved for the purposes of this condition by the Director-General. The monitoring program must include the following features:</p> <ol style="list-style-type: none"> Identification of mature trees surrounding the site which afford screening of the Gas Treatment Plant from Mt Gilead Homestead; Provision for assessing and regularly monitoring the health of landscaping on the site and the trees in the Menangle Creek riparian zone adjacent to the Gas Treatment Plant site. The objective of the monitoring is to determine the health of the trees and to recommend measures (if required) to improve the health of the trees; 	<p>Review of documentation relating to vegetation and landscape management and monitoring indicate that monitoring of the landscaping was effective in 2007 and 2008. Site observations indicated that the vegetation was well established (i.e. no dieback); however no independent quality checks or verifications were made available for inspection. Furthermore, evidence to confirm that these monitoring reports were submitted to the DoP (now DoPI) was not made available for inspection. It is recommended that the results and recommendations of the landscaping monitoring reports be submitted to the DG with records of their submission kept on file.</p>

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Reference	Condition	Audit Finding and Recommended Action
	<p>c) Description of the health of each tree identified under condition (a);</p> <p>d) Recommendation of reasonable measures to ensure at mature trees within the riparian corridor along Menangle Creek are retained and protected, including trees that lie within the transmission line easement to the East of the site;</p> <p>e) Recommendation of any watering or fertilising that needs to be implemented to maintain the landscaping and surrounding trees;</p> <p>f) Recommendation of how to manage the landscaping to promote the maximisation of growth to maturity.</p> <p>The results and recommendations of the monitoring program must be submitted to the Director-General at the conclusion of each stage of monitoring.</p>	
<p>DA282-6-2003i, schedule 4-18</p>	<p>INDEPENDENT AUDIT</p> <p>The Applicant shall commission and pay the full cost of an Independent Audit of the performance of the mitigation measures implemented to prevent and minimise visual impacts of the proposal including landscaping, preservation of existing trees, and night-lighting effects. The audit must be conducted within 6 months of the commissioning of the proposed development and every 2 years thereafter, unless the Director-General directs otherwise. This audit must:</p> <p>a) Be conducted by an independent landscape expert who is suitably qualified and experienced and whose appointment has been approved by the Director-General;</p> <p>b) Assess the performance of the visual mitigation measures with specific reference to the effectiveness of mitigation measures in screening the development and lighting from the development from the Mount Gilead Homestead;</p> <p>c) Review the adequacy of the Vegetation and Landscape Management Plan;</p> <p>d) Recommend actions or measures to improve the performance of the visual mitigation measures and the adequacy of the Vegetation and Landscape Management Plan (if required); and</p> <p>e) Be submitted to the Director-General; and</p> <p>f) Be implemented to the satisfaction of the Director-General.</p>	<p>AGL engaged Distinctive Landscape Planners to complete an Independent Audit Report: Landscape and Lighting (11 December 2008).</p> <p>AGL has not yet commissioned the latest landscape audit (due every 2 years i.e. due December 2010) and thus is unable to demonstrate ongoing compliance with the requirements of this condition. It was reported that AGL has engaged Distinctive Landscape Planners to complete the outstanding 2010 audit.</p> <p>It is recommended that the 2010 audit of performance of the mitigation measures implemented to prevent and minimise visual impacts is completed and the audit report is submitted to the DG, with records maintained to demonstrate compliance.</p>
<p>DA282-6-2003i, schedule 4-19</p>	<p>Within 2 months of commissioning this audit the Applicant shall submit a copy of the audit report to the Director-General and provide a detailed response to any of the recommendations in the audit report. A copy of the Independent Audit, and/or the results and recommendations of any monitoring</p>	<p>Evidence to verify that a copy of the audit report was submitted to the DG was not made available for inspection.</p> <p>It is recommended that the audit report be submitted to the DG and records maintained to demonstrate compliance.</p>

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Reference	Condition	Audit Finding and Recommended Action
	carried out under condition 14, will be provided to the owner of Lot 1 DP 807555 by the Director-General upon request.	
DA282-6-2003i, schedule 4-19B	<p>Within 6 months of completion of the landscaping and every 2 years thereafter, unless the Director-General directs otherwise, the Applicant shall commission and pay the full costs of an Independent Audit of the performance of the mitigation measures. The audit shall:</p> <ol style="list-style-type: none"> be conducted by a suitably qualified, experienced and independent person(s) whose appointment has been approved by the Director-General; assess the performance of the visual mitigation measures with specific reference to the effectiveness of mitigation measures in screening the road from the Mount Gilead Homestead; review the adequacy of the Landscape Planting Plan; recommend actions or measures to improve the performance of the visual mitigation measures and the adequacy of the Landscape Planting Plan (if required); and be submitted and implemented to the satisfaction of to the Director-General. 	<p>The auditors sighted RGP Landscape Works Monitoring Report (4) 20 April 2007, Audit of landscape planting completed by Corkery Consulting - 'AGL Rosalind Gas Plant Access Road, Landscape Audit Report (11 December 2008)' and 'AGL Rosalind Gas Plant Site, Landscape Audit Report (11 December 2008)'. However, evidence to confirm that these audit reports were submitted to the DoP (now DoPI) were not made available for inspection.</p> <p>An independent audit of landscaping and performance of mitigation measures to be audited every two years - the audit due in 2010 was not completed. It is recommended that the audit of landscape planting (due 2010) be completed and the audit reports (2008 and 2010) be submitted to the DG as required.</p>
DA282-6-2003i, schedule 4-40	<p>MONITORING</p> <p>The Applicant must submit a noise compliance report to the DECC and the Department within one month of commissioning of the Gas Treatment Plant and on an annual basis with the Annual Return required by the DECC's licence to assess the project's compliance with the noise limits in Conditions 29 and 31. The noise monitoring must be conducted in accordance with Condition 42.</p>	<p>OEH requested annual noise compliance reports to be submitted with the Annual Return to report compliance with the operational noise limits specified in the EPL (L6.1). Auditors sighted the Noise Compliance Statement submitted with the Annual Return in 2010. Prior to this, only AEPR and Annual Returns were prepared annually and submitted to OEH and DoP. It is recommended that the noise compliance report is prepared and submitted with the Annual Return in future.</p>
DA282-6-2003i, schedule 4-48	<p>For each discharge point (refer to tables for Points 1 to 5 in Appendix A), the Applicant shall ensure that the concentration of a pollutant discharged at that point does not exceed the concentration limit specified for that pollutant in the table, and where a pH quality limit is specified in the table, the specified percentage of samples must be within the specified ranges.</p>	<p>During the audit period, levels of sulfuric acid mist and sulfur trioxide were recorded at levels above the EPL limits (1.3 mg/m³, exceeding limit of 1 mg/m³) at monitoring point 4 (reboiler unit) in October 2009 quarterly monitoring period. AGL conducted a thorough inspection and clean of the TEG burner unit in consultation with AGL's TEG burner service provider, Total Combustion Services. Further monitoring of the burner was undertaken on 8 and 10 December 2009 and results were below the EPL concentration limit.</p> <p>Note that limits were increased following previous audit period; refer to current EPL. However it is recommended that AGL continue to monitor and maintain plant within specified operating criteria.</p>

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Reference	Condition	Audit Finding and Recommended Action
DA282-6-2003i, schedule 4-83	The Applicant shall document in detail the decommissioning of all sediment and erosion controls and any other water diversion structures to the satisfaction of the Director-General. The Applicant shall ensure that the decommissioning meets the requirements of the most recent version of the NSW Department of Housing's publication "Managing Urban Stormwater: Soils and Construction" (3rd Edition 1998).	It was reported that sediment and erosion control measures are installed, monitored and decommissioned in accordance with the Landcom Guidance. Removal of sediment and erosion controls may only be completed upon approval by AGL Environmental Operator and/or Field Environment & Safety Officer. Decommissioning was not documented to verify actions; therefore the development is non-compliant with this condition. Only two well sites required rehabilitation in two years.
DA282-6-2003i, schedule 4-85	EVAPORATION POND LINER INTEGRITY EVALUATION PROGRAM The Applicant must submit at least 1 month prior to completion of construction of the Treatment Plant, to the DECC's Manager Sydney Industry PO Box 668 Parramatta NSW 2124, a written report containing a program for future evaluation of the integrity testing of the liner in the evaporation pond. The report must contain details of an initial evaluation of the liner prior to use and then an on-going program for review of the integrity of the liner.	The auditors sighted evidence to verify the initial integrity testing of the evaporation pond and ongoing monthly testing to record quality of water/volumes lost. However records to demonstrate that a written report containing a program for future evaluation of the integrity testing of the liner in the evaporation pond that was submitted to OEH was not made available for inspection; therefore the development was unable to demonstrate compliance with this condition. It is recommended that AGL provide to OEH a program for review of the integrity of the liner in the evaporation pond, as well as details of the initial integrity testing carried out. It is also recommended that this program be implemented and records retained.
DA282-6-2003i, schedule 4-95	HAZARD AUDIT Twelve months after the commencement of operations of the proposed development or within such further period as the Director-General may agree, the Applicant shall carry out a comprehensive hazard audit of the proposed development and within one month of the audit submit a report to the Director-General. The audit shall be carried out at the Applicant's expense by a duly qualified independent person or team approved by the Director-General prior to commencement of the audit. Further audits shall be carried out every three years or as determined by the Director-General and a report of each audit shall within a month of the audit be submitted to the Director-General. Hazard audits shall be carried out in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 5, "Hazard Audit Guidelines". The audit shall include a review of the safety management system and a review of all entries made in the incident register since the previous audit.	Past audit reported that a hazard audit was carried out in 2006. The following hazard audit scheduled for 2009 has not been completed; therefore the development is non-compliant with this condition. The Hazard Audit should be commissioned with priority, with the audit report submitted to the DG as required by this condition.
DA282-6-2003i, schedule 4-96	CRIME RISK PERFORMANCE The Applicant is required to implement measures to minimise the risk of crime from the proposed development. The Applicant	Measures to minimise the risk of crime were observed to be implemented and operating effectively. It was noted that the gates on the RPGP are self-locking, but are not self-

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Reference	Condition	Audit Finding and Recommended Action
	<p>shall implement the following measures prior to the operation of the proposed development.</p> <p>Gas Treatment Plant</p> <p>The Applicant is required to:</p> <ul style="list-style-type: none"> a) ensure the Plant is closed to community access; b) fully enclose the Plant with a 3-metre metal framed chain mesh fence with a 3-strand barbed wire head; c) ensure the Plant is gated and manned 24 hours per day; d) keep vehicular and pedestrian gates closed at all times (when not in immediate use); e) use self-closing and self-locking pedestrian gates; f) use gate locking mechanisms that facilitate emergency egress; and g) ensure plant staff are adequately trained in undertaking security functions. <p>h) Gas Wellhead Sites</p> <p>The Applicant is required to:</p> <ul style="list-style-type: none"> a) install fixed (permanent) perimeter fencing and gates around each well head. The fencing and gates should be 3 metres high (all inclusive) metal framed and topped with a 3-strand barbed wire head; and b) keep gates securely hinged and permanently locked, unless otherwise agreed by NSW Police. 	<p>closing as per condition 96 (e). Therefore the development is non-compliant with this condition.</p> <p>AGL noted that due to the gates being exposed to weather elements, self closing gates were found to be not practical as a long term security measure; therefore site security was further improved by the installation of site security cameras installed on the entry points to the gas plant.</p> <p>It is recommended that AGL install self-closing gates at the RPGP or seek approval from DoPI for alternative security measures.</p>
DA282-6-2003i, schedule 4-127	<p>GAS GATHERING SYSTEM</p> <p>The Applicant shall comply with the following in the construction of the gas gathering system pipeline:</p> <ul style="list-style-type: none"> a) signs stating the presence of a buried gas pipeline shall be erected periodically along the length of the trench once the pipeline has been laid; b) trenches are to be restored and reseeded with local grass seeds on completion of the work; c) local council traffic guidelines in respect of work carried out on road verges and underneath roads shall be implemented; d) The Applicant shall construct the gas gathering system so as not to impeach lateral water flows; e) The Applicant shall ensure that no crown or camber remains along the gas gathering systems, following construction; f) the pipeline shall be designed, constructed and operated in accordance with the Australian Standard for the installation and maintenance of Plastic Pipe Systems for Gas AS 3723-1989; and 	<p>Site observations indicated that the gas gathering system was appropriately rehabilitated and identified using signs, as per the consent requirements. AGL reported that all trenches are restored but not all seeded with grass due to the minor level of disturbance caused onsite.</p> <p>In regards to traffic management during the gas gathering line installation, AGL reported that local council traffic guidelines were not relevant as the gas gathering line was not installed underneath council roads or on council road verges. AGL reported that construction did not impact lateral flows. Drainage and camber were also reported to be successfully reinstated following construction.</p> <p>In regards to trenching works, AGL notified DII (now TIRIS) at the start and finish of project works but not DoP (now DoPI). As DoP (now DoPI) was not notified as required by this condition, the development was deemed to be non-compliant.</p>

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Reference	Condition	Audit Finding and Recommended Action
	g) the Department shall be notified on the completion of any trenching works.	
DA282-6-2003i, schedule 5-7	The Applicant shall also submit a copy of the Annual Environmental Performance Report to the DECC, DPI, Camden Council, Campbelltown City Council and Wollondilly Shire Council. The Applicant shall make a copy of the Report publicly available.	Evidence to demonstrate that the AEPR was submitted to local councils was available for the 2007/2008 AEPR. The auditors sighted letters to Camden, Campbelltown and Wollondilly Councils, as well as OEH, DoP (now DoPI) and DPI (letters dated 3/9/2008). However it is not clear if the AEPR was submitted to councils in 2009 and 2010. The AGL website has copies of the AEPRs for 2006-2007, 2007-2008 and 2008-2009 available online. It is recommended that copies of the 2009/10 AEPR and future AEPRs be provided to local councils and evidence of submission is retained.
DA282-6-2003i, schedule 5-20	COMMUNITY AWARENESS PROTOCOL The Applicant shall prepare a Community Awareness Protocol to advise nearby residents and appropriate authorities if a leak of mercaptan odourant occurs from the Gas Treatment Plant and/or associated facilities. The Protocol shall detail the circumstances when it will be implemented and describe the procedure and timeframe in which residents and authorities will be notified. The residents and authorities to be notified will be identified in the Protocol. The Applicant shall submit the Community Awareness Protocol to the Director-General for approval one month prior to commissioning of the Gas Treatment Plant.	A community awareness protocol is defined within the Emergency Response Management Plan. However evidence to verify that the community awareness protocol was submitted to the DG for approval was not made available for inspection. As a result, the development was not able to demonstrate compliance with the full requirements of this condition. Obtain DG's approval for the community awareness protocol and retain records.

4.3.4 Summary of compliance with DA183-8-2004

There are 29 consent conditions included in DA183-8-2004 issued by the DoP (now DoPI) on 16 December 2004 of which 21% were closed out previously. The audit identified three conditions that the development did not comply with, giving a compliance score of 79%. A summary of conditions that the development was unable to demonstrate compliance with is presented in Table 4-4.

Table 4-4 Summary of non-compliance with conditions of DA183-8-2004

Reference	Condition	Audit Finding and Recommended Action
DA183-8-2004, schedule 2-6	The Applicant shall provide Campbelltown City Council and Wollondilly Shire Council with the Geographical Positioning System (GPS) co-ordinates and digital survey data for gas well sites and gas gathering systems within their respective Local Government Area, in a format suitable to each of these Councils, within two months of the completion of the gas wells and gas gathering system.	AGL has not provided local councils with location data (GPS coordinates and digital surveys) for gas well sites and gas gathering systems, as required by this condition. It is recommended that GPS coordinates and digital survey data is compiled and issued to local councils and records of transaction be retained.

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Reference	Condition	Audit Finding and Recommended Action
DA183-8-2004, schedule 2-7	The Applicant shall provide Campbelltown City Council and Wollondilly Shire Council with the wellhead configurations of each gas well within two months of the gas well being completed or two months from the date of this consent, whichever is the later.	It was reported that wellhead configurations were available; however these were not provided to local councils as required by this condition. It is recommended that well head configurations be compiled for new and existing wells and reissued to local councils and records of transaction be retained.
DA183-8-2004, schedule 2-8	The Applicant shall provide written notification to the Director-General that it has fulfilled the requirements of Conditions 6 and 7, within two weeks of the information being provided to the Councils.	As the requirements of condition 6 and 7 were not met, the development can not comply with the requirements of this condition. It is recommended that written notification is provided to the DoP (now DoPI) upon completion of the requirements of condition 6 and 7.

4.3.5 Summary of compliance with DA9-1-2005

There are 45 consent conditions included in DA9-1-2005 issued by the DoP (now DoPI) on 26 May 2005 of which 20% were closed out previously. The audit identified four conditions that the development did not comply with, giving a compliance score of 87%. A summary of conditions that the development was unable to demonstrate compliance with is presented in Table 4-5.

Table 4-5 Summary of non-compliance with conditions of DA9-1-2005

Reference	Condition	Audit Finding and Recommended Action
DA9-1-2005, schedule 2-7	The Applicant shall provide Camden Council and Wollondilly Shire Council with the Geographical Positioning System (GPS) co-ordinates and digital survey data for gas well sites and gas gathering systems within their respective Local Government Area, in a format suitable to each of these Councils, within two months of the completion of the gas wells and gas gathering system.	AGL has not provided local councils with location data (GPS coordinates and digital surveys) for gas well sites and gas gathering systems, as required by this condition. It is recommended that GPS coordinates and digital survey data is compiled and provided to local councils and records of transaction be retained.
DA9-1-2005, schedule 2-8	The Applicant shall provide Camden Council and Wollondilly Shire Council with the wellhead configurations of each gas well within two months of the gas well being completed or two months from the date of this consent, whichever is the later.	It was reported that wellhead configurations were available; however these were not provided to local councils as required by this condition. It is recommended that well head configurations be compiled for new and existing wells and provided to local councils and records of transaction be retained.
DA9-1-2005, schedule 2-9	The Applicant shall provide written notification to the Director-General that it has fulfilled the requirements of Conditions 7 and 8, within two weeks of the information being provided to the Councils.	As the requirements of condition 7 and 8 were not met, the development can not comply with the requirements of this condition. It is recommended that written notification is provided to the DoP (now DoPI) upon completion of the requirements of condition 7 and 8.
DA9-1-2005, schedule 2-34	HAZARD AUDIT Twelve months after the commencement of operations of the proposed development or within such further period as the Director-General may agree, the Applicant shall	A past audit reported that a hazard audit was carried out in 2006. The following hazard audit scheduled for 2009 has not been completed; therefore the development is non-compliant with this condition.

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Reference	Condition	Audit Finding and Recommended Action
	<p>carry out a comprehensive hazard audit of the development and within one month of the audit submit a report to the Director-General.</p> <p>The audit shall be carried out at the Applicant's expense by a duly qualified independent person or team approved by the Director-General prior to commencement of the audit. Further audits shall be carried out every three years or as determined by the Director-General and a report of each audit shall, within one month of the audit, be submitted to the Director-General. Hazard audits shall be carried out in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 5, "Hazard Audit Guidelines".</p>	<p>The Hazard Audit should be commissioned with priority, with the audit report submitted to the DG as required by this condition.</p>

4.3.6 Summary of compliance with DA171-7-2005

There are 69 consent conditions included in DA171-7-2005 issued by the DoP (now DoPI) on 25 March 2006. As the wells approved under this development consent have not been drilled and no development activity occurred at the EI Bethel gas field during the audit period, there were only six conditions applicable to the audit period. The development complied with the six applicable consent conditions with the remaining (63 consent conditions) relevant for notation only.

4.3.7 Summary of compliance with DA75-4-2005

There are 63 consent conditions included in DA75-4-2005 issued by the DoP (now DoPI) on 7 October 2005 of which 3% were closed out previously. The audit identified seven conditions that the development did not comply with, giving a compliance score of 84%. A summary of conditions that the development was unable to demonstrate compliance with is presented in Table 4-6.

Table 4-6 Summary of non-compliance with conditions of DA75-4-2005

Reference	Condition	Audit Finding and Recommended Action
DA75-4-2005, schedule 2-13	The Applicant must provide Council with the Geographical Positioning System (GPS) coordinates and digital survey data for the gas well sites and gas gathering system in a format suitable to the Council, within two months of the completion of the gas wells and gas gathering system.	<p>AGL has not provided local councils with location data (GPS coordinates and digital surveys) for gas well sites and gas gathering systems, as required by this condition.</p> <p>It is recommended that GPS coordinates and digital survey data is compiled and issued to local councils and records of transaction be retained.</p>
DA75-4-2005, schedule 2-14	The Applicant shall provide Council with the wellhead configurations of each gas well within two months of the gas well being completed or two months from the date of this consent, whichever is the later.	<p>It was reported that wellhead configurations were available; however these were not provided to local councils as required by this condition.</p> <p>It is recommended that well head configurations be compiled for new and existing wells and provided to local councils and records of transaction be retained.</p>

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Reference	Condition	Audit Finding and Recommended Action
DA75-4-2005, schedule 2-15	The Applicant shall provide written notification to the Director-General that it has fulfilled the requirements of Conditions 13 and 14, within two weeks of the information being provided to the Council.	As the requirements of condition 13 and 14 were not met, the development can not comply with the requirements of this condition. It is recommended that written notification is provided to the DoP (now DoPI) upon completion of the requirements of condition 13 and 14.
DA75-4-2005, schedule 2-20	At least one month prior to operation of the development the Applicant shall prepare and submit for the Director-General's approval, a Well Gathering System and Trunk Line Maintenance Noise Management Protocol to be used for the premises for the life of the consent. The Protocol shall include but is not limited to: <ul style="list-style-type: none"> a) A primary objective of attaining the noise limits in condition 18; b) Community consultation; c) Advance notice to affected members of the community for planned well maintenance activities; d) Complaints handling monitoring system; e) Mitigation measures; f) The design/orientation of the proposed mitigation methods demonstrating best practice; g) Construction times; h) Contingency measures where noise complaints are received; and i) Monitoring methods and programs. 	Well Gathering System and Trunk Line Maintenance Noise Management Protocol is contained within the EMS and associated Noise Management Sub-Plan. Relevant sections of the EMS and the noise management sub-plan highlight controls for items a) - i). However evidence to demonstrate that the protocol was submitted to the DG for approval at least one month prior to operation of the development was not available. Therefore the development did not comply with this condition. It was reported that a trunk line is no longer proposed.
DA75-4-2005, schedule 2-30	COMPLIANCE REPORT Three months after commencement of operation of the development, the Applicant shall submit to the Director-General a compliance report detailing compliance with Condition 29, including: <ul style="list-style-type: none"> a) Dates of study/plan/system completion/submission and commencement of construction and commissioning; b) Actions taken or proposed, to implement recommendations made in the studies/plans/systems; and c) Responses to any requirement imposed by the Director-General under Condition 32. This report shall verify that: <ul style="list-style-type: none"> a) The Emergency Plan required under Condition 29(a) is effectively in place and that at least one emergency exercise has been conducted; and b) The Safety Management System required under Condition 29(b) has been fully implemented and that records required by the system are being kept. The report shall include a signed	Previous audits have found that because the development was not yet operational that the preparation of a compliance report was not applicable. During the audit period, Sugarloaf Farm has become operational; however a Compliance Report has not been prepared or submitted to the DG. It is recommended that a compliance report be prepared and submitted to the DG.

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Reference	Condition	Audit Finding and Recommended Action
	<p>commitment by the Applicant's representative responsible for the operation of the development, that for each study/plan/system:</p> <p>a) The required study/plan/system has been undertaken or prepared to the relevant Hazardous Industry Planning Advisory Paper;</p> <p>b) All recommendations of each study/plan/system have been implemented; and</p> <p>c) All safety management system and their associated risk controls have been implemented and are being maintained.</p>	
DA75-4-2005, schedule 2-31	<p>HAZARD AUDIT</p> <p>Twelve months after the commencement of operations of the proposed development or within such further period as the Director-General may agree, the Applicant shall carry out a comprehensive hazard audit of the development and within one month of the audit submit a report to the Director-General.</p> <p>The audit shall be carried out at the Applicant's expense by a duly qualified independent person or team approved by the Director-General prior to commencement of the audit. Further audits shall be carried out every three years or as determined by the Director-General and a report of each audit shall, within one month of the audit, be submitted to the Director-General. Hazard audits shall be carried out in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 5, "Hazard Audit Guidelines".</p>	<p>A past audit report recorded that a hazard audit was carried out in 2006. The following hazard audit scheduled for 2009 has not been completed; therefore the development is non-compliant with this condition.</p> <p>The Hazard Audit should be commissioned with priority, with the audit report submitted to the DG as required by this condition.</p>
DA75-4-2005, schedule 2-44	<p>Prior to operation the Applicant shall prepare a Bushfire Management Plan for the development, to the satisfaction of the Director-General. The Applicant shall consult with Council and the Rural Fire Service in the preparation of the Plan.</p>	<p>Bushfire management is covered within the Emergency Plan; however documentation to verify that consultation was carried out or the DG was satisfied was not made available for inspection.</p>

4.3.8 Summary of compliance with PA06_0137

There are 34 consent conditions included in PA06_0137 issued by the DoP (now DoPI) on 9 December 2006 of which there were none closed out previously. The audit identified four conditions that the development did not comply with, giving a compliance score of 90%. A summary of conditions that the development was unable to demonstrate compliance with is presented in Table 4-7.

Table 4-7 Summary of non-compliance with conditions of PA06_0137

Reference	Condition	Audit Finding and Recommended Action
PA06_0137, schedule 2-8	<p>NOTIFICATION</p> <p>Within 3 months of the commissioning of the</p>	<p>AGL has not provided local councils with location data (GPS coordinates and digital surveys) for gas well sites and gas gathering</p>

4 Compliance Assessment

Reference	Condition	Audit Finding and Recommended Action
	<p>wells, the Proponent shall provide Council with:</p> <ol style="list-style-type: none"> the Geographical Positioning System (GPS) co-ordinates and digital survey data for the gas well sites and gas gathering system, in a format suitable to the Council; and the wellhead configuration of each gas well. 	<p>systems, as required by this condition.</p> <p>It is recommended that GPS coordinates and digital survey data is compiled with well head configurations for new and existing wells and provided to local councils and records of transaction be retained.</p>
PA06_0137, schedule 3-6	<p>NOISE MONITORING PROGRAM</p> <p>The Proponent shall prepare and implement a Noise Monitoring Program for the construction and operation of the project to the satisfaction of the Director-General. The Program shall be submitted to the Director-General prior to construction commencing and shall include a noise monitoring protocol for evaluating compliance with the construction noise goals and the operational noise impact assessment criteria in this approval.</p>	<p>A Noise Monitoring Program was prepared and presented as part of the EMS (2008) and Noise Management Plan (previously approved by the Director General in 2006). The Plan requires that noise is monitored on installation and at 3 months at 7m from the well. Currently noise is monitored at the well on commissioning and observations check that noise levels from operating wells are inaudible. As noise monitoring is not implemented in a way that is consistent with the approved plan, it is recommended that the Noise Management Sub Plan and Monitoring Program are updated to reflect monitoring practices adopted onsite and submitted to DoP for review/approval.</p>
PA06_0137, schedule 3-12	<p>COMPLIANCE REPORT</p> <p>Within 3 months of commissioning of the project, the Proponent shall prepare a compliance report to the satisfaction of the Director-General. The report shall be prepared by a suitably qualified, experienced, and independent expert whose appointment has been endorsed by the Director-General and shall include:</p> <ol style="list-style-type: none"> dates of commencement of construction and commissioning; actions taken (or proposed to be taken) to implement conditions 10 and 11; and a signed statement that: <ul style="list-style-type: none"> — the Emergency Plan required under condition 10 is effectively in place and that at least one emergency exercise has been conducted; — the SMS required under condition 11 has been fully implemented and that records required by the system are being kept; — the Emergency Plan and SMS have been prepared in accordance with the relevant Hazardous Industry Planning Advisory Paper; — all recommendations of the Emergency Plan and SMS have been implemented and are being maintained; and — all safety management systems and their associated risk controls have been implemented and are being 	<p>It was reported that the project was commissioned in 2007; however the compliance report had not been completed. It is recommended that a suitably qualified, experienced, and independent expert endorsed by the DG be appointed to prepare the compliance report and it is submitted to the DG, as required by this condition.</p>

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Reference	Condition	Audit Finding and Recommended Action
	maintained.	
PA06_0137, schedule 4-7	Following each Independent Environmental Audit, the Proponent shall review and if necessary revise the OEMP (and any documents contained in the plan), to the satisfaction of the Director-General. The revised OEMP shall be submitted to the Director-General within 6 months of completing the audit.	It was reported that the OEMP was written after last audit and submitted to DoP (now DoPI); however evidence to verify submission and timing was not made available for inspection.

4.3.9 Summary of compliance with PA06_0138

There are 37 consent conditions included in PA06_0138 issued by the DoP (now DoPI) on 9 December 2006 of which there were none closed out previously. The audit identified five conditions that the development did not comply with, giving a compliance score of 82%. A summary of conditions that the development was unable to demonstrate compliance with is presented in Table 4-8.

Table 4-8 Summary of non-compliance with conditions of PA06_0138

Reference	Condition	Audit Finding and Recommended Action
PA06_0138, schedule 2-8	<p>NOTIFICATION OF COUNCIL</p> <p>Within 3 months of the commissioning of the wells, the Proponent shall provide Council with:</p> <p>a) the Geographical Positioning System (GPS) co-ordinates and digital survey data for the gas well sites and gas gathering system, in a format suitable to the Council; and</p> <p>b) the wellhead configuration of each well.</p>	<p>AGL has not provided local councils with location data (GPS coordinates and digital surveys) for gas well sites and gas gathering systems, as required by this condition.</p> <p>It is recommended that GPS coordinates and digital survey data is compiled with well head configurations for new and existing wells and provided to local councils and records of transaction be retained.</p>
PA06_0138, schedule 3-6	<p>NOISE MONITORING PROGRAM</p> <p>The Proponent shall prepare and implement a Noise Monitoring Program for the construction and operation of the project to the satisfaction of the Director-General. The Program shall be submitted to the Director-General prior to construction commencing and shall include a noise monitoring protocol for evaluating compliance with the construction noise goals and the operational noise impact assessment criteria in this approval.</p>	<p>A Noise Monitoring Program was prepared and presented as part of the EMS (2008) and Noise Management Plan (previously approved by the Director General in 2006). The Plan requires that noise is monitored on installation and at 3 months at 7m from the well. Currently noise is monitored at the well on commissioning and observations check that noise levels from operating wells are inaudible. As noise monitoring is not implemented in a way that is consistent with the approved plan, it is recommended that the Noise Management Sub Plan and Monitoring Program are updated to reflect monitoring practices adopted onsite and submitted to DoP for review/approval.</p>
PA06_0138, schedule 3-13	<p>COMPLIANCE REPORT</p> <p>Within 3 months of commissioning of the project, the Proponent shall prepare a compliance report to the satisfaction of the Director-General. The report shall be prepared by a suitably qualified, experienced, and independent expert whose appointment has been endorsed by the Director-General and shall include:</p>	<p>It was reported that the project was commissioned in 2007; however the compliance report had not been completed. It is recommended that a suitably qualified, experienced, and independent expert endorsed by the DG be appointed to prepare the compliance report and it is submitted to the DG, as required by this condition.</p>

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Reference	Condition	Audit Finding and Recommended Action
	a) dates of commencement of construction and commissioning; b) actions taken (or proposed to be taken) to implement conditions 11 and 12; and c) a signed statement that: <ul style="list-style-type: none"> — the Emergency Plan required under condition 11 is effectively in place and that at least one emergency exercise has been conducted; — the SMS required under condition 12 has been fully implemented and that records required by the system are being kept; — the Emergency Plan and SMS have been prepared in accordance with the relevant Hazardous Industry Planning Advisory Paper; — all recommendations of the Emergency Plan and SMS have been implemented and are maintained; and — all safety management systems and their associated risk controls have been implemented and are being maintained. 	
PA06_0138, schedule 3-14	FLORA AND FAUNA The Proponent shall only undertake drilling and fracture stimulation of EM23, EM27, EM33 and EM36, and construction of gas gathering lines and access roads located within the raptor zones outside of the recognised breeding season (June to January) of raptor species nesting in the EMAl's raptor zones.	Drilling and fracture stimulation should only be conducted outside of the recognised raptor breeding season. The fracture stimulation of EM27 occurred on 07/10/2008, which falls within the raptor breeding season. Insufficient evidence was provided to establish approval for this works, and as such it is considered non-compliant with the requirements of this condition. It is recommended that future drilling and fracture stimulation is conducted outside the recognised breeding season (June to January) of raptor species nesting in the EMAl's raptor zones.
PA06_0138, schedule 4-7	Following each Independent Environmental Audit, the Proponent shall review and if necessary revise the OEMP (and any documents contained in the plan), to the satisfaction of the Director-General. The revised OEMP shall be submitted to the Director-General within 6 months of completing the audit.	It was reported that the OEMP was written after last audit and submitted to DoP (now DoPI); however evidence to verify submission and timing was not made available for inspection.

4.3.10 Summary of compliance with PA06_0291

There are 51 consent conditions included in PA06_0291 issued by the DoP (now DoPI) on 4 September 2008. The audit identified five conditions that the development did not comply with, giving a compliance score of 89%. A summary of conditions that the development was unable to demonstrate compliance with is presented in Table 4-9.

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Table 4-9 Summary of non-compliance with conditions of PA06_0291

Reference	Condition	Audit Finding and Recommended Action
PA06_0291, schedule 2-13	<p>Within three months of commissioning the wells, the Proponent shall provide Camden Council and Campbelltown City Council with:</p> <ol style="list-style-type: none"> the Geographical Positioning System (GPS) co-ordinates and digital survey data for the well surface locations and gas gathering system, in a format suitable to the councils; and the wellhead configuration of each well. <p>The Proponent shall provide a copy of this information to the landowner on request.</p>	<p>AGL has not provided local councils with location data (GPS coordinates and digital surveys) for gas well sites and gas gathering systems, as required by this condition.</p> <p>It was reported that wellhead configurations were available; however these were not provided to local councils as required by this condition.</p> <p>It is recommended that GPS coordinates and digital survey data is compiled with well head configurations for new and existing wells and provided to local councils and records of transaction be retained.</p>
PA06_0291, schedule 3-7	<p>NOISE MONITORING PROGRAM</p> <p>The Proponent shall prepare and implement a Noise Monitoring Program for the construction and operation of the project to the satisfaction of the Director-General. The Program shall be submitted to the Director-General prior to construction commencing and shall include a noise monitoring protocol for evaluating compliance with the construction noise goals and the operational noise impact assessment criteria in this approval.</p>	<p>A Noise Monitoring Program was prepared and presented as part of the EMS (2008) and Noise Management Plan (previously approved by the Director General in 2006). The Plan requires that noise is monitored on installation and at 3 months at 7m from the well. Currently noise is monitored at the well on commissioning and observations check that noise levels from operating wells are inaudible. As noise monitoring is not implemented in a way that is consistent with the approved plan, it is recommended that the Noise Management Sub Plan and Monitoring Program are updated to reflect monitoring practices adopted onsite and submitted to DoP for review/approval.</p>
PA06_0291, schedule 3-16	<p>COMPLIANCE REPORT</p> <p>Within 3 months of commissioning of the project, the Proponent shall prepare a compliance report to the satisfaction of the Director-General. The report shall be prepared by a suitably qualified, experienced, and independent expert whose appointment has been endorsed by the Director-General and shall include:</p> <ol style="list-style-type: none"> dates of commencement of construction and commissioning; actions taken (or proposed to be taken) to implement conditions 10 and 11; and a signed statement that: <ul style="list-style-type: none"> — the Emergency Plan required under condition 14 is effectively in place and that at least one emergency exercise has been conducted; — the SMS required under condition 15 has been fully implemented and that records required by the system are being kept; — the Emergency Plan and SMS have been prepared in accordance with the relevant Hazardous Industry Planning Advisory Paper; 	<p>It was reported that while compliance documentation has been prepared, it has not been verified independently. It is recommended that a suitably qualified, experienced, and independent expert endorsed by the DG is appointed to prepare the compliance report that is submitted to the DG, as required by this condition.</p>

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Reference	Condition	Audit Finding and Recommended Action
	<ul style="list-style-type: none"> — all recommendations of the QRA, Emergency Plan and SMS have been implemented and are being maintained; and — all safety management systems and their associated risk controls have been implemented and are being maintained. 	
PA06_0291, schedule 4-7	Following each Independent Environmental Audit, the Proponent shall review and if necessary revise the EMP (and any documents contained in the plan), to the satisfaction of the Director-General. The revised EMP shall be submitted to the Director-General within 6 months of completing the audit.	It was reported that the OEMP (August 2008) was written after last audit and submitted to DoP; however evidence to verify submission and timing was not made available for inspection.
PA06_0291, schedule 4-10	During the project, the Proponent shall: <ol style="list-style-type: none"> a) make a summary of all environmental monitoring results required under this approval publicly available on the website; and b) update these results on a regular basis (at least every 6 months) or as required. 	It was reported that the monitoring results are updated annually and made publicly available on the website. The AGL website is currently not up to date, as required by this condition.

4.3.11 Summary of compliance with other environmental approvals

To assess whether the development complied with other relevant environmental approvals, a brief review and assessment of the applicable PELs, PPLs and EPLs identified in Table 1-2 was carried out as part of the audit. The following observations were made with regard to the compliance of the construction and operation of the development.

The lease areas were observed to be maintained in a clean and tidy state. Generally, appropriate security, weed and erosion control measures were in place to maintain the site(s) effectively and minimise offsite impacts. However, some operational and closed sites were observed to be overgrown (e.g. RB08), poorly signed and/or vandalised (e.g. SF20). The AGL Field Environment and Safety Officer noted that the growth of long grass and weeds was to be minimised to maintain effective bushfire protection areas at development sites.

The audit has found that construction and operation of the development had generally occurred in accordance with measures outlined in the EMP and site-specific management plans (e.g. Refrac Management Plan). However, there was no evidence to verify that the most recent Production Operation Plan (Version 7) and Compliance Reports were submitted and/or approved by the DoP (now DoPI) and DII (now TIRIS) prior to commencement of production in these areas.

The development of wells and the gas gathering system have been planned to align to previously disturbed areas to minimise impacts on sensitive habitats and waterways. Steel casing is used in the drilling process to minimise impact on the coal seam. The construction and operation development appears to be managed in a way that minimises land disturbance and impacts of dust, noise, erosion and sediment. There was one incident where an overhead electricity transmission line was damaged by a contractor causing a minor grass fire (applied fire extinguishers, fire services attended, no injuries reported). The contractor was reported to have paid for repair of the damage. The DII (now TIRIS) was notified.

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A proactive inspection and maintenance program has been implemented to effectively identify and treat leaks or other damage throughout the gas gathering system. It was reported that DII (now TIRIS) had attended site inspections and provided positive reports and constructive guidance. Rehabilitation was observed to occur in consultation with the landowner. Rehabilitation has been effective to facilitate the handover of sites in a state consistent with the surrounding land use and original land values.

AGL monitors environmental performance through analysis of production trends and annual reporting via the footprint report (internal) and the AEPR (submitted to regulatory agencies). AGL has adopted an approach whereby operational noise levels are monitored at adjacent receivers on commissioning a new activity; should measured levels comply with relevant limits, ongoing monitoring is not conducted (unless in response to a reported incident). Generally, noise limits have been complied with.

Review of Environmental Management Plans

5.1 Overview

The development and operation of the CGP is governed by a new integrated management system comprising the following components.

- AGL Health Safety and Environment (HSE) Policy;
- Environmental Management System made up of the Environmental Management Plan (EMP) and associated Sub Plans, that is
 - Noise Management Sub Plan;
 - Flora and Fauna Management Sub Plan;
 - Soil and Water Management Sub Plan;
 - Aboriginal Cultural Heritage Management Sub Plan;
 - Landscape and Rehabilitation Management Sub Plan;
 - Air Quality Management Sub Plan;
 - Waste Management Sub Plan;
 - Traffic Management Sub Plan;
 - Dangerous Goods and Hazardous Materials Storage Management Sub Plan; and
 - Emergency Response Plan.
- AGL Life Guard Safety Management System;
- Production Operations Plan; and
- Site-specific management plans for operations/activities to be carried out.

This section addresses the requirement to assess the adequacy of the EMP applicable to the development and operation of the CGP.

5.2 Adequacy of Environmental Management Plan/s

The EMP and associated Sub Plans came into effect on 10 September 2008 and represent an update to the previous Environment, Health and Safety Management Plan (EHSMP). The update reflects the growth of the development, changing activities and new approvals.

The EHSMP was approved by the Department of Minerals and Resources (DMR, now part of DII (now TIRIS)), Department of Infrastructure Planning and Natural Resources (DIPNR, now DoPI) and the EPA (part of OEH) in April 2004 following approval for development of Rosalind Park in June 2003. There was no documented evidence to verify approval of the updated EMP (August 2008).

The EMP was observed to contain general information and guidance regarding construction methodologies, environmental management and monitoring to address the requirements of most consent conditions. Site-specific detail is communicated via procurement and induction processes and site-specific management plans (e.g. Razorback Refracting Management Plan, dated October 2009). It appeared to be well supported by a comprehensive register tracking induction, training and competency of site personnel and contractors.

The annual footprint report for the CGP was observed to be completed and provides a valuable tool for tracking resource efficiency and environmental performance across the development against the key performance indicators listed in the EMP.

In cooperation with the site-specific management plans for operations/activities to be carried out on site, the environmental management documentation is sufficient for managing development and operation of the CGP in a way that minimises impacts on the community and environment.

Summary and Recommendations

This independent environmental audit of the CGP assessed compliance of the construction and operation of the development between 1 July 2008 and 30 June 2010. The audit assessed compliance with statutory approvals, permits and licences, adequacy of management plans and overall environmental performance of the development.

The audit findings are based on evidence gained through documentation, site inspection (31 January, 1 February and 7 February 2011) and interviews with site personnel. As part of the audit process, documentation relevant to the assessment of consent conditions was reviewed, including refracting management plans; however a review of the fracture stimulation process and agents used and related impacts was not completed as part of the audit.

Overall, compliance of the CGP development to the key project approvals considered in this audit was found to be of a high standard. There were no significant ongoing environmental issues identified; however opportunities to improve compliance status were identified through the detailed audit process.

During the audit period, minor environmental incidences reported included noise-related complaints and air emissions of fine particulates and sulfur acid mist/sulfur trioxide exceeding relevant discharge limits. Appropriate measures were taken by AGL to rectify these incidences and further monitoring has demonstrated that the development has since complied with noise and discharge limits.

A summary of the compliance status of each planning approval is summarised in Table 6-1. It is noted that a proportion of the consent conditions were finalised and closed out during past audits and were not assessed further as part of this audit. The compliance score was calculated on the basis of the remaining conditions not categorised as previously closed out, not applicable or noted.

Table 6-1 Summary of compliance status with planning approvals

Planning Approval	Total consent conditions	Number of consent conditions				Compliance score*
		Closed out previously	Not applicable	Noted	Non-compliant	
DA15-1-2002i	92	34	1	3	1	98%
DA246-8-2002i	37	0	2	0	1	97%
DA282-6-2003i	254	49	19	33	16	90%
DA183-8-2004i	29	6	3	1	3	84%
DA9-1-2005	45	9	4	2	4	87%
DA171-7-2005	69	0	0	63	0	100%
DA75-4-2005	63	2	2	2	7	88%
PA06_0137	35	0	0	3	4	88%
PA06_0138	37	0	0	4	5	85%
PA06_0291	52	0	1	7	5	89%

* Compliance score calculated as a percent of remaining conditions not categorised as previously closed out, not applicable or noted.

The audit process has recognised a number of opportunities to improve compliance status of the CGP development with regard to relevant statutory approvals, permits and licences. The majority of identified non-compliances related to administrative requirements and the inability to provide adequate records to verify compliance. There were no significant ongoing environmental issues identified.

6 Summary and Recommendations

Recommendations

The following provides a list of the recommendations developed throughout the audit process i.e. as a result of identified non-compliances or observations for improved environmental performance.

- Obtain and retain written evidence to verify that the POP Version 7 was submitted to DII (now TIRIS) and submitted to DoP (now DoPI) (DA15-1-2002i, 3-14; DA246-8-2002i, 3-10).
- Compile well head configuration and GPS coordinates and digital surveys for gas well sites and gas gathering systems for new and existing wells and reissue to local councils and retain records (DA282-6-2003i, 3-15 and 16; DA183-8-2004, 2-6 and 7; DA9-1-2005, 2-7 and 8; DA75-4-2005, 2-13 and 14; PA06_0137, 2-8; PA06_0138, 2-8; PA06_0291, 2-13).
- Notify the DG in writing to confirm that well head configuration and GPS coordinates and digital surveys for gas well sites and gas gathering systems was issued to local councils (DA282-6-2003i, 3-17; DA183-8-2004, 2-8; DA9-1-2005, 2-9; DA75-4-2005, 2-15).
- Submit independent audit and monitoring of landscape management to the DG and confirm landscape is established and no further reports are required (DA282-6-2003i, 4-14).
- Trees removed from the site adjacent to the southern boundary of the RPGP should be replanted (DA282-6-2003i, 4-15, 26).
- Complete and submit independent audit of performance of mitigation measures to prevent and minimise visual impacts to the DG and retain records (DA282-6-2003i, 4-18 and 19).
- Complete 2010 audit of landscaping and performance of visual impact mitigation measures and submit 2008 and 2010 reports to the DG (DA282-6-2003i, 4-19B).
- Noise Management Sub Plan and Monitoring Program to be updated to reflect monitoring practices adopted onsite and submitted to DoP for review/approval (PA06_0137, 3-6; PA06_0138, 3-6; PA06_0291, 3-7).
- Prepare and submit noise compliance reports with Annual Return in future (DA282-6-2003i, 4-40).
- Continue to monitor and maintain plant within specified operating criteria (DA282-6-2003i, 4-48).
- Document decommissioning undertaken as part of rehabilitation to verify that it meets requirements of DoP (now DoPI) and relevant guidelines (DA282-6-2003i, 4-83).
- Compliance reports to be prepared and submitted to DoP (now DoPI) and records retained (DA75-4-2005, 2-30; PA06_0137, 3-12; PA06_0138, 3-13; and PA06_0291, 3-16).
- Commission hazard audit and submit audit report to the DG (DA282-6-2003i, 4-95; DA74-4-2005, 2-31; DA9-1-2005, 2-34).
- Submit to OEH a program for review of the integrity of the liner in the evaporation pond, as well as details of the initial integrity testing carried out (DA282-6-2003i, 4-85); this program is to be implemented and records retained.
- Install self-closing gates at the RPGP or seek approval from DoPI for alternative security measures (DA282-6-2003i, 4-96).
- Notify DoP (now DoPI) on completion of trenching works (DA282-6-2003i, 4-127).
- Copy of the 2009/10 AEPR and future AEPRs to be provided to local councils and evidence of submission is retained (DA282-6-2003i, 5-7).
- Obtain DG's approval for the community awareness protocol, retain records (DA282-6-2003i, 5-20).
- Obtain and retain records to verify that the Noise Management Protocol was submitted to the DG and OEH at least one month prior to operation of the development (DA75-4-2005, 2-20).
- Future drilling and fracture stimulation is to be conducted outside the recognised breeding season (June to January) of raptor species nesting in the EMAI's raptor zones (PA06_0138, 3-14).

6 Summary and Recommendations

- Obtain and retain records to verify consultation for development of the Bushfire Management Plan was carried out and the DG was satisfied (DA75-4-2005, 2-44).
- Obtain and retain records to verify consultation with RTA and local councils for development of the Traffic Management Plan (PA06_0291, 3-22).
- Confirm DoP (now DoPI) approval and retain records for OEMP (PA06_0291, 4-7; PA06_0138, 4-7; PA06_0137, 4-7).
- Update AGL website with new documentation and monitoring data every six months (PA06_0291, 4-9 and 10).

Limitations

URS Australia Pty Ltd (URS) has prepared this report in accordance with the usual care and thoroughness of the consulting profession for the use of AGL Upstream Investments Pty Ltd and only those third parties who have been authorised in writing by URS to rely on the report. It is based on generally accepted practices and standards at the time it was prepared. No other warranty, expressed or implied, is made as to the professional advice included in this report. It is prepared in accordance with the scope of work and for the purpose outlined in the Proposal dated 5 August 2010.

The methodology adopted and sources of information used by URS are outlined in this report. URS has made no independent verification of this information beyond the agreed scope of works and URS assumes no responsibility for any inaccuracies or omissions. No indications were found during our investigations that information contained in this report as provided to URS was false.

This report was prepared between 31 January 2011 and 23 August 2011 and is based on the conditions encountered and information reviewed at the time of preparation. URS disclaims responsibility for any changes that may have occurred after this time.

This report should be read in full. No responsibility is accepted for use of any part of this report in any other context or for any other purpose or by third parties. This report does not purport to give legal advice. Legal advice can only be given by qualified legal practitioners.

Appendix A DA15-1-2002i Compliance Checklist

DA NUMBER: 15-1-2002-i
 LOCATION: Apap, Joe Stanley, Johndilo, Lipscombe, Loganbrae, Mahon
 MODIFICATION: MOD 53-4-2006, MOD 24-3-2007, MOD 3
 WORKS (2008-10): Yes, twinning of gas gathering lines and rehabilitation of Ray Beddoe Treatment Plant.

Number of Conditions: 92
 Closed out previously: 34
 Number Noted: 3
 Number N/A: 1
 Number Non-Compliant: 1
 Compliance Score: 98%

DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
DA 15-1-2002-i	<p>1 Obligation to minimise harm</p> <p>The Applicant shall implement all practicable measures to prevent or minimise any harm to the environment that may result from the construction or operation of the development.</p>	General audit findings and observations made during site inspection.	<p>The audit indicates that no significant environmental issues occurred at Apap, Joe Stanley, Johndilo, Lipscombe, Loganbrae or Mahon gas fields during the audit period. No environmental incidents, complaints or non-compliances have reportedly occurred under this consent.</p> <p>Observations made during inspection of the former site of Ray Beddoe Treatment Plant (Apap) indicated that the management and rehabilitation of the site had included practical measures to minimise environmental impacts. Evidence was sighted to indicate that the former site had been decommissioned, rehabilitated and handed back to the landowner.</p>	Compliant.	
DA 15-1-2002-i	<p>2 Terms of Approval</p> <p>The Applicant shall carry out the development generally in accordance with the:</p> <p>(a) DA submitted to the Department on 31 January 2002;</p> <p>(b) Camden Coalbed Methane Project Petroleum Production Operations – Environmental Impact Statement for the Sydney Gas Company (four volumes), dated December 2001 and prepared by Harvest Scientific Services;</p> <p>(c) Letter from Sydney Gas Company dated 4 April 2002 to the EPA in relation to community complaints, lot and DP details of the treatment plant, wells and infrastructure, and map showing existing well locations;</p> <p>(d) Letter from Sydney Gas Company dated 8 April 2002 to the EPA in relation to background noise level monitoring;</p> <p>(e) Letter from Sydney Gas Company dated 11 April 2002 to the EPA in relation to achievable noise levels, operational flaring noise, and ongoing maintenance issues;</p> <p>(f) Letter from Sydney Gas Company dated 11 April 2002 to the EPA in relation to nitrogen dioxide impact assessment and odour issues;</p> <p>(g) Letter from Sydney Gas Company dated 12 April 2002 to the EPA in relation to the 3 additional wells, and maintenance activities;</p> <p>(h) Letter from Sydney Gas Company dated 16 April 2002 to the EPA in relation to noise monitoring, noise levels, operational flaring noise, construction and maintenance activities, nitrogen dioxide assessment, and odour impact assessment;</p> <p>(i) Letter from Sydney Gas Company dated 29 May 2002 to Planning NSW in relation to the risk assessments and drawings for the Westbrook Road to Camden Pipeline;</p> <p>(j) The modification application submitted to the Department on 11 April 2006 and the accompanying document "Camden Gas Project Joint Venture Proposed Multiple Gas Well Modifications" prepared by AGL Gas Production (Camden) Pty Ltd and Sydney Gas (Camden) Operations Pty Ltd, dated April 2006; and</p> <p>(k) Conditions of this consent.</p>	General audit findings and observations made during site inspection. Letters from Sydney Water (2002) referenced in the Terms of Approval were not sighted; however it was reported that these were not relevant to the current audit period.	During the audit period, works were limited to twinning of gas gathering lines near Logan Brae field (subject to MOD 24-3-2007) and rehabilitation of former site of the Ray Beddoe Treatment Plant. It was reported that the development has been undertaken in accordance with the Terms of Approval.	Compliant.	
DA 15-1-2002-i	<p>3 Period of Approval</p> <p>This approval is for a period of twenty one (21) years from the date of granting of the production lease.</p>		Noted. Approval expires in 2023.	Noted.	
DA 15-1-2002-i	<p>4 Special Conditions of Approval</p> <p>The Applicant shall submit a development application for a new treatment plant within two (2) years of the date of this consent. Upon the commissioning of the new treatment plant the Applicant shall cease production from the Ray Beddoe Treatment Plant and proceed to rehabilitate the site in accordance with the Site Rehabilitation Management Plan.</p>	<p>New treatment plant (Rosalind Park Gas Plant) development consent (DA 282-6-2003-i) and as constructed.</p> <p>Inspection of rehabilitated site of former Ray Beddoe Treatment Plant (RBTP) and corresponding Site Rehabilitation Management Plan for RBTP (March 2008), RBTP Decommissioning Plan Approval (17/06/2008), RBTP EPA Licence Surrender (13/07/09) and RBTP Landowner signoff form (24/4/09).</p>	Ray Beddoe Treatment Plant has now been decommissioned, rehabilitated and handed over to the land owner.	Closed out.	

DA NUMBER: 15-1-2002-i
 LOCATION: Apap, Joe Stanley, Johndilo, Lipscombe, Loganbrae, Mahon
 MODIFICATION: MOD 53-4-2006, MOD 24-3-2007, MOD 3
 WORKS (2008-10): Yes, twinning of gas gathering lines and rehabilitation of Ray Beddoe Treatment Plant.

Number of Conditions: 92
 Closed out previously: 34
 Number Noted: 3
 Number N/A: 1
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 Compliance Score: 98%

DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
DA 15-1-2002-i	5 If after five (5) years of the date of this consent any well that is the subject of this consent has not yet been drilled or completed, then the Applicant shall surrender the approval for that well.	MOD 24-3-2007 approving drilling of two surface to in seam wells.	AGL has been granted approval to drill two surface to in seam wells under MOD 24-3-2007. At the time of the audit, these wells had not been drilled.	Compliant.	
DA 15-1-2002-i	6 At the expiration of ten (10) years from the date of this consent, the Applicant shall submit to the Director General a reserve report covering the petroleum production lease (PPL) area. The report shall be prepared by an independent petroleum expert in accordance with relevant definitions approved by the Society of Petroleum Engineers and/or the World Petroleum Congress. In the absence of a proven reserve, the Applicant shall make a further submission to the Director-General justifying why production should continue. After reviewing this report, the Director-General may direct the Applicant to carry out certain actions (including the closure and rehabilitation of certain wells).		As DA 15-1-2002-I was granted in 2002, the reserve report covering the petroleum production lease (PPL) area is due in 2012.	Compliant.	
DA 15-1-2002-i	7 Further Approvals Nothing in this consent permits the drilling and operation of any additional wells (beyond the approved 25 wells) or a new treatment plant. These shall be the subject of another development consent or development consents.		It was reported that no additional wells were drilled without development consent.	Compliant.	
DA 15-1-2002-i	8 Redrilling and Refracting Management Plan For the purposes of this consent the redrilling and/or additional fracing of a well does not constitute wellhead maintenance.		It was reported that no redrilling or additional fracing occurred during this audit period.	Compliant.	
DA 15-1-2002-i	9 The Applicant shall obtain the approval of the Director-General for the redrilling and/or additional fracing of a well.		It was reported that no redrilling or additional fracing occurred during this audit period.	Compliant.	
DA 15-1-2002-i	10 The Applicant shall prepare a Redrilling and Refracting Management Plan in consultation with the Department of Mineral Resources for redrilling and/or refracting of an existing well. The Plan shall be submitted to the Director-General no later than one month prior to the commencement of the work or within such period as agreed by the Director-General. The Plan shall include, but not necessarily be limited to: (a) a description of all the activities to be undertaken on the well site during the redrilling and/or refracting work; (b) details of how the environmental performance of the work will be monitored and what actions will be taken to address identified adverse environmental impacts; (c) reference to the relevant parts of the Environmental Management Plan required under condition 15 of this consent; (d) compliance with all the relevant environmental performance requirements of this consent; and arrangements for complaints handling procedures during the redrilling/refracting work. The Applicant shall give written notification of the proposed redrilling/refracting work to potentially affected residences and other noise sensitive receivers at least fourteen days prior to work commencing.		It was reported that no redrilling or additional fracing occurred during this audit period.	Compliant.	
DA 15-1-2002-i	11 Compliance Throughout the life of the development, the Applicant shall secure, renew, maintain, and comply with all the relevant statutory approvals applying to the development.	EMS (2008)	Noted. Section 2.1 of the AGL EMS contains reference to applicable legislative requirements, including this DA. There were no non-compliances related to this DA recorded during the audit period.	Compliant.	

DA NUMBER: 15-1-2002-i
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DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
DA 15-1-2002-i	12 The Applicant shall take all reasonable steps to ensure that all of its employees, contractors and subcontractors are made aware of, and comply with, the conditions of this consent relevant to their respective activities.	Sighted site specific induction information and induction register, which details personnel, experience, competencies etc. Sighted Induction Register Database.	AGL provides awareness training of the EMS and associated management sub plans through mandatory contractor inductions. Register of training and competency maintained in hard copy and electronically within the HSE Induction Folder. When EMS was finalised, all employees attended training to review requirements of these conditions (high level unless site-specific induction to manage local issues e.g. aboriginal heritage or noise). Personnel interviewed demonstrated good understanding of site-specific environmental management issues.	Compliant.	
DA 15-1-2002-i	13 The Applicant must, in the opinion of the EPA, be a fit and proper person to hold a licence under the Protection of the Environment Operations Act, 1997, having regard to the matters in section 83 of that Act.		AGL Energy Limited (AGL) is considered to be fit and proper person' (ABN 95 052 167 405) and holds EPA Licence No. 12003 for the Camden Gas Project Stage 2. Note that EPL 11713 was surrendered; activities relating to petroleum fuel production licensed under EPL 12003.	Compliant.	
DA 15-1-2002-i	14 PRODUCTION OPERATIONS PLAN The Applicant shall prepare a Production Operations Plan (POP) for the approval of the Department of Mineral Resources. The POP shall have regard to the conditions of this consent and the licence under the POEO Act. The POP will form the basis for the: (a) ongoing operations and environmental management; and (b) ongoing monitoring of the development. A copy of the POP shall be forwarded to the Department within fourteen days of the DMR's acceptance.	AGL have submitted a revised POP (September 2008 - Version 7) which has not been approved by DII. Sighted POP Version 6 approved by DII (September 2008)	An updated POP (v7) was submitted to DII in 2010; however DII required changes (e.g. update well numbers) before an approval was granted. AGL was not able to provide evidence to verify the POP (v7) was resubmitted to DII. As the current/approved POP (v6) does not reflect the current status of operations at Camden Gas Project (i.e. development has progressed without an approved POP (v7), the development is considered to not comply with this condition.	Non-Compliant.	Version 7 of the POP is to be completed and submitted for approval to the DII.
DA 15-1-2002-i	15 ENVIRONMENTAL MANAGEMENT Environmental Management Plan The Applicant shall prepare and implement an Environmental Management Plan (EMP) to provide an environmental management framework, practices and procedures to be followed during the drilling and operation of the development. The EMP shall be prepared in consultation with the relevant authorities (EPA, DMR, DLWC). The EMP shall include, but not necessarily be limited to: (a) identification of all statutory and other obligations that the Applicant is required to fulfil in relation to operation of the development, including all consents, licences, approvals and consultations;	Sighted EMS (August 2008), including: Noise Management Plan; Soil and Water Management Plan; Water Quality Management Plan; Traffic Management Plan; Waste Management Plan; and Site Rehabilitation Management Plan (including Vegetation and Landscape Management Plan).	The Camden Project Health, Safety and Environment Management Plan (HSEMP) (approved by DoP) has been updated. The new format includes an Environmental Management System (EMS) and Safety Management System (SMS). The EMS contains: Legislative requirements (Section 2.1) Structure and responsibility (Section 5.1) AGL HSE Policy (Jan 2008) Objectives, targets and KPI (section 4.2) Policies and procedures within the EMS and additional Management Sub Plans. It was reported that the organisation made sufficient resources available to implement the EMS effectively as part of the normal operations.	Compliant.	

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DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
	(b) a description of the roles and responsibilities for all key personnel involved in the drilling and operation of the development; (c) the overall environmental policies and principles to be applied to the operation of the development; (d) standards and performance measures to be applied to the development, and a means by which environmental performance can be periodically reviewed and improved; (e) management policies to ensure that environmental performance goals are met and to comply with conditions of this consent; and (f) include the following detailed plans: • Noise Management Plan; • Soil and Water Management Plan; • Water Quality Management Plan; • Traffic Management Plan; • Vegetation and Landscape Management Plan; • Waste Management Plan; and • Site Rehabilitation Management Plan				
DA 15-1-2002-i	16 The EMP shall be submitted for the approval of the Director-General within three months of the date of this consent, or within such period otherwise agreed by the Director-General.		Pre-audit period. Previous audit findings indicate that the EHSMP was approved by the Director-General; however no letter of approval was sighted during this audit. As per condition 18 of this consent, the updated EMS does not require additional approval.	Closed out.	
DA 15-1-2002-i	17 The Applicant shall supply a copy of the EMP to the EPA, DLWC, DMR, Wollondilly Council and Camden Council within fourteen days of the Director-General's approval. The Applicant shall ensure that a copy of the EMP is publicly available.		Pre-audit period. During the previous audit, it was reported that the EMP was submitted to relevant authorities; however no correspondence was sighted. The EMS is publicly available via the Project website.	Closed out.	
DA 15-1-2002-i	18 The Applicant shall review and update the EMP regularly, or as directed by the Director-General.	Sighted updated EMS (August 2008).	The EMS was updated in August 2008.	Compliant.	
DA 15-1-2002-i	19 Noise Management Plan The Applicant shall prepare and implement a Noise Management Plan for the whole site. The Plan shall include, but not necessarily be limited to: (a) identification of the potential sources of noise during drilling and operation; (b) the noise criteria for these activities; (c) details of what actions and measures would be implemented to ensure that these operations would comply with the relevant noise criteria; (d) describe how the effectiveness of these actions and measures would be monitored during the life of the development, clearly indicating who would conduct the monitoring, how often this monitoring would be conducted, how the results of this monitoring would be recorded and reported to the Director-General, and if any non-compliance is detected; and (e) describe what procedures would be followed to ensure compliance.	Noise Management Plan within EMS (August 2008).	The Noise Management Sub-Plan is contained within the EMS and provides details on noise aspects, criteria and relevant noise control process and procedures to be adopted through the implementation of the Project. No noisy works were reported to be completed on this site during this audit period. Trenching works during installation of gas gathering lines and rehabilitation works are not inherently noisy activities.	Compliant.	
DA 15-1-2002-i	20 Soil and Water Management Plan The Applicant shall prepare and implement a Soil and Water Management Plan (SWMP) for the whole site. This plan shall include, but not necessarily be limited to: (a) the measures to be implemented to minimise the potential for soil erosion and the discharge of sediment and other pollutants to lands and/or waters during drilling activities; (b) the measures to be implemented to mitigate the impacts of stormwater run-off from and within the site following the completion of drilling activities; (c) demonstrate that erosion and sedimentation control measures will conform with, or exceed, the relevant requirements and guidelines contained in the Department of Housing's Managing Urban Stormwater: Soils and Construction.	Sighted Soil and Water Management Sub Plan within the EMS (August 2008).	Twinning of gas gathering line works was reportedly completed according to defined processes for control of soils and water related aspects for developments as required under this CoC. No soil and water issues were raised.	Compliant.	

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DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
	(d) consistency with the stormwater management plan for the catchment, should one exist, or with the EPA's Managing Urban Stormwater: Council Handbook should a stormwater management plan for the catchment not exist; (e) measures to rehabilitate erosion-affected areas and areas the subject of excavation, including tree, shrub and/or cover crop species and implementation; and (f) management procedures for all surface and groundwater collection and storage structures on the site, including a maintenance program for associated infrastructure (eg. pipes, pumps, dam walls, etc.) and a program for desilting of those structures, where relevant.				
DA 15-1-2002-i	21 Water Quality Management Plan The Applicant shall prepare and implement a Water Quality Management Plan for the whole site. This plan shall include, but not necessarily be limited to: (a) provide details of an appropriate soil sampling and monitoring program to ensure that areas used for waste water application do not lead to an unacceptable build-up of salts within the soil profile; (b) implement a program of regular testing of waste water quality for compounds, nutrients and metals, as outlined in Table 7.8 of the EIS; and (c) details of the well maintenance procedures to ensure the integrity of the well isolation components to prevent the cross contamination of groundwater aquifers.	Soil and Water Management Sub Plan within the EMS (August 2008).	Generally, the conditions listed in this CoC refer to managing water quality impacts from the Ray Beddoe Treatment Plant (decommissioned during current auditing period). Activities carried out during the audit period are reported to have very limited potential for impact on water quality.	Compliant.	
DA 15-1-2002-i	22 Traffic Management Plan The Applicant shall prepare and implement a Traffic Management Plan for the whole site. This plan shall include, but not necessarily be limited to: (a) Identification of the potential traffic and transport impacts associated with the development and measures to limit traffic movements in the PAL 1 area; (b) restrictions on the movement of heavy vehicles during school pick-up/drop-off times; (c) details of traffic management measures associated with the construction of pipelines within public roads; and (d) measures to reduce the transportation of plant material and/or dirt off site.	Traffic Management Sub Plan within the EMS (August 2008).	Generally, the conditions listed in this CoC refer to managing traffic impacts from the Ray Beddoe Treatment Plant (decommissioned during current auditing period). There are limited traffic movements to/from these gas fields during the audit period.	Compliant.	
DA 15-1-2002-i	23 Vegetation and Landscape Management Plan The Applicant shall prepare and implement a Vegetation and Landscape Management Plan for the whole site. This plan shall include, but not necessarily be limited to: (a) measures to protect mature trees as part of the well drilling or gas gathering pipeline construction activities; (b) details of all landscaping to be undertaken on the site; (c) ensure that tree and shrub species used for landscaping of the site are indigenous to the locality; and (d) details of a program to ensure that all landscaped areas are maintained in a tidy, healthy state.	Rehabilitation and Landscape Management Sub Plan within the approved EMS (August 2008).	A Vegetation and Landscape Management Plan is included in the EMS. It was reported that access roads and alignment of the gas gathering line is limited to previously cleared areas to minimise disturbance to natural vegetation. No mature trees were reportedly removed during the audit period.	Compliant.	
DA 15-1-2002-i	24 Waste Management Plan The Applicant shall prepare and implement a Waste Management Plan for the whole site. This plan shall include, but not necessarily be limited to: (a) measures to minimise the production and impact of waste produced at the site during drilling and operation; (b) implementation of waste reduction, reuse and recycling principles; (c) details of the reuse and recycling of waste water produced/collected on the site, including collection and handling procedures; (d) details of appropriate disposal methods in the event that reuse and recycling are not available or are not practicable; and (e) programs for involving and encouraging employees and contractors to minimise domestic waste production on the site and reuse/recycle where appropriate.	Waste Management Sub-Plan within the EMS (August 2008). Records for waste disposal and recycling in the 2008/2009 and 2009/2010 Footprint Data Collection.	Waste management data includes records of recycling and disposal of hazardous and non-hazardous waste categories. The records indicate that AGL has adopted measures to identify and implement waste minimisation and resource recovery (reuse and recycling) opportunities across project operations. Signage was evident during inspection of RPGP encouraging employees to minimise domestic waste production on the site and reuse/recycle where appropriate.	Compliant.	
DA 15-1-2002-i	25 Site Rehabilitation Management Plan The Applicant shall prepare and implement a Site Rehabilitation Management Plan for the whole site. This plan shall include, but not necessarily be limited to: (a) details of the staging and timing for rehabilitation works; (b) ongoing management strategies to ensure the success of rehabilitation works; (c) details of the establishment of vegetation and all landscaping to be undertaken including flora species, location of grassed areas, garden beds and other vegetated areas, and mature height and width measurements of all flora species; and (d) the measures to remediate sites following the decommissioning of the wells, pipelines and treatment plant.	Site Rehabilitation Management Plan for RBTP (March 2008); RBTP Decommissioning Plan Approval (17/06/2008); RBTP EPA Licence Surrender (13/07/09); RBTP Landowner signoff form (24/4/09).	The Rehabilitation Management Plan for RBTP and Landscape and Rehabilitation Management Sub Plan provide details of staging, timing and management strategies to be adopted during rehabilitation of former RBTP site.	Compliant.	

DA NUMBER: 15-1-2002-i
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DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
DA 15-1-2002-i	<p>26 PERFORMANCE REPORTING Condition Report The Applicant shall prepare a Condition Report on residences and structures that may be potentially affected by drilling/fracing work, including the redrilling and refracing of an existing well. The Applicant shall undertake an inspection of the residence and/or structure prior to work commencing, and a follow up inspection within one month of the completion of the work. The Applicant shall take immediate action for repair of any damage to the residence or structure as a result of the work and to avoid any further damage. A copy of the Condition Report shall be submitted to the Director-General and the DMR after completion of the work.</p>		N/A	N/A	
DA 15-1-2002-i	<p>27 Incident Reporting The Applicant shall notify the EPA, DMR and the Director-General of any incident with significant off-site impacts on people or the biosphere environment as soon as practicable after the occurrence of the incident. The Applicant shall provide written details of the incident to the Director-General, the EPA, DMR, Wollondilly Council and Camden Council within seven days of the date on which the incident occurred.</p>	ConnectFirst Incident Database	<p>Incidents are reported, recorded and tracked through AGL Life Guard (Safety Management System) and ICAM (incident investigation methodology). All incident details are recorded via ConnectFirst.</p> <p>No reportable incident occurred within gas fields relevant to DA 15-1-2002 during the audit period.</p>	Compliant.	
DA 15-1-2002-i	<p>28 The Applicant shall meet the requirements of the Director-General to address the cause or impact of any incident, as it relates to this consent, reported in accordance with condition 27 of this consent, within such period as the Director-General may agree.</p>		The ConnectFirst Incident Database indicates that only maintenance activities were logged at gas fields relevant to this DA during the audit period.	Compliant.	
DA 15-1-2002-i	<p>29 Complaints Register The Applicant shall record details of all complaints received in an up-to-date Complaints Register. The Register shall record, but not necessarily be limited to: (a) the date and time, where relevant of the complaint; (b) the means by which the complaint was made; (c) any personal details of the complainant that were provided, or if no details were provided, a note to that effect; (d) the nature of the complaints; (e) any action(s) taken by the Applicant in relation to the complaint, including any follow-up contact with the complainant; and (f) if no action was taken by the Applicant in relation to the complaint, the reason(s) why no action was taken. The Complaints Register shall be made available for inspection by the EPA or the Director-General upon request. The Applicant shall also make summaries of the register, without details of the complainants, available for public inspection.</p>	Sighted the Complaints register for the project.	The complaints register for the project adequately records and maintains the details required by this CoC.	Compliant.	
DA 15-1-2002-i	<p>30 Risk Assessment Within six months from the date of this consent, the Applicant shall submit a compliance report to the Director-General confirming that the recommendations (1 to 17) made in the Quantified Risk Assessment dated September 2000 by McCracken Consulting have been satisfactorily implemented. Where a recommendation has not been implemented or completed, justification must be provided in the compliance report.</p>		Pre-audit period.	Closed out.	
DA 15-1-2002-i	<p>31 Within six months from the date of this consent, the Applicant shall submit a compliance report to the Director-General confirming that the actions (1 to 66 and A to SS) arising from the HAZOP study report dated May 2001 by McCracken Consulting have been satisfactorily implemented. Where an action has not been implemented or completed, justification must be provided in the compliance report.</p>		Pre-audit period.	Closed out.	

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DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
DA 15-1-2002-i	32 Within six months from the date of this consent, the Applicant shall submit for approval by the Director-General, a document setting out a comprehensive Safety Management System, covering all operations on site and associated transport activities involving hazardous materials. The document shall clearly specify all safety related procedures, responsibilities and policies, along with details of mechanisms for ensuring adherence to procedures. Records shall be kept on site and shall be available for inspection by the Director-General on request. The Safety Management System shall be developed in accordance with the Department of Urban Affairs and Planning's Hazardous Industry Planning Advisory Paper No. 9 "Guidelines for the Development of Safety Management Systems".		Pre-audit period.	Closed out.	
DA 15-1-2002-i	33 EPA Annual Return The applicant shall provide an Annual Return to the EPA in relation to the development as required by any licence under the POEO Act. In the return the Applicant shall report on the annual monitoring undertaken (where the activity results in pollutant discharges), provide a summary of complaints relating to the development, report on compliance with licence conditions and provide a calculation of fees (administrative fees and where relevant, load based fees) that are payable. If load based fees apply to the activity the Applicant will be required to submit load based fee calculation worksheets with the return.	Sighted Annual Return for 2008/2009 and 2009/2010 (draft).	Annual Returns were observed to be prepared and submitted as required by this CoC.	Compliant.	
DA 15-1-2002-i	34 Annual Environmental Performance Reporting Within twelve months of the date of this consent, and annually thereafter during the life of the development, the Applicant shall submit an Annual Environmental Performance Report to the Director-General. This report shall include, but not be limited to: (a) the standards, performance measures and statutory requirements the development is required to comply with; (b) an assessment of the environmental performance of the development to determine whether it is complying with these standards, performance measures, and statutory requirements; (c) copy of the Complaints Register for the preceding twelve month period and indicating what actions were (or are being) taken to address these complaints; (d) indication of what actions were taken to address any issue and/or recommendation raised by the Community Consultative Committee; (e) provision of the detailed results of all the monitoring required by this consent; and (f) review of the results of this monitoring, identifying any non-compliance and any significant trends in the data and if any non-compliance is detected, describe what actions and measures would be carried out to ensure compliance, clearly indicating who would carry out these actions and measures, when they would be carried out, and how the effectiveness of these measures would be monitored over time.	Sighted Annual Environmental Performance Reports for June 2007, June 2008, June 2009 and June 2010.	Annual Environmental Performance Reports were observed to be prepared and submitted as required by this CoC.	Compliant.	
DA 15-1-2002-i	35 The Director-General may require the Applicant to address certain matters identified in the Annual Environmental Performance Report. Any action required to be undertaken shall be completed within such period as the Director-General may agree.		No matters reportedly raised in relation to AEPR.	Compliant.	
DA 15-1-2002-i	36 The Applicant shall also submit a copy of the Annual Environmental Performance Report to the EPA, DMR, DLWC, Wollondilly Council and Camden Council. The Applicant shall make a copy of the Report publicly available.		AEPR reportedly submitted to relevant authorities.	Compliant.	
DA 15-1-2002-i	37 Independent Environmental Audit Within two years of the date of this consent and every two years thereafter, unless the Director-General directs otherwise, the Applicant shall commission and pay the full costs of an Independent Environmental Audit. The Independent Environmental Audit shall: (a) be conducted by a suitably qualified, experienced, and independent person(s) whose appointment has been approved by the Director-General; (b) be consistent with ISO 14010 – Guidelines and General Principles for Environmental Auditing, and ISO 14011 – Procedures for Environmental Auditing, or updated versions of these guidelines/manuals; (c) assess the environmental performance of the development, and its effects on the surrounding environment;		This audit (2008-2010) satisfies the requirements of this CoC. The auditors appointed were approved by the Director-General in a letter dated 17/09/2010.	Compliant.	

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DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION																
	(d) assess whether the development is complying with the relevant standards, performance measures, and statutory requirements; (e) review the adequacy of the Applicant's Environmental Management Plan; and (f) recommend measures or actions to improve the environmental performance of the development, and/or its environmental management and monitoring systems. Within two months of commissioning the audit, the Applicant must submit a copy of the audit report to the Director-General and the EPA and the DMR. The Director-General may require the Applicant to address certain matters identified in the report and any comments received from the EPA and DMR . Any action required to be undertaken shall be completed within such period as the Director-General may agree.																				
DA 15-1-2002-i	<p>38 ENVIRONMENTAL PERFORMANCE Noise Limits The Applicant shall comply with the noise criteria specified in the table below. Table 1 – Noise Limits (dB(A))</p> <table border="1"> <thead> <tr> <th>Location (Identified in Fig 10.1 of the EIS)</th> <th>Day L_{AEQ15min}</th> <th>Evening L_{AEQ15min}</th> <th>Night L_{AEQ15min}</th> </tr> </thead> <tbody> <tr> <td>Receiver Locations B, C and F</td> <td>37</td> <td>37</td> <td>37</td> </tr> <tr> <td>Receiver Locations D, E and G to M</td> <td>37</td> <td>37</td> <td>35</td> </tr> <tr> <td>Any other residential receiver</td> <td>35</td> <td>35</td> <td>35</td> </tr> </tbody> </table>	Location (Identified in Fig 10.1 of the EIS)	Day L _{AEQ15min}	Evening L _{AEQ15min}	Night L _{AEQ15min}	Receiver Locations B, C and F	37	37	37	Receiver Locations D, E and G to M	37	37	35	Any other residential receiver	35	35	35		It was reported that no noisy works were completed on this site during this audit period i.e. trenching for installation of gas gathering lines and rehabilitation works are reported to not be inherently noisy activities. RBTP was decommissioned in 2008 during standard operating hours. Noise generated from these works was reported to not exceed the noise criteria specified; however no noise monitoring was carried out during the auditing period. No noise-related complaints were recorded.	Compliant.	
Location (Identified in Fig 10.1 of the EIS)	Day L _{AEQ15min}	Evening L _{AEQ15min}	Night L _{AEQ15min}																		
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DA 15-1-2002-i	<p>39 For the purposes of assessment of noise levels specified in this consent, noise from the development shall be: (a) measured at the most affected point on or within the residential boundary or, where the dwelling is more than 30m from the boundary, at the most affected point within 30m of the dwelling to determine compliance with the LAEQ15min, LAEQday, LAEQevening and LAEQ night noise limits; (b) subject to the modification factors provided in Section 4 of the NSW Industrial Noise Policy; and (c) measured using the "FAST" response on the sound level meter.</p>		Noted; however no noise monitoring was carried out during the auditing period. Where complaints were recorded, AGL would undertake monitoring with regards to these requirements.	Compliant.																	
DA 15-1-2002-i	<p>40 Notwithstanding condition 39 of this consent, should direct measurement of noise from the site be impractical, the Applicant may employ an alternative noise assessment method deemed acceptable by the EPA (refer to Chapter 11 of the NSW Industrial Noise Policy). Details of such an alternative noise assessment method accepted by the EPA shall be submitted to the Director-General prior to the implementation of the assessment method.</p>		Noted; however no noise monitoring was carried out during the auditing period and an alternative method was not proposed.	Noted.																	
DA 15-1-2002-i	<p>41 All noise limits specified as part of this consent apply under: (a) wind speeds up to 3m/s at 10 metres above ground level; and (b) temperature inversion conditions of up to 30C/100m.</p>		Noted	Noted.																	
DA 15-1-2002-i	<p>42 Noise – Well Maintenance The Applicant shall apply all feasible and reasonable noise mitigation measures to planned well maintenance activities in order to achieve the noise limits specified by this consent. Where the noise limits are not achievable the Applicant shall implement management practices as necessary to minimise the potential noise impacts. These management practices are to include, but not be limited to: (a) appropriately informing affected residences and other relevant parties at least two weeks in advance of any planned well maintenance activities and updating the information as required; (b) documenting and implementing any specific work practices the Applicant will employ to limit noise; (c) documenting the feasible and reasonable noise mitigation measures that will be undertaken to reduce noise impacts from planned well maintenance activities; and (d) conducting noise monitoring where appropriate.</p>	EMS and Noise Management Plan (August 2008).	The EMS and Noise Management Plan (August 2008) details hours of operation and other specific work practices to limit noise during well maintenance. Maintenance on wells constructed under this consent is reportedly minimal, comprising mostly visual inspection and minor unblocking of gas. This is reportedly occurring during day light hours only and generates minimal noise. As there was only minor well maintenance carried out during the audit period, no noise monitoring was undertaken.	Compliant.																	

DA NUMBER: 15-1-2002-i
 LOCATION: Apap, Joe Stanley, Johndilo, Lipscombe, Loganbrae, Mahon
 MODIFICATION: MOD 53-4-2006, MOD 24-3-2007, MOD 3
 WORKS (2008-10): Yes, twinning of gas gathering lines and rehabilitation of Ray Beddoe Treatment Plant.

Number of Conditions: 92
 Closed out previously: 34
 Number Noted: 3
 Number N/A: 1
 Number Non-Compliant: 1
 Compliance Score: 98%

DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
DA 15-1-2002-i	43 Noise – Drilling Impacts The Applicant shall implement management practices as necessary to minimise the potential noise impacts from drilling work at wells LB-1, LB-2 and LB-3. These management practices are to include, but not be limited to: (a) identifying all potentially affected noise sensitive receivers (including residences, schools, commercial premises and noise sensitive equipment) that may be affected by drilling work at these wells; (b) predicting potential noise levels from the proposed well drilling methods where appropriate; (c) identifying and implementing all reasonable and feasible noise mitigation measures to reduce any drilling noise impacts; (d) documenting and implementing any specific work practices the Applicant will employ to limit noise; conducting noise monitoring where appropriate; and (e) appropriately informing affected residences and other relevant parties at least two weeks in advance of any drilling work at wells LB-1, LB-2 and LB-3 and updating the information as required.	EMS and Noise Management Plan (August 2008).	No drilling was conducted at wells within these gas fields during the audit period. The EMS and Noise Management Plan (August 2008) details hours of operation and other specific work practices to limit noise during drilling.	Compliant.	
DA 15-1-2002-i	44 Hours of Operation All site preparation works and construction activities and specifically those works involving the drilling of wells LB-1, LB-2 and LB-3, except where the Applicant has reached an agreement with all potentially affected residences and other noise sensitive receivers to conduct drilling works outside these hours, shall be restricted to the following times: (a) from 7.00am to 6.00pm, Monday to Friday inclusive; (b) from 8.00am to 1.00pm on Saturdays; and (c) at no time on Sunday or a public holiday.	EMS and Noise Management Plan (August 2008).	Wells LB-1, LB-2 and LB-3 have not been drilled.	Compliant.	
DA 15-1-2002-i	45 Notwithstanding condition 44 of this consent, the specified hours of operation also apply to: (a) planned maintenance activities at any of the wells; (b) planned deliveries to the treatment plant; and (c) planned maintenance activities at the treatment plant. except where the Applicant has reached an agreement with all potentially affected residences and other noise sensitive receivers, to conduct maintenance works outside these hours.		There are minimal operational duties under this consent; all activities are completed during daylight hours.	Compliant.	
DA 15-1-2002-i	46 Condition 44 of this consent does not apply to the delivery of materials outside the specified hours of operation if that delivery is required by, the police or other authorities for safety reasons, and/or the operation or personnel or equipment are endangered. In such circumstances, prior notification is provided to the EPA and affected residences as soon as possible, or within a reasonable period in the case of an emergency.		Noted.Wells LB-1, LB-2 and LB-3 have not been drilled.	Compliant.	
DA 15-1-2002-i	47 The hours of operation specified in condition 44 of this consent may be varied with the written consent of the Director-General, if the EPA is satisfied that the amenity of the residents in the locality will not be adversely affected.		Noted.Wells LB-1, LB-2 and LB-3 have not been drilled.	Compliant.	
DA 15-1-2002-i	48 Ray Beddoe Treatment Plant –Reduction of Noise The Applicant shall prepare and submit to the Department and the EPA a Pollution Reduction Program (PRP) for noise designed to meet the following levels at receiver Locations A to M (identified in Fig. 10.1 of the EIS) (a) an LAEQ15min level of 37 dB(A) for the day time period; (b) an LAEQ15min level of 37 dB(A) for the evening period; and (c) an LAEQ15min level of 35 dB(A) for the night time period. These levels are to apply at the most affected point on or within the residential boundary of each nominated receiver or, where the dwelling is more than 30m from the boundary, at the most affected point within 30m of the dwelling.		Pre audit period. RBTP decommissioned and rehabilitated.	Closed out.	
DA 15-1-2002-i	49 If the Applicant determines that the levels set out in condition 48 of this consent cannot be achieved after all feasible and reasonable mitigation measures have been implemented, then the Applicant is to advise the Department and EPA of the levels that can be feasibly and reasonably achieved.		Pre audit period. RBTP decommissioned and rehabilitated.	Closed out.	
DA 15-1-2002-i	50 The PRP is to be submitted to the Department and the EPA within six months of the date of the consent for the development. PRP implementation is to be undertaken in the period from six months to eighteen months from the date of development consent.		Pre audit period. RBTP decommissioned and rehabilitated.	Closed out.	

DA NUMBER: 15-1-2002-i
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DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
DA 15-1-2002-i	51 The PRP shall include a timetable for the implementation of mitigation measures. If the implementation of mitigation measures is to progress in stages, then the PRP is to specify the noise levels that will be achieved following the implementation of each intermediate stage.		Pre audit period. RBTP decommissioned and rehabilitated.	Closed out.	
DA 15-1-2002-i	52 Odour Under the Protection of Environment Operations Act 1997, the Applicant shall not cause or permit any offensive odours to be emitted from the site. For the purposes of this condition, "offensive odour" has the same meaning as provided for by the Protection of the Environment Operations Act 1997.	Complaints register. ConnectFirst Incident Database.	No odour complaints have reportedly been received within the audit period.	Compliant.	
DA 15-1-2002-i	53 Water Quality Impacts Except as may be expressly provided for by a licence under the Protection of the Environment Operations Act 1997, the Applicant shall comply with section 120 of the Protection of the Environment Operations Act 1997 in carrying out the development.	Complaints register. ConnectFirst Incident Database.	No water quality impacts have reportedly occurred within the audit period.	Compliant.	
DA 15-1-2002-i	54 Waste Water Waste water from the construction, installation and operation of wells and associated infrastructure shall only be applied to the following areas: (a) dust suppression on any unsealed roads within PAL 1; (b) irrigated onto pastures within PAL 1; (c) evaporation dam; and (d) reinjection into gas wells. The Applicant shall prepare a detailed feasibility study of reinjection of waste water into a gas well if this method of disposal of waste water is proposed. The approval of the Director-General shall be obtained for reinjection of waste water into a gas well.		Observed wastewater collected in large tanks on site which is reported collected and disposed to licensed waste transfer facility. During the decommissioning of RBTP, one UST (septic) was removed - no documentation sighted.	Compliant.	
DA 15-1-2002-i	55 Spray from waste water application shall not drift beyond the boundary of the waste water utilisation area to which it is applied.		Noted.	Closed out.	
DA 15-1-2002-i	56 The Applicant shall ensure that areas proposed to be used for waste water application can effectively utilise the waste water. This includes the use for pasture or crop production, as well as ensuring the soil is able to absorb the nutrients, salts, hydraulic load and organic materials in the liquids. The Applicant may be required to undertake monitoring of land and receiving waters to determine the impact of waste water application.		Noted.	Closed out.	
DA 15-1-2002-i	57 The Applicant shall ensure that all waste water that is used for dust suppression and/or irrigation has a salinity measure that does not exceed 800 µS/cm.		Noted.	Closed out.	
DA 15-1-2002-i	58 The Applicant shall ensure that activities are carried out in a manner that will minimise the emission of dust from the site, including traffic generated dust from the site access roads.	Sighted landowner rehabilitation statement sign off and handover plan, 24/04/2009.	AGL has implemented the following measures to control emissions of dust from the project: employee inductions raise awareness of dust sources and potential impacts, reduced speed limits and water sprays minimise dust generation.	Compliant.	
DA 15-1-2002-i	59 The Applicant shall take all practicable measures to ensure that all vehicles entering or leaving a site, carrying a load that may generate dust, are covered at all times, except during loading and unloading. Any such vehicles shall be covered or enclosed in a manner that will prevent emissions of dust from the vehicle at all times.	Complaints register.	The requirement for covered loads is discussed during contractor induction. There have been no complaints recorded regarding dust from the gas fields related to this DA.	Compliant.	
DA 15-1-2002-i	60 The Applicant shall take all practicable measures to minimise the generation of wind-blown dust from soil stockpiles.	Temporary stock piles are normally in filled on the same day to minimise exposure to wind and erosion.	Temporary stock piles from trenching operations are normally backfilled into trenches on the same day to minimise exposure to wind and erosion. This is the standard operating practice for installing gas gathering line.	Compliant.	
DA 15-1-2002-i	61 Waste The Applicant shall not cause, permit or allow any waste generated outside the site to be received at the site for storage, treatment, processing, reprocessing or disposal or any waste generated at the site, to be disposed of at the site, except as expressly permitted by a licence under the Protection of the Environment Operations Act 1997. This condition only applies to the storage, treatment, processing, reprocessing or disposal of waste at the site, if it requires a licence under the Protection of the Environment Operations Act 1997.	Waste Management Sub-Plan within the EMS (August 2008).	Inspection of rehabilitated site (formerly RBTP) showed that no waste was stored on site. It was reported that the decommissioned tank was either sold on, stored at LB yard or returned to west farmers (no documentation sighted).	Compliant.	

DA NUMBER: 15-1-2002-i
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DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
DA 15-1-2002-i	62 Notwithstanding condition 61 of this consent, the Applicant may dispose of waste water generated on the site in accordance with condition 54 of this consent.	Observations during site inspection. Sighted details recorded for waste disposal and recycling in the 2008/2009 and 2009/2010 Footprint Data Collection.	Noted. Waste water from wells is collected in large tanks for collection and disposal to licensed waste transfer facility.	Compliant.	
DA 15-1-2002-i	63 Lighting The Applicant shall ensure that all external lighting associated with the development is mounted, screened and directed in such a manner so as to not create a nuisance to surrounding land uses. The lighting must be the minimum level of illumination necessary, and in general accordance with the Australian Standard 4282 – 1997 Control of the Obtrusive Effects of Outdoor Lighting.		Pre-audit period. RBTP decommissioned and rehabilitated.	Closed out.	
DA 15-1-2002-i	64 Gas Flare The gas flare located at the treatment plant shall be ground-level (i.e.. Less than 6.1 metres in height), shrouded, provided with automatic combustion air control, automatic shut-off gas valve and automatic restart system.		Pre-audit period. RBTP decommissioned and rehabilitated. Gas flare not operational during the audit period.	Closed out.	
DA 15-1-2002-i	65 Activated Carbon Filter The activated carbon filter on the odour control system shall be replaced prior to breakthrough occurring.		Pre-audit period. RBTP decommissioned and rehabilitated. No activated carbon filter used.	Closed out.	
DA 15-1-2002-i	66 Steel Pipeline The 200 mm steel pipeline shall not be operated above a pressure of 1.05 MPa.		Pre-audit period. RBTP decommissioned and rehabilitated. Pipeline is fully decommissioned.	Closed out.	
DA 15-1-2002-i	67 The Director-General's approval shall be obtained to operate the steel pipeline pressure above 1.05 MPa. An application to operate the steel pipeline at a higher pressure shall be accompanied by: (a) a Final Hazard Analysis of the proposal including the entire steel pipeline and those sections of the plant where the operating pressure will be increased. The analysis shall be prepared in accordance with the Department of Urban Affairs and Planning's Hazardous Industry Planning Advisory Paper No. 6 "Guidelines for Hazard Analysis". The existing land use and compliance with NSW criteria shall be clearly demonstrated. Where further risk reduction could be required as a result of changes in land use, additional risk reduction measures shall be outlined; and (b) a Hazard and Operability Study for the proposal, chaired by an independent qualified person approved by the Director-General prior to the commencement of the study. The study shall be carried out in accordance with the Department of Urban Affairs and Planning's Hazardous Industry Planning Advisory Paper No. 8 "Hazard and Operability Studies".		Pre-audit period. RBTP decommissioned and rehabilitated. Pipeline is fully decommissioned.	Closed out.	
DA 15-1-2002-i	68 Gas Gathering System Pipeline The Applicant shall comply with the following in the construction of the gas gathering system pipeline: (a) excavated trenches shall not be left uncovered overnight, unless adequate fencing and warning lights are erected; (b) signs stating the presence of a buried gas pipeline shall be erected periodically along the length of the trench once the pipeline has been laid; (c) trenches are to be restored and reseeded with local grass seeds on completion of the work; (d) local council traffic guidelines in respect of work carried out on road verges and underneath roads shall be implemented; (e) the pipeline shall be constructed in accordance with the AS 3723-1989; and (f) the Department shall be notified on the completion of any trenching works.	EMS Guidelines for construction of gas gathering lines (August 2008). Section 3.3 of EMS discusses construction methods and rehabilitation. KPI (section 4.2 of EMS) requires that soil disturbance is minimised.	It was reported that gas gathering lines that fed into RBTP were purged with nitrogen and capped (no longer pressurised). It was reported that the pipelines are recorded in the Dial Before you Dig databases. Site inspection indicated that gas gathering lines were adequately signed and rehabilitated. Twinning of gas pipelines in Logan Brae field was reported to be carried out as per the construction methods described in the EMS. The Contractor engaged to carry out the pipeline trenching and installation works is provided with a copy of the EMS, which describes the standards of work. Formal procedures to verify that the requirements of this condition are met were not sighted. The Contractor for trenching works is responsible for notifying the Department upon completion of works. Generally, AGL do not notify DoP of completion of works. DII is notified on completion of trenching project.	Compliant.	
DA 15-1-2002-i	69 LPG Storage The LPG storage and handling system and procedures shall be in accordance with AS 1596-2002 and industry guidelines.		Pre-audit period. RBTP decommissioned and rehabilitated. Previous audit found that the tank was removed in 2007.	Closed out.	

DA NUMBER: 15-1-2002-i
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DA 15-1-2002-i	70 Indigenous Heritage Prior to the commencement of site preparation works for the three (3) additional wellheads and the associated gas gathering system, the Applicant shall clearly indicate the locations of known aboriginal relics on the site, and ensure that all employees and contractors are aware of these locations, to prevent the known relics being impacted upon during site preparation and construction.		Pre-audit period.	Closed out.																					
DA 15-1-2002-i	71 Cultural Heritage If, during the site preparation and/or drilling phases of the development, an unexpected archaeological relic is uncovered, excavation shall cease and an excavation permit under the Heritage Act 1977, shall be obtained from the NSW Heritage Office.		Pre-audit period.	Closed out.																					
DA 15-1-2002-i	72 Site Rehabilitation The Applicant shall ensure the prompt and effective rehabilitation of all disturbed areas of the site following the completion of construction, operations and associated activities and/or the decommissioning of plant, to minimise the generation of wind erosion dust.	Inspection of rehabilitated site of former Ray Beddoe Treatment Plant (RBTP) and corresponding Site Rehabilitation Management Plan for RBTP (March 2008), RBTP Decommissioning Plan Approval (17/06/2008), RBTP EPA Licence Surrender (13/07/09) and RBTP Landowner signoff form (24/4/09).	Site inspection of former site of RBTP and supporting documentation showed that the site was effectively rehabilitated to a standard consistent with general pasture land use and to the satisfaction of DII and landowner.	Compliant.																					
DA 15-1-2002-i	73 The Applicant shall carry out rehabilitation of the site in accordance with the requirements of the DMR and the Site Rehabilitation Management Plan.	Inspection of rehabilitated site of former Ray Beddoe Treatment Plant (RBTP) and corresponding Site Rehabilitation Management Plan for RBTP (March 2008), RBTP Decommissioning Plan Approval (17/06/2008), RBTP EPA Licence Surrender (13/07/09) and RBTP Landowner signoff form (24/4/09).	Site inspection of former site of RBTP showed that the site was effectively rehabilitated in accordance with the Site Rehabilitation Management Plan (March 2008).	Compliant.																					
DA 15-1-2002-i	74 ENVIRONMENTAL MONITORING Land Subsidence The Applicant shall implement a program to monitor any potential land subsidence effects of long term extraction of gas (and water) on the groundwater resource in the PAL 1 area. The Applicant shall consult with the DLWC over the implementation of the monitoring program. The monitoring program shall be submitted for the Director-General's approval.		RBTP decommissioned and rehabilitated. There was no subsidence observed or reported.	Compliant.																					
DA 15-1-2002-i	75 Vibration Impacts The Applicant shall carry out monitoring of ground vibrations from well drilling activities (including percussion drilling, casing perforation, hydrofracturing operations and air blasts), as recommended by Coffey Geosciences report titled "Camden Coalbed Methane Project Geotechnical Impact Assessment" and dated 5 December 2001. The results of the monitoring shall be submitted to the Director-General.		Decommissioning and rehabilitation of RBTP did not generate vibration impacts during audit period.	Closed out.																					
DA 15-1-2002-i	76 Air Emissions For the purposes of this consent air discharge monitoring points, shall be identified as provided in Table 2 below. Table 2 – Identification of Air Discharge Monitoring Points		Decommissioning and rehabilitation of RBTP did not generate air emission impacts during audit period.	Closed out.																					
<table border="1"> <thead> <tr> <th>Discharge Monitoring Point Identification Number</th> <th>Type of Monitoring Point</th> <th>Type of Discharge</th> <th>Description of Location</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Air emissions monitoring</td> <td>Discharge to air</td> <td>TEG reboiler exhaust (located on the dehydrator unit as shown in Fig. 3.9 of the EIS)</td> </tr> <tr> <td>2</td> <td>Air emissions monitoring</td> <td>Discharge to air</td> <td>Flare (located on the southern corner of the Treatment Plant as shown in Fig. 3.9 of the EIS)</td> </tr> <tr> <td>3</td> <td>Air emissions monitoring</td> <td>Air</td> <td>Coal seam methane gas supply to TEG reboiler (located on the dehydrator unit as shown in Fig 3.9. of the EIS)</td> </tr> <tr> <td>4</td> <td>Air emissions monitoring</td> <td>Discharge to air</td> <td>Odour control system exhaust (located between the dehydrator unit and final gas filter as shown in Fig 3.9. of the EIS)</td> </tr> </tbody> </table>						Discharge Monitoring Point Identification Number	Type of Monitoring Point	Type of Discharge	Description of Location	1	Air emissions monitoring	Discharge to air	TEG reboiler exhaust (located on the dehydrator unit as shown in Fig. 3.9 of the EIS)	2	Air emissions monitoring	Discharge to air	Flare (located on the southern corner of the Treatment Plant as shown in Fig. 3.9 of the EIS)	3	Air emissions monitoring	Air	Coal seam methane gas supply to TEG reboiler (located on the dehydrator unit as shown in Fig 3.9. of the EIS)	4	Air emissions monitoring	Discharge to air	Odour control system exhaust (located between the dehydrator unit and final gas filter as shown in Fig 3.9. of the EIS)
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DA 15-1-2002-i	<p>77 Load Limits The Applicant will be required to pay load based licensing fees once a licence under the POEO Act has been issued. The licence will identify the assessable pollutants and load limits for each fee-based activity classification. These assessable pollutants will be required to be monitored and pollutant loads calculated in accordance with the EPA's Load Calculation Protocol. The assessable pollutants and load limits applicable to this development are given in Table 3 below.</p> <p>Table 3 – Assessable Pollutant Load Limit</p> <table border="1"> <thead> <tr> <th>Assessable Pollutant</th> <th>Load Limit (kg)</th> </tr> </thead> <tbody> <tr> <td>Benzene</td> <td>Applicant to negotiate with the EPA prior to issue of the licence</td> </tr> <tr> <td>Benzo (a) pyrene</td> <td>Applicant to negotiate with the EPA prior to issue of the licence</td> </tr> <tr> <td>Fine particles</td> <td>Applicant to negotiate with the EPA prior to issue of the licence</td> </tr> <tr> <td>Hydrogen sulfide</td> <td>Applicant to negotiate with the EPA prior to issue of the licence</td> </tr> <tr> <td>Nitrogen oxides</td> <td>Applicant to negotiate with the EPA prior to issue of the licence</td> </tr> <tr> <td>Sulfur oxides</td> <td>Applicant to negotiate with the EPA prior to issue of the licence</td> </tr> <tr> <td>VOC's</td> <td>Applicant to negotiate with the EPA prior to issue of the licence</td> </tr> </tbody> </table>	Assessable Pollutant	Load Limit (kg)	Benzene	Applicant to negotiate with the EPA prior to issue of the licence	Benzo (a) pyrene	Applicant to negotiate with the EPA prior to issue of the licence	Fine particles	Applicant to negotiate with the EPA prior to issue of the licence	Hydrogen sulfide	Applicant to negotiate with the EPA prior to issue of the licence	Nitrogen oxides	Applicant to negotiate with the EPA prior to issue of the licence	Sulfur oxides	Applicant to negotiate with the EPA prior to issue of the licence	VOC's	Applicant to negotiate with the EPA prior to issue of the licence	Annual return (EPL11713) 2008-2009. Correspondence from EPA regarding timing of surrender of EPL11713.	During the audit period, the site of RBTP was decommissioned and rehabilitated. These activities did not generate emissions of assessable air pollutants. AGL surrendered EPL11713 during audit period.	Closed out.	
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DA 15-1-2002-i	<p>78 Testing Method – Load Limits Clause 17(1) and (2) of the Protection of the Environment Operations (General) Regulation 1998 requires that monitoring of actual loads of assessable pollutants listed in Table 3 of condition 78 of this consent shall be carried out in accordance with the testing method set out in the relevant load calculation protocol for the fee-based activity classification.</p>		During the audit period, the site of RBTP was decommissioned and rehabilitated. These activities did not generate emissions of assessable air pollutants. No monitoring was undertaken.	Closed out.																	
DA 15-1-2002-i	<p>79 Concentration Limits The Applicant shall ensure that the concentration of each pollutant listed in Table 4 below does not exceed the concentration limits specified for that pollutant at discharge monitoring point 1. This condition does not authorise the discharge or emission of any other pollutants.</p> <p>Table 4 – Point 1 : Concentration Limits</p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Units of measure</th> <th>100 percentile limit</th> <th>Reference conditions</th> </tr> </thead> <tbody> <tr> <td>Nitrogen oxides</td> <td>g/m3</td> <td>0.35</td> <td>Dry, 273 K, 101.3 kPa, 7% O2</td> </tr> <tr> <td>Sulphuric acid mist and/or sulphur trioxide</td> <td>g/m3</td> <td>0.1</td> <td>Dry, 273 K, 101.3 kPa</td> </tr> </tbody> </table>	Pollutant	Units of measure	100 percentile limit	Reference conditions	Nitrogen oxides	g/m3	0.35	Dry, 273 K, 101.3 kPa, 7% O2	Sulphuric acid mist and/or sulphur trioxide	g/m3	0.1	Dry, 273 K, 101.3 kPa		During the audit period, the site of RBTP was decommissioned and rehabilitated. As a result, air pollutants were not emitted from the discharge monitoring point.	Closed out.					
Pollutant	Units of measure	100 percentile limit	Reference conditions																		
Nitrogen oxides	g/m3	0.35	Dry, 273 K, 101.3 kPa, 7% O2																		
Sulphuric acid mist and/or sulphur trioxide	g/m3	0.1	Dry, 273 K, 101.3 kPa																		
DA 15-1-2002-i	<p>80 Destruction Efficiency The Applicant shall ensure that each parameter listed in Table 5 below are equal to or greater than the lower limits specified for that parameter at discharge monitoring point</p> <p>Table 5 – Discharge Monitoring Point 1: Destruction Efficiency</p> <table border="1"> <thead> <tr> <th>Parameter</th> <th>Units of Measure</th> <th>Lower limit</th> <th>Reference Conditions</th> </tr> </thead> <tbody> <tr> <td>Volatile organic compound (VOC) destruction efficiency</td> <td>%</td> <td>98</td> <td>N/A</td> </tr> </tbody> </table>	Parameter	Units of Measure	Lower limit	Reference Conditions	Volatile organic compound (VOC) destruction efficiency	%	98	N/A		During the audit period, the site of RBTP was decommissioned and rehabilitated. As the RBTP was not operational, destruction efficiency at the discharge point does not apply.	Closed out.									
Parameter	Units of Measure	Lower limit	Reference Conditions																		
Volatile organic compound (VOC) destruction efficiency	%	98	N/A																		

DA NUMBER: 15-1-2002-i
 LOCATION: Apap, Joe Stanley, Johndilo, Lipscombe, Loganbrae, Mahon
 MODIFICATION: MOD 53-4-2006, MOD 24-3-2007, MOD 3
 WORKS (2008-10): Yes, twinning of gas gathering lines and rehabilitation of Ray Beddoe Treatment Plant.

Number of Conditions: 92
 Closed out previously: 34
 Number Noted: 3
 Number N/A: 1
 Number Non-Compliant: 1
 Compliance Score: 98%

DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION															
DA 15-1-2002-i	<p>81 Combustion Parameters The Applicant shall ensure that each parameter listed in Table 6 below (over the averaging period) is equal to or greater than the lower limit specified for that parameter at discharge monitoring point 2.</p> <p>Table 6 – Discharge Monitoring Point 2 : Combustion Parameter</p> <table border="1"> <thead> <tr> <th>Parameter</th> <th>Units of Measure</th> <th>Lower limit</th> <th>Averaging Period</th> </tr> </thead> <tbody> <tr> <td>Residence time</td> <td>s</td> <td>0.6</td> <td>Instantaneous</td> </tr> <tr> <td>Temperature</td> <td>°C</td> <td>760</td> <td>Instantaneous</td> </tr> </tbody> </table>	Parameter	Units of Measure	Lower limit	Averaging Period	Residence time	s	0.6	Instantaneous	Temperature	°C	760	Instantaneous		During the audit period, the site of RBTP was decommissioned and rehabilitated. As the RBTP was not operational, combustion parameters are not relevant.	Closed out.				
Parameter	Units of Measure	Lower limit	Averaging Period																	
Residence time	s	0.6	Instantaneous																	
Temperature	°C	760	Instantaneous																	
DA 15-1-2002-i	<p>82 Site Specific Emission Concentration Limit The Applicant shall submit a report to the EPA, which includes a site specific emission concentration limit for sulfuric acid mist and/or sulfur trioxide (as SO₃) and sulfur dioxide for discharge monitoring point 1. The date of submission of the report shall be negotiated with the EPA prior to the issue of the licence.</p>		During the audit period, the site of RBTP was decommissioned and rehabilitated. As the RBTP was not operational, concentration limits are not relevant.	Closed out.																
DA 15-1-2002-i	<p>83 The emission concentration limits shall be developed in accordance with the Approved Methods and Guidance for the Modelling and Assessment of Air Pollutants in NSW and utilise the ground-level concentration criteria specified in Table 7 below.</p> <p>Table 7 – Site Specific Emission Concentration Limit</p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Design Ground-Level Concentration Criteria (ug/m³)</th> <th>Averaging Time</th> <th>Percentile</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Sulfuric acid mist and/or sulfur trioxide (as SO₃)</td> <td>27</td> <td>3 minutes</td> <td>99.9</td> </tr> <tr> <td>712</td> <td>10 minutes</td> <td>100</td> </tr> <tr> <td rowspan="2">Sulfur dioxide</td> <td>570</td> <td>1 hour</td> <td>100</td> </tr> </tbody> </table>	Pollutant	Design Ground-Level Concentration Criteria (ug/m ³)	Averaging Time	Percentile	Sulfuric acid mist and/or sulfur trioxide (as SO ₃)	27	3 minutes	99.9	712	10 minutes	100	Sulfur dioxide	570	1 hour	100		During the audit period, the site of RBTP was decommissioned and rehabilitated. As the RBTP was not operational, concentration limits are not relevant.	Closed out.	
Pollutant	Design Ground-Level Concentration Criteria (ug/m ³)	Averaging Time	Percentile																	
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	712	10 minutes	100																	
Sulfur dioxide	570	1 hour	100																	
	DA 15-1-2002-i	<p>84 Monitoring Records The Applicant shall record and retain the details of any monitoring required as a condition of this consent or a licence under the POEO Act, in relation to the development or in order to comply with the load calculation protocol.</p>		During the audit period, the site of RBTP was decommissioned and rehabilitated. No monitoring was undertaken.	Closed out.															
DA 15-1-2002-i	<p>85 The monitoring required under this consent for the concentration of a pollutant emitted to the air, shall be carried out in accordance with: (a) any methodology which is required under the POEO Act to be used for the testing of the concentration of the pollutant; or (b) if no such requirement is imposed by or under the POEO Act or by the consent or a condition of the licence or the protocol (as the case may be) requires to be used for that testing; or (c) if no such requirement is imposed by or under the POEO Act or by the consent or a condition of the licence or the protocol (as the case may be), any methodology approved in writing by the EPA for the purposes of that testing prior to the testing taking place.</p>		During the audit period, the site of RBTP was decommissioned and rehabilitated. No monitoring was undertaken.	Closed out.																
DA 15-1-2002-i	<p>86 All records required to be kept by the licence shall be: (a) in a legible form, or in a form that can readily be reduced to a legible form; (b) kept for at least four years after the monitoring or event to which they relate took place; and (c) produced in a legible form to any authorised officer of the EPA who asks to see them.</p>	Sighted environmental monitoring records maintained on AGL Server.	Sighted monitoring records with adequate information for traceability.	Compliant.																
DA 15-1-2002-i	<p>87 The following records shall be kept in respect of any samples required to be collected: (a) the date(s) on which the sample was taken; (b) the time(s) at which the sample was taken; (c) the point at which the sample was taken; and (d) the name of the person who collected the sample.</p>	Sighted environmental monitoring records maintained on AGL Server.	Sighted monitoring records with adequate information for traceability.	Compliant.																

DA NUMBER: 15-1-2002-i
 LOCATION: Apap, Joe Stanley, Johndilo, Lipscombe, Loganbrae, Mahon
 MODIFICATION: MOD 53-4-2006, MOD 24-3-2007, MOD 3
 WORKS (2008-10): Yes, twinning of gas gathering lines and rehabilitation of Ray Beddoe Treatment Plant.

Number of Conditions: 92
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DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION																																																																																					
DA 15-1-2002-i	<p>88 Requirement to Monitor Concentrations of Pollutants Discharged</p> <p>The Applicant shall determine the relevant pollutant concentrations and emission parameters specified in Table 8 below, at the discharge monitoring points indicated and employing the sampling and analysis method specified. All relevant pollutant concentrations and emission parameters for each discharge monitoring point shall be determined concurrently and at the frequency specified in the table. The discharge monitoring points are specified in condition 76 of this consent.</p> <p>Table 8 – Discharge Monitoring Point Pollutant and Parameter Monitoring Note 1 : Units of measure, frequency and sampling method to be approved by the EPA in writing.</p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Discharge Monitoring Point</th> <th>Unit of Measure</th> <th>Frequency</th> <th>Sampling Method</th> </tr> </thead> <tbody> <tr><td>carbon dioxide in stack gases</td><td>1 and 3</td><td>%</td><td>Annual</td><td>TM-24</td></tr> <tr><td>carbon monoxide</td><td>1</td><td>ppm</td><td>Annual</td><td>OM-1</td></tr> <tr><td>dry gas density</td><td>1 and 3</td><td>kg/m3</td><td>Annual</td><td>TM-23</td></tr> <tr><td>moisture content in stack gases</td><td>1 and 3</td><td>%</td><td>Annual</td><td>TM-22</td></tr> <tr><td>molecular weight of stack gases</td><td>1 and 3</td><td>g/gmole</td><td>Annual</td><td>TM-23</td></tr> <tr><td>nitrogen oxides</td><td>1</td><td>g/m3</td><td>Annual</td><td>TM-11</td></tr> <tr><td>oxygen in stack gases</td><td>1 and 3</td><td>%</td><td>Annual</td><td>TM-25</td></tr> <tr><td>sulfur dioxide</td><td>1</td><td>g/m3</td><td>Annual</td><td>TM-4</td></tr> <tr><td>sulfuric acid mist and/or sulfur trioxide</td><td>1</td><td>g/m3</td><td>Annual</td><td>TM-3</td></tr> <tr><td>temperature</td><td>1 and 3</td><td>0C</td><td>Annual</td><td>TM-2</td></tr> <tr><td></td><td>2</td><td>0C</td><td>Continuous</td><td>TM-2</td></tr> <tr><td>tertiary butyl mercaptan</td><td>4</td><td>Note1</td><td>Note1</td><td>Note1</td></tr> <tr><td>velocity</td><td>1 and 3</td><td>m/s</td><td>Annual</td><td>TM-2</td></tr> <tr><td>volatile organic compounds (VOC)</td><td>1 and 3</td><td>ppm</td><td>Annual</td><td>OM-2</td></tr> <tr><td>volumetric flow rate</td><td>1 and 3</td><td>m3/s</td><td>Annual</td><td>TM-2</td></tr> <tr><td></td><td>2</td><td>m3/s</td><td>Continuous</td><td>CEM-6</td></tr> </tbody> </table>	Pollutant	Discharge Monitoring Point	Unit of Measure	Frequency	Sampling Method	carbon dioxide in stack gases	1 and 3	%	Annual	TM-24	carbon monoxide	1	ppm	Annual	OM-1	dry gas density	1 and 3	kg/m3	Annual	TM-23	moisture content in stack gases	1 and 3	%	Annual	TM-22	molecular weight of stack gases	1 and 3	g/gmole	Annual	TM-23	nitrogen oxides	1	g/m3	Annual	TM-11	oxygen in stack gases	1 and 3	%	Annual	TM-25	sulfur dioxide	1	g/m3	Annual	TM-4	sulfuric acid mist and/or sulfur trioxide	1	g/m3	Annual	TM-3	temperature	1 and 3	0C	Annual	TM-2		2	0C	Continuous	TM-2	tertiary butyl mercaptan	4	Note1	Note1	Note1	velocity	1 and 3	m/s	Annual	TM-2	volatile organic compounds (VOC)	1 and 3	ppm	Annual	OM-2	volumetric flow rate	1 and 3	m3/s	Annual	TM-2		2	m3/s	Continuous	CEM-6		<p>Last round of monitoring at RBTP took place in June 2006; the results of which are described in the 2004-2006 audit report.</p> <p>RBTP is now decommissioned and fully rehabilitated. The site has been handed over to the land owner.</p>	Closed out.	
Pollutant	Discharge Monitoring Point	Unit of Measure	Frequency	Sampling Method																																																																																						
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DA 15-1-2002-i	<p>89 The selection of sampling positions is to be carried out in accordance with test method TM-1.</p>			Closed out.																																																																																						
DA 15-1-2002-i	<p>90 Community Consultative Committee</p> <p>The Applicant shall establish a Community Consultative Committee to oversee the environmental performance of the development. This Committee shall:</p> <p>(a) be chaired by an independent chairperson approved by the Director-General in consultation with the Applicant, Wollondilly Council and Camden Council;</p> <p>(b) have four community representatives residing in the PAL 1 area;</p> <p>(c) have one representative from each council;</p> <p>(d) two representatives appointed by the Applicant (including the environmental officer);</p> <p>(e) two (2) representatives from a recognised environmental group;</p> <p>(f) meet at least quarterly;</p> <p>(g) take minutes of the meeting; and</p> <p>(h) make comments and recommendations about the implementation of the development and environmental management plans, monitor compliance with conditions of this consent and other matters relevant to the operation of the development during the term of the consent. Representatives from relevant government agencies or other individuals may be invited to attend meetings as required by the Chairperson.</p>	<p>Sighted Community Consultation Committee (CCC) Minutes: #20 25/09/08, #21 27/11/08, #22 19/03/09 #23 16/07/09 #24 18/02/10 and #25 15/07/10.</p>	<p>AGL have established a Community Consultation Committee (CCC) chaired by an independent person appointed by the DII. Community, local councils and AGL make up CCC membership. Meeting minutes are recorded and demonstrate that the CCC reviews management and monitoring of environmental compliance.</p> <p>It was reported that the CCC had revised the frequency of meetings to three times per year</p> <p>with agreement from all participants but in recent months the quarterly meeting schedule had resumed.</p>	Compliant.																																																																																						
DA 15-1-2002-i	<p>91 The Applicant shall:</p> <p>(a) provide the Committee with regular information on the environmental performance and management of the development;</p> <p>(b) ensure that the Committee has reasonable access to the necessary plans to carry out its functions;</p> <p>(c) consider the recommendations and comments of the Committee and provide a response to the Committee and Director-General;</p> <p>(d) provide access for site inspections by the Committee;</p> <p>(e) make the minutes available for public inspection at Camden and Wollondilly Councils within fourteen days of the Committee meeting, or as agreed by the Committee; and</p> <p>(f) forward a copy of the minutes of each Committee meeting, and any responses to the Committee's recommendations to the Director-General and the DMR within a month of the Committee meeting.</p>	<p>Sighted Community Consultation Committee (CCC) Minutes: #20 25/09/08, #21 27/11/08, #22 19/03/09 #23 16/07/09 #24 18/02/10 and #25 15/07/10.</p>	<p>Meeting minutes were reviewed and found to be compliant with the requirements (a) to (h).</p>	Compliant.																																																																																						

DA NUMBER: 15-1-2002-i
 LOCATION: Apap, Joe Stanley, Johndilo, Lipscombe, Loganbrae, Mahon
 MODIFICATION: MOD 53-4-2006, MOD 24-3-2007, MOD 3
 WORKS (2008-10): Yes, twinning of gas gathering lines and rehabilitation of Ray Beddoe Treatment Plant.

Number of Conditions: 92
 Closed out previously: 34
 Number Noted: 3
 Number N/A: 1
 Number Non-Compliant: 1
 Compliance Score: 98%

DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
DA 15-1-2002-i	<p>92 If required by the Committee, the Applicant shall establish a trust fund or other funding arrangement that may be agreed between the Applicant and Committee, to be managed by the Chair of the Committee to facilitate the functioning of the Committee, and pay \$5000 per annum to the fund or other arrangement, for the duration of operation in the PAL 1 area, or as otherwise directed by the Director-General.</p> <p>The monies are to be used only if required for the engagement of consultants to interpret technical information and the like. The annual payment shall be indexed according to the Consumer Price Index (CPI) at the time of payment. The first payment shall be made by the date of the first Committee meeting. A record of the finances of the trust fund during each year shall be provided to the Director-General and Applicant by the Chair on each anniversary of the first payment. Any unspent monies shall be returned to the Applicant each year.</p>		It was reported that the establishment of a trust fund was not required by the Committee.	Compliant.	
DA 15-1-2002-i	END OF DA15-1-2002-i.				

Appendix B DA246-8-2002i Compliance Checklist

DA NUMBER: 246-8-2002-i
 LOCATION: Kay Park
 MODIFICATION: MOD 25-3-2007;MOD2
 WORKS: Yes, twinning of gas gathering line.

Number of Conditions: 37
 Closed out previously: 0
 Number Noted: 0
 Number N/A: 2
 Number Non-Compliant: 1
 Compliance Score: 97%

DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
246-8-2002-i	1 Obligation to Minimise Harm to the Environment The Applicant shall implement all practicable measures to prevent or minimise any harm to the environment that may result from the construction or operation of the development.	General audit findings and observations made during site inspection. Workover maintenance records for KP05 sighted.	The audit indicates that no significant environmental issues occurred at Kay Park gas fields during the audit period. No environmental incidents, complaints or non-compliances have reportedly occurred under this consent.	Compliant.	
246-8-2002-i	2 Terms of Approval The Applicant shall carry out the development generally in accordance with the: (a) DA submitted to the Department on 2 August 2002; and (b) Sydney Gas Operations Pty Ltd Kay Park CBM Project Prospecting Exploration Licence 2 Statement of Environmental Effects Exploration Drilling & Gas Gathering Operations, dated 15/4/02 and prepared by Harvest Scientific Services; (c) Addendum to Report Camden Coal Bed Methane Project – Kay Park Pipeline Archaeological and Heritage Assessment, dated May 2002 and prepared by New South Wales Archaeology; (d) Conditions of the consent for DA No. 15-1-2002-i dated 23 July 2002; and (e) Modification Application MOD 25-3-2007 and "Camden Gas Project Joint Venture Gas Well and Gathering Line Modification Project Statement of Environmental Effects", dated March 2007; (f) Modification Application DA 246-8-2002i MOD 2 and "Camden Gas Project: Kay Park and Loganbrae Gas Gathering Line Modification Project Statement of Environmental Effects", dated July 2008; and (g) Conditions of this consent. If there is any inconsistency between the above documents, the latter document shall prevail over the former to the extent of the inconsistency. However, the conditions of this consent shall prevail over all other documents to the extent of any inconsistency.	General audit findings and observations made during site inspection. Part 3A approval (DA246-8-2002-i) and PEL2 and DA15-1-2002-i and MOD2 for gas gathering line twinning between Loganbrae and Kay Park. A detailed review of Archaeological and Heritage Assessment (2002) and Statement of Environmental Effects was not carried out as part of this audit.	It was reported that the development has been undertaken in accordance with the Terms of Approval. During the audit period, works were limited to twinning of gas gathering lines near Kay Park field (subject to MOD2). The planned route for gas gathering line twinning avoided heritage areas identified in the Archaeological and Heritage Assessment (2002). KP06 has not yet been drilled; however approval for drilling remains valid.	Compliant.	
246-8-2002-i	3 Period of Approval This approval is for a period of twenty one (21) years from the date of granting of the production lease.		Noted. Approval expires in 2023.	Compliant.	
246-8-2002-i	3A Special Condition of Approval The Applicant shall not produce gas from any well until a Production Lease under the Petroleum (Onshore) Act 1991 has been obtained for the full length of the well.	Production Lease No. 2, dated 16/10/2002.	Noted. Production Lease No. 2 dated 16/10/2002 applies to this development.	Compliant.	
246-8-2002-i	4 Redrilling and Refracting Management Plan For the purposes of this consent the redrilling and/or additional fracture stimulation of a well does not constitute wellhead maintenance.	Interviews with site personnel and drilling, refracting and maintenance records.	No re-drilling or refracting within audit period.	Compliant.	
246-8-2002-i	5 The Applicant shall obtain the approval of the Director-General for the redrilling and/or additional fracture stimulation of a well.	Interviews with site personnel.	No re-drilling or refracting within audit period.	Compliant.	
246-8-2002-i	6 The Applicant shall prepare and submit to the Director-General a Redrilling and Refracting Management Plan (in accordance with Condition 10 of the consent for DA No. 15-1-2002-i dated 23 July 2002) for the redrilling and refracting of an existing well.	Interviews with site personnel.	No re-drilling or refracting within audit period.	Compliant.	
246-8-2002-i	7 The Applicant shall give written notification of the proposed redrilling/refracting work to potentially affected residences and other noise sensitive receivers at least fourteen days prior to work commencing.	Interviews with site personnel.	No re-drilling or refracting within audit period.	Compliant.	
246-8-2002-i	8 Compliance Throughout the life of the development, the Applicant shall secure, renew, maintain, and comply with all the relevant statutory approvals applying to the development.	EMS details the relevant statutory requirements applying to the development.	There were no non-compliances reported during the audit period. Works appear to be consistent with requirements.	Compliant.	
246-8-2002-i	9 The Applicant shall take all reasonable steps to ensure that all of its employees, contractors and subcontractors are made aware of, and comply with, the conditions of this consent relevant to their respective activities.	Sighted site-specific materials on induction, including induction register (details personnel, experience, competencies etc) maintained in hard copy and in electronic database within the HSE Induction Folder.	Induction content and records indicated that the induction communicated the relevant requirements of the conditions of consent. Signage communicating key requirements was evident across the site.	Compliant.	

DA NUMBER: 246-8-2002-i
 LOCATION: Kay Park
 MODIFICATION: MOD 25-3-2007;MOD2
 WORKS: Yes, twinning of gas gathering line.

Number of Conditions: 37
 Closed out previously: 0
 Number Noted: 0
 Number N/A: 2
 Number Non-Compliant: 1
 Compliance Score: 97%

DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
246-8-2002-i	<p>10 Production Operations Plan</p> <p>The Applicant shall prepare a Production Operations Plan (POP) for the approval of the DPI. The POP shall have regard to the conditions of this consent and the Environment Protection Licence under the Protection of the Environment Operations Act 1997. The POP will form the basis for the:</p> <p>(a) ongoing operations and environmental management; and (b) ongoing monitoring of the development.</p> <p>A copy of the POP shall be forwarded to the Department within fourteen days of the DPI's acceptance.</p> <p>(f) Modification Application DA 246-8-2002i MOD2 and "Camden Gas Project: Kay Park and Loganbrae Gas Gathering Line Modification Project Statement of Environmental Effects", dated July 2008; and (g) Conditions of this consent.</p> <p>If there is any inconsistency between the above documents, the latter document shall prevail over the former to the extent of the inconsistency. However, conditions of this consent shall prevail over all other documents to the extent of any inconsistency.</p>	<p>AGL have submitted a revised POP (September 2008 - Version 7) which has not been approved by DII.</p> <p>Sighted POP Version 6 approved by DII (September 2008).</p>	<p>An updated POP (v7) was submitted to DII in 2010; however DII required changes (e.g. update well numbers) before an approval was granted. AGL was not able to provide evidence to verify the POP (v7) was resubmitted to DII. As the current/approved POP (v6) does not reflect the current status of operations at Camden Gas Project (i.e. development has progressed without an approved POP (v7), the development is considered to not comply with this condition.</p>	Non-Compliant.	Version 7 of the POP is to be completed and submitted for approval to the DII.
246-8-2002-i	<p>11 Environmental Management Plan</p> <p>The Applicant shall amend the Environmental Management Plan required under Condition 15 of the consent for DA No. 15-1-2002-i dated 23 July 2002, to include the operation of KP1, KP2, KP3, KP05 and KP06 and the associated gas gathering system.</p>	<p>Sighted EMS (August 2008), including: Noise Management Plan; Soil and Water Management Plan; Water Quality Management Plan; Traffic Management Plan; Waste Management Plan; and Site Rehabilitation Management Plan (including Vegetation and Landscape Management Plan).</p>	<p>The Camden Project Health, Safety and Environment Management Plan (HSEMP) (approved by DoP) has been updated. The new format includes an Environmental Management System (EMS) and Safety Management System (SMS).</p> <p>The EMS contains: Legislative requirements (Section 2.1) Structure and responsibility (Section 5.1) AGL HSE Policy (Jan 2008) Objectives, targets and KPI (section 4.2) Policies and procedures within the EMS and additional Management Sub Plans. It covers heritage conservation and management applicable to Kay Park.</p> <p>It was reported that the organisation made sufficient resources available to implement the EMS effectively as part of the normal operations.</p>	Compliant.	
246-8-2002-i	<p>12 Condition Report</p> <p>The Applicant shall prepare a Condition Report on residences and structures that may be potentially affected by drilling/fracing work, including the redrilling and refracing of an existing well.</p> <p>The Applicant shall undertake an inspection of the residence and/or structure prior to work commencing, and a follow up inspection within one month of the completion of the work. The Applicant shall take immediate action for repair of any damage to the residence or structure as a result of the work and to avoid any further damage. A copy of the Condition Report shall be submitted to the Director-General and the DPI after completion of the work.</p>		<p>As drilling or fracture stimulation was not reported to occur during the audit period, a condition report was not required.</p>	N/A	
246-8-2002-i	<p>13 Incident Reporting</p> <p>The Applicant shall notify the DECC, DPI and the Director-General of any incident with significant off-site impacts on people or the biosphere environment as soon as practicable after the occurrence of the incident. The Applicant shall provide written details of the incident to the Director-General, the DECC, DPI and Wollondilly Council within seven days of the date on which the incident occurred.</p>	ConnectFirst Incident Database	<p>No incidents were reported to have occurred during the audit period at Kay Park.</p>	Compliant.	
246-8-2002-i	<p>14 The Applicant shall meet the requirements of the Director-General to address the cause or impact of any incident, as it relates to this consent, reported in accordance with Condition 13 of this consent, within such period as the Director-General may agree.</p>	ConnectFirst Incident Database	<p>No incidents were reported to have occurred during the audit period at Kay Park.</p>	Compliant.	

DA NUMBER: 246-8-2002-i
 LOCATION: Kay Park
 MODIFICATION: MOD 25-3-2007;MOD2
 WORKS: Yes, twinning of gas gathering line.

Number of Conditions: 37
 Closed out previously: 0
 Number Noted: 0
 Number N/A: 2
 Number Non-Compliant: 1
 Compliance Score: 97%

DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
246-8-2002-i	<p>15 Complaints Register</p> <p>The Applicant shall record details of all complaints received in an up-to-date Complaints Register. The Register shall record, but not necessarily be limited to:</p> <p>(a) the date and time, where relevant of the complaint;</p> <p>(b) the means by which the complaint was made;</p> <p>(c) any personal details of the complainant that were provided, or if no details were provided, a note to that effect;</p> <p>(d) the nature of the complaints;</p> <p>(e) any action(s) taken by the Applicant in relation to the complaint, including any follow-up contact with the complainant; and</p> <p>(f) if no action was taken by the Applicant in relation to the complaint, the reason(s) why no action was taken.</p> <p>The Complaints Register shall be made available for inspection by the DECC or the Director-General upon request. The Applicant shall also make summaries of the register, without details of the complainants, available for public inspection.</p>	Sighted the Complaints register for the project.	Complaints are recorded in the complaints register and are reported in the Annual Environmental Performance Report. No complaints relating to this development have been reported during the audit period.	Compliant.	
246-8-2002-i	<p>16 Annual Environmental Performance Reporting</p> <p>The Applicant shall include the operation of KP 1, KP2, KP3, KP05 and KP06 and the associated gas gathering system, and the conditions of this consent, in the Annual Environmental Performance Report required under Condition 34 of the consent for DA No. 15-1-2002-i dated 23 July 2002.</p>	Sighted Annual Environmental Performance Reports for June 2007, June 2008, June 2009 and June 2010.	Annual Environmental Performance Reports were observed to be prepared and submitted as required by this CoC.	Compliant.	
246-8-2002-i	<p>17 Independent Environmental Audit</p> <p>The Applicant shall include the operation of KP 1, KP2, KP3, KP05 and KP06 and the associated gas gathering system, and the conditions of this consent, in the Independent Environmental Audit required under Condition 35 of the consent for DA No. 15-1-2002-i dated 23 July 2002.</p>	This audit provides evidence of the independent environmental audit being completed.	This audit report demonstrates that the operation of KP1, KP2, KP3, KP05 and KP06 and associated gas gathering system was assessed for compliance with the conditions of consent.	Compliant.	
246-8-2002-i	<p>18 Noise – Well Maintenance</p> <p>The Applicant shall apply all feasible and reasonable noise mitigation measures to planned well maintenance activities in order to achieve the noise limits specified by Condition 38 of the consent for DA No. 15-1-2002-i dated 23 July 2002. Where the noise limits are not achievable the Applicant shall implement management practices as necessary to minimise the potential noise impacts. These management practices are to include, but not be limited to:</p> <p>(a) appropriately informing affected residences and other relevant parties at least two weeks in advance of any planned well maintenance activities and updating the information as required;</p> <p>(b) documenting and implementing any specific work practices the Applicant will employ to limit noise;</p> <p>(c) documenting the feasible and reasonable noise mitigation measures that will be undertaken to reduce noise impacts from planned well maintenance activities; and</p> <p>(d) conducting noise monitoring where appropriate.</p>	Sighted KP05 Well Work Over Reports and KP05 Well Completion Program maintained on AGL Server.	There were no planned well maintenance works during this audit period. There were no corresponding noise complaints reported during the audit period.	Compliant.	
246-8-2002-i	<p>19 Noise – Drilling Impacts</p> <p>19. The Applicant shall implement management practices as necessary to minimise the potential noise impacts from any redrilling and refracturing work. These management practices are to include, but not be limited to:</p> <p>(a) identifying all potentially affected noise sensitive receivers (including residences, schools, commercial premises and noise sensitive equipment) that may be affected by drilling work at these wells;</p> <p>(b) predicting potential noise levels from the proposed well drilling methods where appropriate;</p> <p>(c) identifying and implementing all reasonable and feasible noise mitigation measures to reduce any drilling noise impacts;</p> <p>(d) documenting and implementing any specific work practices the Applicant will employ to limit noise; conducting noise monitoring where appropriate; and</p> <p>(e) appropriately informing affected residences and other relevant parties at least two weeks in advance of any drilling work and updating the information as required.</p>	Approval to Drill KP06.	No drilling occurred during this audit period. Approval exists to drill KP06 - not yet drilled or scheduled to be drilled.	Compliant.	

DA NUMBER: 246-8-2002-i
LOCATION: Kay Park
MODIFICATION: MOD 25-3-2007;MOD2
WORKS: Yes, twinning of gas gathering line.

Number of Conditions: 37
Closed out previously: 0
Number Noted: 0
Number N/A: 2
Number Non-Compliant: 1
Compliance Score: 97%

DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION										
	<p>19A Construction Hours The Applicant shall ensure that all construction work (except for the drilling (including well casing and grouting) of SIS wells) shall only be conducted between 7.00am and 6.00pm Monday to Friday and between 8.00 am and 1.00 pm Saturdays, unless inaudible at any residential receiver.</p>		It was reported that standard construction hours were applied consistently across all Camden Gas Project. All works completed under this DA were reportedly undertaken during approved construction hours.	Compliant.											
	<p>19B Construction Noise Criteria for SIS Wells Noise from the drilling and construction of KP05 and KP06 shall not exceed the sound pressure level (noise) limits in the table below:</p> <table border="1" style="margin-left: 40px;"> <thead> <tr> <th>Receiver Location</th> <th>Weekday (7.00am-6.00pm) Saturday (7.00am-1.00pm)</th> <th>Saturday (1.00pm-6.00pm) Sunday(7.00am-6.00pm)</th> <th>Evening (6.00pm-10.00pm)</th> <th>Night (10.00pm-7.00am)</th> </tr> </thead> <tbody> <tr> <td>Nearest Receiver</td> <td>53</td> <td>48</td> <td>41</td> <td>35</td> </tr> </tbody> </table>	Receiver Location	Weekday (7.00am-6.00pm) Saturday (7.00am-1.00pm)	Saturday (1.00pm-6.00pm) Sunday(7.00am-6.00pm)	Evening (6.00pm-10.00pm)	Night (10.00pm-7.00am)	Nearest Receiver	53	48	41	35		KP06 not yet drilled. Drilling of KP05 occurred pre audit period. There were no corresponding noise complaints reported during the audit period.	N/A	
Receiver Location	Weekday (7.00am-6.00pm) Saturday (7.00am-1.00pm)	Saturday (1.00pm-6.00pm) Sunday(7.00am-6.00pm)	Evening (6.00pm-10.00pm)	Night (10.00pm-7.00am)											
Nearest Receiver	53	48	41	35											
246-8-2002-i	<p>20 Water Quality Impacts Except as may be expressly provided for by a licence under the Protection of the Environment Operations Act 1997, the Applicant shall comply with section 120 of the Protection of the Environment Operations Act 1997 in carrying out the development.</p>	Part 3A approval for Gas Gathering Line twinning project - no specific conditions.	AGL staff reported that during gas gathering line twinning, all works were conducted during dry weather periods and no impacts on water quality were reported. Construction methods for gas gathering line installation minimise disturbance i.e. trench excavations are backfilled daily to minimise sedimentation impacts on waterways.	Compliant.											
246-8-2002-i	<p>21 Waste Water Waste water from the construction, installation and operation of wells and associated infrastructure shall only be applied to the following areas: (a) dust suppression on any unsealed roads within the site; (b) irrigated onto pastures within the site; (c) evaporation dam; and (d) reinjection into gas wells. The Applicant shall prepare a detailed feasibility study of reinjection of waste water into a gas well if this method of disposal of waste water is proposed. The approval of the Director-General shall be obtained for reinjection of waste water into a gas well.</p>	EMS (2008) includes guidelines for construction of gas gathering lines. Section 3.3 of EMS (2008) outlines construction methods and rehabilitation. KPI (section 4.2) requires that soil disturbance is minimised.	Gas gathering line twinning does not generally result in generation of wastewater to be managed. Wastewater generating activities (e.g. construction, installation and operation of wells) did not occur at Kay Park during the audit period.	Compliant.											
246-8-2002-i	<p>22 Spray from waste water application shall not drift beyond the boundary of the waste water utilisation area to which it is applied.</p>		Gas gathering line twinning does not generally result in generation of wastewater to be managed. Wastewater generating activities (e.g. construction, installation and operation of wells) did not occur at Kay Park during the audit period.	Compliant.											
246-8-2002-i	<p>23 The Applicant shall ensure that areas proposed to be used for waste water application can effectively utilise the waste water. This includes the use for pasture or crop production, as well as ensuring the soil is able to absorb the nutrients, salts, hydraulic load and organic materials in the liquids. The Applicant may be required to undertake monitoring of land and receiving waters to determine the impact of waste water application.</p>		Gas gathering line twinning does not generally result in generation of wastewater to be managed. Wastewater generating activities (e.g. construction, installation and operation of wells) did not occur at Kay Park during the audit period.	Compliant.											
246-8-2002-i	<p>24 The Applicant shall ensure that all waste water that is used for dust suppression and/or irrigation has a salinity measure that does not exceed 800 µS/cm.</p>	EMS (2008) includes guidelines for construction of gas gathering lines. Section 3.3 of EMS (2008) outlines construction methods and rehabilitation. KPI (section 4.2) requires that soil disturbance is minimised.	Gas gathering line twinning does not generally result in generation of wastewater to be managed. Wastewater generating activities (e.g. construction, installation and operation of wells) did not occur at Kay Park during the audit period.	Compliant.											

DA NUMBER: 246-8-2002-i
 LOCATION: Kay Park
 MODIFICATION: MOD 25-3-2007;MOD2
 WORKS: Yes, twinning of gas gathering line.

Number of Conditions: 37
 Closed out previously: 0
 Number Noted: 0
 Number N/A: 2
 Number Non-Compliant: 1
 Compliance Score: 97%

DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
246-8-2002-i	25 Dust The Applicant shall ensure that activities are carried out in a manner that will minimise the emission of dust from the site, including traffic generated dust from the site access roads.	EMS (2008) includes guidelines for construction of gas gathering lines. Section 3.3 of EMS (2008) outlines construction methods and rehabilitation. KPI (section 4.2) requires that soil disturbance is minimised.	Standard construction methods for gas gathering line installation minimise disturbance i.e. trench excavations are backfilled daily, reduced vehicle speeds etc prevent emissions of dust from site. Fresh water is used for dust suppression (wastewater too saline), where necessary. Water cart is available for dust suppression.	Compliant.	
246-8-2002-i	26 The Applicant shall take all practicable measures to ensure that all vehicles entering or leaving a site, carrying a load that may generate dust, are covered at all times, except during loading and unloading. Any such vehicles shall be covered or enclosed in a manner that will prevent emissions of dust from the vehicle at all times.	EMS (2008) includes guidelines for construction of gas gathering lines. Section 3.3 of EMS (2008) outlines construction methods and rehabilitation. KPI (section 4.2) requires that soil disturbance is minimised.	Noted. A speed limit is enforced at AGL sites. Loads are reportedly covered where applicable. Observations made during a site inspection showed that water sprays were used to minimise dust where required.	Compliant.	
246-8-2002-i	27 The Applicant shall take all practicable measures to minimise the generation of wind-blown dust from soil stockpiles.	EMS (2008) includes guidelines for construction of gas gathering lines. Section 3.3 of EMS (2008) outlines construction methods and rehabilitation. KPI (section 4.2) requires that soil disturbance is minimised.	Construction methods for gas gathering line installation minimise disturbance i.e. trench excavations are backfilled daily.	Compliant.	
246-8-2002-i	28 Gas Gathering System Pipeline The Applicant shall comply with the following in the construction of the gas gathering system pipeline: (a) excavated trenches shall not be left uncovered overnight, unless adequate fencing and warning lights are erected; (b) signs stating the presence of a buried gas pipeline shall be erected periodically along the length of the trench once the pipeline has been laid; (c) trenches are to be restored and reseeded with local grass seeds on completion of the work; (d) local council traffic guidelines in respect of work carried out on road verges and underneath roads shall be implemented; (e) the pipeline shall be constructed in accordance with the AS 3723-1989; and (f) the Department shall be notified on the completion of any trenching works.	EMS (2008) includes guidelines for construction of gas gathering lines. Section 3.3 of EMS (2008) outlines construction methods and rehabilitation. KPI (section 4.2) requires that soil disturbance is minimised.	According to site plans and observations, gas gathering lines appear to be well located, signed and rehabilitated. Guidelines are included in the EMS (2008). Formal procedures relating to the requirements of this condition not sighted. The project manager for the gas gathering lines is responsible for notifying the Department upon completion of trenching works. It was reported that the Department is notified following completion of the whole trenching project, rather than individual sections of trenching work.	Compliant.	
246-8-2002-i	28A Threatened Species The Applicant shall ensure that, during the drilling and construction of KP05 and KP06, impacts on threatened species are minimised by implementing actions including, but not limited to, the following: (a) The recommendations outlined in Sections 6 and 7 of the Ecosearch Environmental Consultants Pty Ltd report titled "Flora and Fauna Assessment, AGL –Gas Well and Gathering Line Project modifications"; and (b) Marking the boundaries of endangered ecological communities (EECs) and locations of other known threatened species and, where possible, avoiding construction activities within these areas.	Updated Flora and fauna assessment, Ecosearch presented in the SEE (The Planning Group, 01/07/2008) for gas gathering line twinning.	KP06 not yet drilled. Drilling of KP05 occurred pre audit period. AGL minimise impact by using only defined access routes and planning works in previously cleared areas. It was reported that no-go zones applied to edge of road near waterway. It was reported that no threatened species were impacted as a result of activities that occurred during the audit period.	Compliant.	
	28B Heritage The Applicant shall ensure that, if any historical archaeological relics within the meaning of the Heritage Act 1997 are disturbed, the Heritage Council of NSW shall be notified in accordance with section 146 of the Heritage Act 1977.	SEE (The Planning Group, 01/07/2008)	Heritage recommendations in SEE (The Planning Group, 01/07/2008) identify procedures for minimising disturbance and where relics are identified. AGL minimise impact by using only defined access routes and planning works in previously cleared areas.	Compliant.	

DA NUMBER: 246-8-2002-i
 LOCATION: Kay Park
 MODIFICATION: MOD 25-3-2007;MOD2
 WORKS: Yes, twinning of gas gathering line.

Number of Conditions: 37
 Closed out previously: 0
 Number Noted: 0
 Number N/A: 2
 Number Non-Compliant: 1
 Compliance Score: 97%

DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
	<p>29 Site Rehabilitation The Applicant shall ensure the prompt and effective rehabilitation of all disturbed areas of the site following the completion of construction, operations and associated activities and/or the decommissioning of plant, to minimise the generation of wind erosion dust.</p>	EMS (2008) includes guidelines for construction of gas gathering lines. Section 3.3 of EMS (2008) outlines construction methods and rehabilitation. KPI (section 4.2) requires that soil disturbance is minimised.	Construction methods published in the EMS (2008) allow for progressive rehabilitation of trenching works during installation of gas gathering line. As far as practical, the Kay Park gas gathering line was installed on existing access roads to minimise disturbance.	Compliant.	
246-8-2002-i	30 The Applicant shall carry out rehabilitation of the site in accordance with the requirements of the DPI and the Site Rehabilitation Management Plan.	EMS (2008) includes guidelines for construction of gas gathering lines. Section 3.3 of EMS (2008) outlines construction methods and rehabilitation. KPI (section 4.2) requires that soil disturbance is minimised.	It was reported that gas gathering line twinning was carried out in accordance with the rehabilitation management plan in the EMS (2008). It was reported that there were no specific requirements of DII.	Compliant.	
246-8-2002-i	<p>31 Community Consultative Committee The Applicant shall include the operation of KP1, KP2, KP3, KP05 and KP06 and the associated gas gathering system, and the conditions of this consent, as a matter for the consideration of the Community Consultative Committee (established under Condition 90 of the consent for DA No. 15-1-2002-i dated 23 July 2002).</p>	Sighted Community Consultation Committee (CCC) Minutes. #20 25/09/08, #21 27/11/08, #22 19/03/09 #23 16/07/09 #24 18/02/10 and #25 15/07/10.	The Community Consultation Committee Meetings respond to general business and emerging issues relating to all aspects of the Camden Gas Project, including KP1, KP2, KP3, KP05 and KP06 and the associated gas gathering system.	Compliant.	
246-8-2002-i	<p>32 Environment Protection Licence The Applicant shall seek a variation to the Environment Protection Licence issued by the DECC for the Petroleum Production Lease No.1 area, to include the operation of the Kay Park wells (KP1, KP2, KP3, KP05 and KP06) and associated gas gathering system.</p>	Sighted EPL 12003.	EPL 11713 surrendered. EPL 12003 applies to RPGP and all wells and gas gathering system, including Kay Park.	Compliant.	
	End Of DA 246-8-2002-i				

Appendix C DA282-6-2003i Compliance Checklist

DA NUMBER: DA 282-6-2003-i
 LOCATION: Rosalind Park; Wandinong
 MODIFICATION: MOD72-7-2004-I, MOD5-1-2005, MOD42-3-2005, MOD119-10-2006, MOD124-10-2006, MOD11-2-2007, MOD26-3-2007
 WORKS: Gas gathering line twinning at Rosalind Park and repair damaged line at GL06. Drilled GL17 and EM39. No activity at Wandinong gas field.

Number of Conditions: 254
 Closed out previously: 49
 Number Noted: 33
 Number N/A: 19
 Number Non-Compliant: 16
 Compliance Score: 90%

DA/MOD	COC	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
	SCHEDULE 3 Administrative Conditions				
DA 282-6-2003-i	3-1 Obligation to Minimise Harm to the Environment The Applicant shall implement all practicable measures to prevent or minimise any harm to the environment that may result from the construction or operation of the development.	General audit findings and observations made during site inspection.	The audit indicates that no significant environmental issues occurred at Rosalind Park or Wandinong gas fields during the audit period. No environmental incidents, complaints or non-compliances have reportedly occurred under this consent.	Compliant.	
DA 282-6-2003-i	3-2 Terms of Approval The Applicant shall carry out the development generally in accordance with the: (a) DA submitted to the Department on 20 June 2003; (b) Camden Gas Project Stage II – Environmental Impact Statement for the Sydney Gas Company (four volumes), dated 19 June 2003; (c) All other documents listed in Appendix C; (d) Drawings No. 32339 SK010 Issue 17 and SK014 Issue 1 ; and URS Plan LC-0100 Revision G dated 16 June 2004; (e) Modification Application 42-3-2005 and the letter from Sydney Gas Operations Pty Ltd to the Department dated 14 March 2005 titled Camden Gas Project Stage II – Modification Application, and the accompanying attachments; (f) The modification application submitted to the Department on 11 April 2006 and the accompanying document "Camden Gas Project Joint Venture Proposed Multiple Gas Well Modifications" prepared by AGL Gas Production (Camden) Pty Ltd and Sydney Gas (Camden) Operations Pty Ltd, dated April 2006; (g) The modification application submitted to the Department on 29 September 2006 and the accompanying document "Camden Gas Project Joint Venture Statement of Environmental Effects Proposed SIS Well Project" prepared by AGL Gas Production (Camden) Pty Ltd and Sydney Gas (Camden) Operations Pty Ltd, and dated September 2006; (h) The modification application submitted to the Department on 16 October 2006 and the accompanying document "Camden Gas Project Joint Venture Statement of Environmental Effects Proposed SIS Well Project (GL15)" prepared by AGL Gas Production (Camden) Pty Ltd and Sydney Gas (Camden) Operations Pty Ltd, and dated October 2006; (i) Modification Application MOD 11-2-2007 and Statement of Environmental Effects Section 96AA Modification of DA No 282-6-2003-I Relocation of an Existing Internal Road at Rosalind Park Gas Plant (RPGP) off Medhurst Road, Menangle, dated February 2007; (j) Modification Application MOD 26-3-2007 and "Camden Gas Project Joint Venture Gas Well and Gathering Line Modification Project Statement of Environmental Effects", dated March 2007; (k) Modification Application 282-6-2003 MOD 9, the Statement of Environmental Effects titled "Camden Gas Project Joint Venture – EM39 and GL17 Modification Project" dated February 2008, letter from AGL Gas Production (Camden) Pty Limited to the Department, dated 19 March 2008, and letter from Wilkinson Murray Pty Limited to AGL Gas Production (Camden) Pty Limited, dated 31 March 2008; and (l) Conditions of this consent.	General audit findings and observations made during site inspection. Sighted environmental assessment (2008) for EM39 and GL17 modification (MOD9).	During the audit period, works included: Twinning of gas gathering line at Rosalind Park; Repair of damaged gas gathering line at GL06; and Drilling GL17 and EM39. No activity occurred at Wandinong gas field. It was reported that the development has been undertaken in accordance with the Terms of Approval.	Compliant.	
DA 282-6-2003-i	3-3 If there is any inconsistency between the above documents, the latter document shall prevail over the former to the extent of the inconsistency. However, the conditions of this consent shall prevail over all other documents to the extent of any inconsistency.		Noted.	Noted.	
DA 282-6-2003-i	3-4 The Applicant shall comply with any reasonable requirement/s of the Director-General arising from the Department's assessment of: (a) Any reports, plans or correspondence that are submitted in accordance with this consent; and (b) The implementation of any actions or measures contained in these reports, plans or correspondence.	Interviews with site personnel. Some correspondence sighted.	Site personnel reported that there were no additional requirements placed on the development by DoP.	Compliant.	
DA 282-6-2003-i	3-5 Limits of Approval This approval shall lapse twenty one (21) years from the granting of the production lease.		Noted. Production Lease No. 4 granted in 2004. Approval expires in 2025.	Noted.	
DA 282-6-2003-i	3-6 The Applicant shall not exceed the maximum production capacity of 14.5 petajoules per annum, from the gas treatment plant.	Production report generated from online data	Sighted production report (commercial in confidence) which confirmed production did not exceed maximum capacity in any 12 month period.	Compliant.	
DA 282-6-2003-i	3-6A The Applicant shall not produce gas from GL14 until a Production Lease under the Petroleum (Onshore) Act 1991 has been obtained for the entirety of the well.	PPL No. 5	Gas production from GL14 is covered by Production Lease (PPL5), dated February 2007.	Compliant.	
DA 282-6-2003-i	3-7 Special Conditions of Approval The Applicant must in the opinion of the DECC be a fit and proper person to hold a licence under the Protection of the Environment Operations Act 1997, having regard to the matters in s83 of that Act.		AGL Energy Limited (AGL) is considered to be fit and proper person and hold a licence (EPL 12003) for the Rosalind Park Gas Plant under the Protection of the Environment Operations Act 1997.	Compliant.	
DA 282-6-2003-i	3-8 Within one month of consent being issued and in any case before the commencement of any construction works causing the Gas Treatment Plant to become scheduled under the Protection of the Environment Operations Act 1997, the Applicant must submit, to the DECC's Manager Sydney Industry PO Box 668 Paramatta NSW 2124, a written report containing actual dates for submission of reports where specified in Conditions 126, 56, 62, 63, 43, 60, 85, 86, 71 and 61 of Schedule 4.	Records are not available to support this requirement. AGL reported that they cannot provide evidence as these reports were submitted by SydneyGas and records have not been made available for AGL.	Pre-audit period.	Closed out.	
DA 282-6-2003-i	3-9 If after five (5) years of the date of this consent any well that is the subject of this consent has not yet been drilled or completed, then the Applicant shall surrender the approval for that well.		It was reported that wells were drilled within five years of development approval. Drilling of GL14 and EM39 during the audit period occurred within five years of approval of MOD 26-3-2007.	Compliant.	

DA NUMBER: DA 282-6-2003-i
 LOCATION: Rosalind Park; Wandinong
 MODIFICATION: MOD72-7-2004-I, MOD5-1-2005, MOD42-3-2005, MOD119-10-2006, MOD124-10-2006, MOD11-2-2007, MOD26-3-2007
 WORKS: Gas gathering line twinning at Rosalind Park and repair damaged line at GL06. Drilled GL17 and EM39. No activity at Wandinong gas field.

Number of Conditions: 254
 Closed out previously: 49
 Number Noted: 33
 Number N/A: 19
 Number Non-Compliant: 16
 Compliance Score: 90%

DA/MOD	COC	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
DA 282-6-2003-i	3-10 At the expiration of ten (10) years from the date of this consent, the Applicant shall submit to the Director-General a reserve report covering the petroleum production lease (PPL) area. The report shall be prepared by an independent petroleum expert in accordance with relevant definitions approved by the Society of Petroleum Engineers and/or the World Petroleum Congress. In the absence of a proven reserve, the Applicant shall make a further submission to the Director-General justifying why production should continue. After reviewing this report, the Director-General may direct the Applicant to carry out certain actions (including the closure and rehabilitation of certain wells).		Not applicable till 2014.	N/A	
DA 282-6-2003-i	3-11 Further Approvals The Applicant shall run verticality logs for new gas wells located within coal exploration titles. <i>Note: The Petroleum Production Lease that may be granted by the DPI will apply to the PEL 2 area, which is a much larger area than that which the development consent applies to. This consent applies to the land and structures identified in Schedule 1, being the gas wells, gas treatment plant, associated workshop and office facilities and gas gathering system.</i>	Drilling well files for GL17 and EA39	Due to wells being vertical, geophysical logs with callipers are used as a more suitable measurement tool. Logs from each well are kept in hard copy format in the well files in the Camden Gas Project site office.	Compliant.	
DA 282-6-2003-i	3-12 Nothing in this consent permits the drilling and operation of any additional wells (beyond the approved 49 wells for gas production) or gas gathering lines.		It was reported that the total number of wells in Rosalind Park and Wandinong gas fields did not exceed 49 wells in total. Two wells (GL17 and EA39) were drilled during the audit period.	Compliant.	
DA 282-6-2003-i	3-13 Structural Adequacy The Applicant shall ensure that all new buildings and structures, and any alterations or additions to existing buildings and structures, are constructed in accordance with the relevant requirements of the BCA. <i>Note:</i> a) Under Part 4A of the EP&A Act, the Applicant is required to obtain construction and occupation certificates for the proposed building works. b) Part 8 of the EP&A Regulation sets out the detailed requirements for the certification of development. c) The development is located in the South Campbelltown and Wilton Mine Subsidence Districts. Under Section 15 of the Mine Subsidence Compensation Act 1961, the Applicant is required to obtain the Mine Subsidence Board's approval before constructing or relocating any improvements on the site.	Sighted Building Code of Australia assessment and certificates for AGL Camden Gas Project administration and office buildings. 24/10/2010.	During the audit period, the lunch room and office extension was constructed. Construction certificates for the new building and structures were sighted.	Compliant.	
DA 282-6-2003-i	3-14 Public Infrastructure The Applicant shall: (a) Repair, or pay the full costs associated with repairing any existing public infrastructure that is damaged by the development; (b) Relocate or pay the full costs associated with relocating any existing public infrastructure that needs to be relocated as part of the development; and (c) Meet the reasonable requirements of Sydney Water and Macarthur Water regarding the construction and operation of the proposed development adjacent to the water mains operated by Sydney Water and Macarthur Water respectively. <i>Note: The Applicant may be required to apply to Sydney Water for a Section 73 Compliance Certificate under the Sydney Water Act 1994 and to meet Sydney Water's reasonable requirements.</i>		No previous damage to public infrastructure. Not applicable at this stage of the project.	Compliant.	
DA 282-6-2003-i	3-15 Location of Gas Wells and Gas Gathering Systems The Applicant shall provide Camden Council, Campbelltown City Council and Wollondilly Shire Council with the Geographical Positioning System (GPS) co-ordinates and digital survey data for gas well sites and gas gathering systems within their respective Local Government Area, in a format suitable to each of these Councils, within two months of the completion of the gas wells and gas gathering system.		AGL has not provided advice to local councils regarding location (GPS coordinates and digital survey data) of gas well sites and gas gathering systems as required by this condition. The development was therefore non-compliant with this condition. It was recommended that AGL comply with this requirement for all wells constructed under this DA and records be maintained.	Non-Compliant.	Complete digital survey and provide report to councils.
DA 282-6-2003-i	3-16 The Applicant shall provide Camden Council, Campbelltown City Council and Wollondilly Shire Council with the wellhead configurations of each gas well within two months of the gas well being completed or two months from the date of this consent, whichever is the later.		Wellhead configurations are available, however these have not been provided to the relevant authorities as required by this condition. The development did not comply with the requirements of this condition. It was recommended that AGL comply with this requirement for new wells constructed under this DA and records maintained.	Non-Compliant.	Provide wellhead configurations to councils.
DA 282-6-2003-i	3-17 The Applicant shall provide written notification to the Director-General that it has fulfilled the requirements of Conditions 15 and 16, within two weeks of the information being provided to the Councils.		As the requirements of condition 15 and 16 have not been met, the development can not comply with the requirements of this condition.	Non-Compliant.	Provide written notification to the Department upon completion of the requirements of condition 15

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 WORKS: Gas gathering line twinning at Rosalind Park and repair damaged line at GL06. Drilled GL17 and EM39. No activity at Wandinong gas field.

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DA/MOD	COC	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
DA 282-6-2003-i	3-18 Compliance The Applicant shall prepare a Project Commitments Register (PCR) within six months of the date of this consent. The Project Commitments Register shall be submitted to the Director-General for approval. The PCR shall include all commitments and initiatives referred to in the documents listed in Condition 2(c) (Appendix C) and all other documents and supplementary information provided to the Department from the time of DA lodgement to the date of this consent. The PCR shall include, but not necessarily be limited to: (a) All commitments and initiatives (environmental, social, economic or project related) that the Applicant has agreed or suggested to implement for this development; (b) Timeframe for implementation of the commitment or initiative; (c) The responsibility for ensuring that the commitment or initiative is implemented in the manner and timeframe provided by the Applicant; and (d) A reference to the document or correspondence that the commitment or initiative was stated by the Applicant.		Completed, submitted and approved pre-audit period	Closed out.	
DA 282-6-2003-i	3-19 The Applicant shall prior to the commencement of substantial construction certify in writing to the Director-General that all the relevant conditions applicable to construction have been complied with.	Gas plant out of audit period. Substantial construction relates to the original construction of the Gas Plant. AGL reported that this document was submitted by Sydney Gas in 2004, and has since been lost by Sydney Gas.	It was reported that the construction of temporary structures did not constitute substantial construction triggering the requirements of this condition. Therefore notification was not made to the Director-General as required by this condition.	Compliant.	
DA 282-6-2003-i	3-20 The Applicant shall submit for the approval of the Director-General two weeks prior to the commissioning of the development or within such other period that the Director-General may agree, a compliance report detailing compliance with all the relevant conditions that apply prior to the commissioning of the development.		Pre-audit period. It was reported that relevant documentation related to the Rosalind Park Gas treatment plant was independently reviewed and verified.	Closed out.	
	SCHEDULE 4 SPECIFIC ENVIRONMENTAL CONDITIONS				
DA 282-6-2003-i	4-1 VISUAL AMENITY Visual Performance The Applicant shall implement visual mitigation measures as depicted on the plan "Camden Gas Project Stage 2: Vegetation and Landscape Management Plan" Drawing No LC-0100 Revision G prepared by URS for Sydney Gas dated 16 June 2004 (the "Landscape Design").	Site observations, EMS (2008) and "Camden Gas Project Stage 2: Vegetation and Landscape Management Plan" Drawing No LC-0100 Revision G.	Site observations, EMS documentation and interviews with site personnel confirmed that planted vegetation was maintained in accordance with the "Camden Gas Project Stage 2: Vegetation and Landscape Management Plan" Drawing No LC-0100 Revision G.	Compliant.	
DA 282-6-2003-i	4-2 Prior to the commencement of construction of the workshop, office, plant and associated facilities at Rosalind Park, the Applicant shall submit for the approval of the Director-General, a colour scheme (paint colour specifications) for all proposed buildings, fences and associated structures. Colours selected for the facilities (in particular the "Workshop" and "Offices") shall aim to minimise the visual impact of the facility on surrounding land uses and maximise the ability of the facilities to "blend into" the local landscape. <i>Note: The Applicant where practicable should aim to use darker paint colours on the facilities (such as dark grey colour). Wherever practical, the Applicant shall ensure that ground surfaces and stabilisation materials for the facilities at Rosalind Park utilise material in dark shades of colour (such as blue metal and dark coloured mulch).</i>		Pre-audit period.	Closed out.	
DA 282-6-2003-i	4-3 The Applicant shall implement reasonable measures to screen gas wells GL 4, GL 5 and GL 10 and the interconnecting gas gathering line from the Banksia Garden picnic area within the Mount Annan Botanic Garden. The Applicant shall undertake such measures to the satisfaction of the Director-General.		During the 2006 audit, it was observed that two of the three wells were screened from the Botanic Garden by existing vegetation. Some vegetation was observed to screen GL04, but it may still be visible from the picnic area. AGL has since consulted with the Botanic Gardens regarding the requirement for screening of these wells. No additional screening is required around these wells.	Closed out.	
DA 282-6-2003-i	4-4 Lighting Performance The Applicant shall take all practicable measures to minimise any off-site lighting impacts from the development.	Complaints database and interviews with site personnel.	No light-related issues or complaints were recorded during the audit period.	Compliant.	
DA 282-6-2003-i	4-5 The Applicant shall ensure that all external lighting associated with the development is mounted, screened and directed in such a manner so as to achieve the minimum level of illumination necessary, and in accordance with the Australian Standard 4282 – 1997 Control of the Obtrusive Effects of Outdoor Lighting.		No change in external lighting on site during the 2008/2010 audit period. It was reported that external lighting was directed in accordance with AS 4282.	Compliant.	
DA 282-6-2003-i	4-6 The Applicant shall ensure that measures to minimise lighting effects from the operation of the proposed development and the operation of the flare (including under emergency conditions) are implemented as recommended in the following reports (except where inconsistent with the Landscape Design or these conditions): (a) Report titled "Camden Gas Plant Stage 2 – Lighting Review with Respect to Obtrusive Effects from Methane Gas Flare" prepared by Bassett Consulting Engineers Pty Ltd for Sydney Gas dated 17 October 2003; (b) Report titled "Camden Gas Plant Stage 2 – Lighting Review with Respect to Obtrusive Effects" prepared by Bassett Consulting Engineers Pty Ltd for Sydney Gas dated 14 October 2003; (c) Plan titled "Lighting Review to Minimise Obtrusive Light to Mount Gilead Homestead – Drawing No. S5397-F001" prepared by Bassett dated October 2003.	AGL reported that evidence is unable to be provided as this was managed by Sydney Gas at the time of construction in 2004.	Pre-audit period.	Closed out.	

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DA/MOD	COC	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
	(d) Plan titled "Camden Gas Plant Phase II proposed Area and Perimeter Lighting Layout-Drawing No. 03-1212-84-301 Revision 2" prepared by Simon Engineering and dated 15 October 2003; (e) Report titled "Lighting Scope Camden Gas Phase II" prepared by Simon Engineering, Document Reference No 03 1212 LS-02 dated 13 October 2003; and (f) Report titled "Sydney Gas Proposal Stage 2 Coal Seam Methane Project Visual Assessment of Lighting and Flare" prepared by URS for Sydney Gas dated 6 November 2003.				
DA 282-6-2003-i	4-7 Prior to the commencement of construction of the Gas Treatment Plant, the Applicant must submit to the Director-General or the certifying authority a revised "area and perimeter lighting layout" and "electrical services lighting review" to replace the two plans of this name in the document referred to in condition 6(b) above, taking into account the revisions to the development plans for the Gas Treatment Plant as approved in this consent. The lighting design under these revised plans shall be designed to minimise the effect of obtrusive light on the Mount Gilead Homestead from the Gas Treatment Plant.	AGL reported that evidence is unable to be provided as this was managed by Sydney Gas at the time of construction in 2004.	Pre-audit period.	Closed out.	
DA 282-6-2003-i	4-8 The Applicant must ensure that wherever possible, any scheduled use of the flare occurs during daylight hours.	Flare log	It was reported that there has been no scheduled use of the flare during this audit period. Flare Log indicated 2 unscheduled uses of flare during external power failure. These occurred on 04/10/2009 for 68 mins at 11:03 pm (night) and on 02/01/10 for 21mins at 12:56 pm (day). Flare use at night was an unscheduled event due to power failure.	Compliant.	
DA 282-6-2003-i	4-9 The design of the flare pit must be amended by installing an opaque barrier to a height of 7.5m above the flare tip as depicted on the Landscape Design. The Applicant may remove this barrier with the consent of the owner of Lot 1 DP 807555.		Pre-audit period. As per previous audit findings, 7.5m opaque barrier has been installed and maintained.	Closed out.	
DA 282-6-2003-i	4-10 The Applicant shall report on the effectiveness of the lighting controls in the AEPR.	Sighted Annual Environmental Performance Report (July 06-June 07; July 07-June 08; July 08-June 09; July 09-June 10).	Inspection of the AEPR for Camden Gas Project confirms that it includes reporting on lighting conditions.	Compliant.	
DA 282-6-2003-i	4-11 The Applicant shall record the frequency of the operation of the flare and shall make this information available for inspection by the Director-General on request. The records shall include but not be limited to the following: (a) date and time of each flare event; (b) duration of each flare event; (c) whether the flare operated during daylight or night-time hours; (d) the cause for the operation of the flare; (e) the number of compressor engines that have been commissioned and operating during the period; and (f) comparison of the frequency, night-time frequency, duration and estimated light level of each type of flare event with the flare events predicted in Table 2 of the following report: URS (2003) "Sydney Gas Proposal Stage 2 Coal Seam Methane Project Visual Assessment of Lighting and Flare" prepared by URS for Sydney Gas dated 6 November 2003."	Flare log and interviews with site personnel.	It was reported that there has been no scheduled use of the flare during this audit period. Flare Log indicated 2 unscheduled uses of flare during external power failure. These occurred on 04/10/2009 for 68 mins at 11:03 pm (night) and on 02/01/10 for 21mins at 12:56 pm (day). Records are maintained as required by this condition. There have been no requests made by the Director-General.	Compliant.	
DA 282-6-2003-i	4-12 Landscaping design The site shall be landscaped as shown on the Landscape Design and this landscaping shall be maintained for the life of the development.	Site observations, EMS (2008) and "Camden Gas Project Stage 2: Vegetation and Landscape Management Plan" Drawing No LC-0100 Revision G.	There was apparently no change or development of landscaping during the audit period. The last landscaping activity occurred along the access road. Planted vegetation was being maintained on site in accordance with the approved plans. There was no evidence of die-back.	Compliant.	
DA 282-6-2003-i	4-13 Vegetation and Landscape Management Plan The Applicant shall prepare and implement a Vegetation and Landscape Management Plan for the Gas Treatment Plant site and the gas well sites. The plan shall include, but not necessarily be limited to: (a) reasonable measures to protect mature trees as part of the well drilling, gas gathering system and Treatment Plant Site construction activities; (b) a landscape strategy detailing the design and proposed planting of trees and shrubs to be undertaken; (c) ensuring that tree and shrub species used for landscaping of the site are indigenous to the locality; (d) details of a program to ensure that all landscaped areas are maintained in a tidy, healthy state; (e) measures intended to maximise the screening of infrastructure from views from the Mt Gilead Homestead; (f) details of the visual appearance of all new buildings, structures and facilities (including paint colours and specifications). New buildings shall be constructed so as to present a neat and orderly appearance and to blend as far as practicable with the surrounding landscape; (g) Details of any necessary irrigation system to ensure that adequate supplies of water are made available to all landscaping on site, the trees between the site and Menangle Creek and the trees located on the southern boundary of the Gas Treatment Plant site; (h) Details of any necessary methods to be employed in the establishment of trees on cut batters in the event that the excavated surface is not conducive to the planting of vegetation of the type displayed in the Landscape Design;	Sighted Vegetation and Landscape Management Plan for Proposed Gas Treatment Plan (Prepared by Sydney Gas Ltd - 28 June 2004).	Pre-audit period	Closed out.	

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	<p>(i) provision for assessing and regularly monitoring the health of the trees in the Menangle Creek riparian zone adjacent to the Gas Treatment Plant site. The objective of the monitoring is to determine the health of the trees and to recommend measures (if required) to improve the health of the trees;</p> <p>(j) reasonable measures to ensure that mature trees within the riparian corridor along Menangle Creek are retained and protected;</p> <p>(k) details of proposed screening works including supplementary planting along the border of the site with Menangle Creek;</p> <p>(l) reasonable measures to minimise the impacts of the gas wells on the cultural heritage landscape of the EMAI;</p> <p>(m) details of a monitoring program to assess the effectiveness of all visual impact mitigation measures, particularly the measures used to minimise the visual impacts on the Mount Gilead Homestead; and</p> <p>(n) reporting the results of the visual impact monitoring in the Annual Environmental Performance Report. The monitoring results will specifically identify any remedial measures required. The Vegetation and Landscape Management Plan must be submitted and approved by the Director-General prior to commencement of construction on the Gas Treatment Plant site.</p>				
DA 282-6-2003-i	<p>4-14 As part of an independent audit required under condition 18, the Vegetation and Landscape Management Plan must make provision for ensuring that landscaping of the Gas Treatment Plant site and surrounds is maintained in an adequate condition by providing details of a monitoring program. Monitoring must be carried out pursuant to the monitoring program every 6 months for the first two years from the commencement of planting and thereafter every 2 years by an independent and suitably qualified and experienced arborist whose appointment has been approved for the purposes of this condition by the Director-General. The monitoring program must include the following features:</p> <p>(a) identification of mature trees surrounding the site which afford screening of the Gas Treatment Plant from Mt Gilead Homestead;</p> <p>(b) provision for assessing and regularly monitoring the health of landscaping on the site and the trees in the Menangle Creek riparian zone adjacent to the Gas Treatment Plant site. The objective of the monitoring is to determine the health of the trees and to recommend measures (if required) to improve the health of the trees;</p> <p>(c) Description of the health of each tree identified under condition (a);</p> <p>(d) Recommendation of reasonable measures to ensure that mature trees within the riparian corridor along Menangle Creek are retained and protected, including trees that lie within the transmission line easement to the East of the site;</p> <p>(e) Recommendation of any watering or fertilising that needs to be implemented to maintain the landscaping and surrounding trees;</p> <p>(f) Recommendation of how to manage the landscaping to promote the maximisation of growth to maturity.</p> <p>The results and recommendations of the monitoring program must be submitted to the Director-General at the conclusion of each stage of monitoring.</p>	<p>Sighted RPGP Vegetation landscape Management plan "Task Completed" Register. Contains details of work activity and maintenance over 2006 - 2010 period.</p> <p>Sighted AGL Rosalind Park Gas Plant Access Road Landscape Audit Report (11 December 2008).</p> <p>Sighted AGL Rosalind Park Gas Plant Landscape Audit Report (11 December 2008)</p> <p>Sighted Ultimate Horticultural Solutions Pty Ltd (UHS) Tree Planting Report (20 August 2009) and (August 2008).</p> <p>Sighted RPGP Landscape Works Monitoring Report (4) 20 April 2007.</p> <p>Sighted Distinctive Landscape Planners - Independent Audit Report: Landscape and Lighting (11 December 2008).</p>	<p>Review of documentation relating to vegetation and landscape management and monitoring indicate that the landscaping was effectively monitored in 2007 and 2008. Observations indicated that the vegetation is well established (i.e. no dieback); however no further independent quality checks were provided for inspection in 2010. Evidence to confirm that these monitoring reports were submitted to the Department were not made available for inspection.</p>	Non-Compliant.	It is recommended that the results and recommendations of the landscaping monitoring reports be submitted to the DG with records of their submission kept on file.
DA 282-6-2003-i	<p>4-15 (a) The existing trees shown on the Landscape Design adjacent to the southern boundary of the Gas Treatment Plant site, must be retained. They must not be lopped or trimmed except on the advice of an independent arborist whose appointment has been approved for the purposes of this condition by the Director-General that the proposed work is reasonably necessary for safety reasons. The trees must be maintained in a healthy condition.</p> <p>(b) If any of the trees described in this condition ceases to provide screening of the quarry from the Mount Gilead Homestead, as a result of the Applicant's activities (other than trimming or lopping undertaken on the advice of the arborist), the Applicant must provide alternative screening to the satisfaction of the Director-General.</p>	Letter of approval to remove trees, June 2008	Approval was granted by DoP in June 2008 to remove two trees along southern boundary for safety reasons. The approval was given subject to replanting - the replanting has not been completed. The trees should be replanted to screen the quarry from the Mount Gilead Homestead as per the letter of approval.	Compliant.	Trees to be replanted as per approval.
DA 282-6-2003-i	<p>4-16 Prior to the commencement of construction on the Gas Treatment Plant site the Applicant must secure the right to implement on land outside the Gas Treatment Plant site for the life of the development any necessary mitigative or screening measures proposed for the Gas Treatment Plant as part of the Vegetation and Landscape Management Plan or as required by this Consent.</p>		Pre-audit period.	Closed out.	
DA 282-6-2003-i	<p>4-17 For the purpose of avoiding possible detrimental impact on vegetation screening of the Gas Treatment Plant from the Mt Gilead Homestead due to any clear felling of trees in the area marked "A" on the Applicant's Plan Map Ref M240212 dated 16 June 2004 ("Applicant's Plan") by the holder of the electricity transmission line easement over Lot 1 DP 807555 ("Holder"), the Applicant shall carry out any reasonable and necessary trimming and lopping of those trees provided the Holder requests the Applicant in writing to carry out this trimming and lopping and undertakes in return to refrain from the clear felling of those trees within 5 years of the date of this Consent.</p>		No requests have been made regarding main powerline easement; however Integral attended site to trim top of trees under lines connecting to RPGP.	Compliant.	
DA 282-6-2003-i	<p>4-18 Independent Audit</p> <p>The Applicant shall commission and pay the full cost of an Independent Audit of the performance of the mitigation measures implemented to prevent and minimise visual impacts of the proposal including landscaping, preservation of existing trees, and night-lighting effects. The audit must be conducted within 6 months of the commissioning of the proposed development and every 2 years thereafter, unless the Director-General directs otherwise. This audit must:</p> <p>(a) Be conducted by an independent landscape expert who is suitably qualified and experienced and whose appointment has been approved by the Director-General;</p> <p>(b) Assess the performance of the visual mitigation measures with specific reference to the effectiveness of mitigation measures in screening the development and lighting from the development from the Mount Gilead Homestead;</p> <p>(c) Review the adequacy of the Vegetation and Landscape Management Plan;</p>	<p>Sighted AGL letter to DoP (dated 31/10/08) that Dean Boone of Distinctive Landscape Planning is to undertake Independent Audit.</p> <p>Sighted Distinctive Landscape Planners - Independent Audit Report: Landscape and Lighting (11 December 2008).</p>	<p>AGL engaged Distinctive Landscape Planners to complete an Independent Audit Report: Landscape and Lighting (11 December 2008).</p> <p>AGL have not yet commissioned the latest landscape audit (due every 2 years) and thus are unable to demonstrate ongoing compliance with the requirements of this condition. It was reported that AGL have engaged Distinctive Landscape Planners to complete this audit also.</p>	Non-Compliant.	Complete audit of performance of the mitigation measures implemented to prevent and minimise visual impacts and submit the audit report to the Director-General. Retain records to demonstrate compliance with this condition.

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	(d) Recommend actions or measures to improve the performance of the visual mitigation measures and the adequacy of the Vegetation and Landscape Management Plan (if required); and (e) Be submitted to the Director-General; and (f) Be implemented to the satisfaction of the Director-General.				
DA 282-6-2003-i	4-19 Within 2 months of commissioning this audit the Applicant shall submit a copy of the audit report to the Director-General and provide a detailed response to any of the recommendations in the audit report. A copy of the Independent Audit, and/or the results and recommendations of any monitoring carried out under condition 14, will be provided to the owner of Lot 1 DP 807555 by the Director-General upon request.	Sighted Distinctive Landscape Planners - Independent Audit Report: Landscape and Lighting (11 December 2008).	Evidence to verify submission of an audit report to the Director-General was not sighted.	Non-Compliant.	Retain records to demonstrate compliance with this condition.
DA 282-6-2003-i	4-19A Landscape Planting Plan – Rosalind Park Access Road The Applicant shall prepare and implement a Landscape Planting Plan for the relocated Rosalind Park access road, to the satisfaction of the Director-General. This plan must be submitted to the Director-General for approval prior to the commencement of construction, and include: (a) details of the landscaping measures along the road and visual bund; (b) measures to manage and maintain the landscaping; and (c) describe the construction rehabilitation measures.	Sighted Access Road Landscape Specification Final 27/7/2007.	Pre-audit period.	Closed out.	
DA 282-6-2003-i	4-19B Within 6 months of completion of the landscaping and every 2 years thereafter, unless the Director-General directs otherwise, the Applicant shall commission and pay the full costs of an Independent Audit of the performance of the mitigation measures. The audit shall: (a) be conducted by a suitably qualified, experienced and independent person(s) whose appointment has been approved by the Director-General; (b) assess the performance of the visual mitigation measures with specific reference to the effectiveness of mitigation measures in screening the road from the Mount Gilead Homestead; (c) review the adequacy of the Landscape Planting Plan; (d) recommend actions or measures to improve the performance of the visual mitigation measures and the adequacy of the Landscape Planting Plan (if required); and (e) be submitted and implemented to the satisfaction of to the Director-General. <i>Note: The Applicant may include this audit in the Independent Audit required under Schedule 4 Condition 18 of development consent Da-282-6-2003-I, dated 16 June 2004. The due date for a combined audit shall be the earlier of the due dates for the separate audits.</i>	Sighted RPGP Landscape Works Monitoring Report (4) 20 April 2007.	Audit of landscape planting completed by Corkery Consulting 'AGL Rosalind Gas Plant Access Road, Landscape Audit Report (11 December 2008) and 'AGL Rosalind Gas Plant Site, Landscape Audit Report (11 December 2008). Evidence to confirm that these audit reports were submitted to the Department were not made available for inspection. An independent audit of landscaping and performance of mitigation measures to be audited every two years - the audit due in 2010 was not completed.	Non-Compliant.	Audit of landscape planting (due 2010) required to be completed. Audit reports (2008 and 2010) to be submitted to the Director-General as required.
DA 282-6-2003-i	4-20 FLORA AND FAUNA Raptor Breeding Zones at EMAI The Applicant shall ensure that the drilling of gas wells and the construction of the gas gathering system and any related activities do not occur within 100 metres of the Raptor Breeding zones.		It was reported that no raptor breeding zones occurred within operational area of this consent.	Compliant.	
DA 282-6-2003-i	4-21 The Applicant shall only drill and "fracc" wells EM 5, EM 7, EM 8, EM 9, EM 11 and EM12 during the months of February and/or March or such other period as agreed by the Director-General.		No wells fracted or refracted during the audit period.	Compliant.	
DA 282-6-2003-i	4-22 The Applicant shall ensure that gas gathering lines connecting well sites listed in Condition 21 shall be constructed outside the breeding seasons of raptor species. <i>Note: The above condition provides protection for breeding raptor species on the EMAI, in proximity to the stated wells, through ensuring activities that are likely to generate noise are conducted outside of the breeding season of raptor species.</i>		It was reported that well EM39 drilled during the audit period was located next to EM2 and was not located in the raptor breeding zone.	Compliant.	
DA 282-6-2003-i	4-23 Flora and Fauna Protection Measures The Applicant shall implement best practice flora and fauna management.	EMS (2009) and Flora and Fauna Management Sub Plan	Wells EM39 and GL17 drilled during the audit period were sited within corridors that were pre-disturbed or existing access tracks. The Flora and Fauna Management Sub Plan contains measure to minimise	Compliant.	
DA 282-6-2003-i	4-24 The Applicant shall take all practicable measures to minimise potential flora and fauna impacts of the proposed development.	EMS (2009) and Flora and Fauna Management Sub Plan	Wells EM39 and GL17 drilled during the audit period were sited within corridors that were pre-disturbed or existing access tracks. The Flora and Fauna Management Sub Plan contains measure to minimise	Compliant.	
DA 282-6-2003-i	4-25 The Applicant shall ensure that trenches constructed during the construction of gas gathering lines are not left open overnight unless otherwise agreed by the Director-General.	EMS (2009) and Flora and Fauna Management Sub Plan	Standard practice adopted by Contractors for these works	Compliant.	
DA 282-6-2003-i	4-26 The Applicant shall not remove mature trees as part of this development unless otherwise agreed by the Director-General.	Letter of approval to remove trees, June 2008	Development occurred on land that was pre-disturbed (e.g. cleared or grazed) or existing access tracks. No further trees were removed from southern boundary in June 2008. As per previous audit, the majority of existing trees were retained. Approval was granted by DoP in June 2008 to remove two trees along southern boundary for safety reasons. The approval was given subject to replanting - the replanting has not been completed. The trees should be replanted to screen the quarry from the Mount Gilead Homestead as per the letter of approval.	Compliant.	Trees to be replanted as per approval.
DA 282-6-2003-i	4-27 The Applicant shall employ a suitably qualified ecologist with specific experience in identifying the Cumberland Plain Snail, during the construction period of the development. The ecologist shall monitor and examine areas for the presence of the threatened Cumberland Plain Snail, during the clearing for the proposed development.		Pre-audit period. Ecologist reportedly present during construction.	Closed out.	
DA 282-6-2003-i	4-28 The Applicant shall prepare a translocation strategy for the threatened Cumberland Plain Snail which will be submitted for the Director-General's approval prior to construction. The Translocation strategy shall be implemented should any individuals or populations of the Cumberland Plain Snail be identified.	Sighted Survey and Translocation Strategy Cumberland Plain Land Snail Camden Gas Project Jan 2004.	Pre-audit period.	Closed out.	

DA NUMBER: DA 282-6-2003-i
 LOCATION: Rosalind Park; Wandinong
 MODIFICATION: MOD72-7-2004-I, MOD5-1-2005, MOD42-3-2005, MOD119-10-2006, MOD124-10-2006, MOD11-2-2007, MOD26-3-2007
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DA/MOD	COC	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION																			
DA 282-6-2003-i	<p>4-28A Threatened Species The Applicant shall ensure that, during the drilling and construction of EM38 and upgrading of the gas gathering lines, impacts on threatened species are minimised by implementing actions including, but not limited, to the following: (a) The recommendations outlined in Ecosearch Environmental Consultants Pty Ltd's reports titled: "Flora and Fauna Assessment, AGL - Gas Well and Gathering Line Project Modifications" (Sections 6 and 7); and "Flora and Fauna Assessment, Executive Summary for Rosalind Park Gas Field" (page 9); and (b) Marking the boundaries of endangered ecological communities (EECs) and locations of other known threatened species and, where possible, avoiding construction activities within these areas.</p>		EM38 and twinning of connecting gas gathering lines did not occur during audit period. No works completed during the audit period.	Compliant.																				
DA 282-6-2003-i	<p>4-28B The Applicant shall ensure that, during the drilling and construction of EM39 and GL17 and upgrading of the gas gathering lines, impacts on threatened species are minimised by implementing actions including, but not limited to the following: (a) the recommendations outlined in the flora and fauna assessment carried out by Biosis Research Pty Ltd in Appendix A of the Statement of Environmental Effects titled "Camden Gas Project Joint Venture - EM39 and GL17 Modification Project"; and (b) marking the boundaries of endangered ecological communities (EECs) and locations of other known threatened species and, where possible, avoiding construction activities within these areas.</p>	Sighted Biosis Research Pty Ltd - Statement of Environmental Effects titled "Camden Gas Project Joint Venture - EM39 and GL17 Modification Project".	No threatened species, populations or ecological communities were recorded during the original survey and the sites are previously disturbed by agricultural activities. Works were reportedly carried out in accordance to the statement of commitment in the flora and fauna assessment.	Compliant.																				
DA 282-6-2003-i	<p>4-29 NOISE Noise Impact Assessment Criteria The Applicant shall ensure that noise from the normal operation of the premises, excluding flaring events, must not exceed the noise limits in the table below:</p> <table border="1"> <thead> <tr> <th rowspan="2">Receiver Location</th> <th>Day</th> <th>Evening</th> <th>Night</th> <th>Flaring (anytime)</th> </tr> <tr> <th>L_{day}(5 minute)</th> <th>L_{even}(5 minute)</th> <th>L_{night}(5 minute)</th> <th>L_{anytime}</th> </tr> </thead> <tbody> <tr> <td>R1 Medhurst Street Gilead</td> <td>35</td> <td>35</td> <td>35</td> <td>45</td> </tr> <tr> <td>R7 Mt. Gilead Gilead</td> <td>37</td> <td>36</td> <td>36</td> <td>45</td> </tr> </tbody> </table>	Receiver Location	Day	Evening	Night	Flaring (anytime)	L _{day} (5 minute)	L _{even} (5 minute)	L _{night} (5 minute)	L _{anytime}	R1 Medhurst Street Gilead	35	35	35	45	R7 Mt. Gilead Gilead	37	36	36	45	Sighted Noise Monitoring data RPGP Compliance Results - 01/07/08 RPGP Compliance Results - 31/07/08 RPGP Compliance Results - 01/11/08 RPGP Compliance Results - 03/02/09 RPGP Compliance Results - 02/04/09 RPGP Compliance Results - 16/07/09 RPGP Compliance Results - 29/10/09 RPGP Compliance Results - 28/02/10 RPGP Compliance Results - 30/06/10	Quarterly noise monitoring of the RPGP was carried out by Wilkinson Murray in order to assess compliance with the relevant noise limits set by EPL 12003 and the consent conditions. Noise levels are monitored at R1 and R7 by attended monitoring methods. Review of monitoring results indicate compliance with this condition. Noise monitoring indicates that noise levels are dominated by traffic and background environmental activity (e.g. insects, frogs, etc). No noise-related complaints relevant to RPGP were recorded.	Compliant.	
Receiver Location	Day		Evening	Night	Flaring (anytime)																			
	L _{day} (5 minute)	L _{even} (5 minute)	L _{night} (5 minute)	L _{anytime}																				
R1 Medhurst Street Gilead	35	35	35	45																				
R7 Mt. Gilead Gilead	37	36	36	45																				
DA 282-6-2003-i	<p>4-29A Noise from the operation of EM39 and GL17 shall not exceed the noise limits in the table below:</p> <table border="1"> <thead> <tr> <th rowspan="2">Receiver Location</th> <th rowspan="2">Noise Criteria</th> <th>Day</th> <th>Evening</th> <th>Night</th> </tr> <tr> <th>dBA L_{max}</th> <th>dBA L_{max}</th> <th>dBA L_{max}</th> </tr> </thead> <tbody> <tr> <td>All residential receivers except R22 and R26</td> <td>Project-Specific</td> <td>40</td> <td>40</td> <td>38</td> </tr> <tr> <td>R22 and R26</td> <td>Project-Specific</td> <td>43</td> <td>42</td> <td>37</td> </tr> </tbody> </table>	Receiver Location	Noise Criteria	Day	Evening	Night	dBA L _{max}	dBA L _{max}	dBA L _{max}	All residential receivers except R22 and R26	Project-Specific	40	40	38	R22 and R26	Project-Specific	43	42	37	Interviews with site personnel. CGP SIS Wells EM39 and GL17 Construction and Operation Noise Assessment (Wilkinson Murray, January 2008).	The Noise Assessment indicated that noise levels from construction and operation of EM39 and GL17 would comply with noise limits at receiver locations (table 3-3), which are consistent with this condition, plus requirements of INP and sleep disturbance criteria. AGL report and site observations confirm that the operation of wells EM39 and GL17 generate no audible noise above background at the well head location. The Assessment recommends that AGL monitor operational noise emissions to ensure that relevant criteria are met. There were no records of monitoring operational noise of EM39 and GL17 at these residential receivers. However, no noise-related complaints relevant to operation of EM39 or GL17 were recorded.	Compliant.	It is recommended that the Noise Management Sub Plan and Monitoring Program are updated to reflect monitoring practices adopted onsite and submitted to DoP for review/approval.	
Receiver Location	Noise Criteria			Day	Evening	Night																		
		dBA L _{max}	dBA L _{max}	dBA L _{max}																				
All residential receivers except R22 and R26	Project-Specific	40	40	38																				
R22 and R26	Project-Specific	43	42	37																				
DA 282-6-2003-i	<p>4-30 For the purposes of condition 29, 29A and 31: (a) Day is defined as the period from 7am to 6pm Monday to Saturday and 8am to 6pm Sundays and Public holidays; (b) Evening is defined as the period 6pm to 10pm; (c) Night is defined as the period from 10pm to 7am Monday to Saturday and 10pm to 8am Sundays and Public Holidays; and (d) The receiver locations R1 and R7 are as shown in Figure 5.1 of the Environmental Noise and Vibration Study by Environmental Resources Management Australia Pty Ltd dated June 2003 which accompanied the Environmental Impact Statement for the project.</p>	Interviews with site personnel.	Noted. Construction hours consistent with the requirements of this condition apply across all Project operations.	Compliant.																				

DA NUMBER: DA 282-6-2003-i
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DA/MOD	COC	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION																												
DA 282-6-2003-i	<p>4-31 Noise from flaring events, must not exceed the noise limits in the table below:</p> <table border="1"> <thead> <tr> <th>Location</th> <th>Duration of each Event</th> <th>Expected Type Of Event (Z)</th> <th>Daytime LAeq,15min</th> <th>Evening LAeq,15min</th> <th>Night LAeq,15min</th> </tr> </thead> <tbody> <tr> <td rowspan="2">R1 Medhurst Street</td> <td>> 2.5 hours 15 min – 60 min</td> <td>Spill Valve Compressor Blowdown (ESD)</td> <td>35</td> <td>35</td> <td>35</td> </tr> <tr> <td>6 min – 15 min</td> <td>Compressor Blowdown (shutdown and unload)</td> <td>42</td> <td>42</td> <td>37</td> </tr> <tr> <td rowspan="2">R7 Mt. Gilead</td> <td>> 2.5 hours 15 min – 60 min</td> <td>Spill Valve Compressor Blowdown (ESD)</td> <td>37</td> <td>36</td> <td>36</td> </tr> <tr> <td>6 min – 15 min</td> <td>Compressor Blowdown (shutdown and unload)</td> <td>42</td> <td>41</td> <td>40 (1)</td> </tr> </tbody> </table> <p>1. Where ESD flare events exceed a frequency of occurrence of 1 per 21 days or duration higher than 15 minutes per event to a reduced flow rate of less than 0.5mmscfd for each event, a lower limit of 36dB(A) Leq 15 minute applies at night. 3. Definition: A flaring event is taken to be any gas flow to the flare greater than that which is necessary to maintain the pilot flame.</p>	Location	Duration of each Event	Expected Type Of Event (Z)	Daytime LAeq,15min	Evening LAeq,15min	Night LAeq,15min	R1 Medhurst Street	> 2.5 hours 15 min – 60 min	Spill Valve Compressor Blowdown (ESD)	35	35	35	6 min – 15 min	Compressor Blowdown (shutdown and unload)	42	42	37	R7 Mt. Gilead	> 2.5 hours 15 min – 60 min	Spill Valve Compressor Blowdown (ESD)	37	36	36	6 min – 15 min	Compressor Blowdown (shutdown and unload)	42	41	40 (1)	Interviews with site personnel.	Refer past audit. Previous monitoring results of noise from flaring events indicated compliance with the requirements of this condition. Once compliance was demonstrated, it was considered that there was no need for ongoing monitoring. Continuous noise monitors were removed in 2011 i.e. continue recording but data not processed or reported. Quarterly compliance monitoring only.	Compliant.	
Location	Duration of each Event	Expected Type Of Event (Z)	Daytime LAeq,15min	Evening LAeq,15min	Night LAeq,15min																												
R1 Medhurst Street	> 2.5 hours 15 min – 60 min	Spill Valve Compressor Blowdown (ESD)	35	35	35																												
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	6 min – 15 min	Compressor Blowdown (shutdown and unload)	42	41	40 (1)																												
DA 282-6-2003-i	<p>4-32 Noise from the premises is to be measured at the most affected point on or within the residential boundary or at the most affected point within 30m of the dwelling (rural situations) where the dwelling is more than 30m from the boundary to determine compliance with the LAeq(15 minute) and LAeq(period) noise limits in Conditions 29, 29A and 31. Where it can be demonstrated that direct measurement of noise from the premises is impractical, the DECC may accept alternative means of determining compliance. See Chapter 11 of the NSW Industrial Noise Policy. The modification factors presented in Section 4 of the NSW Industrial Noise Policy shall also be applied to the measured noise levels where applicable.</p>	Noise monitoring data for EM39 and GL17	Quarterly attended noise monitoring records at most affected point or at boundary for RPPG reported in AEPR. Noise levels assessed at nearest affected receivers to EM39 and GL17 during drilling (inaudible - refer 08-09 AEPR 4.14.3) but no ongoing monitoring.	Compliant.																													
DA 282-6-2003-i	<p>4-33 The noise emission limits identified in Conditions 29, 29A and 31 apply under meteorological conditions of: • Wind speed up to 3m/s at 10 metres above ground level; or • Temperature inversion conditions of up to 3oC/100m and wind speed up to 2m/s at 10 metres above</p>		Noted.	Noted.																													
DA 282-6-2003-i	<p>4-34 Noise – Construction and Well Maintenance The Applicant shall prepare and implement a Construction and Well Maintenance Noise Management Protocol to be used for the duration of the project. The Protocol must include, but is not necessarily limited to: (a) noise compliance standards; (b) community consultation; (c) advance notice to affected members of the community for planned well maintenance activities; (d) complaints handling monitoring/system; (e) site contact person to follow up complaints; (f) mitigation measures; (g) the design/orientation of the proposed mitigation methods demonstrating best practice; (h) construction times; (i) contingency measures where noise complaints are received; and (j) monitoring methods and program.</p>	Construction and Well Maintenance Noise Management Protocol within the EMS and associated Noise Management Sub-Plan. Sighted: Community consultation meeting minutes (most recent #25 -15 July 2010); complaints handling procedures and complaints register; Procedures for noise minimisation and implementation on site (noise barriers around site); Construction times are covered in induction and within EMS; noise management sub plan that contains details on noise monitoring and compliance levels.	The EMS (2008) and Noise Management Plan presents a Construction and Well Maintenance Noise Management Protocol - relevant sections of the EMS and the noise management sub-plan highlight controls for items a) - i).	Compliant.																													
DA 282-6-2003-i	<p>4-34A Noise from the drilling and construction of GL14 and GL15 shall not exceed the sound pressure level (noise) limits presented in the table below:</p> <table border="1"> <thead> <tr> <th>Receiver Location</th> <th>Night Time Noise Limit dB(A) LAeq</th> </tr> </thead> <tbody> <tr> <td>Glenlee House</td> <td>35</td> </tr> <tr> <td>Menangle Park</td> <td>35</td> </tr> </tbody> </table>	Receiver Location	Night Time Noise Limit dB(A) LAeq	Glenlee House	35	Menangle Park	35		Drilling of GL14 and GL15 did not occur during the current audit period.	N/A																							
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DA 282-6-2003-i	<p>4-34B Noise from the drilling and construction of EM38 shall not exceed the sound pressure level (noise) limits in the table below:</p> <table border="1"> <thead> <tr> <th>Receiver Location</th> <th>Weekday (7.00am-6.00pm)</th> <th>Saturday (1.00pm-6.00pm)</th> <th>Evening (6.00pm-10.00pm)</th> <th>Night (10.00pm-7.00am)</th> </tr> </thead> <tbody> <tr> <td>Nearest receiver</td> <td>57</td> <td>42</td> <td>42</td> <td>40</td> </tr> </tbody> </table>	Receiver Location	Weekday (7.00am-6.00pm)	Saturday (1.00pm-6.00pm)	Evening (6.00pm-10.00pm)	Night (10.00pm-7.00am)	Nearest receiver	57	42	42	40		Drilling of EM38 did not occur during the current audit period.	Compliant.																			
Receiver Location	Weekday (7.00am-6.00pm)	Saturday (1.00pm-6.00pm)	Evening (6.00pm-10.00pm)	Night (10.00pm-7.00am)																													
Nearest receiver	57	42	42	40																													
DA 282-6-2003-i	<p>4-34C Noise from the drilling and construction of EM39 and GL17 shall not exceed the sound pressure level (noise) limits in the table below:</p> <table border="1"> <thead> <tr> <th>Receiver Location</th> <th>Weekday (7.00am-6.00pm)</th> <th>Saturday (1.00pm-6.00pm)</th> <th>Evening (6.00pm-10.00pm)</th> <th>Night (10.00pm-7.00am)</th> </tr> </thead> <tbody> <tr> <td>EM39 – R3</td> <td>40</td> <td>40</td> <td>40</td> <td>38</td> </tr> <tr> <td>GL17 – R3</td> <td>40</td> <td>40</td> <td>40</td> <td>38</td> </tr> </tbody> </table>	Receiver Location	Weekday (7.00am-6.00pm)	Saturday (1.00pm-6.00pm)	Evening (6.00pm-10.00pm)	Night (10.00pm-7.00am)	EM39 – R3	40	40	40	38	GL17 – R3	40	40	40	38	Interviews with site personnel.	On the basis of site personnel observations, it was reported that noise from drilling EM39 during July 2008 was inaudible at sensitive locations. As a result of observed levels (i.e. inaudible at nearest sensitive receptors), noise testing is not regularly conducted. It was reported that noise monitoring is conducted on commissioning and in response to complaints only.	Compliant.	It is recommended that the Noise Management Sub Plan and Monitoring Program are updated to reflect monitoring practices adopted onsite and submitted to DoP for review/approval.													
Receiver Location	Weekday (7.00am-6.00pm)	Saturday (1.00pm-6.00pm)	Evening (6.00pm-10.00pm)	Night (10.00pm-7.00am)																													
EM39 – R3	40	40	40	38																													
GL17 – R3	40	40	40	38																													

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DA/MOD	COC	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
DA 282-6-2003-i	<p>4-35 Noise – Drilling Impacts</p> <p>The Applicant shall implement management practices as necessary to minimise the potential noise impacts from drilling work at gas wells located on EMAL. These management practices are to include, but are not limited to:</p> <p>(a) identifying all potentially affected noise sensitive receivers (including residences of EMAL staff) that may be affected by drilling work at these wells;</p> <p>(b) predicting potential noise levels from the proposed well drilling methods where appropriate;</p> <p>(c) identifying and implementing all reasonable and feasible noise mitigation measures to reduce any drilling noise impacts;</p> <p>(d) documenting and implementing any specific work practices the Applicant will employ to limit noise; conducting noise monitoring where appropriate; and</p> <p>(e) appropriately informing affected residences and other relevant parties at least two weeks in advance of any drilling work at the gas wells and updating the information as required.</p>	Construction and Well Maintenance Noise Management Protocol within the EMS and associated Noise Management Sub-Plan. Sighted noise monitoring records for the EM sites.	According to management practices defined in the EMS (2008), effective noise barriers are installed at drill locations to minimise noise impacts on sensitive receivers.	Compliant.	
DA 282-6-2003-i	<p>4-36 Hours of Operation</p> <p>Planned maintenance activities at any of the wells must only be conducted between:</p> <ul style="list-style-type: none"> • 7am and 6pm on weekdays; and • 8am and 1pm on Saturdays (excluding Public Holidays). <p>This condition does not apply to the delivery of material outside the hours of operation permitted by the DECC's licence, if that delivery is required by police or other authorities for safety reasons; and/or the operation or personnel or equipment are endangered. In such circumstances, prior notification is to be provided to the DECC and affected residents as soon as possible, or within a reasonable period in the case of emergency.</p>	Interviews with site personnel.	It was reported that construction hours consistent with the requirements of this condition apply across all Project operations. Operating hours are covered in the site induction.	Compliant.	
DA 282-6-2003-i	<p>4-36A Construction Hours</p> <p>Except for the drilling (including well casing and grouting) of SIS wells, all construction work shall be conducted between 7.00am and 6.00pm Monday to Friday and between 8.00am and 1.00pm Saturdays and at no time on Sundays and Public Holidays, unless inaudible at any residential receiver.</p> <p>Note: Inaudible means that the construction activity cannot be heard by the human ear at the nearest affected residential receiver.</p>	Interviews with site personnel.	It was reported that construction hours consistent with the requirements of this condition apply across all Project operations. Operating hours are covered in the site induction.	Compliant.	
DA 282-6-2003-i	<p>4-37 Flare – Measures to Reduce Noise</p> <p>The Applicant must implement the following noise mitigation options to prevent noise impacts from flare operation:</p> <ul style="list-style-type: none"> • Noise mitigation options 1 through to 9 (exclusive of option 8) must be implemented to prevent undue noise impacts at Receiver Location R7 (Mount Gilead residence) as referred to in Table B.1 titled "Flare Mitigation Options – Mt. Gilead (R7)" in the Letter Report titled "Stage 2 Coal Bed Methane Project – Response to the EPA's Request for Flare Noise Details" from Environmental Resources Management Australia to Sydney Gas Ltd dated 22 October 2003. • Measures identified in the report "Amendment to Statement of Evidence – Compressor Blow Down Systems" by Gary Scott dated 11 June 2004. 		Measures for noise reduction have been implemented prior to this audit period. These measures continue to be maintained.	Closed out.	
DA 282-6-2003-i	<p>38 Operational Noise Management Plan</p> <p>The Applicant shall prepare and implement a Noise Management Plan for the whole site. The Plan shall be submitted to the Director-General for approval within six months of the date of this consent. The Plan shall include, but not necessarily be limited to:</p> <p>(a) identification of the potential sources of noise during drilling and operation;</p> <p>(b) the noise criteria for these activities;</p> <p>(c) details of what actions and measures would be implemented to ensure that these operations would comply with the relevant noise criteria;</p> <p>(d) describe how the effectiveness of these actions and measures would be monitored during the life of the development, clearly indicating who would conduct the monitoring, how often this monitoring would be conducted, how the results of this monitoring would be recorded and reported to the Director-General, and if any non-compliance is detected; and</p> <p>(e) describe what procedures would be followed to ensure compliance.</p>	EMS (2008) and associated Noise Management Sub-Plan - endorsed by OEH (sighted letter dated 18/11/10).	It was reported that a previous version of the EMS and Noise Management Plan was submitted to the Director General and approved. EMS (2008) and associated Noise Management Plan has been updated to reflect new development and changed operations. The findings of the AEPR indicate that the management measures are effective and the development is compliant with relevant noise conditions.	Compliant.	
DA 282-6-2003-i	<p>4-39 Operating Conditions</p> <p>The Applicant shall undertake the development in a way that minimises the noise generated by the development.</p>	EMS (2008) and associated Noise Management Sub-Plan.	The development is operated and managed according to procedures in the noise management sub plan and EMS to minimise noise impacts. This is evident through no recorded complaints or breaches of EPL breaches.	Compliant.	
DA 282-6-2003-i	<p>4-40 Monitoring</p> <p>The Applicant must submit a noise compliance report to the DECC and the Department within one month of commissioning of the Gas Treatment Plant and on an annual basis with the Annual Return required by the DECC's licence to assess the project's compliance with the noise limits in Conditions 29 and 31. The noise monitoring must be conducted in accordance with Condition 42.</p>	AEPR and correspondence with OEH and DoP. Sighted noise compliance monitoring records. Sighted Annual Return 16/2/11 which included Annual Noise Compliance Report (2011) by Wilkinson Murray.	OEH requested annual noise compliance reports to be submitted with the Annual Return to report compliance with the operational noise limits specified in the EPL (L6.1). Auditors sighted the Noise Compliance Statement submitted with the Annual Return in 2010. Prior to this, only AEPR and Annual Returns were prepared annually and submitted to OEH and DoP. It is recommended that the noise compliance report is prepared and submitted with the Annual Return in future.	Non-Compliant.	Ensure noise compliance reports are submitted to OEH as requested.

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DA 282-6-2003-I	4-41 Following the first 12 months of continuous noise monitoring, during the life of the Development or as otherwise agreed by the Director-General, the Applicant shall undertake quarterly attended monitoring at the Mt Gilead Homestead to the satisfaction of the Director-General, in accordance with the NSW Industrial Noise Policy and AS 1055: "Acoustics – Description and Measurement of Environmental Noise".	Sighted Noise Monitoring data by Wilkinson-Murray RPPG Compliance Results - 01/07/08 RPPG Compliance Results - 31/07/08 RPPG Compliance Results - 01/11/08 RPPG Compliance Results - 03/02/09 RPPG Compliance Results - 02/04/09 RPPG Compliance Results - 16/07/09 RPPG Compliance Results - 28/02/10 RPPG Compliance Results - 30/06/10	Quarterly attended noise monitoring records for RPPG reported in AEPR.	Compliant.	
DA 282-6-2003-I	4-42 Within six months of the date of this consent, the Applicant shall submit a detailed Noise Monitoring Program for the development to the Director-General for approval prior to commissioning. The Noise Monitoring Program must be prepared in consultation with the DECC and must include: a detailed noise monitoring protocol for evaluating compliance with the limits in conditions 29 and 31. The protocol must include consideration of monitoring under meteorological conditions as required by condition 33 and must provide for installation and use of a continuous noise monitoring system for the first 12 months of operation capable of identifying the source of dominant noise at R7 Mt Gilead, subject to the agreement of the owners and occupiers of this residence. In addition, meteorological conditions must be obtained for the time of noise monitoring. This is to include wind speed and direction as well as data suitable for quantifying the presence or otherwise of temperature inversions. The Applicant must comply with the Noise Monitoring Program at all times during operation of the development.	Noise Management Plan developed and endorsed by OEI (sighted letter dated 18/11/10) including monitoring program. Sighted Field Noise Reports, which include the required meteorological conditions.	Noise Management Plan developed and endorsed by OEI (sighted letter dated 18/11/10) including monitoring program.	Compliant.	
DA 282-6-2003-I	4-43 Noise Monitoring Report - Flare The Applicant must submit to the DECC's Manager Sydney Industry PO Box 668 Parramatta NSW 2124 within seven months of commissioning of the Gas Treatment Plant, a report on noise from operation of the flare in the first 6 months of operation of the plant. The report must assess the compliance of noise levels during the range of flaring incidents experienced since commissioning, with the noise limits provided in Conditions 29 and 31. The noise monitoring must be undertaken in accordance with the Noise Monitoring Program in condition 42. Where during the first six month period all flare types identified in Condition 31 have not occurred, noise measurements shall be carried out of a simulation of the remaining events by applying the appropriate flow rates in order to assess compliance. The report must contain the following information: • A listing of each incident when the flare operated including the duration, gas discharge rate and cause of the incident; • The temperature and volume data for each flare event, as required by Condition 59; • The results of noise measurements for flare operation for each flare type event, as required by Condition 31, • The results of noise measurements for flare operation for each flare event for receivers at location R7; and • An assessment of compliance with noise limits provided in Condition 31. The noise monitoring must be undertaken in accordance with Condition 42. • Where noise levels do not comply with Condition 31, noise mitigation measures to ensure compliance. <i>Modification to the control system to reduce gas flow at the flare is considered a practical noise</i>		This has occurred pre-audit period.	Closed out.	
DA 282-6-2003-I	4-44 Redrilling and Refracting Management Plan <i>Note: For the purposes of this consent the redrilling and/or additional fracture stimulation of a well does not constitute wellhead maintenance. The Applicant shall obtain the prior approval of the Director-General for the redrilling and/or additional fracture stimulation of a gas well.</i>		There has been no fracture stimulation or redrilling of any wells under this consent within the audit period.	Compliant.	
DA 282-6-2003-I	4-45 The Applicant shall prepare a Redrilling and Refracting Management Plan in consultation with the DPI for the redrilling and/or refracting of an existing well. The Plan shall be submitted to the Director-General no later than one month prior to the commencement of the work or within such period as agreed by the Director-General. The Plan shall include, but not necessarily be limited to: (a) a description of all the activities to be undertaken on the well site during the redrilling and/or refracting work; (b) details of how the environmental performance of the work will be monitored and what actions will be taken to address identified adverse environmental impacts; (c) reference to the relevant parts of the Environmental Management Plan required under conditions 1 and 2 (Schedule 5) of this consent; (d) compliance with all the relevant environmental performance requirements of this consent; and (e) arrangements for complaints handling procedures during the redrilling/refracting work The Applicant shall give written notification of the proposed redrilling/refracting work to potentially affected residences and other noise sensitive receivers at least fourteen days prior to work		Redrilling or Refracting management plans are developed for individual well sites. There have been no redrilling or refracting of any wells under this consent within the audit period.	Compliant.	
DA 282-6-2003-I	4-46 VIBRATION Condition Report The Applicant shall prepare a Condition Report for all residences or structures (including structures on EMAI) within 25 metres of a wellhead. The Applicant shall undertake an inspection of the residence and/or structure prior to work commencing, and a follow up inspection within one month of the completion of the work. The Applicant shall take immediate action for repair of any damage to the residence or structure as a result of the work and to avoid any further damage. A copy of the Condition Report shall be submitted to the Director-General and the DPI after completion of the work.		There are no wells within 25 m of a residence or structure.	Compliant.	

DA NUMBER: DA 282-6-2003-i
 LOCATION: Rosalind Park; Wandinong
 MODIFICATION: MOD72-7-2004-I, MOD5-1-2005, MOD42-3-2005, MOD119-10-2006, MOD124-10-2006, MOD111-2-2007, MOD26-3-2007
 WORKS: Gas gathering line twinning at Rosalind Park and repair damaged line at GL06. Drilled GL17 and EM39. No activity at Wandinong gas field.

Number of Conditions: 254
 Closed out previously: 49
 Number Noted: 33
 Number N/A: 19
 Number Non-Compliant: 16
 Compliance Score: 90%

DA/MOD	COC	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION																																																												
DA 282-6-2003-i	<p>4-47 AIR QUALITY Air Emission Criteria The Applicant shall ensure that air pollutant emissions from the development do not exceed the following criteria at any privately owned residence.</p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Averaging Period</th> <th>Criterion</th> </tr> </thead> <tbody> <tr> <td>Nitrogen Dioxide</td> <td>1 Hour</td> <td>246 µg/m³</td> </tr> <tr> <td>Nitrogen Dioxide</td> <td>Annual</td> <td>62 µg/m³</td> </tr> <tr> <td>Sulphur Dioxide</td> <td>1 Hour</td> <td>570 µg/m³</td> </tr> <tr> <td>Sulphur Dioxide</td> <td>Annual</td> <td>60 µg/m³</td> </tr> <tr> <td>Sulphuric acid mist</td> <td>3 minute</td> <td>33 µg/m³</td> </tr> <tr> <td>Methyl mercaptan</td> <td>3 minute</td> <td>0.84 µg/m³</td> </tr> </tbody> </table>	Pollutant	Averaging Period	Criterion	Nitrogen Dioxide	1 Hour	246 µg/m ³	Nitrogen Dioxide	Annual	62 µg/m ³	Sulphur Dioxide	1 Hour	570 µg/m ³	Sulphur Dioxide	Annual	60 µg/m ³	Sulphuric acid mist	3 minute	33 µg/m ³	Methyl mercaptan	3 minute	0.84 µg/m ³	Sighted EML analysis reports: 12/1/2009; 14/1/2009; 12/6/2009; 15/6/2009; 16/9/2009; 2/11/2009; 11/1/2010; 29/3/2010; 14/7/2010. AEPR details summary of air emissions monitoring.	EML Air Pty Ltd undertook quarterly air quality emissions analysis which demonstrated that the emission rates complied with the specified limits for all pollutants.	Compliant.																																								
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DA 282-6-2003-i	<p>4-48 For each discharge point specified in the table below, the Applicant shall ensure that the concentration of a pollutant discharged at that point does not exceed the concentration limit specified for that pollutant in the table, and where a pH quality limit is specified in the table, the specified percentage of samples must be within the specified ranges.</p> <p>POINT 1, 2, 3</p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Units of measure</th> <th>100 percentile limit</th> <th>Reference Conditions</th> <th>Averaging Period</th> </tr> </thead> <tbody> <tr> <td>Oxides of Nitrogen</td> <td>mg/m³</td> <td>461</td> <td>Dry, 273K, 101.3kPa, 7% O₂</td> <td>As per test method</td> </tr> <tr> <td>Sulfur Dioxide</td> <td>mg/m³</td> <td>7</td> <td>Dry, 273 K, 101.3 kPa</td> <td>As per test method</td> </tr> <tr> <td>Sulphuric acid mist and/or sulphur trioxide</td> <td>mg/m³</td> <td>3.1</td> <td>Dry, 273 K, 101.3 kPa</td> <td>As per test method</td> </tr> </tbody> </table> <p>POINT 4</p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Units of measure</th> <th>100 percentile limit</th> <th>Reference Conditions</th> <th>Averaging Period</th> </tr> </thead> <tbody> <tr> <td>Oxides of Nitrogen</td> <td>mg/m³</td> <td>110</td> <td>Dry, 273K, 101.3kPa, 7% O₂</td> <td>As per test method</td> </tr> <tr> <td>Sulfur Dioxide</td> <td>mg/m³</td> <td>35</td> <td>Dry, 273 K, 101.3 kPa</td> <td>As per test method</td> </tr> <tr> <td>Sulphuric acid mist and/or sulphur trioxide</td> <td>mg/m³</td> <td>1.0</td> <td>Dry, 273 K, 101.3 kPa</td> <td>As per test method</td> </tr> </tbody> </table> <p>POINT 5</p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Units of measure</th> <th>100 percentile limit</th> <th>Reference Conditions</th> <th>Averaging Period</th> </tr> </thead> <tbody> <tr> <td>Oxides of Nitrogen</td> <td>mg/m³</td> <td>13</td> <td>Dry, 273K, 101.3kPa, 7% O₂</td> <td>As per test method</td> </tr> <tr> <td>Sulfur Dioxide</td> <td>mg/m³</td> <td>1042</td> <td>Dry, 273 K, 101.3 kPa</td> <td>As per test method</td> </tr> <tr> <td>Sulphuric acid mist and/or sulphur trioxide</td> <td>mg/m³</td> <td>35</td> <td>Dry, 273 K, 101.3 kPa</td> <td>As per test method</td> </tr> </tbody> </table> <p>Note 1: Concentration limits at points 1, 2, 3, 4 and 5 in the above Condition may be subject to review after the submission of the Air Emissions Reports in compliance with Conditions 62 and 63. Note 2: Should the proponent seek to revise the concentration limits as specified in condition 48 for oxides of nitrogen, the proponent must demonstrate that:</p> <ul style="list-style-type: none"> the revised emission limit is representative of the proper and efficient maintenance and operation of the equipment; the equipment is designed to minimise emissions as far as is practicable and consistent with best practice considering the type of equipment and application; the revised emission limit is supported by Manufacturers Design Specification; and the revised emission limit does not cause adverse impacts on local air quality. This assessment must be undertaken in accordance with the document: Approved Methods and Guidance for the Modelling and Assessment of Air Pollutants in NSW. 	Pollutant	Units of measure	100 percentile limit	Reference Conditions	Averaging Period	Oxides of Nitrogen	mg/m ³	461	Dry, 273K, 101.3kPa, 7% O ₂	As per test method	Sulfur Dioxide	mg/m ³	7	Dry, 273 K, 101.3 kPa	As per test method	Sulphuric acid mist and/or sulphur trioxide	mg/m ³	3.1	Dry, 273 K, 101.3 kPa	As per test method	Pollutant	Units of measure	100 percentile limit	Reference Conditions	Averaging Period	Oxides of Nitrogen	mg/m ³	110	Dry, 273K, 101.3kPa, 7% O ₂	As per test method	Sulfur Dioxide	mg/m ³	35	Dry, 273 K, 101.3 kPa	As per test method	Sulphuric acid mist and/or sulphur trioxide	mg/m ³	1.0	Dry, 273 K, 101.3 kPa	As per test method	Pollutant	Units of measure	100 percentile limit	Reference Conditions	Averaging Period	Oxides of Nitrogen	mg/m ³	13	Dry, 273K, 101.3kPa, 7% O ₂	As per test method	Sulfur Dioxide	mg/m ³	1042	Dry, 273 K, 101.3 kPa	As per test method	Sulphuric acid mist and/or sulphur trioxide	mg/m ³	35	Dry, 273 K, 101.3 kPa	As per test method	Sighted EML analysis reports: 12/1/2009; 14/1/2009; 12/6/2009; 15/6/2009; 16/9/2009; 2/11/2009; 11/1/2010; 29/3/2010; 14/7/2010. AEPR details summary of air emissions monitoring.	Note that limits increased following previous audit period; refer to current EPL. During the audit period, levels of sulfuric acid mist and sulfur trioxide were recorded at levels above the EPL limits (1.3 mg/m ³ , exceeding limit of 1 mg/m ³) at monitoring point 4 (reboiler unit) in October 2009 quarterly monitoring period. AGL conducted a thorough inspection and clean of the TEG burner unit in consultation with AGL's TEG burner service provider, Total Combustion Services. Further monitoring of the burner was undertaken on 8 and 10 December 2009 and results were below the EPL concentration limit	Non-Compliant.	Continue to monitor and maintain plant within specified operating criteria.
Pollutant	Units of measure	100 percentile limit	Reference Conditions	Averaging Period																																																													
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DA 282-6-2003-i	49 To avoid any doubt, the above Condition does not authorise the discharge or emission of any other pollutants.		Noted.	Noted.																																																													
DA 282-6-2003-i	<p>50 Combustion Parameters For each monitoring/discharge point or utilisation area specified in the table below (by point number), the Applicant shall ensure that the parameter is equal to or greater than the lower limits specified for that parameter in the table.</p> <p>POINT 7</p> <table border="1"> <thead> <tr> <th>Parameter</th> <th>Units of measure</th> <th>Lower limit</th> <th>Averaging period</th> </tr> </thead> <tbody> <tr> <td>Residence time</td> <td>s</td> <td>*TBD</td> <td>Instantaneous</td> </tr> <tr> <td>Temperature</td> <td>°C</td> <td>*TBD</td> <td>Instantaneous</td> </tr> </tbody> </table>	Parameter	Units of measure	Lower limit	Averaging period	Residence time	s	*TBD	Instantaneous	Temperature	°C	*TBD	Instantaneous	Noted.	AGL is currently in discussions with DoP to have this consent condition removed from the consent.	Closed out.																																																	
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	Note: The limits for residence time and temperature for the main flare will be determined after the Applicant has submitted the report specified in Condition 126 based upon flare design of 98% destruction efficiency for VOCs plus methane and a NOx emission rate as determined in the report specified in Condition 126.																																																																

DA NUMBER: DA 282-6-2003-i
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DA/MOD	COC	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION																																
DA 282-6-2003-i	4-51 Operating Conditions The Applicant shall undertake the development and maintain the condition of the premises in a way that minimises or prevents the emission of dust generated by the development.	Interviews with site personnel. Site observations	The following measures were undertaken to minimise the emission of dust from the development when necessary: - Use water cart on unsealed roads as required; - Restrict height of stockpiles to 2 m; - Restrict speed limits (this is communicated in induction and by speed signs); - Restrict access to existing access roads, gathering lines easements and well head areas; and - Install erosion and sediment controls as per the erosion and sediment management sub plan. No dust-related complaints were reported to have been received by AGL with regards to activities under this development consent.	Compliant.																																	
DA 282-6-2003-i	4-52 The Applicant shall take all practicable measures to ensure that all vehicles entering or leaving a site, carrying a load that may generate dust, are covered at all times, except during loading and unloading. Any such vehicles shall be covered or enclosed in a manner that will minimise emissions of dust from the vehicle at all times.	Interviews with site personnel.	It was reported that there were no significant loads entering or leaving site with potential to generate dust. Some road-base shale is delivered, but this was reported to be covered.	Compliant.																																	
DA 282-6-2003-i	4-53 The Applicant shall take all practicable measures to minimise the generation of wind blown dust from soil stockpiles.		EMS requires that activities are monitored for dust generation and controls applied as required. Controls include restricted speed limits, stockpile heights, water sprays etc. No soil stockpiles observed on site.	Compliant.																																	
DA 282-6-2003-i	4-54 Monitoring Locations For the purposes of this consent, the points referred to in the table below are identified for the purposes of monitoring and/or setting of limits for the emission of pollutants to air from that point: <table border="1"> <thead> <tr> <th>EPA ID</th> <th>Monitoring Point</th> <th>Type of Discharge Point</th> <th>Description of Location</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Air emissions monitoring</td> <td>Discharge to air</td> <td>Compressor Engine 1 marked 'Engine Exhaust Stack 1' as shown on 'Camden Gas Project Site Plan Location of Emission Points' drawing number 4229DG06 (Rev 2) provided to the DECC.</td> </tr> <tr> <td>2</td> <td>Air emissions monitoring</td> <td>Discharge to air</td> <td>Compressor Engine 2 marked 'Engine Exhaust Stack 2' as shown on 'Camden Gas Project Site Plan Location of Emission Points' drawing number 4229DG06 (Rev 2) provided to the DECC.</td> </tr> <tr> <td>3</td> <td>Air emissions monitoring</td> <td>Discharge to air</td> <td>Compressor Engine 3 marked 'Engine Exhaust Stack 3' as shown on 'Camden Gas Project Site Plan Location of Emission Points' drawing number 4229DG06 (Rev 2) provided to the DECC.</td> </tr> <tr> <td>4</td> <td>Air emissions monitoring</td> <td>Discharge to Air</td> <td>TEG Fire Tube marked 'Reboiler Flue' as shown on 'Camden Gas Project Site Plan Location of Emission Points' drawing number 4229DG06 (Rev 2) provided to the DECC.</td> </tr> <tr> <td>5</td> <td>Air emissions monitoring</td> <td>Discharge to Air</td> <td>Reboiler Still Column marked 'Reflux Column Vent' as shown on 'Camden Gas Project Site Plan Location of Emission Points' drawing number 4229DG06 (Rev 2) provided to the DECC.</td> </tr> <tr> <td>6</td> <td>Air emissions monitoring</td> <td>Discharge to Air</td> <td>Carbon scrubber vent discharge stack as shown on Camden Gas Project Site Plan Location of Emission Points' drawing number 4229DG06 (Rev 2) provided to the DECC.</td> </tr> <tr> <td>7</td> <td>Air emissions monitoring</td> <td>Discharge to Air</td> <td>Main Flare marked 'Flare' as shown on 'Camden Gas Project Site Plan Location of Emission Points' drawing number 4229DG06 (Rev 2) provided to the DECC.</td> </tr> </tbody> </table>	EPA ID	Monitoring Point	Type of Discharge Point	Description of Location	1	Air emissions monitoring	Discharge to air	Compressor Engine 1 marked 'Engine Exhaust Stack 1' as shown on 'Camden Gas Project Site Plan Location of Emission Points' drawing number 4229DG06 (Rev 2) provided to the DECC.	2	Air emissions monitoring	Discharge to air	Compressor Engine 2 marked 'Engine Exhaust Stack 2' as shown on 'Camden Gas Project Site Plan Location of Emission Points' drawing number 4229DG06 (Rev 2) provided to the DECC.	3	Air emissions monitoring	Discharge to air	Compressor Engine 3 marked 'Engine Exhaust Stack 3' as shown on 'Camden Gas Project Site Plan Location of Emission Points' drawing number 4229DG06 (Rev 2) provided to the DECC.	4	Air emissions monitoring	Discharge to Air	TEG Fire Tube marked 'Reboiler Flue' as shown on 'Camden Gas Project Site Plan Location of Emission Points' drawing number 4229DG06 (Rev 2) provided to the DECC.	5	Air emissions monitoring	Discharge to Air	Reboiler Still Column marked 'Reflux Column Vent' as shown on 'Camden Gas Project Site Plan Location of Emission Points' drawing number 4229DG06 (Rev 2) provided to the DECC.	6	Air emissions monitoring	Discharge to Air	Carbon scrubber vent discharge stack as shown on Camden Gas Project Site Plan Location of Emission Points' drawing number 4229DG06 (Rev 2) provided to the DECC.	7	Air emissions monitoring	Discharge to Air	Main Flare marked 'Flare' as shown on 'Camden Gas Project Site Plan Location of Emission Points' drawing number 4229DG06 (Rev 2) provided to the DECC.	EML Air Pty Ltd undertook quarterly air quality emissions analysis. Sighted EML analysis reports: 12/1/2009; 14/1/2009; 12/6/2009; 15/6/2009; 16/9/2009; 2/11/2009; 11/1/2010; 29/3/2010; 14/7/2010. AEPR details summary of compliance.	Air emissions monitoring is carried out at Points 1 to 6. OEH removed the requirement to undertake emissions monitoring (temperature and residence time) from Point 7 (Flare) from the EPL in September 2007. Point 7 remains on CoC but monitoring is reportedly not required and not done.	Compliant.	
EPA ID	Monitoring Point	Type of Discharge Point	Description of Location																																		
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DA 282-6-2003-i	4-55 Testing Method – Concentration Limits The Applicant shall ensure that monitoring for the concentration of a pollutant emitted to the air required to be conducted by the DECC's General Terms of Approval, or a licence under the Protection of the Environment Operations Act 1997, in relation to the development or in order to comply with a relevant local calculation protocol is done in accordance with: (a) any methodology which is required by or under the POEO Act 1997 to be used for the testing of the concentration of the pollutant; or (b) if no such requirement is imposed by or under the POEO Act 1997, any methodology which the general terms of approval or a condition of the licence or the protocol (as the case may be) requires to be used for that testing; or (c) if no such requirement is imposed by or under the POEO Act 1997 or by the general terms of approval or a condition of the licence or the protocol (as the case may be), any methodology approved in writing by the DECC for the purposes of that testing prior to the testing taking place. <i>Note: The Clean Air (Plant and Equipment) Regulation 1997 requires testing for certain purposes to be conducted in accordance with test methods contained in the publication "Approved Methods for the Sampling and Analysis of Air Pollutants in NSW".</i>		Test were completed by EML Air Pty Ltd. The methods meet the requirements of the NSW OEH (as specified in the Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales, January 2007). All sampling and analysis was performed by EML Air, NATA accreditation number 2732.	Compliant.																																	

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DA 282-6-2003-i	<p>4-56 Manufacturers Design Specifications</p> <p>At least 1 month prior to the commissioning of the Gas Treatment Plant, the Applicant shall submit to the DECC's Manager Sydney Industry PO Box 668 Parramatta NSW 2124, a report containing Manufacturers Design Specifications for air emissions from each of the following:</p> <ul style="list-style-type: none"> • compressor engine; • TEG Fire tube; and • Reboiler still column. <p>The report must compare the Design Specifications with the limits specified in Condition 48 and 50 to demonstrate that compliance can be achieved.</p> <p><i>Note: The objective of this condition is to verify that the equipment installed is designed to comply with the air emissions limits specified in Condition 48.</i></p>		This was completed pre-audit period	Closed out.																																																																																																																									
DA 282-6-2003-i	<p>4-57 Monitoring</p> <p>Within 6 months of the date of this consent, the Applicant shall submit a detailed Air Quality Monitoring Program for the development to the Director-General, which has been prepared in consultation with the DECC and includes a detailed air quality monitoring protocol for evaluating compliance of the development with the Air Quality Pollutants in Condition 47. The Applicant shall prepare the Air Quality Monitoring Program in accordance with the NSW DECC Guideline "Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales" 20 July 2001 or its latest version.</p>		Submitted and approved prior to audit period. Air Quality Monitoring is detailed in the Air Quality Management Sub Plan	Closed out.																																																																																																																									
DA 282-6-2003-i	<p>4-58 For each monitoring/ discharge point or utilisation area specified in the tables below (by a point number), the Applicant must monitor (by sampling and obtaining results by analysis) the concentration of each pollutant specified in Column 1. The Applicant must use the sampling method, units of measure, and sample at the frequency, specified opposite in the other columns.</p> <p>POINTS 1, 2, 3</p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Units of Measure</th> <th>Frequency</th> <th>Sampling Method</th> </tr> </thead> <tbody> <tr> <td>Oxides of Nitrogen</td> <td>mg/m³</td> <td>Continuous</td> <td>CEM-2</td> </tr> <tr> <td>Temperature</td> <td>oC</td> <td>Continuous</td> <td>TM-2</td> </tr> <tr> <td>Moisture</td> <td>%</td> <td>Continuous</td> <td>TM-22</td> </tr> <tr> <td>Volumetric flow rate</td> <td>m³/s</td> <td>Continuous</td> <td>CEM-6</td> </tr> <tr> <td>Oxygen</td> <td>%</td> <td>Continuous</td> <td>CEM-3</td> </tr> </tbody> </table> <p><i>Note: The requirement for continuous monitoring at Point 1, 2 and 3 in Condition 57 will be reviewed after the submission of the Air Emissions Reports in compliance with Conditions 62 and 63.</i></p> <p>POINTS 1, 2, 3, 4, 5</p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Units of measure</th> <th>Frequency</th> <th>Sampling Method</th> </tr> </thead> <tbody> <tr> <td>Velocity</td> <td>m/s</td> <td>Quarterly</td> <td>TM-2</td> </tr> <tr> <td>Volumetric flow rate</td> <td>m³/s</td> <td>Quarterly</td> <td>TM-2</td> </tr> <tr> <td>Temperature</td> <td>°C</td> <td>Quarterly</td> <td>TM-2</td> </tr> <tr> <td>Moisture</td> <td>%</td> <td>Quarterly</td> <td>TM-22</td> </tr> <tr> <td>Dry gas density</td> <td>Kg/m³</td> <td>Quarterly</td> <td>TM-23</td> </tr> <tr> <td>Molecular weight of stack gases</td> <td>g/g.mol</td> <td>Quarterly</td> <td>TM-23</td> </tr> <tr> <td>Oxygen</td> <td>%</td> <td>Quarterly</td> <td>TM-25</td> </tr> <tr> <td>Carbon dioxide</td> <td>%</td> <td>Quarterly</td> <td>TM-24</td> </tr> <tr> <td>Oxides of Nitrogen</td> <td>mg/m³</td> <td>Quarterly</td> <td>TM-11</td> </tr> <tr> <td>Sulfuric Acid Mist/Sulfur Trioxide</td> <td>mg/m³</td> <td>Quarterly</td> <td>TM-3</td> </tr> <tr> <td>Sulfur Dioxide</td> <td>mg/m³</td> <td>Quarterly</td> <td>TM-4</td> </tr> <tr> <td>Selection of sampling positions</td> <td>-</td> <td>-</td> <td>TM-1</td> </tr> </tbody> </table> <p><i>Note: The requirement for monitoring of emissions at Points 2 and 3 only applies after compressor engines 2 and 3 respectively, commence operations.</i></p> <p>POINT 6</p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Units of measure</th> <th>Frequency</th> <th>Sampling Method</th> </tr> </thead> <tbody> <tr> <td>Velocity</td> <td>m/s</td> <td>Quarterly</td> <td>TM-2</td> </tr> <tr> <td>Volumetric flow rate</td> <td>m³/s</td> <td>Quarterly</td> <td>TM-2</td> </tr> <tr> <td>Temperature</td> <td>°C</td> <td>Quarterly</td> <td>TM-2</td> </tr> <tr> <td>Moisture</td> <td>%</td> <td>Quarterly</td> <td>TM-22</td> </tr> <tr> <td>Dry gas density</td> <td>Kg/m³</td> <td>Quarterly</td> <td>TM-23</td> </tr> <tr> <td>Molecular weight of stack gases</td> <td>g/g.mol</td> <td>Quarterly</td> <td>TM-23</td> </tr> <tr> <td>Oxygen</td> <td>%</td> <td>Quarterly</td> <td>TM-25</td> </tr> <tr> <td>Carbon dioxide</td> <td>%</td> <td>Quarterly</td> <td>TM-24</td> </tr> <tr> <td>Odour</td> <td>OU</td> <td>Quarterly</td> <td>OM-7</td> </tr> <tr> <td>Selection of sampling positions</td> <td>-</td> <td>-</td> <td>TM-1</td> </tr> </tbody> </table> <p><i>Note: The requirement for quarterly monitoring at Point 6 may be removed based on odour emission performance after 12 months from commissioning of the gas treatment plant.</i></p>	Pollutant	Units of Measure	Frequency	Sampling Method	Oxides of Nitrogen	mg/m ³	Continuous	CEM-2	Temperature	oC	Continuous	TM-2	Moisture	%	Continuous	TM-22	Volumetric flow rate	m ³ /s	Continuous	CEM-6	Oxygen	%	Continuous	CEM-3	Pollutant	Units of measure	Frequency	Sampling Method	Velocity	m/s	Quarterly	TM-2	Volumetric flow rate	m ³ /s	Quarterly	TM-2	Temperature	°C	Quarterly	TM-2	Moisture	%	Quarterly	TM-22	Dry gas density	Kg/m ³	Quarterly	TM-23	Molecular weight of stack gases	g/g.mol	Quarterly	TM-23	Oxygen	%	Quarterly	TM-25	Carbon dioxide	%	Quarterly	TM-24	Oxides of Nitrogen	mg/m ³	Quarterly	TM-11	Sulfuric Acid Mist/Sulfur Trioxide	mg/m ³	Quarterly	TM-3	Sulfur Dioxide	mg/m ³	Quarterly	TM-4	Selection of sampling positions	-	-	TM-1	Pollutant	Units of measure	Frequency	Sampling Method	Velocity	m/s	Quarterly	TM-2	Volumetric flow rate	m ³ /s	Quarterly	TM-2	Temperature	°C	Quarterly	TM-2	Moisture	%	Quarterly	TM-22	Dry gas density	Kg/m ³	Quarterly	TM-23	Molecular weight of stack gases	g/g.mol	Quarterly	TM-23	Oxygen	%	Quarterly	TM-25	Carbon dioxide	%	Quarterly	TM-24	Odour	OU	Quarterly	OM-7	Selection of sampling positions	-	-	TM-1	<p>EML Air Pty Ltd undertook quarterly air quality emissions analysis. Sighted EML analysis reports: 12/1/2009; 14/1/2009; 12/6/2009; 15/6/2009; 16/9/2009; 2/11/2009; 11/1/2010; 29/3/2010; 14/7/2010. AEPR details summary of compliance.</p> <p>Quarterly Stack Emission Survey, 4-5 August 2009 Quarterly Stack Emission Survey, 15 October 2009 Quarterly Stack Emission Survey, 8-10 December 2009 Quarterly Stack Emission Survey, 17 March 2010.</p>	<p>Monitoring results showed continued compliance with NOx limits for Compressor 1, 2 and 3. Full results of the continuous emissions monitoring for the reporting period are kept on file at the RPPG.</p> <p>AGL submitted an application to modify a development consent with DoP on 28 May 2010. OEH confirmed acceptance of AGL's request to raise the limits for sulfuric acid mist and sulfur trioxide emissions to 3.5 mg/m3 at monitoring point 4 on 21 June 2010.</p>	Compliant.	
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 LOCATION: Rosalind Park; Wandinong
 MODIFICATION: MOD72-7-2004-I, MOD5-1-2005, MOD42-3-2005, MOD119-10-2006, MOD124-10-2006, MOD11-2-2007, MOD26-3-2007
 WORKS: Gas gathering line twinning at Rosalind Park and repair damaged line at GL06. Drilled GL17 and EM39. No activity at Wandinong gas field.

Number of Conditions: 254
 Closed out previously: 49
 Number Noted: 33
 Number N/A: 19
 Number Non-Compliant: 16
 Compliance Score: 90%

DA/MOD	COC	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION												
DA 282-6-2003-i	<p>4-59 Monitoring of Combustion Parameters For each monitoring/discharge point or utilisation area specified below (by point number), the Applicant must monitor (by sampling and obtaining results by analysis) each parameter specified in Column 1. The Applicant must use the sampling method, units of measure, and sample at the frequency, specified opposite in the other columns.</p> <p>POINT 7</p> <table border="1"> <thead> <tr> <th>Parameter</th> <th>Units of measure</th> <th>Frequency</th> <th>Sampling Method</th> </tr> </thead> <tbody> <tr> <td>Temperature</td> <td>°C</td> <td>Continuous</td> <td>TM-2</td> </tr> <tr> <td>Volume</td> <td>m³/d</td> <td>Daily during discharge</td> <td>By Calculation (duration of flaring incident multiplied by the capacity of the unit causing the flaring event)</td> </tr> </tbody> </table>	Parameter	Units of measure	Frequency	Sampling Method	Temperature	°C	Continuous	TM-2	Volume	m ³ /d	Daily during discharge	By Calculation (duration of flaring incident multiplied by the capacity of the unit causing the flaring event)		This requirement has been deleted from the EPL due to health and safety concerns and there is now no requirement for monitoring of Point 7 within EPL. No application has been made to DoP to remove consent condition.	Closed out.	
Parameter	Units of measure	Frequency	Sampling Method														
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Volume	m ³ /d	Daily during discharge	By Calculation (duration of flaring incident multiplied by the capacity of the unit causing the flaring event)														
DA 282-6-2003-i	<p>4-60 Installation of Air Monitoring Points Report The Applicant must submit to the DECC's Manager Sydney Industry PO Box 668 Parramatta NSW 2124, one month prior to the completion of construction of the Gas Treatment Plant, a written report containing plans showing the locations of air monitoring points for discharges from: (a) the compressor engines; (b) TEG Fire Tube; (c) Reboiler Still Column; and (d) Carbon scrubber vent stack.</p>		Pre-audit period.	Closed out.													
DA 282-6-2003-i	<p>4-61 Monitoring Program for Air Based Assessable Pollutants The Applicant must submit to the DECC's Manager Sydney Industry PO Box 668 Parramatta NSW 2124, one month prior to the completion of construction of the Gas Treatment Plant, a written report containing a program for monitoring of assessable pollutants from the start gas vents.</p>		Pre-audit period.	Closed out.													
DA 282-6-2003-i	<p>4-62 Requirement to Monitor Concentrations of Pollutants Discharged Post Commissioning Air Emissions Report The Applicant must submit to the DECC's Manager Sydney Industry PO Box 668 Parramatta NSW 2124, within six months of the commissioning of the Gas Treatment Plant, a written report detailing the results of post commissioning source air emissions sampling and analysis undertaken in accordance with the requirements specified in Condition 58 and Condition 59. The report must assess compliance with the limit conditions specified in Condition 48 and Condition 50. The report must also include an assessment of flare operations and report on the results of continuous temperature monitoring and</p>		Pre-audit period.	Closed out.													
DA 282-6-2003-i	<p>4-63 Quarterly Reporting of Air Emissions The Applicant must submit the results of quarterly air emissions monitoring as required by Condition 58 on a quarterly basis for the first 12 months of the operation of the Gas Treatment Plant to the DECC's Manager Sydney Industry at PO Box 668 Parramatta NSW 2124. The results must be received by the DECC within one month of the date on which the sampling was undertaken for that quarter.</p>		Pre-audit period. AGL continue to submit results.	Closed out.													
DA 282-6-2003-i	<p>4-64 Odour The Applicant must not cause or permit the emission of offensive odours from the premises, as defined under Section 129 of the Protection of the Environment Operations Act 1997.</p>		There are no perceptible odours produced from the gas wells as methane is odourless. Mercaptan is stored at RPPG. No complaints have been received regarding odours.	Compliant.													
DA 282-6-2003-i	<p>4-65 The Applicant must not cause the emission of detectable mercaptan odour from the premises. <i>Note: Should odour emissions become an issue, the DECC will consider requiring investigation and implementation of further odour control measures.</i></p>		Regular preventative maintenance is undertaken on the mercaptan odour filtration system (i.e. carbon filters).	Compliant.													
DA 282-6-2003-i	<p>4-66 SURFACE WATER MANAGEMENT Pollution of Waters Except as may be expressly provided for by a licence under the Protection of the Environment Operations Act 1997 in relation to the development, the Applicant shall comply with section 120 of the Protection of the Environment Operations Act 1997 in carrying out the development.</p>	EMS (2008), including Soil and Water Management Sub Plan.	All sites are constructed in accordance with Soil and Water Management Plans published in the EMS (2008). It was reported that the settlement pond at treatment plant sometimes overflows into creek (runoff only). All compressors have own bunding for oil/water leaks.	Compliant.													
DA 282-6-2003-i	<p>4-67 Management of Waste Water <i>Note: Section 120 of the Protection of the Environment Operations Act 1997 applies to the disposal of waste water. This section refers to the pollution of waters.</i> Operating Conditions The Applicant shall undertake the development in a way that minimises the potential surface water impacts of the development.</p>	EMS (2008). Sighted wastewater removal dockets (Worth Recycling).	The development aims to minimise the potential surface water impacts through management strategies and controls outlined in the soil and water management plan (2008), including effective design and implementation of construction methods, wastewater management, erosion and sediment controls. The liner of the evaporation pit at RPPG is tested for integrity (monthly), which indicates a slow increase in conductivity over time - approx 10L/month (doesn't reach creek). Water from bunds is processed in an oily water separation system.	Compliant.													

DA NUMBER: DA 282-6-2003-i
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DA 282-6-2003-i	<p>4-68 Monitoring Locations For the purposes of this consent, the points referred to in the table below are identified for the purposes of monitoring and/or setting of limits for the emission of pollutants to water from that point.</p> <table border="1"> <thead> <tr> <th>EPA Identification no.</th> <th>Type of Monitoring Point</th> <th>Type of Discharge Point</th> <th>Description of Location</th> </tr> </thead> <tbody> <tr> <td>8</td> <td>Discharge to waste facility Discharge quality monitoring</td> <td>Discharge (by tanker) to waste processing facility</td> <td>Pump connection point at evaporation pond as shown on 'Camden Gas Project Site Plan Location of Emission Points' drawing number 4229DG06 (Rev 2) provided to the DECC.</td> </tr> <tr> <td>9</td> <td>Discharge to waste facility Discharge quality monitoring</td> <td>Discharge (by tanker) to sewage treatment plant</td> <td>Sewage connection point at sewage storage tank as shown on 'Camden Gas Project Site Plan Location of Emission Points' drawing number 4229DG06 (Rev 2) provided to the DECC.</td> </tr> <tr> <td>10</td> <td>Discharge to waste facility Discharge quality monitoring</td> <td>Discharge (by tanker) to waste processing facility</td> <td>Pump connection point for oily water wastes as shown on 'Camden Gas Project Site Plan Location of Emission Points' drawing number 4229DG06 (Rev 2) provided to the DECC.</td> </tr> </tbody> </table>	EPA Identification no.	Type of Monitoring Point	Type of Discharge Point	Description of Location	8	Discharge to waste facility Discharge quality monitoring	Discharge (by tanker) to waste processing facility	Pump connection point at evaporation pond as shown on 'Camden Gas Project Site Plan Location of Emission Points' drawing number 4229DG06 (Rev 2) provided to the DECC.	9	Discharge to waste facility Discharge quality monitoring	Discharge (by tanker) to sewage treatment plant	Sewage connection point at sewage storage tank as shown on 'Camden Gas Project Site Plan Location of Emission Points' drawing number 4229DG06 (Rev 2) provided to the DECC.	10	Discharge to waste facility Discharge quality monitoring	Discharge (by tanker) to waste processing facility	Pump connection point for oily water wastes as shown on 'Camden Gas Project Site Plan Location of Emission Points' drawing number 4229DG06 (Rev 2) provided to the DECC.		It was reported that monitoring is undertaken at the locations defined i.e. evaporation pond (8), grey water tank (9) and in-ground oily water tank (10). There is no discharge from the evaporation pond so reporting is no longer required by the EPL e.g. in Annual Return.	Compliant.																									
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DA 282-6-2003-i	<p>4-69 Monitoring of Effluent Parameters For each monitoring/discharge point or utilisation area specified (by point number) in the table below, the Applicant must monitor (by sampling and obtaining results by analysis) each parameter specified in Column 1. The Applicant must use the sampling method, units of measure and sample at the frequency specified in the respective columns.</p> <p>POINT 8</p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Units of Measure</th> <th>Frequency</th> <th>Sampling Method</th> </tr> </thead> <tbody> <tr> <td>Total suspended solids</td> <td>Mg/L</td> <td>Monthly</td> <td>Representative</td> </tr> <tr> <td>Biochemical oxygen demand</td> <td>Mg/L</td> <td>Monthly</td> <td>Representative</td> </tr> <tr> <td>Oil & Grease</td> <td>Mg/L</td> <td>Monthly</td> <td>Representative</td> </tr> <tr> <td>Total polycyclic aromatic hydrocarbons</td> <td>µg/L</td> <td>Monthly</td> <td>Representative</td> </tr> <tr> <td>Phenols</td> <td>µg/L</td> <td>Monthly</td> <td>Representative</td> </tr> <tr> <td>Total organic carbon</td> <td>µg/L</td> <td>Monthly</td> <td>Representative</td> </tr> <tr> <td>Total petroleum hydrocarbons</td> <td>µg/L</td> <td>Monthly</td> <td>Representative</td> </tr> <tr> <td>Electrical conductivity</td> <td>µS/cm</td> <td>Monthly</td> <td>Representative</td> </tr> <tr> <td>Water level in storage</td> <td>Mm</td> <td>Monthly</td> <td>Direct measurement</td> </tr> </tbody> </table>	Pollutant	Units of Measure	Frequency	Sampling Method	Total suspended solids	Mg/L	Monthly	Representative	Biochemical oxygen demand	Mg/L	Monthly	Representative	Oil & Grease	Mg/L	Monthly	Representative	Total polycyclic aromatic hydrocarbons	µg/L	Monthly	Representative	Phenols	µg/L	Monthly	Representative	Total organic carbon	µg/L	Monthly	Representative	Total petroleum hydrocarbons	µg/L	Monthly	Representative	Electrical conductivity	µS/cm	Monthly	Representative	Water level in storage	Mm	Monthly	Direct measurement		Monthly sampling of the defined parameters are listed in the monthly task list for the environmental representative on site. Samples are delivered to ALS for analysis. Records of monitoring results are maintained by AGL, and were sighted during the audit.	Compliant.	
Pollutant	Units of Measure	Frequency	Sampling Method																																										
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DA 282-6-2003-i	<p>4-70 The Applicant must install a measurement device in the Evaporation Pond at the Gas Treatment Plant Site for recording the depth of effluent in the storage for the life of the Evaporation Pond.</p>		A water level gauge was observed to be installed at the site.	Compliant.																																									
DA 282-6-2003-i	<p>4-71 Monitoring Program for Water Based Assessable Pollutants The Applicant must at least one month prior to the completion of construction of the Gas Treatment Plant, submit to the DECC's Manager Sydney Industry PO Box 668 Parramatta NSW 2128, a written report containing a program for monitoring assessable pollutants contained within the following waste streams: (a) oily water wastes proposed to be transported to the waste management facilities at Unanderra or Camellia or any other facility which can legally receive such wastes; and (b) sewage waste proposed to be transported to the Bargo Ponds or any other facility which can legally receive such wastes. <i>Note: Monitoring of gas vented from waste is required by Condition 69.</i></p>		Pre-audit period	Closed out.																																									
DA 282-6-2003-i	<p>4-72 Testing Methods – Concentration Limits Subject to any express provision to the contrary in this licence, the Applicant shall undertake monitoring for the concentration of a pollutant discharged to waters or applied to a utilisation area or taken off-site in accordance with the Approved Methods Publication unless another method has been approved by the DECC in writing before any tests are conducted.</p>		It was reported that no waters were disposed off-site i.e. there is no discharge from the evaporation pond and all waters from wells are contained in tanks on site. All process waters enter the evaporation pond as a new oil/water separator has been installed onsite. No waters applied to utilisation area.	Compliant.																																									
DA 282-6-2003-i	<p>4-73 Gas Gathering System - Stream Crossings <i>Note: The Rivers and Foreshore Improvement Act 1948 applies to the proposed development and therefore any excavation, removal of material from the bank, shore or bed of any stream, estuary or lake, or land within 40 metres from the top of the bank will require a Part 3A permit.</i> The Applicant shall ensure that stream crossings B and F, as shown on the plan Camden Gas Project Stage 2 – RFI Act 3A Permit Areas by Sydney Gas (Figure 2, Appendix B) are under-bored. The gas pipe is to be at least 2 metres below the bed of the watercourses. The bed and banks of the watercourses are not to be disturbed.</p>		Twinning project did not require Part 3A permit as there was no stream crossing.	Closed out.																																									
DA 282-6-2003-i	<p>4-74 The Applicant is permitted to trench stream crossings A, C, D, E, J, K, L, M, N, O, X, Y, Z, as shown on plan Camden Gas Project Stage 2 – RFI Act 3A Permit Areas by Sydney Gas (Figure 2, Appendix B). The Applicant shall prepare and implement a representative trenched crossing design. The design shall be prepared and implemented by a person(s) with relevant knowledge, qualifications and experience, in consultation with the Director-General. The Applicant shall submit the plan for approval by the Department prior to the issue of the Part 3A Permit. The final crossing design is to be presented in plan view and cross section. The cross section is to be at right angles to the direction of flow, is to extend for a minimum distance of 10 metres from the top of both banks and is to include the location of all structures associated with the proposed crossing.</p>		Pre-audit period - this is no longer applicable.	Closed out.																																									
DA 282-6-2003-i	<p>4-75 The Applicant shall ensure that stream crossing I as shown on plan Camden Gas Project Stage 2 – RFI Act 3A Permit Areas by Sydney Gas (Figure 2, Appendix B) is strapped to the Menangle Bridge.</p>		Pre-audit period - this is no longer applicable.	Closed out.																																									

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 LOCATION: Rosalind Park; Wandinong
 MODIFICATION: MOD72-7-2004-I, MOD5-1-2005, MOD42-3-2005, MOD119-10-2006, MOD124-10-2006, MOD111-2-2007, MOD26-3-2007
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Number of Conditions: 254
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 Number N/A: 19
 Number Non-Compliant: 16
 Compliance Score: 90%

DA/MOD	COC	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
DA 282-6-2003-i	4-76 The Applicant shall ensure that stream crossing H as shown on plan Camden Gas Project Stage 2 – RFI Act 3A Permit Areas by Sydney Gas (Figure 2, Appendix B), is either strapped to the existing road crossing, strapped to an upgraded road crossing, under-bored or consist of a pipe bridge. Should a pipe bridge be proposed, the Applicant shall prepare and implement a design of the crossing which shall be prepared and implemented by a person(s) with relevant knowledge, qualifications and experience, in consultation with the DWE. The Applicant shall submit the plan for approval by the Director-General prior to the issue of the Part 3A Permit. The final crossing design is to be presented in plan view and cross section. The cross section is to be at right angles to the direction of flow, is to extend for a minimum distance of 20 metres from the top of both banks and is to include the location of all structures associated with the proposed crossing.		Pre-audit period - this is no longer applicable.	Closed out.	
DA 282-6-2003-i	4-77 The Applicant shall advise the Director-General of the proposed stream crossing methods located on EMAI, which are to be assessed and approved by the DWE prior to the issue of the Part 3A Permit.		Pre-audit period - this is no longer applicable.	Closed out.	
DA 282-6-2003-i	4-78 The Applicant shall ensure that works within 20 m of watercourses are to be undertaken during dry weather conditions.		Works are reportedly not undertaken within 20 m of a watercourse during wet weather in accordance with standard construction guidelines published in the EMS (2008).	Compliant.	
DA 282-6-2003-i	4-79 The Applicant shall ensure that the disturbance to the bed and banks of all watercourses are kept at an absolute minimum during the construction procedure and reinstatement of the site.		Pre-audit period - not near watercourse.	Closed out.	
DA 282-6-2003-i	4-80 Management of Site Water and Sediment Runoff The Applicant shall implement all practicable measures to minimise soil erosion and the discharge of sediments and water pollutants from the site.	Site observations, EMS (2008) and Soil and Water Management Plan.	Sighted implementation of soil and water management strategies and controls outlined in the plan, including sediment fencing, induction, route alignment and construction methods.	Compliant.	
DA 282-6-2003-i	4-81 The Applicant shall ensure that the amount of dirty water and sediment from the site entering protected waters, or that is exposed to the flow of protected waters, or that is likely to detrimentally affect water quality, riparian vegetation or habitat or the environment is minimised in a manner acceptable to the Director-General.	Sighted waste transfer dockets maintained by AGL. Sighted sediment pond at the RPGP site to collect stormwater run-off.	Stormwater run-off is controlled on-site through the use of sediment fences. Water generated during well construction is managed within lined drill pits as defined in the EMS and Soil Water Management Sub Plan. Where saline waters are identified, these are transported and disposed of at licensed disposal facilities.	Compliant.	
DA 282-6-2003-i	4-82 The Applicant shall implement all relevant site drainage and sediment and erosion control works and measures and any other pollution controls as required by these conditions, prior to the commencement of any other works at the site.	Drilling operations compliance checklist	Sediment and erosion controls are established onsite prior to drilling activities. A drilling operations compliance checklist is utilised for each well at each stage of well development. The checklist includes checking the sediment and erosion controls. These checklists were observed to be completed for each well visited.	Compliant.	
DA 282-6-2003-i	4-83 The Applicant shall document in detail the decommissioning of all sediment and erosion controls and any other water diversion structures to the satisfaction of the Director-General. The Applicant shall ensure that the decommissioning meets the requirements of the most recent version of the NSW Department of Housing's publication "Managing Urban Stormwater: Soils and Construction" (3rd Edition 1998).		It was reported that sediment and erosion control measures are installed, monitored and decommissioned in accordance with the Landcom guidance. Removal of sediment and erosion controls may only be completed upon approval by AGL Environmental Operator and/or Field Environment & Safety Officer. Decommissioning was not documented to verify actions; therefore the development is non-compliant with this condition. Only 2 well sites required rehabilitation in 2 years.	Non-Compliant.	Decommissioning of all sediment and erosion controls is to be documented in detail, as per the requirements of this condition.
DA 282-6-2003-i	4-84 Soil and Water Management Plan The Applicant shall prepare and implement a Soil and Water Management Plan (SWMP) for the development. A person, with professional qualifications, knowledge and experience to industry standards, must prepare the SWMP. The Applicant shall seek the Director-General's prior approval of the person to prepare the Plan. The SWMP shall be prepared to the satisfaction of the Director-General prior to the issue of the Part 3A permit. This plan shall include, but not necessarily be limited to: (a) all works on protected land and in protected waters, and staging and maintenance requirements; (b) the measures to be implemented to minimise the potential for soil erosion and the discharge of sediment and other pollutants to lands and/or waters during drilling and construction activities; (c) the measures to be implemented to mitigate the impacts of stormwater run-off from and within the site following the completion of drilling and construction activities; (d) demonstrate that erosion and sedimentation control measures will conform with, or exceed, the relevant requirements and guidelines contained in the Department of Housing's publication "Managing Urban Stormwater: Soils and Construction" (3rd Edition 1998) or its latest version; (e) consistency with the stormwater management plan for the catchment, should one exist, or with the DECC's Managing Urban Stormwater: Council Handbook should a stormwater management plan for the catchment not exist; (f) any DECC licence requirements; (g) measures to rehabilitate erosion-affected areas and areas the subject of excavation, including the planting of local native tree, shrub and/or cover crop species; (h) measures to maintain the soil quality, soil integrity and soil structure of land on the EMAI during the construction and operation of the proposal; (i) implement a program of regular testing of waste water quality for compounds, nutrients and metals, as outlined in the EIS;		Soil and Water Management Sub Plan is maintained within the EMS. Site observations indicate that the plan is implemented effectively across the development.	Compliant.	

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DA/MOD	COC	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
	(j) provide details of an appropriate soil sampling and monitoring program to ensure that areas used for waste water application do not lead to an unacceptable build-up of salts within the soil profile; (k) management procedures for all surface and groundwater collection and storage structures on the site, including a maintenance program for associated infrastructure (eg. pipes, pumps, dam walls, etc.) and a program for desilting of those structures, where relevant; (l) details of the well maintenance procedures to ensure the integrity of the well isolation components to prevent the cross contamination of groundwater aquifers; and (m) ensuring that saline groundwater which would exceed the ANZECC guidelines for the protection of aquatic ecosystems and irrigation application purposes is contained in lined holding evaporation ponds and dilutes with fresh water prior to any application of the water to the land surface.				
DA 282-6-2003-i	4-84A Soil and Water Management Plan – Rosalind Park Access Road The Applicant shall prepare and implement a Soil and Water Management Plan for the relocated Rosalind Park access road, to the satisfaction of the Director-General. This plan must be submitted to the Director-General for approval prior to the commencement of construction, and: (a) be consistent with the requirements in Managing Urban Stormwater: Soils and Construction, Volume 1, 4th Edition, 2004 (Landcom); (b) identify activities that could cause soil erosion and generate sediment; (c) describe measures to minimise soil erosion and the potential for the transport of sediment to downstream waters; (d) describe the location, function, and capacity of erosion and sediment control structures; and (e) describe what measures would be implemented to maintain (and if necessary, decommission) the structures over time.		Soil and Water Management Sub Plan is maintained within the EMS. Site observations indicate that the plan is implemented effectively across the development.	Compliant.	
DA 282-6-2003-i	4-84B Piping and Filling of Watercourse The Applicant shall obtain a Controlled Activity Approval under the Water Management Act 2000 from DWE prior to work commencing on the piping and partial filling of the watercourse near GL05. The Applicant shall fully rehabilitate the watercourse after completion of the construction of GL17 to the satisfaction of DWE and the Director-General.	Controlled Activity Approval (3 June 2008) from DWE. Site inspection and photographs.	GL17 well relevant to this audit period. Well located near drainage line. Native grasses were planted and photos taken to verify works in accordance with approved management plans.	Compliant.	
DA 282-6-2003-i	4-85 Evaporation Pond Liner Integrity Evaluation Program The Applicant must submit at least 1 month prior to completion of construction of the Treatment Plant, to the DECC's Manager Sydney Industry PO Box 668 Parramatta NSW 2124, a written report containing a program for future evaluation of the integrity testing of the liner in the evaporation pond. The report must contain details of an initial evaluation of the liner prior to use and then an on-going program for review of the integrity of the liner.	Sighted spreadsheet of monitoring evaporation pond.	Initial integrity testing of evaporation pond but ongoing monthly testing to record quality of water/volumes lost. Records to demonstrate that a written report containing a program for future evaluation of the integrity testing of the liner in the evaporation pond was submitted to DECCW was not made available for inspection, therefore the development is non-	Non-Compliant.	Records to demonstrate that a written report containing a program for future integrity testing of the evaporation pond liner was submitted to DECCW/OEH to be obtained and retained.
DA 282-6-2003-i	4-86 Within one month of the report above being provided to the licensee, the licensee must submit, to the DECC's Manager Sydney Industry PO Box 668 Parramatta NSW 2124, a copy of each written report containing the results of an evaluation of the integrity testing of the liner in the evaporation pond as specified in the report submitted to the DECC as required by Condition 85.		Pre-audit period. It was reported to be done initially and interpreted as ongoing reporting not required.	Closed out.	
DA 282-6-2003-i	4-87 INDIGENOUS HERITAGE Protection of Indigenous Heritage Prior to the commencement of site preparation works for the gas wells, gas gathering system and the Gas Treatment Plant Site, the Applicant shall clearly indicate the locations of known aboriginal relics on the site, and ensure that all employees and contractors are aware of these locations, to prevent the known relics being impacted upon during site preparation and construction.	Application for modification of consent.	Aboriginal Heritage Management Plan in the EMS (2008) covers whole project site and applies to all operations on the site. No new heritage items identified during the audit period (AEPR and modification application).	Compliant.	
DA 282-6-2003-i	4-88 The Applicant shall provide a report of the Indigenous Heritage Monitoring undertaken for the Stage II project to DECC and the Director-General within two months of the Heritage Monitoring being completed. <i>Note: Under Section 86 of the National Parks and Wildlife Act 1974, it is an offence to disturb or</i>		Heritage monitoring undertaken as part of the application and modification - refer past audit. No indigenous heritage monitoring undertaken for works under this DA.	Compliant.	
DA 282-6-2003-i	4-88A Aboriginal Heritage – EM38 The Applicant shall ensure that development of EM38 and upgrade of the gas gathering lines are undertaken in accordance with the recommendations in the reports titled "Aboriginal Cultural Heritage Survey and Assessment Report – Camden Gas Joint Venture Project – Proposed Gas Well Location and Gas Gathering System Modifications, Camden, NSW" dated February 2007, and "Aboriginal Heritage Assessment – Sugarloaf Twin Gathering Line, Rosalind Park" dated 8 September 2006.		No construction relevant to EM38 occurred during the audit period.	Compliant.	
DA 282-6-2003-i	4-88B Aboriginal Heritage – EM39 and GL17 The Applicant shall ensure that development of EM39 and GL17 and upgrade of the gas gathering lines are undertaken in accordance with the recommendations outlined in the cultural heritage assessment carried out by Biosis Research Pty Ltd in Appendix B of the Statement of Environmental Effects titled "Camden Gas Project Joint Venture – EM39 and GL17 Modification Project".	Biosis report for EM39 and GL17 modification project.	Past audit relates to EM39 only - same applies. EM39 and GL17 both drilled during this auditing period. Biosis report for EM39 and GL17 modification reported that all vehicles stayed in previously cleared and disturbed areas as far as practicable and no cultural heritage items were encountered during works.	Compliant.	
DA 282-6-2003-i	4-89 NON-INDIGENOUS HERITAGE Protection of the Heritage Landscape of EMAI The Applicant shall implement all mitigatory measures listed in Sections 7.1, 7.2 and 7.3 of the report titled "Statement of Heritage Impact for Land within the Elizabeth Macarthur Agricultural Institute NSW Agriculture, Menangle" by Geoffrey Britton dated September 2003.		Pre-audit period. No related to works undertaken at EM39 (within EMAI) during this audit period. European Heritage relevant to previous wells approved under this consent was subject of past audits.	Compliant.	

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DA/MOD	COC	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
DA 282-6-2003-i	4-90 The Applicant shall ensure roadside plantings for sites EM 16, EM 18, EM 19 and EM 20 are strengthened using the species outline provided in the report titled "Statement of Heritage Impact for Land within the Elizabeth Macarthur Agricultural Institute NSW Agriculture, Menangle" by Geoffrey Britton dated September 2003. <i>Note: a relic is defined under the Heritage Act as any deposit, object or material evidence:</i> (a) which relates to the settlement of the area that comprises NSW, not being Aboriginal settlement; and (b) which is more than 50 years old.		Completed in a previous audit period.	Closed out.	
DA 282-6-2003-i	4-90A The Applicant shall ensure that, if any historical archaeological relics within the meaning of the <i>Heritage Act 1977</i> are disturbed, the Heritage Council of NSW shall be notified in accordance with section 146 of the <i>Heritage Act 1977</i> .		None identified. No historical archaeological relics have been encountered during works under this development consent.	Compliant.	
DA 282-6-2003-i	4-91 SAFETY AND RISK MANAGEMENT Risk Assessment Pre-Construction Studies The Applicant shall prepare and submit for the approval of the Director-General at least one month prior to the commencement of construction of the development (except for construction of those preliminary works that are outside the scope of the hazard studies), or within such further period as the Director-General may agree, the studies set out under subsections (a) to (c) (the pre-construction studies). Construction, other than of preliminary works that do not adversely affect facility safety, shall not commence until approval has been given by the Director-General and, with respect to the fire safety study, approval has also been given by the Commissioner of the NSW Fire Brigades. (a) Fire Safety Study A fire safety study for the gas treatment plant of the proposed development. This study shall cover relevant aspects of the Department's Hazardous Industry Planning Advisory Paper No. 2, "Fire Safety Study Guidelines". The study shall also be submitted for approval, to the NSW Fire Brigade. (b) Hazard and Operability Study Updated Hazard and Operability (HAZOP) Studies for the development, chaired by an independent qualified person approved by the Director-General prior to the commencement of the study. The studies shall cover any significant changes to the gas treatment plant or gas wells, since the HAZOPs carried out by Kvaerner E & C (Australia) Pty Limited (report dated 15 November 2002) and Worley Pty Ltd (report dated 13 March 2003). The updated HAZOPs shall be carried out in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 8, "HAZOP Guidelines". The reports shall also cover the implementation status of all recommendations arising out of the original studies. (c) Final Hazard Analysis A final hazard analysis of the development, focusing on design changes since preparation of the preliminary hazard analysis, which significantly affect the risk results. The analysis should be prepared in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 6, "Guidelines		Pre-audit period.	Closed out.	
DA 282-6-2003-i	4-92 Pre-commissioning Studies The Applicant shall develop and submit for the approval of the Director-General, at least one month prior to the commencement of the commissioning of the development, or within such further period as the Director-General may agree, the plans and systems set out under subsections (a) and (b) (the pre-commissioning studies). Commissioning shall not commence until approval has been given by the Director-General. The Applicant shall implement the plans and systems set out under subsections (a) and (b) (the pre-commissioning studies). (a) Emergency Plan A comprehensive emergency plan and detailed emergency procedures for the development, including the gas wells and gas treatment plant. This plan shall include detailed procedures for the safety of all people outside of the development who may be at risk from the development. The plan shall be in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 1, "Industry Emergency Planning Guidelines". (b) Safety Management System A document setting out a comprehensive safety management system, covering all operations on the gas wells, gathering system and gas treatment plant. The document shall clearly specify all safety related procedures, responsibilities and policies, along with details of mechanisms for ensuring adherence to procedures. Records shall be kept on site and shall be available for inspection by the Director-General upon request. The Safety Management System shall be developed in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 9, "Safety Management".		RPGP commissioned late 2004. AGL Safety Management System maintained on online server. The system is detail and adequately addresses the requirements of this CoC.	Compliant.	
DA 282-6-2003-i	4-93 Compliance Report The Applicant shall submit to the Director-General one month prior to the commissioning of the plant, or within such period approved by the Director-General, a compliance report detailing compliance with Conditions 91 and 92, including: (a) dates of study submission, approval, commencement of construction and commissioning; (b) actions taken or proposed, to implement recommendations made in the studies; and (c) responses to any requirement imposed by the Director-General.		Pre-audit period. RPGP commissioned late 2004.	Closed out.	
DA 282-6-2003-i	4-94 Incident Report The Applicant is required within 24 hours of any incident or potential incident with actual or potential significant off-site impacts on people or the biophysical environment, to supply a report to the Department outlining the basic facts. A further detailed report shall be prepared and submitted following investigations of the causes and identification of necessary additional preventive measures. That report must be submitted to the Director-General no later than 14 days after the incident or potential incident. The Applicant shall maintain a register of accidents, incidents and potential incidents. The register shall	Incident register.	Incident register indicated no reportable incidents (i.e. offsite impacts on people or environment) during the audit period.	Compliant.	

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DA/MOD	COC	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
DA 282-6-2003-i	4-95 Hazard Audit Twelve months after the commencement of operations of the proposed development or within such further period as the Director-General may agree, the Applicant shall carry out a comprehensive hazard audit of the proposed development and within one month of the audit submit a report to the Director-General. The audit shall be carried out at the Applicant's expense by a duly qualified independent person or team approved by the Director-General prior to commencement of the audit. Further audits shall be carried out every three years or as determined by the Director-General and a report of each audit shall within a month of the audit be submitted to the Director-General. Hazard audits shall be carried out in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 5, "Hazard Audit Guidelines". The audit shall include a review of the safety management system and a review of all entries made in the incident register since the previous audit.		Past audit reported that a hazard audit was carried out in 2006. The following hazard audit scheduled for 2009 has not been completed, therefore the development is non-compliant with this condition.	Non-Compliant.	Hazard Audit to be scheduled and completed.
DA 282-6-2003-i	4-96 Crime Risk Performance The Applicant is required to implement measures to minimise the risk of crime from the proposed development. The Applicant shall implement the following measures prior to the operation of the proposed development. Gas Treatment Plant The Applicant is required to: a) ensure the Plant is closed to community access; b) fully enclose the Plant with a 3-metre metal framed chain mesh fence with a 3-strand barbed wire head; c) ensure the Plant is gated and manned 24 hours per day; d) keep vehicular and pedestrian gates closed at all times (when not in immediate use); e) use self-closing and self-locking pedestrian gates; f) use gate locking mechanisms that facilitate emergency egress; and g) ensure plant staff are adequately trained in undertaking security functions. Gas Wellhead Sites The Applicant is required to: a) install fixed (permanent) perimeter fencing and gates around each well head. The fencing and gates should be 3 metres high (all inclusive) metal framed and topped with a 3-strand barbed wire head; and b) keep gates securely hinged and permanently locked, unless otherwise agreed by NSW Police.	Site observations.	Measures to minimise the risk of crime were observed to be implemented and operating effectively. It was noted that the gates on the RPGP are self-locking, but are not self-closing as per condition 96 (e). Therefore the development is non-compliant with this condition. AGL noted that due to the gates being exposed to weather elements, self closing gates were found to be not practical as a long term security measure, therefore site security was further improved by the installation of site security cameras installed on the entry points to the gas plant.	Non-Compliant.	It is recommended that the alternative security measures are submitted to DoP for approval and records of correspondence retained.
DA 282-6-2003-i	4-97 Dangerous Goods The Applicant shall ensure that the storage, handling, and transport of: (a) Dangerous goods is done in accordance with the relevant Australian Standards, particularly AS1940 and AS1596, and the Dangerous Goods Code; and (b) Explosives are carried out in accordance with the requirements of DPI.	Internal audit of dangerous goods compliance.	AGL conducts internal audits of dangerous goods storage, handling and transport to demonstrate compliance with relevant standards. It was reported that there was no need to notify Workcover NSW.	Compliant.	
DA 282-6-2003-i	4-98 WASTE Operating Conditions <i>Note: These conditions only apply to the storage, treatment, processing, reprocessing or disposal of waste at the premises if it requires an environment protection licence under the Protection of the Environment Operations Act 1997.</i> The Applicant must not cause, permit or allow any waste generated outside the premises to be received at the premises for storage, treatment, processing, reprocessing or disposal or any waste generated at the premises to be disposed of at the premises, except as expressly permitted by a licence under the Protection of the Environment Operations Act 1997.		No waste is received at the premises. Wastewaters from wells returned to RPPG for storage and treatment under EPL, which covers Project in its entirety.	Compliant.	
DA 282-6-2003-i	4-99 Except as provided by any other condition of this consent, only the hazardous and/or industrial and/or Group A waste listed below may be generated and/or stored at the premises: - Waste oil/water, hydrocarbons/water mixtures or emulsions.		A full waste audit was not carried out; however observations and discussions with site personnel indicated compliance with this condition.	Compliant.	
DA 282-6-2003-i	4-100 The quantity of hazardous and/or industrial and/or Group A waste stored at the premises must not exceed 9000L at any one time.		It was reported that this condition was deleted from the DA as a result of modification.	Closed out.	
DA 282-6-2003-i	4-101 The quantity of hazardous and/or industrial and/or Group A waste generated and/or stored at the premises must not exceed 85,000L per year.		It was reported that this condition was deleted from the DA as a result of modification.	Closed out.	
DA 282-6-2003-i	4-102 The quantity of non controlled aqueous liquid wastes generated at the premises must not exceed 3,000,000 L per year.		It was reported that this condition was deleted from the DA as a result of modification.	Closed out.	
DA 282-6-2003-i	4-103 The Applicant must ensure that any hazardous, industrial or Group A waste at the premises is assessed and classified in accordance with the DECC's Environmental Guidelines: "Assessment Classification and Management of Liquid and Non-Liquid Wastes" in force as at 1 July 2003.	Sighted Footprint report including annual data and receipts for waste disposal.	Wastes are classified in accordance with OEH guidelines as part of the footprint report into waste oil, oily water (separated and evaporated), Nationwide used for waste oil from workshop. Hazardous waste disposal. Footprint report includes annual data and receipts e.g. asbestos (sighted receipts for removal and disposal dated 19/01/2010) and project wastewaters (sighted numerous receipts Jul-Sep 2009)	Compliant.	
DA 282-6-2003-i	4-104 The Applicant must ensure that waste identified for recycling is stored separately from other waste.		Waste identified for recycling was observed to be stored separately including waste oil, oil filters, batteries, steel, paper, cardboard, plastics and timber.	Compliant.	
DA 282-6-2003-i	4-105 Any movement of hazardous, industrial or Group A waste from the premises must be conducted in accordance with the DECC's waste tracking requirements. A copy of these tracking requirements is included in Schedule 8.	Sighted Footprint report including annual data and receipts for waste disposal.	Waste streams are classified and segregated for transport and disposal in accordance with requirements. Sighted records of waste transfer include receipts for transport and disposal.	Compliant.	

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DA 282-6-2003-i	4-106 Waste Management Plan The Applicant shall prepare and implement a Waste Management Plan for the whole site. This plan shall include, but not necessarily be limited to: (a) measures to minimise the production and impact of waste produced at the site during drilling and operation; (b) implementation of waste reduction, reuse and recycling principles; (c) details of the reuse and recycling of waste water produced/collected on the site, including collection and handling procedures; (d) details of appropriate disposal methods in the event that reuse and recycling are not available or are not practicable; and (e) programs for involving and encouraging employees and contractors to minimise domestic waste production on the site and reuse/recycle where appropriate. Key concepts of the plan and management measures should be submitted and approved by the Director General prior to substantial construction. The plan shall be fully completed and approved by the Director-General prior to commissioning.	The Waste Management Sub Plan is part of EMS (2008).	Site observations, EMS documentation and interviews with site personnel confirmed that waste was managed in accordance with management plan.	Compliant.	
DA 282-6-2003-i	4-107 ROADS AND TRAFFIC Roads within EMAI The Applicant shall not bring into the EMAI site, any road base material for new access roads to gas well sites EM 1 to EM 4 (inclusive) and gas well site EM 6 (refer to Figure 3, Appendix B for locations).		Not applicable to this audit period.	N/A	
DA 282-6-2003-i	4-108 The Applicant shall ensure that the existing access roads marked blue on Figure 3 (Appendix B) (between gas well sites EM 6 and EM 8) are used by light vehicles only.	Interviews with site personnel.	Roads between EM06 and EM08 were used for period of time as preferred road was flooded during audit period. It was reported that AGL resumed use of preferred route and ceased use of road as a regular	Compliant.	
DA 282-6-2003-i	4-109 The Applicant shall ensure that all heavy vehicles only travel along access roads designated for such vehicles.	Induction	It is a requirement that the main road leading into the EMAI must not be used by heavy vehicles. This is addressed in the induction and training process.	Compliant.	
DA 282-6-2003-i	4-110 The Applicant shall ensure that during and immediately following heavy rainfall events, vehicle movements to gas well sites and / or gas gathering systems will cease.	Induction	It was reported that vehicle movements to/from wells within EMAI cease during heavy rainfall. This is addressed in the induction and training process.	Compliant.	
DA 282-6-2003-i	4-111 On completion of drilling and fracture stimulation activities, the Applicant shall rehabilitate soils affected by compaction. This rehabilitation shall be conducted in consultation with a representative from EMAI.		Drilling of EM39 occurred during the audit period, this area was rehabilitated and returned to landowner.	Compliant.	
DA 282-6-2003-i	4-112 Works within the Wollondilly Shire Council Road Reserve The Applicant shall prepare a Road Reserve Environment Management Plan (EMP) in consultation with Wollondilly Shire Council and Campbelltown City Council. The Road Reserve EMP shall be submitted to the Director-General for approval one month prior to the construction of the gas gathering line within the Road Reserve or within such period as approved the Director-General. The Road Reserve EMP shall include: (a) Proposed construction methods; (b) Soil erosion and sediment control measures for works undertaken during construction and following completion of the works; (c) Traffic control plans; and (d) Techniques for construction of the gas gathering line across Menangle Bridge.		Pre-audit period - refers to original gas gathering line.	Closed out.	
DA 282-6-2003-i	4-113 The Applicant shall liaise with Wollondilly Shire Council regarding the proposed crossing of the gas gathering line across Menangle Bridge and undertake the proposed works to the satisfaction of Wollondilly Shire Council.		Pre-audit period - refers to original gas gathering line.	Closed out.	
DA 282-6-2003-i	4-114 M5 Underbore – Menangle Park The Applicant shall conduct the underboring of the M5 road to the satisfaction of the RTA. The Applicant shall ensure that the M5 underbore: (a) Has a minimum depth of 1.2 metres at the lowest point of the road formation; (b) Excavation for the thrust pits are outside the Freeway Reserve; and (c) Requires no access from within the Freeway for construction or maintenance purposes; unless otherwise agreed by the RTA.		Pre-audit period - refers to original gas gathering line.	Closed out.	
DA 282-6-2003-i	4-115 BUSHFIRE Bushfire Hazard Measures The Applicant shall implement the following bushfire hazard measures at the site: (a) Provision of a two-lane access road to the Treatment Plant area from Menangle Road; (b) Provision of a 20 metre asset protection zone managed as an inner protection area, around the perimeter of the Gas Treatment Plant and gas well sites; (c) Provision of a dedicated water supply tank of 20,000 Litres for the sole use of fire-fighting; and (d) Provision of the location of gas wells, access roads to the gas well sites and access roads to the Gas Treatment Plant Site to the NSW Rural Fire Service. <i>Note: The terms "Asset Protection Zone" and "Inner Protection Area" as specified in this Condition are defined within the "Planning for Bushfire Protection 2001" Guidelines published jointly by the NSW Rural Fire Service and the Department.</i>	Interviews with site personnel.	It was reported that during late 2010, site had four or so familiarisation visits with different fire safety crews, which indicated that they were satisfied with the approach being taken (including not providing a 20 m asset protection zone). In late 2009, the company that completes six-monthly fire equipment inspections and also works for fire brigade also indicated that existing management satisfactory as long as the grass is kept down.	Compliant.	
DA 282-6-2003-i	4-116 Measures for the Living Quarters Building The Applicant shall consult with the NSW Rural Fire Service and lodge an application to the NSW Rural Fire Service for any approval or authorisation required in respect to the structure identified as "Living Quarters";		Pre-audit period. Living quarters now removed from the site.	Closed out.	
DA 282-6-2003-i	4-117 The Applicant shall comply with the requirements of any such further approval or authorisation granted by the NSW Rural Fire Service in respect of the structure "Living Quarters."		Pre-audit period. Living quarters now removed from the site.	Closed out.	
DA 282-6-2003-i	4-118 The Applicant shall construct and maintain the building "Living Quarters" and the surrounding area in accordance with the requirements of the "Planning for Bushfire Protection 2001" Guidelines published jointly by the NSW Rural Fire Service and the Department.		Pre-audit period. Living quarters now removed from the site.	Closed out.	

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DA/MOD	COC	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
DA 282-6-2003-i	4-119 Bushfire Management Plan The Applicant shall prepare and implement a Bushfire Management Plan for the whole site. This plan shall be prepared prior to the commissioning of the development and be prepared to the satisfaction of the Rural Fire Service having regard to any standard local government bushfire related requirements. The plan shall be submitted to the Director-General prior to commissioning and include, but not necessarily be limited to: (a) adequate fire protection works, fire fighting equipment and hazard reduction measures with particular attention to boundaries of adjoining landholdings; (b) an annual report on fire management activities to the Campbelltown Fire Management Committee; and (c) the incorporation of relevant bushfire hazard measures and policies of the three Councils.	Interviews with site personnel. Site observations.	Bushfire management plan developed pre-audit period. Observations of auditors and reported feedback from fire and safety crews (see 4-115) indicates that bushfire management is implemented effectively, as long as the grass is kept down.	Compliant.	
DA 282-6-2003-i	4-120 REHABILITATION Site Rehabilitation Performance The Applicant shall ensure the prompt and effective rehabilitation of all disturbed areas of the site following the completion of construction, operations and associated activities and/or the decommissioning of plant, to minimise the generation of wind erosion dust.	Site not inspected during audit.	It was reported that the site was initially rehabilitated following works - EM39 and GL17 were both drilled and returned to landowner during auditing period.	Compliant.	
DA 282-6-2003-i	4-121 The Applicant shall carry out rehabilitation of the site in accordance with the requirements of the DPI.		DPI conduct site inspections, usually for rehabilitation of exploration wells. AGL have not received comment or additional requirements from DPI.	Compliant.	
DA 282-6-2003-i	4-122 The Applicant shall ensure that all areas of earthworks associated with the construction of the gas gathering system are rehabilitated to the pre-existing site conditions on completion of construction.	Site observations.	GL06 gas gathering line rehabilitation sighted confirming that vegetation was consistent with surrounding vegetation.	Compliant.	
DA 282-6-2003-i	4-123 Rehabilitation of Gas Gathering System - Stream Crossings The Applicant shall ensure that for all trenched crossings, the natural bed and bank profiles are restored to their original conditions, with smooth and even surfaces following the installation of the gas pipe.		Only gas gathering line installed was at GL06 - no stream crossing.	Compliant.	
DA 282-6-2003-i	4-124 The Applicant shall stabilise and rehabilitate as soon as possible all disturbed soil surfaces with sterile exotic cover crops and local native grasses. The Applicant is not permitted to use Kikuyu and other invasive grass species.		A pasture type seed mix is reportedly used for rehabilitation. This include sterile exotic grass crops.	Compliant.	
DA 282-6-2003-i	4-125 The Applicant shall maintain and monitor all rehabilitated riparian zones for a period of at least two years after final planting. Maintenance must include sediment and erosion control, watering, weed control, replacement of plant losses, disease and insect control, mulching and any other requirements for achieving successful vegetation establishment. Note: The Director-General may require the Applicant to prepare and implement a Vegetation Management Plan and remedial works if disturbance is deemed excessive.		Only gas gathering line installed was at GL06 - no stream crossing.	Compliant.	
DA 282-6-2003-i	4-126 CONFIRMATION OF PROJECT COMPONENTS Gas Flare Design Report The Applicant shall submit a written report at least one month prior to the commissioning of the flare, to the DECC's Manager Sydney Industry PO Box 668 Parramatta NSW 2124, containing the following information: (a) Describe best practice flare design and, in particular, identify flare design and operational conditions that minimise emissions of air pollutants (including VOCs and nitrogen oxides), maximise destruction of hydrocarbons and maximise dispersion of air pollutants; (b) Benchmark the design of the proposed Stage II flare against best practice as identified in subclause (a); (c) Assess the ability of the proposed Stage II flare to meet a destruction efficiency of 98% for VOCs plus methane; (d) Identify any changes in the design of the proposed Stage II flare required to meet the best practice requirements identified in a) and the destruction efficiency and nitrogen oxides emission rate specified in subclause (c) and any difficulties in making these changes; and (e) Using the results of subclauses (a) to (d), identify the optimum temperature and residence time to act Note: This condition confirms the gas flare structure and specifications.		Pre-audit period.	Closed out.	
DA 282-6-2003-i	4-127 Gas Gathering System The Applicant shall comply with the following in the construction of the gas gathering system pipeline: (a) signs stating the presence of a buried gas pipeline shall be erected periodically along the length of the trench once the pipeline has been laid; (b) trenches are to be restored and reseeded with local grass seeds on completion of the work; (c) local council traffic guidelines in respect of work carried out on road verges and underneath roads shall be implemented; (d) The Applicant shall construct the gas gathering system so as not to impeach lateral water flows; (e) The Applicant shall ensure that no crown or camber remains along the gas gathering systems, following construction; (f) the pipeline shall be designed, constructed and operated in accordance with the Australian Standard for the installation and maintenance of Plastic Pipe Systems for Gas AS 3723-1989; and (g) the Department shall be notified on the completion of any trenching works.		Site observations indicated that gas gathering line was appropriately rehabilitated and identified using signs, as per the consent requirements. AGL reported that all trenches are restored but not all seeded with grass due to the minor level of disturbance caused onsite. In regards to traffic management during the gas gathering line installation, AGL reported that local council traffic guidelines were not relevant as the gas gathering line was not installed underneath council roads or on council road verges. AGL reported that construction did not impact lateral flows. Drainage and camber were also reported to be successfully reinstated following construction. In regards to trenching works, AGL notified DII at the start and finish of project works but not DoP (now DoPI). As DoP (now DoPI) was not notified as required by this condition, the development was deemed to be non-compliant.	Non-Compliant.	DoP (now DoPI) and DII to be notified of trenching works as required by this condition.

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DA/MOD	COC	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
DA 282-6-2003-i	4-128 Menangle Park Urban Release Should the future Local Environmental Plan and/or Master Plan for the Menangle Park urban release area identify the need to relocate any gas gathering lines the subject of this consent to ensure an efficient and environmentally sustainable urban outcome, that infrastructure shall be relocated by, and at the cost of the applicant to the satisfaction of the Director-General following consultation with		No requests made as yet.	Compliant.	
	SCHEDULE 5 ENVIRONMENTAL MANAGEMENT, MONITORING, AUDITING AND REPORTING				
DA 282-6-2003-i	5-1 CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN The Applicant shall prepare and implement a Construction Environmental Management Plan (CEMP) to provide environmental management, practices and procedures to be followed during the drilling and construction phases of the proposed development. A framework plan outlining key practices, procedures and environmental management practices should be approved by the Director-General prior to the commencement of substantial construction. Sub-plans detailing implementation measures shall be submitted for approval at various stages of construction as agreed by the Director-General.	EMS includes construction management methodology.	EMS (2008) provides guidance for implementation and environmental management of construction activities.	Compliant.	
DA 282-6-2003-i	5-2 OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN The Applicant shall prepare and implement an Operational Environmental Management Plan (OEMP) to provide environmental management practices and procedures to be followed during the operation of the development. The OEMP shall be forwarded to the Director-General for approval one month prior to commissioning. The OEMP shall include, but not necessarily be limited to: (a) identification of all statutory and other obligations that the Applicant is required to fulfil in relation to operation of the development, including all consents, licences, approvals and consultations; (b) a description of the roles and responsibilities for all key personnel involved in the drilling and operation of the development; (c) the overall environmental policies and principles to be applied to the operation of the development; (d) standards and performance measures to be applied to the development, and a means by which environmental performance can be periodically reviewed and improved; and (e) management policies to ensure that environmental performance goals are met and to comply with conditions of this consent.	EMS includes operational environmental management.	EMS (2008) provides guidance for implementation and environmental management of operational activities.	Compliant.	
DA 282-6-2003-i	5-3 The Applicant shall supply a copy of the CEMP and OEMP to the DECC, DPI, Camden Council, Campbelltown City Council and Wollondilly Shire Council within fourteen days of the Director-General's approval. The Applicant shall ensure that a copy of the CEMP and OEMP is publicly available.		EMS is available on the website. There was no evidence available to demonstrate submission to councils; however it was reportedly undertaken. As the EMS is publicly available on the website, the development was deemed to comply with this	Compliant.	
DA 282-6-2003-i	5-4 The Applicant shall review and update the OEMP annually, or as directed by the Director-General. Note: Submission of a copy of the approved Plan to other Government agencies does not mean that their approval is required. The Plan is for the information of the agency.	EMS (2008).	EMS most recently updated in 2008 and reported to be reviewed annually.	Compliant.	
DA 282-6-2003-i	5-5 ANNUAL ENVIRONMENTAL PERFORMANCE REPORTING Within twelve months of the date of this consent, and annually thereafter during the life of the development, the Applicant shall submit an Annual Environmental Performance Report to the Director-General. This report shall include, but not be limited to: (a) the standards, performance measures and statutory requirements the development is required to comply with; (b) an assessment of the environmental performance of the development to determine whether it is complying with these standards, performance measures, and statutory requirements; (c) reporting against the implementation of the Project Commitments Register; (d) copy of the Complaints Register for the preceding twelve month period and indicating what actions were (or are being) taken to address these complaints; (e) indication of what actions were taken to address any issue and/or recommendation raised by the Community Consultative Committee; (f) provision of the detailed results of all the monitoring required by this consent; (g) review of the results of this monitoring against: • impact assessment criteria; • monitoring results from previous years; and • predictions in the EIS; (h) identify any non-compliance during the year; (i) identify any significant trends in the data; and (j) if any non-compliance is detected, describe what actions and measures would be carried out to ensure compliance, clearly indicating who would carry out these actions and measures, when they would be carried out, and how the effectiveness of these measures would be monitored over time.	Sighted AEPR for 2008/2009/2010 maintained in electronic copy.	The AEPRs sighted for 2008 and 2009 and adequately address the criteria defined under this condition of consent.	Compliant.	
DA 282-6-2003-i	5-6 The Director-General may require the Applicant to address certain matters identified in the Annual Environmental Performance Report. Any action required to be undertaken shall be completed within such period as the Director-General may agree.	Interviews with site personnel.	There has been no request made from the D.G. regarding the AEPR.	Compliant.	
DA 282-6-2003-i	5-7 The Applicant shall also submit a copy of the Annual Environmental Performance Report to the DECC, DPI, Camden Council, Campbelltown City Council and Wollondilly Shire Council. The Applicant shall make a copy of the Report publicly available.	Sighted Letters to Wollondilly, Campbelltown and Camden Councils (all dated 03/09/08) for notification of the 2007-2008 AEPR. The AEPRs are available online via the AGL website.	Evidence to demonstrate that the AEPR was submitted to local councils was available for 2007-2008 AEPR only. It is not clear if the AEPR was submitted to councils for the 208-2009 and 2009-2010 periods. It is noted that the AEPRs are publicly available via the AGL website.	Non-Compliant.	Provide copies to local councils and retain evidence of submission.

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DA 282-6-2003-i	<p>5-8 INDEPENDENT ENVIRONMENTAL AUDIT – CONSTRUCTION AT EMAI</p> <p>The Applicant shall commission and pay the full costs of an Independent Environmental Audit of the construction of the gas gathering system, construction of the access roads and drilling and fracture stimulation of gas wells on the EMAI. The objective of the audit is to monitor the performance and effect of construction activities on the EMAI. The Independent Environmental Audit shall:</p> <p>(a) be conducted by a suitably qualified, experienced, and independent person(s) whose appointment has been approved by the Director-General; and</p> <p>(b) be consistent with ISO 19011:2002 - Guidelines for Quality and/ or Environmental Management Systems Auditing, or updated versions of these guidelines/manuals.</p> <p>The Audit shall:</p> <p>(a) assess the environmental performance of the construction of the development on EMAI, and its effects on the surrounding environment;</p> <p>(b) assess whether the development is complying with the relevant standards, performance measures, and statutory requirements;</p> <p>(c) consider the Applicant's proposed Construction Environmental Management Plan for the EMAI Site; and</p> <p>(d) recommend measures or actions to improve the environmental performance of the construction of the development on EMAI, and/or its environmental management and monitoring systems (if required).</p> <p>The Audit shall:</p> <p>(a) assess the environmental performance of the construction of the development on EMAI, and its effects on the surrounding environment;</p> <p>(b) assess whether the development is complying with the relevant standards, performance measures, and statutory requirements;</p> <p>(c) consider the Applicant's proposed Construction Environmental Management Plan for the EMAI Site; and</p> <p>(d) recommend measures or actions to improve the environmental performance of the construction of the development on EMAI, and/or its environmental management and monitoring systems (if required).</p>	Sighted EMAI audit (14 April 2005) - consistent with the requirements of this condition.		Closed out.																										
DA 282-6-2003-i	<p>5-9 Within one month of completion of the audit, the Applicant must submit a copy of the audit report to the Director-General, the NSW Heritage Office and NSW Agriculture. The Director-General may require the Applicant to address certain matters identified in the report and any comments received from the NSW Heritage Office and NSW Agriculture. Any action required to be undertaken shall be completed within such period as the Director-General may agree.</p>		Completed, submitted and approved pre-audit period	Closed out.																										
DA 282-6-2003-i	<p>5-10 INDEPENDENT ENVIRONMENTAL AUDIT - OPERATION</p> <p>Within two years of the date of this consent and every two years thereafter, unless the Director-General directs otherwise, the Applicant shall commission and pay the full costs of an Independent Environmental Audit. The Independent Environmental Audit shall:</p> <p>(a) be conducted by a suitably qualified, experienced, and independent person(s) whose appointment has been approved by the Director-General;</p> <p>(b) be consistent with ISO 19011:2002 - Guidelines for Quality and/ or Environmental Management Systems Auditing, or updated versions of these guidelines/manuals;</p> <p>(c) assess the environmental performance of the development, and its effects on the surrounding environment;</p> <p>(d) assess whether the development is complying with the relevant standards, performance measures, and statutory requirements;</p> <p>(e) review the adequacy of the Applicant's Environmental Management Plan; and</p> <p>(f) recommend measures or actions to improve the environmental performance of the development, and/or its environmental management and monitoring systems.</p>		This audit covers the scope of the Independent Environmental Audit - Operation.	Compliant.																										
DA 282-6-2003-i	<p>5-11 Within two months of commissioning the audit, the Applicant must submit a copy of the audit report to the Director-General, DECC and the DPI.</p>		Noted.	Noted.																										
DA 282-6-2003-i	<p>5-12 ASSESSABLE POLLUTANTS – LOAD LIMITS</p> <p>The Applicant shall pay the load based licensing fees once a licence under the Protection of the Environment Operations Act 1997 has been issued. The licence will identify the assessable pollutants for each fee-based activity classification. These assessable pollutants will be required to be monitored and pollutant loads calculated in accordance with the DECC's Load Calculation Protocol. The assessable pollutants and load limits applicable to this activity are given in the table below.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Assessable Pollutant</th> <th>Load Limit (kg)</th> </tr> </thead> <tbody> <tr><td>Benzene (air)</td><td>47</td></tr> <tr><td>Benzo (a) pyrene (air)</td><td>0.27</td></tr> <tr><td>Fine particles (air)</td><td>460</td></tr> <tr><td>Hydrogen sulphide (air)</td><td>1.6</td></tr> <tr><td>Nitrogen oxides (air)</td><td>103000</td></tr> <tr><td>Sulphur oxides (air)</td><td>3000</td></tr> <tr><td>Volatile organic compounds (air)</td><td>33000</td></tr> <tr><td>Total suspended solids (water)</td><td>360</td></tr> <tr><td>Biochemical oxygen demand (water)</td><td>370</td></tr> <tr><td>Oil and grease (water)</td><td>96</td></tr> <tr><td>Total PAHs (water)</td><td>0.14</td></tr> <tr><td>Total phenolics (water)</td><td>0.1</td></tr> </tbody> </table>	Assessable Pollutant	Load Limit (kg)	Benzene (air)	47	Benzo (a) pyrene (air)	0.27	Fine particles (air)	460	Hydrogen sulphide (air)	1.6	Nitrogen oxides (air)	103000	Sulphur oxides (air)	3000	Volatile organic compounds (air)	33000	Total suspended solids (water)	360	Biochemical oxygen demand (water)	370	Oil and grease (water)	96	Total PAHs (water)	0.14	Total phenolics (water)	0.1	Sighted 2009-10 Load Base Licence Additional Fees Payment Details. Also sighted evidence of payment of annual returns (screen shots of banking statements) for 2008-2009 and 2009-2010 annual returns.	Compliant.	Obtain receipt for payment of load based licensing fee.
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	<p><i>Note: An assessable pollutant is a pollutant which affects the licence fee payable for the licence. The above load limits in the table may be revised after submission of annual returns for the first three years of operation of the plant.</i></p> <p><i>Note: Clause 17(1) and (2) of the Protection of the Environment Operations (General) Regulation 1998 requires that monitoring of actual loads of assessable pollutants listed in Condition 12 (above) must be carried out in accordance with the testing method set out in the relevant load calculation protocol for the fee-based activity classification.</i></p>				
DA 282-6-2003-i	<p>5-13 MONITORING AND RECORDING CONDITIONS</p> <p>The results of any monitoring required to be conducted by the DECC's General Terms of Approval, or a licence under the Protection of the Environment Operations Act 1997, in relation to the development or in order to comply with the load calculation protocol must be recorded and retained as set out in the conditions below (Condition 14 and 15).</p>	AGL database of monitoring records	Applicable monitoring records are maintained on the AGL databases. Records required during this audit were readily available, legible and traceable.	Compliant.	
DA 282-6-2003-i	<p>5-14 The Applicant shall keep all records required to be kept by the licence:</p> <ul style="list-style-type: none"> • in a legible form, or in a form that can readily be reduced to a legible form; • kept for at least 4 years after the monitoring or event to which they relate took place; and • produced in a legible form to any authorised officer of the DECC who asks to see them. 	AGL database of monitoring records	Applicable monitoring records are maintained on the AGL databases. Records required during this audit were readily available, legible and traceable.	Compliant.	
DA 282-6-2003-i	<p>5-15 The Applicant shall keep the following records in respect of any samples required to be collected:</p> <ul style="list-style-type: none"> • the date(s) on which the sample was taken; • the time(s) at which the sample was collected; • the point at which the sample was taken; and • the name of the person who collected the sample. 	AGL database of monitoring records	Applicable monitoring records are maintained on the AGL databases. Records required during this audit were readily available, legible and traceable.	Compliant.	
DA 282-6-2003-i	<p>5-16 REPORTING CONDITIONS</p> <p>The Applicant shall provide an Annual Return to the DECC in relation to the development as required by any licence under the Protection of the Environment Operations Act 1997 in relation to the development. In the Annual Return the Applicant must report on the annual monitoring undertaken (where the activity results in pollutant discharges), provide a summary of complaints relating to the development, report on compliance with licence conditions and provide a calculation of licence fees (administrative fees and, where relevant, load based fees) that are payable. If load based fees apply to the activity the Applicant will be required to submit load-based fee calculation worksheets with the return.</p>	Sighted annual returns for 2008, 2009.	Annual returns have been submitted annually since 2005. 2010 annual return is being processed.	Compliant.	
DA 282-6-2003-i	<p>5-17 COMMUNITY CONSULTATIVE COMMITTEE</p> <p>The Applicant shall ensure the continuation of the existing Sydney Gas Operations Camden Project Community Consultative Committee to oversee the environmental performance of the development. The Committee shall continue to be chaired by an independent chairperson approved by the Director-General in consultation with the Applicant, Camden Council, Campbelltown City Council and Wollondilly Shire Council. The Committee shall:</p> <ul style="list-style-type: none"> (a) have four community representatives residing in the PEL 2 area; (b) have one representative from each of the following Councils: Camden Council, Campbelltown City Council and Wollondilly Shire Council; (c) meet at least quarterly; (d) take minutes of the meeting; and (e) make comments and recommendations about the implementation of the development and environmental management plans, monitor compliance with conditions of this consent and other matters relevant to the operation of the Stage 2 development during the term of the consent. <p>Representatives from relevant government agencies or other individuals may be invited to attend meetings as required by the Chairperson.</p>	Sighted Community Consultation Committee Minutes. #20 25/09/08, #21 27/11/08, #22 19/03/09 #23 16/07/09 #24 18/02/10 and #25 15/07/10.	AGL have established a Community Consultation Committee (CCC) chaired by an independent person appointed by the NSW I&I. Community, local councils and AGL make up CCC membership. Meeting minutes are recorded and demonstrate that the CCC reviews management and monitoring of environmental compliance.	Compliant.	It was reported that the CCC had revised the frequency of meetings to three times per year with agreement from all participants but in recent months the quarterly meeting schedule had resumed.
DA 282-6-2003-i	<p>5-18 The Applicant shall:</p> <ul style="list-style-type: none"> (a) Ensure that two of its representatives attend the Committee's meetings; (b) Provide the Committee with regular information on the environmental performance and management of the development; (c) Ensure that the Committee has reasonable access to the necessary plans to carry out its functions; (d) Consider the recommendations and comments of the Committee and provide a response to the Committee and Director-General; (e) Provide access for site inspections by the Committee; (f) Make the minutes available for public inspection at Camden Council, Campbelltown City Council and Wollondilly Shire Council within fourteen days of the Committee meeting, or as agreed to by the Committee; and (g) Forward a copy of the minutes of each Committee meeting, and any responses to the Committee's recommendations to the Director-General and the DPI within a month of each Committee meeting. 	Sighted Community Consultation Committee Minutes. #20 25/09/08, #21 27/11/08, #22 19/03/09 #23 16/07/09 #24 18/02/10 and #25 15/07/10.	The CCC is chaired by an independent person appointed by the DPI. Meeting minutes were reviewed and found to be compliant with the requirements (a) to (g).	Compliant.	

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DA/MOD	COC	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
DA 282-6-2003-i	<p>5-19 COMPLAINTS REGISTER</p> <p>The Applicant shall record details of all complaints received in an up-to-date Complaints Register. The Register shall record, but not necessarily be limited to:</p> <p>(a) the date and time, where relevant of the complaint;</p> <p>(b) the means by which the complaint was made;</p> <p>(c) any personal details of the complainant that were provided, or if no details were provided, a note to that effect;</p> <p>(d) the nature of the complaints;</p> <p>(e) any action(s) taken by the Applicant in relation to the complaint, including any follow-up contact with the complainant; and</p> <p>(f) if no action was taken by the Applicant in relation to the complaint, the reason(s) why no action was taken.</p> <p>The Complaints Register shall be made available for inspection by the DECC or the Director-General upon request. The Applicant shall also make summaries of the register, without details of the complainants, available for public inspection.</p>	Sighted Complaints register and hard copy documentation, including initial complaint report and details on actions taken (recorded within the complaints register).	The complaints register for the project, which adequately records and maintains the details required by this CoC.	Compliant.	
DA 282-6-2003-i	<p>5-20 COMMUNITY AWARENESS PROTOCOL</p> <p>The Applicant shall prepare a Community Awareness Protocol to advise nearby residents and appropriate authorities if a leak of mercaptan odourant occurs from the Gas Treatment Plant and/or associated facilities. The Protocol shall detail the circumstances when it will be implemented and describe the procedure and timeframe in which residents and authorities will be notified. The residents and authorities to be notified will be identified in the Protocol. The Applicant shall submit the Community Awareness Protocol to the Director-General for approval one month prior to commissioning of the Gas Treatment Plant.</p>	A community awareness protocol is defined within the Emergency Response Management Plan.	Evidence to verify that the community awareness protocol was submitted to the Director-General for approval was not made available for inspection. As a result, the development was not able to demonstrate compliance with the requirements of this condition.	Non-Compliant.	It is recommended that the protocol is submitted to the DG for approval and evidence retained to verify approval.
	<p>SCHEDULE 6</p> <p>MANDATORY CONDITIONS FOR ALL DECC LICENCES</p> <p>ADMINISTRATIVE CONDITIONS</p> <p>Other activities Not applicable.</p>				
DA 282-6-2003-i	<p>6-1 OPERATING CONDITIONS</p> <p>Activities must be carried out in a competent manner Licensed activities must be carried out in a competent manner. This includes:</p> <p>a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and</p> <p>b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.</p>	Induction package	Licensed waste contractors carry out waste and recycling services for the site. Sighted relevant induction records and competencies that demonstrate that site personnel are aware and adequately skilled to carry out licensed activities.	Compliant.	
DA 282-6-2003-i	<p>6-2 Maintenance of plant and equipment</p> <p>All plant and equipment installed at the premises or used in connection with the licensed activity:</p> <p>a) must be maintained in a proper and efficient condition; and</p> <p>b) must be operated in a proper and efficient manner.</p>	Sighted Preventative Maintenance Register; Sighted calibration records for gas monitors within the RPPG offices	Workshop for preventative maintenance and repair was inspected. Observations of plant and equipment and records indicated that it was maintained effectively and operated appropriately.	Compliant.	
DA 282-6-2003-i	<p>6-3 MONITORING AND RECORDING CONDITIONS</p> <p>Recording of pollution complaints</p> <p>The licensee must keep a legible record of all complaints made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this licence applies. The record must include details of the following:</p> <p>a) the date and time of the complaint;</p> <p>b) the method by which the complaint was made;</p> <p>c) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect;</p> <p>d) the nature of the complaint;</p> <p>e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and</p> <p>f) if no action was taken by the licensee, the reasons why no action was taken.</p> <p>The record of a complaint must be kept for at least 4 years after the complaint was made. The record must be produced to any authorised officer of the DECC who asks to see them.</p>	Sighted Complaints register and hard copy documentation, including initial complaint report and details on actions taken (recorded within the complaints register).	Complaints are recorded in a database and details of corrective action reported for each.	Compliant.	
DA 282-6-2003-i	<p>6-4 Telephone complaints line</p> <p>The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted at the premises or by the vehicle or mobile plant, unless otherwise specified in the licence.</p> <p>The licensee must notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint.</p> <p>This condition does not apply until 3 months after the issue of an environment protection licence.</p>		The complaints line number is displayed on all gates accessing AGL sites. Complaints line number is also displayed in the emergency management plan	Compliant.	
DA 282-6-2003-i	<p>6-5 REPORTING CONDITIONS</p> <p>Annual Return documents What documents must an Annual Return contain? The licensee must complete and supply to the DECC an Annual Return in the approved form comprising:</p> <p>a) a Statement of Compliance; and</p> <p>b) a Monitoring and Complaints Summary.</p> <p>A copy of the form in which the Annual Return must be supplied to the DECC accompanies this licence. Before the end of each reporting period, the DECC will provide to the licensee a copy of the form that must be completed and returned to the DECC.</p>	Sighted annual returns for 2008, 2009, 2010 currently being processed.	Annual returns have been completed as required.	Compliant.	

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DA 282-6-2003-i	<p>6-6 Period covered by Annual Return An Annual Return must be prepared in respect of each reporting, except as provided below. <i>Note: The term "reporting period" is defined in the dictionary at the end of this licence. Do not complete the Annual Return until after the end of the reporting period.</i></p> <ul style="list-style-type: none"> • Where this licence is transferred from the licensee to a new licensee, <ul style="list-style-type: none"> a) the transferring licensee must prepare an annual return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted; and b) the new licensee must prepare an annual return for the period commencing on the date the application for the transfer of the licence is granted and ending on the last day of the reporting period. <p><i>Note: An application to transfer a licence must be made in the approved form for this purpose. Where this licence is surrendered by the licensee or revoked by the DECC or Minister, the licensee must prepare an annual return in respect of the period commencing on the first day of the reporting period and ending on</i></p> <ul style="list-style-type: none"> a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or b) in relation to the revocation of the licence - the date from which notice revoking the licence operates. 	Sighted annual returns for 2008, 2009, 2010 currently being processed.	Annual returns have been completed as required.	Compliant.	
DA 282-6-2003-i	<p>6-7 Deadline for Annual Return The Annual Return for the reporting period must be supplied to the DECC by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date').</p>	Sighted annual returns for 2008, 2009, 2010 currently being processed.	Annual returns have been completed as required.	Compliant.	
DA 282-6-2003-i	<p>6-8 Notification where actual load can not be calculated Where the licensee is unable to complete a part of the Annual Return by the due date because the licensee was unable to calculate the actual load of a pollutant due to circumstances beyond the licensee's control, the licensee must notify the DECC in writing as soon as practicable, and in any event not later than the due date.</p> <ul style="list-style-type: none"> • The notification must specify: <ul style="list-style-type: none"> a) the assessable pollutants for which the actual load could not be calculated; and b) the relevant circumstances that were beyond the control of the licensee. 	Sighted annual returns for 2008, 2009, 2010 currently being processed.	Annual returns have been completed as required.	Compliant.	
DA 282-6-2003-i	<p>6-9 Licensee must retain copy of Annual Return The licensee must retain a copy of the annual return supplied to the DECC for a period of at least 4 years after the annual return was due to be supplied to the DECC.</p>	Sighted annual returns for 2008, 2009, 2010 currently being processed.	Annual returns have been completed since 2005. All relevant records are retained.	Compliant.	
DA 282-6-2003-i	<p>6-10 Certifying of Statement of Compliance and Signing of Monitoring and Complaints Summary Within the Annual Return, the Statement of Compliance must be certified and the Monitoring and Complaints Summary must be signed by:</p> <ul style="list-style-type: none"> a) the licence holder; or b) by a person approved in writing by the DECC to sign on behalf of the licence holder. 	Sighted annual returns for 2008, 2009, 2010 currently being processed.	Annual returns have been completed as required.	Compliant.	
DA 282-6-2003-i	<p>6-11 Notification of environmental harm <i>Note: The licensee or its employees must notify the DECC of incidents causing or threatening material harm to the environment as soon as practicable after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act.</i> Notifications must be made by telephoning the DECC's Pollution Line service on 131 555. The licensee must provide written details of the notification to the DECC within 7 days of the date on which the incident occurred.</p>		No incidents causing or threatening material harm reportedly occurred during the audit period. Therefore there was no requirement to report to OEH.	Compliant.	
DA 282-6-2003-i	<p>6-12 Written report Where an authorised officer of the DECC suspects on reasonable grounds that:</p> <ul style="list-style-type: none"> (a) where this licence applies to premises, an event has occurred at the premises; or (b) where this licence applies to vehicles or mobile plant, an event has occurred in connection with the carrying out of the activities authorised by this licence, <p>and the event has caused, is causing or is likely to cause material harm to the environment (whether the harm occurs on or off premises to which the licence applies), the authorised officer may request a written report of the event.</p> <p>The licensee must make all reasonable inquiries in relation to the event and supply the report to the DECC within such time as may be specified in the request.</p> <p>The request may require a report which includes any or all of the following information:</p> <ul style="list-style-type: none"> a) the cause, time and duration of the event; b) the type, volume and concentration of every pollutant discharged as a result of the event; c) the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event; and d) the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort; e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants; f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; g) any other relevant matters. <p>The DECC may make a written request for further details in relation to any of the above matters if it is not satisfied with the report provided by the licensee. The licensee must provide such further details to the DECC within the time specified in the request.</p>		It was reported that OEH had made no requests for written reports.	Compliant.	

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DA/MOD	COC	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
DA 282-6-2003-i	6-13 GENERAL CONDITIONS Copy of licence kept at the premises or on the vehicle or mobile plant A copy of this licence must be kept at the premises or on the vehicle or mobile plant to which the licence applies. The licence must be produced to any authorised officer of the DECC who asks to see it. The licence must be available for inspection by any employee or agent of the licensee working at the premises or operating the vehicle or mobile plant.		A copy of the current licence is kept on site in the office of the Environmental & Safety Officer.	Compliant.	
	SCHEDULE 7 GENERAL CONDITIONS FOR PART 3A PERMITS DEPARTMENT OF WATER AND ENERGY				
DA 282-6-2003-i	7-1 Irrespective of the granting of this consent or approval by any other Authority, work is not to commence in, or within a horizontal distance of 40m from the top of the bank of the watercourse/foreshore, without the prior issue of a Part 3A permit by the DWE.		Part 3A permit obtained (15 January 2008) and works were completed during this audit period.	Compliant.	
DA 282-6-2003-i	7-2 Prior to the issue of the Part 3A permit the applicant must provide the DWE with the following: • A copy of the development consent including all conditions of approval; • Plans and/or other documentation (3 copies) that satisfy the DWE's General Terms of Approval and recommendations which are included in the consent conditions; and • The appropriate permit fee paid to the DWE.		These requirements were addressed before the Part 3A permit was granted. No additional part 3A permits have been sort by AGL during this audit period.	Compliant.	
DA 282-6-2003-i	7-3 Work is to be carried out in accordance with drawings and any management plans required by these conditions and approved by the DWE that will accompany the 3A permit.		It was reported that works were carried out in accordance with this CoC and permit conditions.	Compliant.	
DA 282-6-2003-i	7-4 Any Part 3A permit issued is to be renewed on an annual basis until all works and all rehabilitation, including maintenance provisions, have been satisfactorily completed in accordance with the permit conditions. Any application for renewal will be lodged at least 1 month prior to the permit expiry date.		Pre-Audit Period. This condition relates to works that were completed by Sydney Gas in approx 2004, well before the audit period. It is AGL's understanding that all required approvals were obtained by Sydney Gas prior to works commencing.	Closed out.	
DA 282-6-2003-i	7-5 Work shall not cause unnecessary damage to, or increase erosion of, the stream bed or banks. The permit holder shall carry out any instructions given by the DWE with a view to preventing degradation of the stream bed or banks.		No specific instructions were provided by DWE in regards to the permit. No issues were reported.	Compliant.	
DA 282-6-2003-i	7-6 Any vegetation or other material removed from the area of works shall be disposed of so that the material cannot be swept back into the stream during a flood.		All vegetation is re-used around the site.	Compliant.	
DA 282-6-2003-i	7-7 All works proposed must be designed, constructed and operated so they do not cause erosion or sedimentation and to minimise adverse impacts on aquatic and riparian environments.		It was reputed that sediment and erosion controls are established onsite prior to any activity in accordance with the Sediment and Erosion Management Sub Plan within the EMS (2008).	Compliant.	
DA 282-6-2003-i	7-8 No plastic netting is to be used, for any purpose, in the stream or within the riparian zone unless such netting is of a rapidly biodegradable variety.		It was reported that no plastic netting is used.	Compliant.	
DA 282-6-2003-i	7-9 Erosion and sediment control measures are required to be implemented prior to any works commencing, and must be maintained for as long as necessary after the completion of works, to prevent sediment and dirty water entering the river system. These measures are to be in accordance with Council's requirements and follow best management practices as outlined in the NSW Department of Housing's "Managing Urban Stormwater: Soils and Construction" (1998) manual (the "Blue Book").		It was reputed that sediment and erosion controls are established onsite prior to any activity in accordance with the Sediment and Erosion Management Sub Plan within the EMS (2008).	Compliant.	
DA 282-6-2003-i	7-10 The excavation of soil/spoil and its removal is the responsibility of the permit holder and the owner or occupier of the land.		Noted.	Noted.	
DA 282-6-2003-i	7-11 The approval of NSW Fisheries is required for all proposed designs of in-stream works prior to the issue of the Part 3A permit.		Pre-Audit Period. This condition relates to works that were completed by Sydney Gas in approx 2004, well before the audit period. It is AGL's understanding that all required approvals were obtained by Sydney Gas prior to works commencing.	Closed out.	
DA 282-6-2003-i	7-12 These conditions are issued with the proviso that operations shall be carried-out on freehold land. Should operations be on Crown Land, these conditions are null and void and the occupier of Crown Land should contact the Department of Lands to obtain landowner's consent.		It was reported that no work was undertaken on crown land during the audit period.	Compliant.	
DA 282-6-2003-i	7-13 Work is to be carried out in accordance with any conditions imposed by other government agencies, provided such conditions do not conflict with these conditions or the conditions on the Part 3A permit.		It was reputed that there were no additional requirements imposed on the development other than the conditions of the development consent and EPL.	Noted.	
DA 282-6-2003-i	7-14 The permit holder and the owner or occupier of the land are responsible for any works undertaken by any other person or company on this site.		Noted.	Noted.	
DA 282-6-2003-i	7-15 The rehabilitation of the area in accordance with the Part 3A permit conditions is the responsibility of the permit holder and the owner or occupier of the land.		Noted.	Noted.	
DA 282-6-2003-i	7-16 Any Part 3A permit granted is not transferable to any other person or company without the written approval of the DWE and does not authorise works at any other site.		Noted.	Noted.	
DA 282-6-2003-i	7-17 Any Part 3A permit granted does not give the holder the right to occupy any land without the owner(s) consent nor does it relieve the holder of any obligation which may exist to also obtain permission from local government and other authorities who may have some form of control over the site and/or the activities proposed.		Noted.	Noted.	
DA 282-6-2003-i	7-18 Work as executed survey plans of a professional standard shall be provided to the DWE upon request.		Plans were submitted as part of the Part 3A application.	Closed out.	
DA 282-6-2003-i	7-19 If, in the opinion of a the DWE officer, any activity is being carried out in such a manner that it may unnecessarily degrade the riparian zone, stream, lake or foreshore environment, all work shall cease immediately upon oral or written direction of such officer.		No inspection of works under a Part 3A Permit have been completed by DWE.	Compliant.	

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DA 282-6-2003-i	7-20 If the permit conditions have been breached, the permit holder shall restore the site in accordance with the permit conditions and/or as directed by the DWE. If any breach of the permit conditions requires a special site inspection by the DWE, then the permit holder shall pay a fee prescribed by the DWE for this inspection and all subsequent breach inspections.		Reportedly no breach of the permit has been recorded during the audit period.	Compliant.	
DA 282-6-2003-i	7-21 If works are to cease prior to completion the DWE must be notified in writing one month in advance of the cessation of the operation.		Noted.	Noted.	
	SCHEDULE 8 DECC WASTE TRACKING REQUIREMENTS		Compliance with waste tracking requirements was not examined in detail as such requirements were deemed to be less material than other consent conditions; however the following views were recorded during the audit.		
	05 Monitoring of waste movements within NSW				
DA 282-6-2003-i	05.1 Conditions O5.2 to O5.16 apply to the movement of the types of hazardous and/or industrial and/or Group A waste as listed in L5.3, within NSW.		Oily wastewater is collected from wells and gas at RPPG and transported offsite for treatment by a licensed operator. According to the NSW Waste Classification Guidelines (DECC, 2009), oily wastewater would be classified as Liquid Waste - types of hazardous, industrial and/or Group A wastes no longer apply. It is noted that L5.3 was deleted from EPL 12003 issued 15/12/2010.	Noted.	
DA 282-6-2003-i	05.2 Prerequisites for waste movements If the waste is transported from the premises, the licensee must ensure that the waste is transported: (a) to a place which has been licensed by the DECC to issue consignment authorisation numbers; and (b) to a place that can otherwise lawfully accept that class of waste.		Licensed to transport and process oily wastewater, Worth Recycling is contracted by AGL to collect and process oily wastewater generated by AGL CGP.	Noted.	
DA 282-6-2003-i	05.3 If the waste is transported from the premises, the licensee must: (a) obtain a consignment authorisation number from the consignee; (b) complete an approved waste data form in relation to the consigned waste in accordance with the instructions on the form and to the extent required, and give a copy of the form to the person transporting the waste; (c) ensure that the waste data form: (i) is completed accurately, and (ii) is retained for a period of not less than 4 years from the time the form was completed, and (iii) is made available for inspection by an authorised officer on request; (d) ensure, if the waste is of such an amount as to require the person transporting it to be licensed, that the person transporting the waste is licensed.		A register comprising details relating to the consigned wastewater including authorisation number, volumes collected/ transported, dates and final destination was sighted during the audit. Licensed to transport and process oily wastewater generated by AGL CGP, Worth Recycling has processes in place to track consigned waste in accordance with NSW requirements.	Noted.	
DA 282-6-2003-i	05.4 Application for a consignment authorisation number To obtain a consignment authorisation number as required by 05.3 (a), the licensee must apply in writing to the consignee. An application must include the following information: (a) a statement identifying the classification of the waste in accordance with the requirements of condition 04.1; (b) copies of all information used to classify the waste; (c) an estimate of the amount of waste to which the application applies; (d) whether the consignment will consist a single load or multiple loads; (e) an estimate of the total period required for transportation of the consignment; (f) the date of dispatch of at least the first load in the consignment. <i>Note: The licensee may nominate the dates of dispatch of as many loads as is feasible. This should be discussed with the consignee and will depend on the predictability of the rate of generation of the waste and the likelihood of the need for amendments to the dates nominated. If the waste is predictable, a schedule may be able to be submitted for the entire consignment, however if it is unpredictable, the date of only one future load may be able to be determined at a time (see also 05.9 about amending notified dates).</i> <i>Note: The requirement for a written application for a consignment authorisation number does not preclude preliminary contact to obtain quotes and/or advice. Such preliminary contact does not require</i>		A register comprising details relating to the consigned wastewater including authorisation number, volumes collected/ transported, dates and final destination was sighted during the audit. Licensed to transport and process oily wastewater generated by AGL CGP, Worth Recycling has processes in place to track consigned waste in accordance with NSW requirements.	Noted.	
DA 282-6-2003-i	05.5 Once an application for a consignment authorisation number, as set out in 05.4 has been submitted, the licensee must not submit an application for the same consignment to another consignee until notification is received concerning the outcome of the application.		Noted. With storage of 85,000 L (increased by 65,000 L in 2009/10), oily wastewater is collected from CGP on an as needs basis. A register comprising details relating to the consigned wastewater including authorisation number, volumes collected/ transported, dates and final destination was sighted during the audit.	Noted.	
DA 282-6-2003-i	05.6 Notification of dates of dispatch of the second and subsequent loads in a consignment The licensee must provide the consignee with written notification of the date of dispatch of each load of waste.		Noted. With storage of 85,000 L (increased by 65,000 L in 2009/10), oily wastewater is collected from CGP on an as needs basis. A register comprising details relating to the consigned wastewater including authorisation number, volumes collected/ transported, dates and final destination was sighted during the audit.	Noted.	

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 Compliance Score: 90%

DA/MOD	COC	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
DA 282-6-2003-i	05.7 The notification referred to in 05.6 must be received by consignee no later than the date of arrival of the preceding load at the destination.		Noted. With storage of 85,000 L (increased by 65,000 L in 2009/10), oily wastewater is collected from CGP on an as needs basis. A register comprising details relating to the consigned wastewater including authorisation number, volumes collected/ transported, dates and final destination was sighted during the audit.	Noted.	
DA 282-6-2003-i	05.8 Notification of a final load in a consignment. Unless the movement of an entire consignment of waste occurs in a single load, by the time the final load in a consignment is accepted at the destination, the licensee must have informed the consignee in writing, that no further loads are to be dispatched under that consignment authorisation number. <i>Note: The notifications referred to in conditions 05.6 and 05.8 may be attached to the waste data form of the preceding load.</i>		Noted. With storage of 85,000 L (increased by 65,000 L in 2009/10), oily wastewater is collected from CGP on an as needs basis. A register comprising details relating to the consigned wastewater including authorisation number, volumes collected/ transported, dates and final destination was sighted during the audit.	Noted.	
DA 282-6-2003-i	05.9 Amendments to the nominated date(s) of dispatch If the date of dispatch for a load of waste is changed, the licensee must give written notification of this to the consignee and nominate a revised date of dispatch.		Noted. With storage of 85,000 L (increased by 65,000 L in 2009/10), oily wastewater is collected from CGP on an as needs basis. A register comprising details relating to the consigned wastewater including authorisation number, volumes collected/ transported, dates and final destination was sighted during the audit.	Noted.	
DA 282-6-2003-i	05.10 A notification referred to in 05.9 must occur on or before the date of delivery as previously nominated. <i>Note: More than one amendment to dates of dispatch may occur.</i>		Noted. Detailed assessment of compliance with this condition was not assessed as it was considered a less material issue and subject to other monitoring.	Noted.	
DA 282-6-2003-i	05.11 Cancellation of consignment authorisations If the licensee determines that the delivery of a consignment of waste is to be discontinued for any reason, the consignee must be notified in writing before the nominated date of dispatch of the next		Noted. Detailed assessment of compliance with this condition was not assessed as it was considered a less material issue and subject to other monitoring.	Noted.	
DA 282-6-2003-i	05.12 Notification of delayed delivery by transporter If the licensee receives written notification from a transporter who removed waste from the premises specifying a revised date of delivery to the destination which is more than 7 days after the date of dispatch, the licensee must note and record that date.		Noted. Detailed assessment of compliance with this condition was not assessed as it was considered a less material issue and subject to other monitoring.	Noted.	
DA 282-6-2003-i	05.13 Record keeping The licensee must record and retain all information related to each consignment of waste. <i>Note: This includes waste data forms and copies of other documents such as notifications of revised delivery dates, regular and other reports, etc.</i>		A register comprising details relating to the consigned wastewater including authorisation number, volumes collected/ transported, dates and final destination was sighted during the audit.	Noted.	
DA 282-6-2003-i	05.14 The records referred to in 05.13 must be kept so that: (a) all records relating to individual consignment authorisation numbers are kept physically together; (b) consignments transported by each transporter can be readily identified and accessed; and (c) consignments sent to each destination can readily be identified and accessed. <i>Note: The licensee must keep all information for at least 4 years.</i>		A register comprising details relating to the consigned wastewater including authorisation number, volumes collected/ transported, dates and final destination was sighted during the audit.	Noted.	
DA 282-6-2003-i	05.15 Exception reporting The licensee must notify the DECC, in writing, within 48 hours of becoming aware of any suspected breaches of the Act, the Protection of the Environment Operations (Waste) Regulation 1996 or this licence.		Noted.	Noted.	
DA 282-6-2003-i	05.16 The licensee must notify the DECC in writing within 48 hours of becoming aware of any of the following: (a) the refusal by a person to whom the licensee has applied for a consignment authorisation number in accordance with 05.4 to issue such a number; (b) the refusal of a transporter to transport waste after arriving at the licensee's premises for the purposes of transporting that waste; (c) a transporter who transports, or attempts to transport, waste without a waste data form completed to the extent required; (d) the refusal of a consignee to accept waste from the licensee; (e) the failure of the licensee to receive written confirmation of receipt of waste from a consignee within 21 days of dispatch, or where a transporter has provided written notification of a revised date of delivery as set out in 05.12 within 21 days of that date; (f) the notification by a transporter of a revised date of delivery which is more than 90 days after the date of dispatch of the waste. <i>Note: The DECC should be notified of exception reports by sending a facsimile to: Manager, Hazardous Waste Regulation NSW Environment Protection Authority</i>		Noted. Detailed assessment of compliance with this condition was not assessed as it was considered a less material issue and subject to other monitoring.	Noted.	
DA 282-6-2003-i	06 Monitoring of interstate movements of controlled wastes 06.1 Conditions 06.2 to 06.11 apply to the movement of the types of hazardous and/or industrial and/or Group A waste as listed in L5.3, into and out of NSW. <i>Note: The requirements of the NEPM apply to the interstate movement of any of the wastes listed in Appendix 1 of this licence.</i>		According to the NSW Waste Classification Guidelines (DECC, 2009), oily wastewater would be classified as Liquid Waste - types of hazardous, industrial and/or Group A wastes no longer apply. AGL reported that there was no interstate transport of controlled wastes during the audit period. Worth Recycling collect the oily wastewater for transport and processing within NSW.	N/A	

DA NUMBER: DA 282-6-2003-i
 LOCATION: Rosalind Park; Wandinong
 MODIFICATION: MOD72-7-2004-I, MOD5-1-2005, MOD42-3-2005, MOD119-10-2006, MOD124-10-2006, MOD11-2-2007, MOD26-3-2007
 WORKS: Gas gathering line twinning at Rosalind Park and repair damaged line at GL06. Drilled GL17 and EM39. No activity at Wandinong gas field.

Number of Conditions: 254
 Closed out previously: 49
 Number Noted: 33
 Number N/A: 19
 Number Non-Compliant: 16
 Compliance Score: 90%

DA/MOD	COC	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
DA 282-6-2003-i	06.2 Classification of controlled waste The licensee must accurately identify the waste, in accordance with 04.1, and determine if the waste is a controlled waste within the meaning of the NEPM. <i>Note: The waste producer must check with the agency in the State or Territory of destination to determine whether waste is classified as a controlled waste under the NEPM. Unless advised otherwise by the agency of the State or Territory of destination, any waste included in Appendix 1 of this licence is a controlled waste for the purposes of the NEPM.</i>		AGL reported that there was no interstate transport of controlled wastes during the audit period. Worth Recycling collect the oily wastewater for transport and processing within NSW.	N/A	
DA 282-6-2003-i	06.3 Application for a consignment authorisation If the waste is transported from the premises to another participating State or Territory, the licensee must comply with all conditions attached to the consignment authorisation issued by an agency or a facility delegated by an agency in the destination State or Territory. <i>Note: The waste producer is required by the Protection of the Environment Operations (Waste) Regulation 1996 to obtain, prior to the waste being dispatched, a consignment authorisation from an agency, or a facility delegated by an agency, in the destination State or territory to allow the movement of controlled waste.</i>		AGL reported that there was no interstate transport of controlled wastes during the audit period. Worth Recycling collect the oily wastewater for transport and processing within NSW.	N/A	
DA 282-6-2003-i	06.4 Waste movements If the waste is transported from the premises to another participating State or Territory, the licensee must ensure that the waste is transported to a place that can lawfully be used as a waste facility for that waste.		AGL reported that there was no interstate transport of controlled wastes during the audit period. Worth Recycling collect the oily wastewater for transport and processing within NSW.	N/A	
DA 282-6-2003-i	06.5 The licensee must ensure that the waste transporter is licensed as required by the agency of each participating State or Territory through which the waste is transported.		AGL reported that there was no interstate transport of controlled wastes during the audit period. Worth Recycling collect the oily wastewater for transport and processing within NSW.	N/A	
DA 282-6-2003-i	06.6 The licensee must: (a) retain a copy of the waste transport certificate for the waste for a period of not less than 4 years from the time the form was completed, and (b) make the copy of the waste transport certificate available for inspection by an authorised officer on request. <i>Note: The waste producer is required by the Protection of the Environment Operations (Waste) Regulation 1996 to complete a waste transport certificate for the waste. This should be done in accordance with the instructions printed on the certificate and the required copy of the waste transport certificate should be forwarded to the agency in the State of destination.</i>		AGL reported that there was no interstate transport of controlled wastes during the audit period. Worth Recycling collect the oily wastewater for transport and processing within NSW.	N/A	
DA 282-6-2003-i	06.7 Notification of delayed delivery by transporter If the licensee receives written notification from the transporter who removed waste from the licensee's premises specifying a revised date of delivery to the destination which is more than 7 days after the date of dispatch, the licensee must note and record that date.		AGL reported that there was no interstate transport of controlled wastes during the audit period. Worth Recycling collect the oily wastewater for transport and processing within NSW.	N/A	
DA 282-6-2003-i	06.8 Record keeping The licensee must record and retain all information related to each consignment of waste. <i>Note: This includes the waste transport certificates and copies of other documents such as consignment authorisations issued by an agency in the destination State or Territory, notifications of revised delivery dates by transporters, regular and other reports, etc.</i>		AGL reported that there was no interstate transport of controlled wastes during the audit period. Worth Recycling collect the oily wastewater for transport and processing within NSW.	N/A	
DA 282-6-2003-i	06.9 The records referred to in 06.8 must be kept so that: (a) all records relating to each consignment authorisation are kept physically together; (b) consignments transported by each transporter can be readily identified and accessed, and (c) consignments sent to each destination can readily be identified and accessed. <i>Note: The licensee must keep all information for at least 4 years.</i>		AGL reported that there was no interstate transport of controlled wastes during the audit period. Worth Recycling collect the oily wastewater for transport and processing within NSW.	N/A	
DA 282-6-2003-i	06.10 Exception Reporting The licensee must notify the DECC in writing within 48 hours of becoming aware of a suspected breach of the Act, the Protection of the Environment Operations (Waste) Regulation 1996 or this licence.		AGL reported that there was no interstate transport of controlled wastes during the audit period. Worth Recycling collect the oily wastewater for transport and processing within NSW.	N/A	
DA 282-6-2003-i	06.11 The licensee must notify the DECC in writing within 48 hours of becoming aware of any of the following: (a) the refusal by an agency, or facility delegated by an agency, in participating State or Territory to whom the licensee has applied for a consignment authorisation in accordance with 06.3, to issue such an authorisation; (b) the refusal of a transporter to transport waste after arriving at the licensee's premises for the purposes of transporting that waste to another participating State or Territory to the extent required; (c) a transporter who transports, or attempts to transport, waste to another participating State or Territory without a waste transport certificate completed to the extent required; (d) the refusal of a destination in another participating State or Territory to accept from the licensee waste for which a consignment authorisation has been issued; (e) the failure of the licensee to receive written confirmation of receipt of waste from a destination in another participating State or Territory within 28 days of dispatch. <i>Note: The DECC should be notified of exception reports by sending a facsimile to: Manager, Hazardous Waste Regulation NSW Environment Protection Authority</i>		AGL reported that there was no interstate transport of controlled wastes during the audit period. Worth Recycling collect the oily wastewater for transport and processing within NSW.	N/A	
R4 Regular reporting of transportation of certain wastes within NSW					
DA 282-6-2003-i	R4.1 Conditions R4.2 to R4.5 apply to the transport of hazardous and/or industrial and/or Group A waste within NSW.		According to the NSW Waste Classification Guidelines (DECC, 2009), oily wastewater would be classified as Liquid Waste - types of hazardous, industrial and/or Group A wastes no longer apply.	Noted.	

DA NUMBER: DA 282-6-2003-i
 LOCATION: Rosalind Park; Wandinong
 MODIFICATION: MOD72-7-2004-I, MOD5-1-2005, MOD42-3-2005, MOD119-10-2006, MOD124-10-2006, MOD11-2-2007, MOD26-3-2007
 WORKS: Gas gathering line twinning at Rosalind Park and repair damaged line at GL06. Drilled GL17 and EM39. No activity at Wandinong gas field.

Number of Conditions: 254
 Closed out previously: 49
 Number Noted: 33
 Number N/A: 19
 Number Non-Compliant: 16
 Compliance Score: 90%

DA/MOD	COC	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
DA 282-6-2003-i	R4.2 Regular reporting The licensee must supply to the DECC, for each transporter that transported waste from the licensee's premises, the information as set out in Appendix 2, table 1.		Noted.Detailed assessment of compliance with this condition was not assessed as it was considered a less material issue and subject to other monitoring.	Noted.	
DA 282-6-2003-i	R4.3 The licensee must supply to the DECC, for each destination within NSW which received waste from the licensee, the information as set out in Appendix 2, table 2.		Noted.Detailed assessment of compliance with this condition was not assessed as it was considered a less material issue and subject to other monitoring.	Noted.	
DA 282-6-2003-i	R4.4 Reporting periods Reports to the DECC in accordance with R4.2 and R4.3 shall be supplied on or before: (a) 30 April for the reporting of information relating to wastes transported from the premises between 1 January and 31 March of that year; (b) 31 July for the reporting of information relating to wastes transported from the premises between 1 April and 30 June of that year; (c) 31 October for the reporting of information relating to wastes transported from the premises between 1 July and 30 September of that year; (d) 31 January for the reporting of information relating to wastes transported from the premises between 1 October and 31 December of the previous year. <i>Note: The DECC should be notified of exception reports by sending a facsimile to: Manager, Hazardous Waste Regulation NSW Department of Environment and Climate Change</i>		Noted.Detailed assessment of compliance with this condition was not assessed as it was considered a less material issue and subject to other monitoring.	Noted.	
DA 282-6-2003-i	R4.5 Nil reports If waste has not been transported from the premises in any reporting period as set out in R4.4 the DECC must be advised in writing by the licensee, by the dates referred to in R4.4 in lieu of reporting as required in R4.2 and R4.3.		Noted.Detailed assessment of compliance with this condition was not assessed as it was considered a less material issue and subject to other monitoring.	Noted.	
	R5 Regular reporting of interstate movements of controlled wastes				
DA 282-6-2003-i	R5.1 Conditions R5.2 to R5.5 apply to the movement of hazardous and/or industrial and/or Group A waste as listed in L5.3, into and out of NSW. <i>Note: The requirements of the NEPM apply to the interstate movement of any of the wastes listed in Appendix 1 of this licence.</i>		AGL reported that there was no interstate transport of controlled wastes during the audit period.	N/A	
DA 282-6-2003-i	R5.2 Regular reporting The licensee must supply to the DECC, for each transporter that transported waste from the premises to a destination in another participating State or Territory, the information as set out in Appendix 2, table 2.		AGL reported that there was no interstate transport of controlled wastes during the audit period.	N/A	
DA 282-6-2003-i	R5.3 Reporting periods Reports to the DECC in accordance with R5.2 shall be supplied on or before: (a) 30 April for the reporting of information relating to wastes transported from the premises between 1 January and 31 March of that year; (b) 31 July for the reporting of information relating to wastes transported from the premises between 1 April and 30 June of that year; (c) 31 October for the reporting of information relating to wastes transported from the premises between 1 July and 30 September of that year; (d) 31 January for the reporting of information relating to wastes transported from the premises between 1 October and 31 December of the previous year.		AGL reported that there was no interstate transport of controlled wastes during the audit period.	N/A	
DA 282-6-2003-i	R5.4 Nil reports If waste has not been transported from the premises in any reporting period as set out in R5.3, the DECC must be advised in writing by the licensee, by the dates referred to in R5.3 in lieu of reporting as defined in R5.2.		AGL reported that there was no interstate transport of controlled wastes during the audit period.	N/A	
DA 282-6-2003-i	R5.5 Interstate transport of controlled wastes The licensee must comply with the requirements of the NEPM.		AGL reported that there was no interstate transport of controlled wastes during the audit period.	N/A	

Appendix D DA183-8-2004i Compliance Checklist

DA NUMBER: 183-8-2004-i
 LOCATION: Menangle Park; and Mt Taurus
 MODIFICATION: MOD 27-3-2007
 WORKS: No

Number of Conditions: 29
 Closed out previously: 6
 Number Noted: 1
 Number N/A: 3
 Number Non-Compliant: 3
 Compliance Score: 84%

DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
DA 183-8-2004-i	1 Obligation to minimise harm to the Environment The Applicant shall implement all practicable measures to prevent or minimise any harm to the environment that may result from the construction or operation of the development.		It was reported that no development activity was carried out on the Menangle Park and Mt Taurus gas fields during the audit period. Gas wells located in these areas were operational and planned maintenance was carried out on equipment to maximise operational efficiency and minimise environmental harm. There were no environmental incidences (including complaints) recorded in relation to operations at these locations.	Compliant.	
DA 183-8-2004-i	2 Terms of Approval The Applicant shall carry out the development generally in accordance with the: (a) DA submitted to the Department on 28 July 2004; (b) "Statement of Environmental Effects -Harness Racing Drilling Program" Sydney Gas Company dated 24 June 2003; (c) "Review of Environmental Effects -Mt Taurus Drilling Program" Sydney Gas Company dated March 2004; (d) Modification application MOD 27-3-2007 and Camden Gas project Venture Gas well and Gathering Line Modification Project Statement of Environmental Effects", dated March 2007; and (e) Conditions of this consent. If there is any inconsistency between the above documents, the latter document shall prevail over the former to the extent of the inconsistency. However, the conditions of this consent shall prevail over all other documents to the extent of the inconsistency.		The past audit found that the development was carried out in accordance with the terms of approval. As there was no further development activity at these locations during the audit period, the existing development was deemed to be generally compliant with the requirements of this condition.	Compliant.	
DA 183-8-2004-i	3 The Applicant shall comply with any reasonable requirement/s of the Director-General arising from the Department's assessment of: (a) any reports, plans or correspondence that are submitted in accordance with this consent; and (b) the implementation of any actions or measures contained in these reports, plans or correspondence.		The were reportedly no requests made by the Director-General in regards to this project in the current audit period.	Compliant.	
DA 183-8-2004-i	4 This approval is for a period of twenty one (21) years from the granting of the production lease.			Noted.	
DA 183-8-2004-i	5 Nothing in this consent permits the drilling and operation of any additional wells (beyond the approved 16 wells for gas production) or gas gathering lines.		There is evidence of 16 wells being drilled prior to the current audit period. No drilling occurred during the current audit period.	Compliant.	
DA 183-8-2004-i	6 The Applicant shall provide Campbelltown City Council and Wollondilly Shire Council with the Geographical Positioning System (GPS) co-ordinates and digital survey data for gas well sites and gas gathering systems within their respective Local Government Area, in a format suitable to each of these Councils, within two months of the completion of the gas wells and gas gathering system.		It was reported that AGL had not complied with the requirement to prepare spatial data (in map and spreadsheet format) and submit to local councils. This would form part of the role of the Land & Approval group at AGL.	Non-Compliant.	Provide data to Council as per requirements for each well.
DA 183-8-2004-i	7 The Applicant shall provide Campbelltown City Council and Wollondilly Shire Council with the wellhead configurations of each gas well within two months of the gas well being completed or two months from the date of this consent, whichever is the later.		AGL had not complied with the requirement to supply well head configurations to local councils. It was reported that the AGL Land and Approvals Manager would complete.	Non-Compliant.	Reissue Council with wellhead configurations for all completed gas wells.
DA 183-8-2004-i	8 The Applicant shall provide written notification to the Director-General that it has fulfilled the requirements of Conditions 6 and 7, within two weeks of the information being provided to the Councils.		AGL can not provide evidence to demonstrate that the Director-General was notified as the requirements of conditions 6 and 7 have not been completed.	Non-Compliant.	Provide written evidence of fulfilling the requirements of conditions 6 and 7 to the Director-General, within two weeks of the information being provided to the council (see above recommended action).

DA 183-8-2004-i	9 Environmental Management Except as may be expressly provided for by a licence under the Protection of the Environment Operations Act 1997 in relation to the development, the Applicant shall comply with section 120 of the Protection of the Environment Operations Act 1997, in carrying out this development. <i>Note: Section 120 of the Protection of the Environment Operations Act 1997 applies to the disposal of wastewater.</i>		No reported incidents or non-compliance with requirements of POEO Act 1997.	Compliant.	
DA 183-8-2004-i	10 The Applicant is required to ensure that the Dam at gas well site MT1 is appropriately lined so that waters stored in the dam do not potentially contaminate the surrounding and underlying soils.	Dam was lined with Poly liner at the time of construction and operation. The Dam has since been rehabilitated and URS have undertaken site assessments to verify that there was no soil contamination caused by the dam, i.e. the dam did not leak. Sighted report (dated 19/11/2010).	Pre-audit period.	Closed out.	
DA 183-8-2004-i	11 The Applicant is not permitted to spray or discharge water from the earth Dam at gas well site MT 1, onto any land or water surface unless it has prior written approval from the Director-General.		AGL Field Environment and Safety Officer verified verbally that no waters were discharged to land or water surface.	Compliant.	
DA 183-8-2004-i	12 The Applicant is required to store and manage the use and disposal of water in accordance with the current version of the Department of Environment and Climate Change's "Environmental Guidelines: Assessment, Classification and Management of Liquid and Non-Liquid Wastes."		The Waste Management Plan references the <i>Protection of Environment Operations Act 1997</i> but should be updated to refer to the Waste Classification Guidelines (DECCW, 2009), which replaced the Environmental Guidelines: Assessment, Classification and Management of Liquid and Non-Liquid Wastes (DECC, 1998). The storage, use and disposal of water is carried out in general accordance with these guidelines.	Compliant.	
DA 183-8-2004-i	13 The Applicant shall undertake the development in a way that minimises the noise generated by the development.	Sighted Noise Management Sub Plan within EMS (2008).	No works or noise-generating activities carried out on sites within audit period. No noise-related complaints recorded.	Compliant.	
DA 183-8-2004-i	13A The Applicant shall ensure that all construction work (except for drilling (including well casing and grouting) of surface to in seam wells), shall only be conducted between 7.00am and 6.00pm Monday to Friday and between 8.00am to 1.00pm on Saturdays unless inaudible at any residential receiver	Sighted Noise Management Sub Plan within EMS - includes work times. Sighted general induction with include hours of work.	Noise Management Plan within EMS (2008) defines hours of operation. This is reinforced via induction and training. No works or noise-generating activities carried out on sites within audit period. No noise-related complaints recorded.	Compliant.	
DA 183-8-2004-i	13B Noise from the drilling and construction of MP30 shall not exceed the sound pressure level (noise) limits in the table below:		No works or noise-generating activities carried out on sites within audit period. No noise-related complaints recorded.	Compliant.	
DA 183-8-2004-i	14 The Applicant is required to prepare and implement a Water Management Plan for the sites and the Dam at MT 1 for the life of the development. The Water Management Plan will include (and not be limited to) sediment and erosion control measures to be implemented prior to the construction of the earth Dam at gas well site MT1. The Applicant shall submit the Water Management Plan for the Director-General's approval within one month of the date of this consent.	Soil and Water Management Sub Plan within EMS (2008).	Pre-audit period.	Closed out.	
DA 183-8-2004-i	15 The Applicant is required to prepare and implement a Flood Management Plan for the sites for the life of the development. The Flood Management Plan will include (and not be limited to) measures to minimise and mitigate flooding impacts. The Applicant shall submit the Flood Management Plan for the Director-General's approval within one month of the date of this consent	Sighted Emergency Management Plan which contains relevant details on flood response.	Pre-audit period.	Closed out.	
DA 183-8-2004-i	16 The Applicant is required to prepare and implement a Soil and Water Management Plan for the sites for the life of the development. The Applicant shall submit the Soil and Water Management Plan for the Director-General's approval within one month of the date of this consent.	Soil and Water Management Sub Plan within EMS (2008).	Pre-audit period.	Closed out.	
DA 183-8-2004-i	16A The Applicant shall ensure that, if any historical archaeological relics within the meaning of the Heritage Act 1977 are disturbed, the Heritage Council of NSW shall be notified in accordance with section 146 of the Heritage Act 1977.		No works completed on sites within audit period. No historical archaeological relics identified.	Compliant.	

DA 183-8-2004-i	16B The Applicant shall ensure that, during the drilling and construction of MP30 and upgrading of the gas gathering lines, impacts on threatened species are minimised by implementing actions including, but not limited, to the following: a) The recommendations outlined in Sections 6 and 7 of the Ecosearch Environmental Consultants Pty Ltd report titled "Flora and fauna Assessment, AGL Gas Well and Gathering Line Project Modifications"; and b) Marking the boundaries of endangered ecological communities (EECs) and locations of other known threatened species and, where possible, avoiding construction activities within these areas.		No works completed during audit period.	Compliant.	
DA 183-8-2004-i	17 The Applicant is required to prepare and implement a Weed Management Plan for the sites for the life of the development. The Applicant shall submit the Weed Management Plan for the Director-General's approval within one month of the date of this consent.	Weed management is address under the Landscape and Rehabilitation Management Sub Plan within the approved EMS (2008).	Pre-audit period.	Closed out.	
DA 183-8-2004-i	18 Redrilling and Refracting Management Plan Note: For the purposes of this consent the redrilling and/or additional fracture stimulation of a well does not constitute wellhead maintenance The Applicant shall obtain the prior approval of the Director-General for the redrilling and/or additional fracture stimulation of a gas well.		No refracting or redrilling carried out under this consent.	N/A	
DA 183-8-2004-i	19 The Applicant shall prepare a Redrilling and Refracting Management Plan in consultation with the Department of Primary Industries for the redrilling and/or refracting of an existing well. The Plan shall be submitted to the Director-General no later than one month prior to the commencement of the work or within such period as agreed by the Director-General. The Plan shall include, but not necessarily be limited to: (a) a description of all the activities to be undertaken on the well site during the redrilling and/or refracting work; (b) details of how the environmental performance of the work will be monitored and what actions will be taken to address identified adverse environmental impacts; (c) reference to the relevant parts of the Environmental Management Plan required under condition 21 of this consent; (d) compliance with all the relevant environmental performance requirements of this consent; and (e) arrangements for complaints handling procedures during the redrilling/refracting work.		No refracting or redrilling carried out under this consent.	N/A	
DA 183-8-2004-i	20 The Applicant shall give written notification of the proposed redrilling/refracting work to potentially affected residences and other noise sensitive receivers at least fourteen days prior to work commencing.		No refracting or redrilling carried out under this consent.	N/A	
DA 183-8-2004-i	21 Operational Environmental Management Plan (OEMP) The Applicant shall prepare and implement an Operational Environmental Management Plan (OEMP) to provide environmental management practices and procedures to be followed during the operation of the development. The OEMP shall be forwarded to the Director-General for approval within one month of the date of this consent. The OEMP shall include, but not necessarily be limited to: (a) identification of all statutory and other obligations that the Applicant is required to fulfil in relation to operation of the development, including all consents, licences, approvals and consultations; (b) a description of the roles and responsibilities for all key personnel involved in the operation of the development; (c) the overall environmental policies and principles to be applied to the operation of the development; (d) standards and performance measures to be applied to the development, and a means by which environmental performance can be periodically reviewed and improved; and (e) management policies to ensure that environmental performance goals are met and to comply with conditions of this consent.	Approved EMS for operational activities.	Pre-audit period.	Closed out.	
DA 183-8-2004-i	22 The Applicant shall supply a copy of the OEMP to Campbelltown City Council and Wollondilly Shire Council within fourteen days of the Director-General's approval. The Applicant shall ensure that a copy of the OEMP is publicly available.		The Camden Gas Project EMS is publicly accessible on the AGL website. It was reported that the operational environmental management plan outlined in the EMS was submitted to councils; however no evidence was provided.	Compliant.	accessible on the AGL website. It was reported that the operational environmental management plan outlined in the EMS was submitted to councils; however no evidence was provided.
DA 183-8-2004-i	23 The Applicant shall review and update the OEMP annually, or as directed by the Director-General		The EMS was last updated in late 2008. Generally reviewed annually, no changes required.	Compliant.	

DA 183-8-2004-i	<p>24 Annual Environmental Performance Reporting The Applicant shall include the operation of MT1 -MT 10 inclusive, MP13 -MP17 and MP30, inclusive and the associated gas gathering system and the conditions of this consent, in the Annual Environmental Performance Report required under Schedule 5 Condition 5 of development consent DA-282-6-2003-i, dated 16 June 2004.</p>	2009-10 AEPR	Annual Environmental Performance Reports were observed to be prepared and submitted as required by this CoC.	Compliant.	
DA 183-8-2004-i	<p>25 Independent Environmental Audit The Applicant shall include the operation of MT1 -MT 10 inclusive, MP13 -MP17 inclusive and MP30, and the associated gas gathering system, and the conditions of this consent, in the Independent Environmental Audit required under Schedule 5 Condition 8 of development consent DA-282-6-2003-i, dated 16 June 2004.</p>		This audit represents the independent environmental audit of the operation of MT1-10 inclusive, MP13-17 inclusive and MP30 and associated gas gathering system. No works completed during audit period.	Compliant.	

Appendix E DA9-1-2005 Compliance Checklist

DA NUMBER: DA 9-1-2005
 LOCATION: Glenlee Wells
 MODIFICATION: MOD 51-4-2006; MOD 28-3-2007
 WORKS: No

Number of Conditions: 45
 Closed out previously: 9
 Number Noted: 2
 Number N/A: 4
 Number Non-Compliant: 4
 Compliance Score: 87%

DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
DA 9-1-2005	<p>1 Obligation to Minimise Harm to the Environment The Applicant shall implement all practicable measures to prevent or minimise any harm to the environment that may result from the construction or operation of the development.</p>		<p>It was reported that no development activity was carried out on the Glenlee Wells during the audit period. Gas wells located in these areas were operational and planned maintenance was carried out on equipment to maximise operational efficiency and minimise environmental harm.</p> <p>There were no environmental incidences (including complaints) recorded in relation to operations at these locations.</p>	Compliant.	
DA 9-1-2005	<p>2 Terms of Approval The Applicant shall carry out the development generally in accordance with the: (a) DA submitted to the Department on 4 January 2005; (b) "Statement of Environmental Effects – Elizabeth Macarthur Agricultural Institute Horizontal Drilling Project" Sydney Gas Company dated July 2002; (c) "Statement of Environmental Effects – Glenlee Drilling Project Drilling Operations" Sydney Gas Company dated September 2002 (d) Letter from Sydney Gas Operations Pty Ltd to the Department dated 13 May 2005, modifying the application to relocate well GL3; (e) The modification application submitted to the Department on 11 April 2006 and the accompanying document "Camden Gas Project Joint Venture Proposed Multiple Gas Well Modifications" prepared by AGL Gas Production (Camden) Pty Ltd and Sydney Gas (Camden) Operations Pty Ltd, dated April 2006; (f) Modification Application MOD 28-3-2007 and "Camden Gas Project Joint Venture Gas Well and Gathering Line Modification Project Statement of Environmental Effects", dated March 2007; and (g) Conditions of this consent. If there is any inconsistency between the above documents, the latter document shall prevail over the former to the extent of the inconsistency. However, the conditions of this consent shall prevail over all other documents to the extent of any inconsistency.</p>		<p>The past audit found that the development was carried out in accordance with the terms of approval. As there was no further development activity at these locations during the audit period, the existing development was deemed to be generally compliant with the requirements of this condition.</p>	Compliant.	
DA 9-1-2005	<p>3 This approval is for a period of twenty one (21) years from the granting of the production lease.</p>		Noted.	Noted.	
DA 9-1-2005	<p>4 The Applicant shall not commence the construction of well GL11 until the Director-General has approved the Drilling and fracture stimulation Management Plan required under condition 37.</p>		<p>No drilling occurred during the audit period. G11 was drilled in 2005 - pre-audit period.</p>	Compliant.	
DA 9-1-2005	<p>5 The Applicant shall comply with any reasonable requirement/s of the Director-General arising from the Department's assessment of: (a) Any reports, plans or correspondence that are submitted in accordance with this consent; and (b) The implementation of any actions or measures contained in these reports, plans or correspondence.</p>		<p>The were reportedly no requests made by the Director-General in regards to this project in the current audit period.</p>	Compliant.	
DA 9-1-2005	<p>6 Nothing in this consent permits the drilling and operation of any additional wells (beyond the approved 8 wells for gas production).</p>		<p>Noted. Six wells have been drilled under this consent.</p>	Compliant.	
DA 9-1-2005	<p>7 The Applicant shall provide Camden Council and Wollondilly Shire Council with the Geographical Positioning System (GPS) co-ordinates and digital survey data for gas well sites and gas gathering systems within their respective Local Government Area, in a format suitable to each of these Councils, within two months of the completion of the gas wells and gas gathering system.</p>		<p>It was reported that AGL had not complied with the requirement to prepare spatial data (in map and spreadsheet format) and submit to local councils. This would form part of the role of the Land & Approval group at AGL.</p>	Non-Compliant.	<p>Provide data to Council as per requirements for each well.</p>
DA 9-1-2005	<p>8 The Applicant shall provide Camden Council and Wollondilly Shire Council with the wellhead configurations of each gas well within two months of the gas well being completed or two months from the date of this consent, whichever is the later.</p>		<p>AGL had not complied with the requirement to supply well head configurations to local councils. It was reported that the AGL Land and Approvals Manager would complete.</p>	Non-Compliant.	<p>Provide Council with wellhead configurations for all completed gas wells.</p>
DA 9-1-2005	<p>9 The Applicant shall provide written notification to the Director-General that it has fulfilled the requirements of Conditions 7 and 8, within two weeks of the information being provided to the Councils.</p>		<p>AGL can not provide evidence to demonstrate that the Director-General was notified as the requirements of conditions 7 and 8 have not been completed.</p>	Non-Compliant.	<p>Provide written evidence of fulfilling the requirements of conditions 7 and 8 to the Director-General, within two weeks of the information being provided to the council (see above recommended action).</p>

DA NUMBER: DA 9-1-2005
 LOCATION: Glenlee Wells
 MODIFICATION: MOD 51-4-2006; MOD 28-3-2007
 WORKS: No

Number of Conditions: 45
 Closed out previously: 9
 Number Noted: 2
 Number N/A: 4
 Number Non-Compliant: 4
 Compliance Score: 87%

DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
DA 9-1-2005	10 The Applicant shall comply with the following in the construction of the gas gathering system pipeline: (a) signs stating the presence of a buried gas pipeline shall be erected periodically along the length of the trench once the pipeline has been laid; (b) trenches are to be restored and reseeded with local grass seeds on completion of the work; (c) local council traffic guidelines in respect of work carried out on road verges and underneath roads shall be implemented; (d) the Applicant shall construct the gas gathering system so as not to impeach lateral water flows; (e) the Applicant shall ensure that no crown or camber remains along the gas gathering systems, following construction; (f) the pipeline shall be designed, constructed and operated in accordance with the Australian Standard for the installation and maintenance of Plastic Pipe Systems for Gas AS 3723-1989 (or its latest version); and (g) the Department shall be notified on the completion of any trenching works.	Observations made during site visit to GL05 and GL06. EMS (2008) and sub plans.	Gas gathering lines observed to be well located, signed and rehabilitated. Auditor observations indicated that gas gathering lines appeared to be installed in general accordance with the requirements for construction of gas gathering line published in EMS (2008). Section 3.3 of main EMS discusses construction methods and rehabilitation. KPIs for soil disturbance to be minimised listed in section 4.2. Formal procedures relating to the requirements of this condition not sighted. The project manager for the gas gathering lines is responsible for notifying the Department upon completion of trenching works.	Compliant.	
DA 9-1-2005	11 Should the Spring Farm Master Plan for the Spring Farm urban release area, and development of the Garden Gates subdivision in Mt Annan South, identify the need to relocate any gas gathering lines the subject of this consent to ensure an efficient and environmentally sustainable urban outcome, that infrastructure shall be relocated by, and at the cost of the Applicant to the satisfaction of the Director-General, following consultation with Camden Council and Landcom.		Not applicable to date.	Noted.	
DA 9-1-2005	12 Hours of Operation The Applicant may conduct construction activities on land owned by Waste Service NSW, during the following hours: Monday to Friday 7.00 am to 6.00 pm; Saturday and Sunday 7.00 am to 6.00 pm. (Excluding Public Holidays)	EMS (2008), including Noise Management Sub Plan. Interviews with site personnel.	No noise-generating activities completed on sites within audit period. Noise Management Sub Plan and induction detail hours of construction/operation applicable to the development.	Compliant.	
DA 9-1-2005	13 For development carried out on land not owned by Waste Service NSW, the Applicant is restricted to the following hours of construction: Monday to Friday 7.00 am to 6.00 pm; Saturday 8.00 am to 1.00 pm. (Excluding Public Holidays)	EMS (2008), including Noise Management Sub Plan. Interviews with site personnel.	No noise-generating activities completed on sites within audit period. Noise Management Sub Plan and induction detail hours of construction/operation applicable to the development.	Compliant.	
DA 9-1-2005	14 Environmental Management The Applicant shall obtain a Part 3A Permit prior to the commencement of construction of any crossing of a stream by the gas gathering line.		No Part 3A Permit was required under this DA.	Closed out.	
DA 9-1-2005	15 Except as may be expressly provided for by a licence under the Protection of the Environment Operations Act 1997 in relation to the development, the Applicant shall comply with section 120 of the Protection of the Environment Operations Act 1997, in carrying out this development.	Site observations. Incident register.	Well locations attended during this audit (GL05 and GL06) appeared well maintained and operated within the requirements of the POEO Act. There were no incidents or breaches of the POEO Act reported during this audit period.	Compliant.	
DA 9-1-2005	16 The Applicant shall implement all practicable measures to minimise soil erosion and the discharge of sediments and water pollutants from the site.	EMS (2008), including Soil and Water Management Sub Plan.	Well locations attended during this audit (GL05 and GL06) appeared well maintained and operated within the requirements of the POEO Act - i.e. wastewaters contained, no erosion or sediment control issues identified.	Compliant.	
DA 9-1-2005	17 The Applicant shall implement all relevant site drainage and sediment and erosion control works and measures prior to the commencement of any other works at the site.	Site observations. EMS (2008), including Soil and Water Sub Plan.	Sediment fences and stabilised access areas were observed to be in place and effective around well sites to minimise sediment and erosions impacts. There were no issues regarding management of sediment and erosion were observed around well sites during the site inspections.	Compliant.	
DA 9-1-2005	18 The Applicant shall ensure that the gas gathering system connecting well site EM 1H shall be constructed outside the breeding seasons of raptor species.	Site observations. Interviews with site personnel. Incident register.	It was reported that no construction works were completed on site within audit period.	Compliant.	
DA 9-1-2005	19 The Applicant shall undertake the development in a way that minimises the noise generated by the development.	Site observations. Interviews with site personnel. Incident register.	It was reported that no construction works or other noise-generating activities were completed on site within audit period. There were no noise-related complaints received for operations under this DA.	Compliant.	

DA NUMBER: DA 9-1-2005
 LOCATION: Glenlee Wells
 MODIFICATION: MOD 51-4-2006; MOD 28-3-2007
 WORKS: No

Number of Conditions: 45
 Closed out previously: 9
 Number Noted: 2
 Number N/A: 4
 Number Non-Compliant: 4
 Compliance Score: 87%

DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
DA 9-1-2005	20 The Applicant is required to prepare and implement a Flood Management Plan for the well within the floodplain for the life of the development. The Flood Management Plan will include (and not be limited to) measures to minimise and mitigate flooding impacts. The Applicant shall submit the Flood Management Plan for the Director-General's approval within one month of the date of this consent.	Emergency Management Plan	Pre-audit period. Sighted Emergency Management Plan, which contains relevant details on flood response.	Closed out.	
DA 9-1-2005	21 The Applicant shall ensure that the route of the gas gathering system follows previously or currently disturbed areas wherever possible.	Site observations. EMS (2008).	It was reported that no construction works were completed on site within audit period. Route alignment is generally planned and constructed in previously or currently disturbed areas, usually along access tracks.	Compliant.	
DA 9-1-2005	22 The Applicant shall ensure that trenches constructed during the construction of gas gathering lines are not left open overnight unless otherwise agreed by the Director-General.	Site observations. EMS (2008).	It was reported that no construction works were completed on site within audit period. However the EMS (2008) includes construction methods for gas gathering lines consistent with the requirements of this condition.	Compliant.	
DA 9-1-2005	22A Threatened Species The Applicant shall ensure that during the upgrading of the gas gathering lines, impacts on threatened species are minimised by implementing actions including, but not limited to the following: a) The recommendations outlined in Sections 6 and 7 of the Ecosearch Environmental Consultants Pty Ltd report titled "Flora and fauna Assessment, AGL Gas Well and Gathering Line Project Modifications"; and b) Marking the boundaries of endangered ecological communities (EECs) and locations of other known threatened species and, where possible, avoiding construction activities within these areas.	Site observations. EMS (2008).	It was reported that no construction works were completed on site within audit period. It was reported that the EMS (2008) adopted the recommendations outlined in sections 6 and 7 of the Flora and Fauna Assessment, AGL Gas Well and Gathering Line Project Modifications; however this report was not provided for review (due to file error).	Compliant.	
DA 9-1-2005	23 The Applicant shall not remove mature trees as part of this development unless otherwise agreed by the Director-General.	Site observations. Interviews with site personnel. Incident register.	It was reported that no mature trees were removed.	Compliant.	
DA 9-1-2005	24 The Applicant shall implement best practice flora and fauna management.	Site observations. Interviews with site personnel. Incident register.	Sighted Landscape and Rehabilitation Management Sub Plan within EMS. Sites visited appeared to be adequately managed and rehabilitated where applicable to minimise impacts on flora and fauna.	Compliant.	
DA 9-1-2005	25 The Applicant shall take all practicable measures to minimise potential flora and fauna impacts of the proposed development.	Site observations. Interviews with site personnel. Incident register.	Sighted Landscape and Rehabilitation Management Sub Plan within EMS. Sites visited appeared to be adequately managed and rehabilitated where applicable to minimise impacts on flora and fauna.	Compliant.	
DA 9-1-2005	26 The Applicant shall provide landscaping around the well heads using appropriate native species.	Site observations. Interviews with site personnel. Incident register.	Sighted Landscape and Rehabilitation Management Sub Plan within EMS. Sites visited appeared to be adequately managed and rehabilitated where applicable to minimise impacts on flora and fauna.	Compliant.	
DA 9-1-2005	27 The Applicant shall employ a suitably qualified ecologist with specific experience in identifying the Cumberland Plain Snail, during the construction period of the development. The ecologist shall monitor and examine areas for the presence of the threatened Cumberland Plain Snail, during the clearing for the development.	Site observations. Interviews with site personnel. Incident register.	Pre-audit period. No new development during the audit period.	N/A	
DA 9-1-2005	28 The Applicant shall prepare a translocation strategy for the threatened Cumberland Plain Snail, which will be submitted for the Director-General's approval prior to construction. The translocation strategy shall be implemented should any individuals or populations of the Cumberland Plain Snail be identified.	Survey and Translocation Strategy - Cumberland Plan Land Snail - Camden Gas Project (Jan 2004).	Pre audit period	Closed out.	
DA 9-1-2005	29 The Applicant is required to prepare and implement a Weed Management Plan for the sites for the life of the development. The Applicant shall submit the Weed Management Plan for the Director-General's approval within one month of the date of this consent.	Weed management is address under the Landscape and Rehabilitation Management Sub Plan within the approved EMS	Pre-audit period.	Closed out.	
DA 9-1-2005	30 Prior to the commencement of site preparation works for the gas gathering system, the Applicant shall clearly mark the locations of known Aboriginal relics on the site (using flags, fencing or other appropriate method) and ensure that all employees and contractors are aware of these locations, to prevent the known relics being impacted or disturbed during site preparation and construction.	Reportedly completed.	Pre-audit period.	Closed out.	
DA 9-1-2005	31 The Applicant shall relocate the section of the gas gathering line east of the Aboriginal relic identified as Clutha 1, to ensure that this the relic is not harmed from installation of the gas gathering line. Details of the relocation of the line shall be submitted to the Director-General for approval.	Reportedly completed.	Pre-audit period.	Closed out.	

DA NUMBER: DA 9-1-2005
 LOCATION: Glenlee Wells
 MODIFICATION: MOD 51-4-2006; MOD 28-3-2007
 WORKS: No

Number of Conditions: 45
 Closed out previously: 9
 Number Noted: 2
 Number N/A: 4
 Number Non-Compliant: 4
 Compliance Score: 87%

DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
DA 9-1-2005	<p>32 Safety and Risk Management</p> <p>The Applicant shall develop and implement an Emergency Plan and Safety Management System for the development. The plan/system shall be submitted for the approval of the Director-General, at least one month prior to the commissioning of the development, or within such further period as the Director-General may agree. Commissioning shall not commence until the Director-General has approved the plan/system.</p> <p>(a) Emergency Plan A comprehensive emergency plan and detailed emergency procedures for the development shall be prepared in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 1, "Industry Emergency Planning Guidelines". The plan shall include detailed procedures for the safety of all people outside of the development who may be at risk from the development.</p> <p>(b) Safety Management System A document setting out a comprehensive safety management system, covering all operations on the gas wells and gathering system shall be developed in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 9, "Safety Management". The document shall clearly specify all safety related procedures, responsibilities and policies, along with details of mechanisms for ensuring adherence to procedures. Records shall be kept on-site and shall be made available for inspection by the Director-General upon request. In particular records shall be maintained to demonstrate that management of change procedures were followed for the connection of the new gas lines to the existing network and for the integration of the new wells into the automatic control system.</p>	<p>Emergency Response Plan Safety Management System (online)</p>	<p>Sighted Emergency Response Plan which is implemented across all aspects of the Camden Gas Project. It is maintained on the AGL server. Also sighted map of the Camden South Emergency Response Plan which identifies locations of well sites, fire stations, hospital, main roads, access and rivers.</p> <p>Observed implementation of Safety Management System, which is maintained on the AGL server. Records such as risk assessments, JSAs and incident reports/investigations inspected to verify implementation.</p>	Compliant.	
DA 9-1-2005	<p>33 Compliance Report</p> <p>Three months after commencement of operation of the development, the Applicant shall submit to the Director-General a compliance report detailing compliance with Condition 32, including:</p> <p>(a) dates of study/plan/system completion/submission and commencement of construction and commissioning;</p> <p>(b) actions taken or proposed, to implement recommendations made in the studies/plans/systems; and</p> <p>(c) responses to any requirement imposed by the Director-General under Condition 35.</p> <p>This report shall verify that:</p> <p>(a) The Emergency Plan required under Condition 32(a) is effectively in place and that at least one emergency exercise has been conducted; and</p> <p>(b) The Safety Management System required under Condition 32(b) has been fully implemented and that records required by the system are being kept.</p> <p>The report shall include a signed commitment by the Applicant's representative responsible for the operation of the development, that for each study/plan/system:</p> <p>(a) The required study/plan/system has been undertaken or prepared to the relevant Hazardous Industry Planning Advisory Panel;</p> <p>(b) All recommendations of each study/plan/system have been implemented; and</p> <p>(c) All safety management system and their associated risk controls have been implemented and are being maintained.</p>		Closed out in previous audit period. Evidence to verify that a compliance report was submitted was not made available for inspection.	Closed out.	
DA 9-1-2005	<p>34 Hazard Audit</p> <p>Twelve months after the commencement of operations of the proposed development or within such further period as the Director-General may agree, the Applicant shall carry out a comprehensive hazard audit of the development and within one month of the audit submit a report to the Director-General.</p> <p>The audit shall be carried out at the Applicant's expense by a duly qualified independent person or team approved by the Director-General prior to commencement of the audit. Further audits shall be carried out every three years or as determined by the Director-General and a report of each audit shall, within one month of the audit, be submitted to the Director-General. Hazard audits shall be carried out in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 5, "Hazard Audit Guidelines".</p>		Previous audit found that the last hazard audit was carried out in 2006 with the next audit due in 2009. The hazard report due in 2009 was not completed. Therefore the development could not demonstrate compliance with this condition.	Non-Compliant.	Commission and submit Hazard Audit to the Director-General as required by this condition.
DA 9-1-2005	<p>35 The Applicant shall comply with all reasonable requirements of the Director-General in respect of the implementation of any measures arising from recommendations of the studies or reports referred to in Conditions 32 to 34 inclusive, within such time as the Director-General may agree.</p>		As the hazard audit has not been completed, the Director-General has not made any additional requirements to be implemented as a result of the audit report.	Compliant.	

DA NUMBER: DA 9-1-2005
 LOCATION: Glenlee Wells
 MODIFICATION: MOD 51-4-2006; MOD 28-3-2007
 WORKS: No

Number of Conditions: 45
 Closed out previously: 9
 Number Noted: 2
 Number N/A: 4
 Number Non-Compliant: 4
 Compliance Score: 87%

DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
DA 9-1-2005	36 Drilling and fracture stimulation Management Plan The Applicant shall obtain the prior approval of the Director-General for the drilling, redrilling and/or additional fracture stimulation of a gas well.		It was reported that no drilling or fracture stimulation was undertaken during this audit period - therefore a drilling and fracture stimulation management plan was not required.	Compliant.	
DA 9-1-2005	37 The Applicant shall prepare a Drilling and Fracing Management Plan in consultation with the Department of Primary Industries for the drilling of a well, or redrilling and/or refracing of an existing well. The Plan shall be submitted to the Director-General no later than one month prior to the commencement of the work or within such period as agreed by the Director-General. The Plan shall include, but not necessarily be limited to: (a) a description of all the activities to be undertaken on the well site during the drilling, redrilling and/or refracing work; (b) details of how the environmental performance of the work will be monitored and what actions will be taken to address identified adverse environmental impacts; (c) reference to the relevant parts of the Environmental Management Plan required under condition 41; (d) compliance with all the relevant environmental performance requirements of this consent; and (e) arrangements for complaints handling procedures during the drilling, redrilling and/or		It was reported that no drilling or fracing was undertaken during this audit period - therefore a drilling and fracing management plan was not required.	N/A	
DA 9-1-2005	38 The Applicant shall give written notification of the proposed drilling, redrilling and/or refracing work to potentially affected residences and other noise sensitive receivers at least fourteen days prior to work commencing.		It was reported that no drilling or fracing was undertaken during this audit period - therefore written notice was not required.	N/A	
DA 9-1-2005	39 Construction Environmental Management Plan (CEMP) The Applicant shall prepare and implement a Construction Environmental Management Plan (CEMP) to provide environmental management, practices and procedures to be followed during the construction phases of the proposed development. A framework plan outlining key practices, procedures and environmental management practices should be approved by the Director-General prior to the commencement of construction.		Pre-audit period.	Closed out.	
DA 9-1-2005	40 The Applicant shall consult with the EMAI in the preparation of the CEMP. The CEMP shall identify measures to minimise the impact of construction of the gas gathering system and any related activities, within and adjacent to the Raptor Breeding zones on the EMAI site.		There were no construction activities completed during this audit period.	N/A	
DA 9-1-2005	41 Operational Environmental Management Plan (OEMP) The Applicant shall prepare and implement an Operational Environmental Management Plan (OEMP) to provide environmental management practices and procedures to be followed during the operation of the development. The OEMP shall be forwarded to the Director-General for approval within one month of the date of this consent. The OEMP shall include, but not necessarily be limited to: (a) identification of all statutory and other obligations that the Applicant is required to fulfil in relation to operation of the development, including all consents, licences, approvals and consultations; (b) a description of the roles and responsibilities for all key personnel involved in the operation of the development; (c) the overall environmental policies and principles to be applied to the operation of the development; (d) standards and performance measures to be applied to the development, and a means by which environmental performance can be periodically reviewed and improved; and		The EMS (2008) covers environmental management and monitoring for operation of the Camden Gas Project, including wells covered by this DA. A site-specific OEMP has not been developed. The EMS includes: Legislative requirements (Section 2.1) Structure and Responsibility (Section 5.1) HSE Policy (Jan 2008) Objectives, targets and KPI (section 4.2) Policies and procedures within the EMS; and additional Management Sub Plans for noise, soil, water, traffic, waste and rehabilitation.	Compliant.	
DA 9-1-2005	42 Annual Environmental Performance Reporting The Applicant shall include the operation of wells GL2 – 4 inclusive, GL 6, EMAI-1H and EMAI-1V and the associated gas gathering system and the conditions of this consent, in the Annual Environmental Performance Report required under Schedule 5 Condition 5 of development consent DA-282-6-2003-i, dated 16 June 2004.	Sighted Annual Environmental Performance Reports for June 2007, June 2008, June 2009 and June 2010.	The AEPRs inspected include the operation of wells covered under this DA; however there were no works completed during this audit period and no issues were reported.	Compliant.	
DA 9-1-2005	43 Independent Environmental Audit – Construction at EMAI The Applicant shall commission and pay the full costs of an Independent Environmental Audit of the construction of the gas gathering system, construction of the access roads and drilling and fracing of gas wells on the EMAI. The objective of the audit is to monitor the performance and effect of construction activities on the EMAI. The Independent Environmental Audit shall: (a) be conducted by a suitably qualified, experienced, and independent person(s) whose appointment has been approved by the Director-General; and (b) be consistent with ISO 19011:2002 -Guidelines for Quality and/ or Environmental Management Systems Auditing, or updated versions of these guidelines/manuals.	Sighted EMAI Audit (2005)	This requirement was completed pre-audit period.	Closed out.	

DA NUMBER: DA 9-1-2005
 LOCATION: Glenlee Wells
 MODIFICATION: MOD 51-4-2006; MOD 28-3-2007
 WORKS: No

Number of Conditions: 45
 Closed out previously: 9
 Number Noted: 2
 Number N/A: 4
 Number Non-Compliant: 4
 Compliance Score: 87%

DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
	<p>The Audit shall:</p> <ul style="list-style-type: none"> (a) assess the environmental performance of the construction of the development on EMAI, and its effects on the surrounding environment; (b) assess whether the development is complying with the relevant standards, performance measures, and statutory requirements; (c) consider the Applicant's proposed Construction Environmental Management Plan for the EMAI Site; and (d) recommend measures or actions to improve the environmental performance of the construction of the development on EMAI, and/or its environmental management and monitoring systems (if required). <p>Within one month of completion of the audit, the Applicant must submit a copy of the audit report to the Director-General, the NSW Heritage Office and Department of Primary Industries-Agriculture. The Director-General may require the Applicant to address certain matters identified in the report and any comments received from the NSW Heritage Office and Department of Primary Industries-Agriculture. Any action required to be undertaken shall be completed within such period as the Director-General may agree.</p>				
DA 171-7-2024	<p>44 Independent Environmental Audit – Operation</p> <p>The Applicant shall include the operation of wells GL2 – 4 inclusive, GL 6, EMAI-1H and EMAI-1V and the associated gas gathering system, and the conditions of this consent, in the Independent Environmental Audit required under Schedule 5 Condition 10 of development consent DA-282-6-2003i, dated 16 June 2004.</p>		This audit meets the requirements of this condition.	Compliant.	

Appendix F DA75-4-2005 Compliance Checklist

DA NUMBER: 75-4-2005
 LOCATION: Sugarloaf Farm
 MODIFICATION: MOD 29-3-2007; MOD2
 WORKS: Yes, connected gas gathering line into Rosalind Park Gas Plant and SL09 fraced.

Number of Conditions: 63
 Closed out previously: 2
 Number Noted: 2
 Number N/A: 2
 Number Non-Compliant: 7
 Compliance Score: 88%

DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
DA 75-4-2005	1 Obligation to Minimise Harm to the Environment The Applicant shall implement all practicable measures to prevent or minimise any harm to the environment that may result from the construction or operation of the development.	General audit findings and observations made during site inspection.	The findings of this audit indicate that no significant environmental issues occurred at Sugarloaf Farm gas fields during the audit period. No environmental incidents, complaints or non-compliances have reportedly occurred under this consent during the audit period.	Compliant.	
DA 75-4-2005	2 Terms of Approval The Applicant shall carry out the development generally in accordance with the: (a) Development Application submitted to the Department on 18 April 2005; (b) "Statement of Environmental Effects – Camden Gas Project, Sugarloaf Farm Drilling Program, PPL4" Sydney Gas (Camden) Operations Pty Ltd, dated March 2005; (c) Letter from Sydney Gas (Camden) Operations Pty Ltd to the Department dated, 15 May 2005, amending the application to include the link between SL6 and RP3; (d) Letter from Sydney Gas (Camden) Operations Pty Ltd to the Department, dated 20 May 2005, amending the application to relocate SL5; (e) Letter from Sydney Gas (Camden) Operations Pty Ltd to the Department, dated 30 May 2005, providing a response to general public submissions; (f) Letter from Sydney Gas (Camden) Operations Pty Ltd to the Department, dated 17 June 2005, about the access roads; (g) Letter from Sydney Gas (Camden) Operations Pty Ltd to the Department of Environment and Conservation, dated 10 June 2005, about Aboriginal heritage issues; (h) Letter from Sydney Gas (Camden) Operations Pty Ltd to the Department, dated 11 July 2005, showing the updated plan of Aboriginal and archaeological assessment areas; (i) Modification Application MOD 29-3-2007 and a "Camden Gas Project Joint Venture Gas Well and Gathering Line Modification Project Statement of Environmental Effects", dated March 2007; (j) Modification Application DA 75-4-2005 MOD 2 and letter dated 18 December 2009; and (k) Conditions of this consent. If there is any inconsistency between the above documents, the latter document shall prevail over the former to the extent of the inconsistency. However, the conditions of this consent shall prevail over all other documents to the extent of any inconsistency.		Prior to the current audit period, surface to in-seam wells were drilled at SL09 and vertical wells were drilled at SL02 and SL03. The total number of wells drilled and now operational under this DA is three i.e. SL02, SL03 and SL09. SL09 was refraced in October 2008 and rehabilitated during the audit period. Gas gathering line was installed to connect Sugarloaf Farm into RPPG. Approval of Modification allowed drilling at SL08 and SL09 - but only drilled at SL09. It appears that the development has occurred in general accordance with the terms of approval.	Compliant.	
DA 75-4-2005	3 The Applicant shall comply with any reasonable requirement/s of the Director-General arising from the Department's assessment of: (a) Any reports, plans or correspondence that are submitted in accordance with this consent; and (b) The implementation of any actions or measures contained in these reports, plans or correspondence.		It was reported that there were no additional requirements placed on the development by the Director-General.	Compliant.	
DA 75-4-2005	4 Limits on Approval This approval shall lapse within 21 years of the date of this consent or on the expiry date of Petroleum Production Lease No. 4, whichever is the shorter period.	PPL04, 2004	As DA 75-4-1 was granted in 2005, the approval shall not lapse until 2026. The petroleum production lease (PPL) area was made on 06/10/2004 and expires in 2025.	Compliant.	
DA 75-4-2005	5 Nothing in this consent permits the drilling and operation of any additional wells (beyond the approved 9 wells for gas production).		Only three wells developed at this stage.	Compliant.	
DA 75-4-2005	6 If after five years of the date of this consent any well that is the subject of this consent has not yet been drilled or completed, then the Applicant shall surrender the approval for that well.		All expired except SL08 (received modification in 2007). No plans for drilling other sites.	Noted.	
DA 75-4-2005	7 The access road near SL7 shall only be used in an emergency.		It was reported that this road was not built.	Compliant.	
DA 75-4-2005	8 Administration Construction shall not commence until the Applicant has obtained a Part 3A Permit under the Rivers and Foreshores Improvement Act 1948, a Licence from the DECCW under the Protection of the Environment Operations Act 1997, and an approval under section 60 of the Heritage Act 1977 from the NSW Heritage Council.		No change from previous audit findings. Part 3A permit has been obtained for SL05, however this has expired. SL05 has not been constructed to date. Note: Part 3A permit will require renewal prior to work within 40 m from the top of a bank.	Compliant.	
DA 75-4-2005	9 An application must be made to the DECCW under section 90 of the National Parks and Wildlife Act 1974 for approval to destroy the known objects at Sugarloaf Farm Site 1 (Locale 5) and Sugarloaf Farm Site 5.		No change from previous audit. A section 90 certificate has been issued and an artefact collected (pre audit period 2008).	Compliant.	

DA NUMBER: 75-4-2005
 LOCATION: Sugarloaf Farm
 MODIFICATION: MOD 29-3-2007; MOD2
 WORKS: Yes, connected gas gathering line into Rosalind Park Gas Plant and SL09 fracedd.

Number of Conditions: 63
 Closed out previously: 2
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DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION														
DA 75-4-2005	10 The Applicant must, in the opinion of the DECC, be a fit and proper person to hold a Licence under the Protection of the Environment Operations Act 1997, having regard to the matters in section 83 of that Act.		AGL Energy Limited (AGL) is considered to be fit and proper person' (ABN 95 052 167 405) and holds EPA Licence No. 12003 for the Camden Gas Project Stage 2.	Compliant.															
DA 75-4-2005	11 The premises for the purposes of the Licence under the Protection of the Environment Operations Act 1997, includes the gas gathering system, access roads and gas wells and any associated effluent storages, temporary work areas and infrastructure associated with the gas gathering systems, access roads and gas wells.	Site inspection.	Gas field observed to include gas gathering system, access roads and gas wells - inspection of roads and enclosed wellhead at SL02.	Noted.															
DA 75-4-2005	12 The premises also applies to the gas well heads consisting of the area bounded by the fenced enclosure during gas well operation. During well establishment, the premises have a nominal area of 100 metres X 70 metres and is surrounded by fencing. At various times during well head maintenance, the premises at the gas well head comprises an area of dimensions 25 metres X 25 metres.	Site inspection.	Site inspection of gas field indicated that the premises includes the well heads enclosed within fence during operation. During the audit period, establishment of wells did not occur.	Compliant.															
DA 75-4-2005	13 The Applicant must provide Council with the Geographical Positioning System (GPS) co-ordinates and digital survey data for the gas well sites and gas gathering system in a format suitable to the Council, within two months of the completion of the gas wells and gas gathering system.		It was reported that AGL had not complied with the requirement to prepare spatial data (in map and spreadsheet format) and submit to local councils.	Non-Compliant.	Provide data to Council as per requirements for each well.														
DA 75-4-2005	14 The Applicant shall provide Council with the wellhead configurations of each gas well within two months of the gas well being completed or two months from the date of this consent, whichever is the later.		AGL had not complied with the requirement to supply well head configurations to local councils.	Non-Compliant.	Provide Council with wellhead configurations for all completed gas wells.														
DA 75-4-2005	15 The Applicant shall provide written notification to the Director-General that it has fulfilled the requirements of Conditions 13 and 14, within two weeks of the information being provided to the Council.		AGL can not provide evidence to demonstrate that the Director-General was notified as the requirements of conditions 13 and 14 have not been completed.	Non-Compliant.	Provide written evidence of fulfilling the requirements of conditions 13 and 14 to the Director-General, within two weeks of the information being provided to the council (see above recommended action).														
DA 75-4-2005	16 Activities Must be Carried out in a Competent Manner The development must be carried out in a competent manner. This includes: <ul style="list-style-type: none"> • The processing, handling, movement and storage of materials and substances used to carry out the activity; and • The treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity. 		Visual observation indicated that site is well maintained and operations carried out in a competent manner. Waste water is contained on site for collection and treatment.	Compliant.															
DA 75-4-2005	17 Maintenance of Plant and Equipment All plant and equipment installed at the premises or used in connection with the development must be maintained and operated in a proper and efficient condition.	Sighted Well Check Sheet maintained in Rosalind Park Gas Plant Workshop.	Site and wells maintained according to a planned maintenance schedule. During audit period, Fetterplace Civil completed maintenance of gas gathering line (approximately 3 km in length) but no construction or works were occurring at time of the audit.	Compliant.															
DA 75-4-2005	18 Noise Limits Noise from the operation of the development shall not exceed the sound pressure level (noise) limits presented in the Table below: <table border="1" data-bbox="309 1114 873 1198"> <thead> <tr> <th rowspan="2">Location</th> <th>Day</th> <th>Evening</th> <th colspan="2">Night</th> </tr> <tr> <th>L_{Aeq} (15 minute)</th> <th>L_{Aeq} (15 minute)</th> <th>L_{Aeq} (15 minute)</th> <th>L_{A1} (1 minute)</th> </tr> </thead> <tbody> <tr> <td>Any residential premise</td> <td>35</td> <td>35</td> <td>35</td> <td>45</td> </tr> </tbody> </table>	Location	Day	Evening	Night		L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{A1} (1 minute)	Any residential premise	35	35	35	45		Sugarloaf wells were observed to be operational and generating very minimal noise -likely to be inaudible at nearby residences. As a result of observed levels (i.e. inaudible at nearest sensitive receptors), noise testing is not regularly conducted. It was reported that noise monitoring is conducted in response to complaints only. It may be appropriate to provide evidence to DoP to confirm that regular monitoring of sound pressure levels is not necessary.	Compliant.	It is recommended that the Noise Management Sub Plan and Monitoring Program are updated to reflect monitoring practices adopted onsite and submitted to DoP for review/approval.
Location	Day		Evening	Night															
	L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{A1} (1 minute)															
Any residential premise	35	35	35	45															

DA NUMBER: 75-4-2005
 LOCATION: Sugarloaf Farm
 MODIFICATION: MOD 29-3-2007; MOD2
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DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION										
	<p>Notes</p> <ul style="list-style-type: none"> The limits represent the sound pressure level (noise) contribution, at the nominated receiver locations in the table. Day is defined as the period from 7.00am to 6.00pm Monday to Saturday and 8.00am to 6.00pm Sundays and Public Holidays. Evening is defined as the period from 6.00pm to 10.00pm. Night is defined as the period from 10.00pm to 7.00am Monday to Saturday and 10.00pm to 8.00am Sundays and Public Holidays. Noise from the site is to be measured at the most affected point within the residential boundary, or at the most affected point within 30 metres of the dwelling where the dwelling is more than 30 metres from the boundary to determine compliance with the noise limits set out in the table. Noise from the premises is to be measured at 1 metre from the dwelling facade to determine compliance with the LA1 (1 minute) noise level in the table. Where it can be demonstrated that direct measurement of noise from the premises is impractical, the DECCW may accept alternative means of determining compliance (see Chapter 11 of the NSW Industrial Noise Policy). The modification factors presented in section 4 of the NSW Industrial Noise Policy shall also be applied to the measured noise level where applicable. The noise emission limits identified in the table apply under meteorological conditions of wind speed up to 3m/s at 10 metres above ground level, and temperature inversion conditions. 														
DA 75-4-2005	<p>18A Noise from the drilling and construction of SL08 and SL09 shall not exceed the sound pressure level (noise) limits in the table below:</p> <table border="1"> <thead> <tr> <th>Receiver Location</th> <th>Weekday (7.00am-6.00pm) Saturday (7.00am-1.00pm)</th> <th>Saturday (1.00pm-6.00pm) Sunday (7.00am-6.00pm)</th> <th>Evening (6.00pm- 10.00pm)</th> <th>Night (10.00pm- 7.00am)</th> </tr> </thead> <tbody> <tr> <td>Nearest Receiver</td> <td>54</td> <td>44</td> <td>47</td> <td>41</td> </tr> </tbody> </table>	Receiver Location	Weekday (7.00am-6.00pm) Saturday (7.00am-1.00pm)	Saturday (1.00pm-6.00pm) Sunday (7.00am-6.00pm)	Evening (6.00pm- 10.00pm)	Night (10.00pm- 7.00am)	Nearest Receiver	54	44	47	41		Construction and drilling of wells at the Sugarloaf gas field did not occur during auditing period.	Compliant.	
Receiver Location	Weekday (7.00am-6.00pm) Saturday (7.00am-1.00pm)	Saturday (1.00pm-6.00pm) Sunday (7.00am-6.00pm)	Evening (6.00pm- 10.00pm)	Night (10.00pm- 7.00am)											
Nearest Receiver	54	44	47	41											
DA 75-4-2005	<p>19 The Applicant shall prepare and implement a Construction Noise Management Protocol for construction of the development. The Protocol shall be submitted for the approval of the DECCW and the Director-General at least one week prior to commencement of construction. The Protocol must include but is not limited to:</p> <p>(a) Compliance with the noise criteria in Condition 18A during all construction activities, when assessed at sensitive locations including residences and schools;</p> <p>(b) Details of the proposed drill rig focussing on the noise emission characteristics for all phases of well establishment, including percussion drilling, setting and casing, and fracturing;</p> <p>(c) Identification of sensitive receivers likely to be impacted by noise levels exceeding the noise goal in (a) above;</p> <p>(d) Details of proposed best practice mitigation measures to seek achieve the noise goal in (a) above;</p> <p>(e) The consideration of best practice mitigation required in (d) above must include but is not necessarily limited to optimum orientation of drill rigs and temporary barriers;</p> <p>(f) Community consultation including advance notice of commencement of construction activities and site contact details;</p> <p>(g) A system to receive, document, respond, action and monitor complaints; and</p> <p>(h) Monitoring methods and program.</p>	EM (2008) and Noise Management Sub Plan.	<p>The EMS, including associated Noise Management Sub Plan and Construction Noise Management protocol contains details to address the consent conditions.</p> <p>It was reported that the Construction Noise Management Protocol sighted within EMS was previously approved by the Director-General. This evidence was sighted during previous audit. It was reported that DECCW had received the plan and were satisfied that it met the requirements of this condition but had not provided approval.</p>	Compliant.											

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DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
DA 75-4-2005	20 At least one month prior to operation of the development the Applicant shall prepare and submit for the Director-General's approval, a Well Gathering System and Trunk Line Maintenance Noise Management Protocol to be used for the premises for the life of the consent. The Protocol shall include but is not limited to: (a) A primary objective of attaining the noise limits in condition 18; (b) Community consultation; (c) Advance notice to affected members of the community for planned well maintenance activities; (d) Complaints handling monitoring system; (e) Mitigation measures; (f) The design/orientation of the proposed mitigation methods demonstrating best practice; (g) Construction times; (h) Contingency measures where noise complaints are received; and (i) Monitoring methods and programs.	EMS (2008) and associated Noise Management Sub-Plan. Sighted: Community consultation meeting minutes (most recent #25 -15 July 2010); complaints handling procedures and complaints register; Procedures for noise minimisation and implementation on site (noise barriers around site); Construction times are covered in induction and within EMS; noise management sub plan that contains details on noise monitoring and compliance levels.	Well Gathering System and Trunk Line Maintenance Noise Management Protocol is contained within the EMS and associated Noise Management Sub-Plan. Relevant sections of the EMS and the noise management sub-plan highlight controls for items a) - i). However evidence to demonstrate the that protocol was submitted to the Director-General for approval at least one month prior to operation of the development was not available, therefore the development did not comply with this condition. A trunk line is no longer proposed.	Non-Compliant.	
DA 75-4-2005	21 Hours of Operation The Applicant shall ensure that all construction works (except for the drilling (including well casing and grouting) of SIS wells) must be conducted between 7.00am and 6.00pm Monday to Friday and between 8.00am and 1.00pm Saturdays and at no time on Sundays and Public Holidays, unless inaudible at any residential receiver.	EMS (2008), including Noise Management Sub Plan. Interviews with site personnel.	Verbal confirmation from AGL staff that construction works were completed in the allocated hours of operation. Hours of operation are covered as part of induction.	Compliant.	
DA 75-4-2005	22 Planned maintenance activities at any of the wells must only be conducted between: (a) 7.00 am to 6.00 pm on weekdays; and (b) 8.00am and 1.00pm on Saturdays (excluding Public Holidays)	EMS (2008), including Noise Management Sub Plan. Interviews with site personnel.	Verbal confirmation from AGL staff that all maintenance works were completed in the allocated hours of operation. Hours of operation are covered as part of induction.	Compliant.	
DA 75-4-2005	23 Air Quality The Applicant shall carry out the development in a manner that will minimise emissions of dust from the site.	EMS (2008), including Air Quality Management Sub Plan. Interviews with site personnel.	It was reported that construction methods adopted from the EMS (2008) limit disturbance of soil such that dust suppression from installation of gas gathering line is not required. Work practices are adjusted as required to minimise dust.	Compliant.	
DA 75-4-2005	24 Except as may be expressly provided by a Licence, the Applicant shall comply with section 120 of the Protection of the Environment Operations Act 1997 during the carrying out of the development.		It was reported that construction or maintenance did not occur within 20 m of a watercourse. There were no incidents reported at site during construction of gas gathering line.	Compliant.	
DA 75-4-2005	25 Stormwater/Sediment Control At least one week prior to the commencement of construction, the Applicant shall submit for the approval of the Director-General, an Erosion and Sediment Control Plan. The Plan must be implemented and used for the duration of all construction activities associated with the development. The Plan must describe the measures that will be employed to minimise soil erosion and the discharge of sediment and other pollutants to land and/or waters during construction activities. The Plan should be prepared in accordance with the requirements for such plans outlined in the Landcom's Managing Urban Stormwater: Soils and Construction.	EMS (2008), including Soil and Water Management Sub Plan. Interviews with site personnel.	There are three gas gathering lines entering RPPG. The EMS includes general information (not specific to gas gathering line installation) for construction methods and controls, which involves digging trench, laying pipe and backfilling within one day to minimise exposed soil surfaces. As far as possible, hay bales are used in preference to silt fences. Seeding not usually required to revegetate narrow trenches.	Compliant.	
DA 75-4-2005	26 Waste The Applicant must not cause, permit or allow any waste generated outside the site to be received at the site for storage, treatment, processing, reprocessing or disposal or any waste generated at the site to be disposed of at the site, except as expressly permitted by a licence under the Protection of the Environment Operations Act 1997.	EMS contains processes for controlling wastewater from drilling activities.	Production water from the drilling and operation of wells represent the major waste stream generated from the Project. Installation of gas gathering line produces very minimal production waste, with general waste removed by Contractor and spoil usually returned to site with landowners consent. The Waste Management Sub Plan within EMS (2008) does not address waste water and excess spoil.	Compliant.	

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DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
DA 75-4-2005	27 The Applicant must ensure that any hazardous, industrial or Group A waste is assessed and classified in accordance with the DECCW's Environmental Guidelines: "Assessment Classification and Management of Liquid and Non-Liquid Wastes".	Sighted Waste Transfer Dockets for hazardous wastes (Worth Recycling).	Drilling mud for SL09 was highly saline and classified as hazardous. Town water used for initial drilling mud. Recycled water used only for inseam sections. Waste waters contained on site for transport to licensed facility for treatment.	Compliant.	
DA 75-4-2005	28 Safety and Risk Management Prior to construction of the wellhead, the Applicant shall provide a Report to the Department from an independent and suitably qualified person approved by the Director-General, to confirm that the design and operation of the wellhead complies with the Department's Locational Guidelines - Development in the Vicinity of Operating Coal Seam Methane Wells (May 2004) for an Automatically Controlled Well (with Separator/Optional Pump). In particular, the Report shall confirm that all safety related systems required by the Guidelines have been included.	Safety Management System	There was no well establishment or construction during the audit period.	N/A	
DA 75-4-2005	29 The Applicant shall develop and implement an Emergency Plan and Safety Management System for the development. The plan/system shall be submitted for the approval of the Director-General, at least one month prior to the commissioning of the development, or within such further period as the Director-General may agree. Commissioning shall not commence until the Director-General has approved the plan/system. (a) Emergency Plan A comprehensive emergency plan and detailed emergency procedures for the development shall be prepared in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 1, "Industry Emergency Planning Guidelines". The plan shall include detailed procedures for the safety of all people outside of the development who may be at risk from the development. (b) Safety Management System A document setting out a comprehensive safety management system, covering all operations on the gas wells and gathering system shall be developed in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 9, "Safety Management". The document shall clearly specify all safety related procedures, responsibilities and policies, along with details of mechanisms for ensuring adherence to procedures. Records shall be kept on-site and shall be made available for inspection by the Director-General and the independent auditor upon request. In particular records shall be maintained to demonstrate that management of change procedures were followed for the connection of the new gas lines to the existing network and for the integration of the new wells into the automatic control system.	Emergency Response Plan, update 08/09/2010 to include Menangle Park and Spring Farm Safety Management System (online) HSE Policy Statement, endorsed January 2008 and displayed in office	Sighted Emergency Response Plan which is implemented across all aspects of the Camden Gas Project. It is maintained on the AGL server. Also sighted map of the Camden South Emergency Response Plan which identifies locations of well sites, fire stations, hospital, main roads, access and rivers. Observed implementation of Safety Management System, which is maintained on the AGL server. Responsibilities and procedures established. Records such as risk assessments, JSAs and incident reports/investigations inspected to verify implementation. Alex Secervegovic has been appointed as the Health and Safety Representative. Sighted use of Management of Change Procedure (MOC-ECR002) for alternative free flow well head configuration.	Compliant.	
DA 75-4-2005	30 Compliance Report Three months after commencement of operation of the development, the Applicant shall submit to the Director-General a compliance report detailing compliance with Condition 29, including: (a) Dates of study/plan/system completion/submission and commencement of construction and commissioning; (b) Actions taken or proposed, to implement recommendations made in the studies/plans/systems; and (c) Responses to any requirement imposed by the Director-General under Condition 32. This report shall verify that: (a) The Emergency Plan required under Condition 29(a) is effectively in place and that at least one emergency exercise has been conducted; and (b) The Safety Management System required under Condition 29(b) has been fully implemented and that records required by the system are being kept. The report shall include a signed commitment by the Applicant's representative responsible for the operation of the development, that for each study/plan/system: (a) The required study/plan/system has been undertaken or prepared to the relevant Hazardous Industry Planning Advisory Paper; (b) All recommendations of each study/plan/system have been implemented; and (c) All safety management system and their associated risk controls have been implemented and are being maintained.		Previous audits have found that because the development was not yet operational that the preparation of a compliance report was not applicable. During the audit period, Sugarloaf Farm has become operational; however a Compliance Report has not been prepared or submitted to the Director-General.	Non-Compliant.	Prepare compliance report and submit to the Director-General.

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DA 75-4-2005	31 Hazard Audit Twelve months after the commencement of operations of the proposed development or within such further period as the Director-General may agree, the Applicant shall carry out a comprehensive hazard audit of the development and within one month of the audit submit a report to the Director-General. The audit shall be carried out at the Applicant's expense by a duly qualified independent person or team approved by the Director-General prior to commencement of the audit. Further audits shall be carried out every three years or as determined by the Director-General and a report of each audit shall, within one month of the audit, be submitted to the Director-General. Hazard audits shall be carried out in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 5, "Hazard Audit Guidelines".		Previous audit found that the last hazard audit was carried out in 2006 with the next audit due in 2009. The hazard report due in 2009 was not completed. Therefore the development could not demonstrate compliance with this condition.	Non-Compliant.	Commission and submit Hazard Audit to the Director-General as required by this condition.
DA 75-4-2005	32 The Applicant shall comply with all reasonable requirements of the Director-General in respect of the implementation of any measures arising from recommendations of the studies or reports referred to in Conditions 28 to 31 inclusive, within such time as the Director-General may agree.		As the hazard audit has not been completed, the Director-General has not made any additional requirements to be implemented as a result of the audit report.	Compliant.	
DA 75-4-2005	33 Redrilling and fracture stimulation Management Plan The Applicant shall obtain the prior approval of the Director-General for the redrilling and/or additional fracture stimulation of a gas well.	Fracc Management Plan for SL09 included in Refrac management plan for EM27, EM31, EM34 and SL09, dated 30 July 2008.	In October 2008, SL09 was fraced. A refrac management plan for EM27, EM31, EM34 and SL09 was prepared by AGL on 30 July 2008. It is noted that approval from the Director-General was not required for this work, as the well was fracture stimulated only once under its original approval (i.e. it was not 'refraced')	Compliant.	
DA 75-4-2005	34 The Applicant shall prepare a Redrilling and Fracing Management Plan in consultation with the Department of Primary Industries for the redrilling and/or refracing of an existing well. The Plan shall be submitted to the Director-General no later than one month prior to the commencement of the work or within such period as agreed by the Director-General. The Plan shall include, but not necessarily be limited to: (a) A description of all the activities to be undertaken on the well site during the redrilling and/or refracing work; (b) Details of how the environmental performance of the work will be monitored and what actions will be taken to address identified adverse environmental impacts; (c) Reference to the relevant parts of the Environmental Management Plan required under condition 52; (d) Compliance with all the relevant environmental performance requirements of this consent; and (e) Arrangements for complaints handling procedures during the redrilling and/or refracing work.	Fracc Management Plan for SL09 included in Refrac management plan for EM27, EM31, EM34 and SL09, dated 30 July 2008.	In October 2008, SL09 was fraced. A refrac management plan for EM27, EM31, EM34 and SL09 was prepared by AGL on 30 July 2008. It is general and not site-specific but provides detail of activities to be undertaken on the well site during the works, environmental management and monitoring and complaints handling. It is noted that a Refracing Management Plan was not required for this work, as the well was fracture stimulated only once under its original approval (i.e. it was not 'refraced') Fracing techniques were not reviewed during this audit.	Compliant.	
DA 75-4-2005	35 The Applicant shall give written notification of the proposed redrilling and/or refracing work to potentially affected residences and other noise sensitive receivers at least fourteen days prior to work commencing.	Site inspection. Interviews with site personnel.	Site observations and interviews with site personnel indicated that a school is the nearest sensitive receptor - approximately 500 m from fracing site. It was reported that the school was notified; however no evidence of written notification was made available for inspection. It is noted that this condition is not triggered by the fracing of SL09 as the well was fracture stimulated only once under its original approval (i.e. it was not 'refraced')	Compliant.	Ensure records of notification are maintained.
DA 75-4-2005	36 Gas Gathering System The Applicant shall ensure that the route of the gas gathering system follows previously or currently disturbed areas wherever possible.	Site inspection. Interviews with site personnel. Satellite imagery.	Site observations, satellite imagery and interviews with site personnel indicated that the gas gathering line alignment generally followed access tracks, property boundaries or edges of vegetated areas.	Compliant.	

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DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
DA 75-4-2005	37 The Applicant shall ensure that trenches constructed during the construction of gas gathering lines are not left open overnight unless otherwise agreed by the Director-General.	Site observations. EMS (2008).	It was reported that no construction works were completed on site within audit period. However the EMS (2008) includes construction methods for gas gathering lines consistent with the requirements of this condition.	Compliant.	
DA 75-4-2005	38 The Applicant shall comply with the following in the construction of the gas gathering system pipeline: (a) Signs stating the presence of a buried gas pipeline shall be erected periodically along the length of the trench once the pipeline has been laid; (b) Trenches are to be restored and reseeded with local grass seeds on completion of the work; (c) Construct the gas gathering system so as not to impeach lateral water flows; (d) Ensure that no crown or camber remains along the gas gathering systems, following construction; (e) Design, construct and operate the pipeline in accordance with the Australian Standard for the installation and maintenance of Plastic Pipe Systems for Gas AS 3723-1989 (or its latest version); and (f) Notify the Department on the completion of any trenching works.	Observations made during site visit to Sugarloaf gas field and SL02. EM (2008) and sub plans.	Gas gathering lines observed to be well located, signed and rehabilitated. Auditor observations indicated that gas gathering lines appeared to be installed in general accordance with the requirements for construction of gas gathering line published in EMS (2008). Section 3.3 of main EMS discusses construction methods and rehabilitation. KPIs for soil disturbance to be minimised listed in section 4.2. Formal procedures relating to the requirements of this condition not sighted. The project manager for the gas gathering lines is responsible for notifying the Department upon completion of trenching works.	Compliant.	
DA 75-4-2005	39 Flora and Fauna The Applicant shall take all practicable measures to minimise potential flora and fauna impacts of the development.	EMS (2008) and Flora and Fauna Management Sub Plan.	According to requirements of EMS (2008) and observations of rehabilitation on site, construction and operation activities appear to be completed with due care to flora and fauna.	Compliant.	
DA 75-4-2005	40 The Applicant shall not remove mature trees as part of this development unless otherwise agreed by the Director-General.		No mature trees have reportedly been removed as part of this development.	Compliant.	
DA 75-4-2005	41 The Applicant shall prepare a translocation strategy for the threatened Cumberland Plain Snail, which will be submitted for the Director-General's approval prior to construction. The translocation strategy shall be implemented should any individuals or populations of the Cumberland Plain Snail be identified.	Sugarloaf EA - Flora and Fauna Assessment.	Translocation strategy developed for EMAI applied to Sugarloaf development. Snails not identified at Sugarloaf (refer start of EMS); however Cumberland Plain Woodland identified. Chosen route alignment did not intersect with populations.	Compliant.	
DA 75-4-2005	42 The Applicant shall prepare and implement a Weed Management Plan for the site for the life of the development. The Applicant shall submit the Weed Management Plan for the Director-General's approval within one month of the date of this consent.	EMS (2008).	Weed Management Plans are contained within the Rehabilitation and Landscape Management Plan. This is within the EMS previously approved by the DG.	Closed out.	
DA 75-4-2005	42A The Applicant shall ensure that during the upgrading of the gas gathering lines, impacts on threatened species are minimised by implementing actions including, but not limited to the following: a) The recommendations outlined in Sections 6 and 7 of the Ecosearch Environmental Consultants Pty Ltd report titled "Flora and fauna Assessment, AGL Gas Well and Gathering Line Project Modifications"; and b) Marking the boundaries of endangered ecological communities (EECs) and locations of other known threatened species and, where possible, avoiding construction activities within these areas.	Sugarloaf EA - Flora and Fauna Assessment, adopted in EMS Flora and Fauna Management sub plan.	The environmental assessment identified areas which were to be avoided in planning and construction of the gas gathering line route. It was reported that boundary identification was not implemented (or required) as route alignment was not near sensitive areas. Route alignment was restricted to previously clearly areas and thus EEC marking was not required.	Compliant.	
DA 75-4-2005	43 Bushfire Management The Applicant shall: (a) Ensure that the development is suitably equipped to respond to any fires on the site; and (b) Assist the Rural Fire Service and emergency services as much as possible if there is a fire on the site.	Emergency Response Plan	Bushfire management is covered within the Emergency Response Plan. Observations made during site inspection indicated that fire response equipment was located on all vehicles. Fire response (extinguisher) training covered within training program. Fire safety trailer attends workover rigs.	Compliant.	

DA NUMBER: 75-4-2005
 LOCATION: Sugarloaf Farm
 MODIFICATION: MOD 29-3-2007; MOD2
 WORKS: Yes, connected gas gathering line into Rosalind Park Gas Plant and SL09 fraced.

Number of Conditions: 63
 Closed out previously: 2
 Number Noted: 2
 Number N/A: 2
 Number Non-Compliant: 7
 Compliance Score: 88%

DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
DA 75-4-2005	44 Prior to operation the Applicant shall prepare a Bushfire Management Plan for the development, to the satisfaction of the Director-General. The Applicant shall consult with Council and the Rural Fire Service in the preparation of the Plan.	Emergency Response Plan.	Bushfire management is covered within the Emergency Plan; however documentation to verify that consultation was carried out or Director-General was satisfied was not made available for inspection.	Non-Compliant.	
DA 75-4-2005	45 Heritage The Applicant must ensure that should any historical relics be uncovered, excavation or disturbance of the area is to stop immediately and the Heritage Council of NSW is notified within a reasonable time of the discovery or location of these relics. Archaeological assessment and approval, or endorsement, may be required prior to works continuing in the affected area(s) based on the nature of the discovery.	EMS (2008) and induction materials.	No new identified historical relics were reported to be identified during works on gas gathering lines. The EMS provides guidance on steps to be taken should relics be discovered. This is also covered in induction training.	Compliant.	
DA 75-4-2005	46 An Interpretation Study being prepared to the satisfaction of the Director, Heritage Office and executed by the Applicant within 6 months of the date of this approval.		No relics have been reported on this site. Not applicable.	Closed out.	
DA 75-4-2005	47 Aboriginal Relics The Applicant must ensure that should any Aboriginal objects be uncovered, excavation or disturbance of the area is to stop immediately and the DECCW is to be informed in accordance with section 91 of the National Parks and Wildlife Act 1974.		No new identified aboriginal relics were reported to be identified during works on gas gathering lines. The EMS provides guidance on steps to be taken should relics be discovered. This is also covered in induction training.	Compliant.	
DA 75-4-2005	48 Prior to the commencement of construction, the Applicant shall clearly mark the locations of known Aboriginal relics on the site (using flags, fencing or other appropriate method) and ensure that all employees and contractors are aware of these locations, to prevent the known relics being impacted or disturbed during site preparation and construction.		No new identified aboriginal relics during works on gas gathering lines. The EMS provides guidance on steps to be taken should relics be discovered. This is also covered in induction training.	Compliant.	
DA 75-4-2005	49 Sydney Water Supply Canal The Applicant shall carry out the construction and operation of the development in a manner that will not adversely affect the structural integrity of the Upper Canal and associated structures nor impact the quality of water in the Upper Canal. The Applicant shall be responsible for ensuring that all persons involved in the development are informed of these requirements.	Site inspection. Interviews with site personnel. Satellite imagery.	It appeared that the gas gathering line alignment did not intersect with the supply canal. It was estimated to be approximately 100 m from the closest point according to satellite imagery.	Compliant.	
DA 75-4-2005	50 The Applicant shall comply with the requirements in Sydney Water's Guidelines on Precautions to be taken when Building Over or Adjacent to Sydney Water's Assets.	Site inspection. Interviews with site personnel. Satellite imagery.	It appeared that the gas gathering line alignment did not intersect with the supply canal. It was estimated to be approximately 100 m from the closest point according to satellite imagery. It was reported that Sydney Water visited the site and had provided input to design and alignment; however physical evidence was unavailable.	Compliant.	
DA 75-4-2005	51 ENVIRONMENTAL MANAGEMENT AND MONITORING Construction Environmental Management Plan (CEMP) The Applicant shall prepare and implement a Construction Environmental Management Plan (CEMP) to provide environmental management, practices and procedures to be followed during the construction phases of the proposed development. A framework plan outlining key practices, procedures and environmental management practices should be approved by the Director-General prior to the commencement of construction.	EMS (2008).	The EMS (2008) serves as the CEMP identifying construction methods and environmental management and monitoring of the development. An earlier version of the EMS (refer EHSMP) was approved pre-audit period. A site-specific CEMP has not been developed.	Compliant.	
DA 75-4-2005	52 Operational Environmental Management Plan (OEMP) The Applicant shall prepare and implement an Operational Environmental Management Plan (OEMP) to provide environmental management practices and procedures to be followed during the operation of the development. The OEMP shall be forwarded to the Director-General for approval within one month of the date of this consent. The OEMP shall include, but not necessarily be limited to: (a) Identification of all statutory and other obligations that the Applicant is required to fulfil in relation to operation of the development, including all consents, licences, approvals and consultations; (b) A description of the roles and responsibilities for all key personnel involved in the operation of the development;	EMS (2008).	The EMS (2008) covers environmental management and monitoring for operation of the Camden Gas Project, including wells covered by this DA. An earlier version of the EMS (refer EHSMP) was approved pre-audit period. A site-specific OEMP has not been developed. The EMS includes: Legislative requirements (Section 2.1) Structure and Responsibility (Section 5.1) HSE Policy (Jan 2008)	Compliant.	

DA NUMBER: 75-4-2005
 LOCATION: Sugarloaf Farm
 MODIFICATION: MOD 29-3-2007; MOD2
 WORKS: Yes, connected gas gathering line into Rosalind Park Gas Plant and SL09 fraced.

Number of Conditions: 63
 Closed out previously: 2
 Number Noted: 2
 Number N/A: 2
 Number Non-Compliant: 7
 Compliance Score: 88%

DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
	(c) The overall environmental policies and principles to be applied to the operation of the development; (d) Standards and performance measures to be applied to the development, and a means by which environmental performance can be periodically reviewed and improved; and (e) Management policies to ensure that environmental performance goals are met and to comply with conditions of this consent.		Objectives, targets and KPI (section 4.2) Policies and procedures within the EMS; and additional Management Sub Plans for noise, soil, water, traffic, waste and rehabilitation.		
DA 75-4-2005	53 Annual Return The Applicant shall provide an annual return to the DECCW in relation to the development as required by any Licence under the Protection of the Environment Operations Act 1997 in relation to the development. In the return the Applicant must report on the annual monitoring undertaken (where the activity results in pollutant discharges), provide a summary of complaints relating to the development, report on compliance with Licence conditions and provide a calculation of licence fees (administrative fees and where relevant, load based fees) that are payable.	Sighted annual return 2008/2009. 2009/2010 Annual return being completed.	Annual returns have been completed as required.	Compliant.	
DA 75-4-2005	54 Annual Environmental Performance Reporting Within twelve months of the date of this consent, and annually thereafter during the life of the development, the Applicant shall submit an Annual Environmental Performance Report to the Director-General. This report shall include, but not be limited to: (a) The standards, performance measures and statutory requirements the development is required to comply with; (b) An assessment of the environmental performance of the development to determine whether it is complying with these standards, performance measures, and statutory requirements; (c) Copy of the Complaints Register for the preceding twelve month period and indicating what actions were (or are being) taken to address these complaints; (d) Indication of what actions were taken to address any issue and/or recommendation raised by the Camden Gas Project's Community Consultative Committee; (e) Provision of the detailed results of all the monitoring required by this consent; (f) Identify any non-compliance during the year; (g) Identify any significant trends in the data; and (h) If any non-compliance is detected, describe what actions and measures would be carried out to ensure compliance, clearly indicating who would carry out these actions and measures, when they would be carried out, and how the effectiveness of these measures would be monitored over time.	Sighted Annual Environmental Performance Reports for June 2007, June 2008, June 2009 and June 2010.	AEPRs have been completed as required.	Compliant.	
DA 75-4-2005	55 The Director-General may require the Applicant to address certain matters identified in the Annual Environmental Performance Report. Any action required to be undertaken shall be completed within such period as the Director-General may agree.		No matters reportedly raised in relation to AEPR.	Compliant.	
DA 75-4-2005	56 The Applicant shall also submit a copy of the Annual Environmental Performance Report to the DECC, Department of Primary Industries and Campbelltown City Council. The Applicant shall make a copy of the Report publicly available.		It was reported that the AEPR 2008-09 was submitted to relevant authorities. Evidence to verify submission and distribution was made available for inspection. AEPR 2009-10 is in final draft form and yet to be submitted. It was reported that DoP was to provide final sign-off on AEPR for 2008-09, before AEPR 2009-10 was submitted.	Compliant.	
DA 75-4-2005	57 Independent Environmental Audit – Construction at Sugarloaf Farm On completion of all construction works, the Applicant shall commission and pay the full costs of an Independent Environmental Audit of the drilling and fracing of gas wells and construction of the gas gathering system and access roads on the site. The objective of the audit is to monitor the performance and effect of construction activities on the site. The Independent Environmental Audit shall: (a) Be conducted by a suitably qualified, experienced, and independent person(s) whose appointment has been approved by the Director-General; and (b) Be consistent with ISO 19011:2002 - Guidelines for Quality and/ or Environmental Management Systems Auditing, or updated versions of these guidelines/manuals.		SL08 may still be constructed; therefore this requirements is not applicable at this stage of the development.	N/A	

DA NUMBER: 75-4-2005
 LOCATION: Sugarloaf Farm
 MODIFICATION: MOD 29-3-2007; MOD2
 WORKS: Yes, connected gas gathering line into Rosalind Park Gas Plant and SL09 fracedd.

Number of Conditions: 63
 Closed out previously: 2
 Number Noted: 2
 Number N/A: 2
 Number Non-Compliant: 7
 Compliance Score: 88%

DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
	<p>The Audit shall:</p> <p>(a) Assess the environmental performance of the construction of the development on the site, and its effects on the surrounding environment;</p> <p>(b) Assess whether the development is complying with the relevant standards, performance measures, and statutory requirements;</p> <p>(c) Consider the Applicant's proposed Construction Environmental Management Plan; and</p> <p>(d) Recommend measures or actions to improve the environmental performance of the construction of the development, and/or its environmental management and monitoring systems (if required).</p> <p>Within one month of completion of the audit, the Applicant must submit a copy of the audit report to the Director-General and the NSW Heritage Office. The Director-General may require the Applicant to address certain matters identified in the report and any comments received from the NSW Heritage Office. Any action required to be undertaken shall be completed within such period as the Director-General may agree.</p>				
DA 75-4-2005	<p>58 Independent Environmental Audit – Operation</p> <p>Within two years of the date of this consent and every two years thereafter, unless the Director-General directs otherwise, the Applicant shall commission and pay the full costs of an Independent Environmental Audit. The Independent Environmental Audit shall:</p> <p>(a) Be conducted by a suitably qualified, experienced, and independent person(s) whose appointment has been approved by the Director-General;</p> <p>(b) Be consistent with ISO 19011:2002 - Guidelines for Quality and/ or Environmental Management Systems Auditing, or updated versions of these guidelines/manuals;</p> <p>(c) Assess the environmental performance of the development, and its effects on the surrounding environment;</p> <p>(d) Assess whether the development is complying with the relevant standards, performance measures, and statutory requirements;</p> <p>(e) Review the adequacy of the Applicant's Environmental Management Plan; and</p> <p>(f) Recommend measures or actions to improve the environmental performance of the development, and/or its environmental management and monitoring systems.</p>		This audit satisfies the requirements of the independent environmental audit - operation required by this condition.	Compliant.	
DA 75-4-2005	<p>59 Complaints Register</p> <p>The Applicant shall keep a legible record of all complaints made to the applicant or any employee or agent of the Applicant in relation to pollution arising from any activity of the development. The Register must:</p> <p>(a) Record the date and time of the complaint;</p> <p>(b) Record the method by which the complaint was made;</p> <p>(c) Note any personal details of the complainant or, if no such details were provided, a note to that effect;</p> <p>(d) The nature of the complaint</p> <p>(e) The action taken by the applicant in relation to the complaint, including any follow-up contact with the complainant; and</p> <p>(f) State, if no action was taken by the Applicant, the reasons why no action was taken.</p> <p>The record of a complaint must be kept for at least 4 years after the complaint was made, and must be produced to any authorised officer of the DECCW or the Department who asks to see them.</p>	Complaints register and hard copy documentation, including initial complaint report and details on actions taken (recorded within the complaints register).	Complaints are recorded in accordance with this condition and reported in the AEPR.	Compliant.	
DA 75-4-2005	<p>60 The Applicant must:</p> <p>(a) Operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted on the site or by the vehicle or mobile plant, unless otherwise specified in the Licence; and</p> <p>(b) Notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint.</p>	Site observations. Complaints register.	A telephone complaints line was observed to be advertised at all well sites. Complaints are being recorded in the Complaints Register, as well as actions taken to address complaints.	Compliant.	
DA 75-4-2005	<p>61 Community Liaison</p> <p>The Applicant shall ensure the continuation of the existing Sydney Gas Operations Camden Project Community Consultative Committee to oversee the environmental performance of the development.</p>	Sighted Community Consultation Committee Minutes. #20 25/09/08, #21 27/11/08, #22 19/03/09 #23 16/07/09 #24 18/02/10 and #25 15/07/10.	It was reported that the frequency of community consultation meetings had been adjusted from quarterly to every four months with agreement from committee members. Recently quarterly meetings were reinstated.	Compliant.	

Appendix G DA171-7-2005 Compliance Checklist

DA NUMBER: 171-7-2005
 LOCATION: El Bethel
 MODIFICATION:
 WORKS: No

Number of Conditions: 69
 Number Non-Compliant: 0
 Number Noted: 63
 Number N/A: 0
 Closed out previously: 0
 Compliance Score: 100%

DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
	SCHEDULE 2 Administrative Conditions				
DA 171-7-2005	1 Obligation to Minimise Harm to the Environment The Applicant shall implement all practicable measures to prevent or minimise any harm to the environment that may result from the construction or operation of the development.		It was reported that no development activity was carried out on the El Bethel gas field during the audit period. These wells have been approved but not yet drilled. There were no environmental incidences (including complaints) recorded in relation to operations at these locations.	Compliant.	
DA 171-7-2005	2 Terms of Approval The Applicant shall carry out the development generally in accordance with the: (a) Development Application submitted to the Department on 14 July 2005; (b) "Statement of Environmental Effects – Camden Gas Project, El Bethel Drilling Program, PPL4" Sydney Gas (Camden) Operations Pty Ltd, dated July 2005; (c) Letter from Sydney Gas (Camden) Operations Pty Ltd to the Department dated, 21 July 2005, providing copies of various environmental studies for the proposal; and (d) Conditions of this consent. If there is any inconsistency between the above, the conditions of this consent shall prevail to the extent of the inconsistency		It was reported that no development activity was carried out on the El Bethel gas field during the audit period. These wells have been approved but not yet drilled.	Compliant.	
DA 171-7-2005	8 The Applicant shall comply with any reasonable requirement/s of the Director-General arising from the Department's assessment of: (a) Any reports, plans or correspondence that are submitted in accordance with this consent; and (b) The implementation of any actions or measures contained in these reports, plans or correspondence.		It was reported that there were no additional requirements placed on the development by the Director-General.	Compliant.	
DA 171-7-2005	9 Limits on Approval This approval shall lapse within 21 years of the date of this consent or on the expiry date of Petroleum Production Lease No. 4, whichever is the sooner.		As DA 171-7-2005 was granted in 2006, the approval shall not lapse until 2027. The petroleum production lease (PPL) No. 4 was made on 06/10/2004 and expires in 2025.	Compliant.	
DA 171-7-2005	10 Nothing in this consent permits the drilling and operation of any additional wells (beyond the approved 10 wells for gas production).		To date, no wells have been drilled under this consent.	Compliant.	
DA 171-7-2005	11 If after 5 years of the date of this consent any well that is the subject of this consent has not yet been drilled or completed, then the Applicant shall surrender the approval for that well.		Noted.	Noted.	
DA 171-7-2005	12 Well EB01 and associated works are to be located at least 40 m, measured horizontally and at right angles from the top of the bank of the Nepean River.		Noted. To date, no wells have been drilled under this consent.	Noted.	
DA 171-7-2005	13 Well EB02 and associated works are to be located at least 20 m, measured horizontally and at right angles from the top of the bank of the unnamed tributary of the Nepean River.		Noted. To date, no wells have been drilled under this consent.	Noted.	
DA 171-7-2005	14 Administration Construction shall not commence until the Applicant has obtained a Part 3A Permit from the DNR under the Rivers and Foreshores Improvement Act 1948, and a Licence from the DEC under the Protection of the Environment Operations Act 1997. <i>Note: The Rivers and Foreshore Improvement Act 1948 applies to the proposed development and therefore any excavation, removal of material from the bank, shore or bed of any stream, estuary or lake, or land within 40 metres from the top of the bank will require a Part 3A Permit.</i>		Noted. To date, no wells have been drilled under this consent.	Noted.	
DA 171-7-2005	15 The Applicant must, in the opinion of the Environment Protection Authority (EPA), be a fit and proper person to hold a Licence under the Protection of the Environment Operations Act 1997, having regard to the matters in section 83 of that Act.		AGL Energy Limited (AGL) is considered to be fit and proper person' (ABN 95 052 167 405) and holds EPA Licence No. 12003 for the Camden Gas Project Stage 2.	Compliant.	
DA 171-7-2005	16 The premises for the purposes of the Licence under the Protection of the Environment Operations Act 1997, includes the gas gathering system, access roads and gas wells and any associated effluent storages, temporary work areas and infrastructure associated with the gas gathering systems, access roads and gas wells.		Noted. To date, no wells have been drilled under this consent.	Noted.	

DA NUMBER: 171-7-2005
 LOCATION: El Bethel
 MODIFICATION:
 WORKS: No

Number of Conditions: 69
 Number Non-Compliant: 0
 Number Noted: 63
 Number N/A: 0
 Closed out previously: 0
 Compliance Score: 100%

DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION														
DA 171-7-2005	17 The premises also apply to the gas well heads consisting of the area bounded by the fenced enclosure during gas well operation. During well establishment, the premise has a nominal area of 100 m x 70 m and is surrounded by fencing. At various times during well head maintenance, the premises at the gas well head comprises an area of dimensions 25 m x 25 m.		Noted. To date, no wells have been drilled under this consent.	Noted.															
DA 171-7-2005	18 The Applicant must provide Council with the Geographical Positioning System (GPS) co-ordinates and digital survey data for the gas well sites and gas gathering system in a format suitable to the Council, within two months of the completion of the gas wells and gas gathering system.		Noted. To date, no wells have been drilled under this consent.	Noted.															
DA 171-7-2005	19 The Applicant shall provide Council with the wellhead configurations of each gas well within two months of the gas well being completed or two months from the date of this consent, whichever is the later.		Noted. To date, no wells have been drilled under this consent.	Noted.															
DA 171-7-2005	20 The Applicant shall provide written notification to the Director-General that it has fulfilled the requirements of Conditions 18 and 19, within two weeks of the information being provided to the Council.		Noted. To date, no wells have been drilled under this consent.	Noted.															
	SCHEDULE 3 ENVIRONMENTAL PERFORMANCE CONDITIONS																		
DA 171-7-2005	1 Activities must be carried out in a competent manner The development must be carried out in a competent manner. This includes: <ul style="list-style-type: none"> The processing, handling, movement and storage of materials and substances used to carry out the activity; and The treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity. 		Noted. To date, no wells have been drilled under this consent.	Noted.															
DA 171-7-2005	2 Maintenance of Plant and Equipment All plant and equipment installed at the premises or used in connection with the development must be maintained and operated in a proper and efficient condition.		Noted. To date, no wells have been drilled under this consent.	Noted.															
DA 171-7-2005	3 Noise Limits Noise from the operation of the development shall not exceed the sound pressure level (noise) limits presented in the Table below: <table border="1" style="margin-left: 20px;"> <thead> <tr> <th rowspan="2">Location</th> <th>Day</th> <th>Evening</th> <th colspan="2">Night</th> </tr> <tr> <th>L_{Aeq} (15 minute)</th> <th>L_{Aeq} (15 minute)</th> <th>L_{Aeq} (15 minute)</th> <th>LA1 (1 minute)</th> </tr> </thead> <tbody> <tr> <td>Any residential or noise sensitive premises.</td> <td>35</td> <td>35</td> <td>35</td> <td>45</td> </tr> </tbody> </table> <p>Notes</p> <ul style="list-style-type: none"> The limits represent the sound pressure level (noise) contribution, at the nominated receiver locations in the table. Day is defined as the period from 7.00am to 6.00pm Monday to Saturday and 8.00am to 6.00pm Sundays and Public Holidays. Evening is defined as the period from 6.00pm to 10.00pm. Night is defined as the period from 10.00pm to 7.00am Monday to Saturday and 10.00pm to 8.00am Sundays and Public Holidays. Noise from the site is to be measured at the most affected point within the residential boundary, or at the most affected point within 30 metres of the dwelling where the dwelling is more than 30 metres from the boundary to determine compliance with the noise limits set out in the table. Noise from the premises is to be measured at 1 metre from the dwelling facade to determine compliance with the LA1 (1 minute) noise level in the table. Where it can be demonstrated that direct measurement of noise from the premises is impractical, the DEC may accept alternative means of determining compliance (see Chapter 11 of the NSW Industrial Noise Policy). The modification factors presented in section 4 of the NSW Industrial Noise Policy shall also be applied to the measured noise level where applicable. The noise emission limits identified in the table apply under meteorological conditions of wind speed up to 3m/s at 10 metres above ground level, and temperature inversion conditions. 	Location	Day	Evening	Night		L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	LA1 (1 minute)	Any residential or noise sensitive premises.	35	35	35	45		Noted. To date, no wells have been drilled under this consent.	Noted.	
Location	Day		Evening	Night															
	L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	LA1 (1 minute)															
Any residential or noise sensitive premises.	35	35	35	45															

DA NUMBER: 171-7-2005
 LOCATION: El Bethel
 MODIFICATION:
 WORKS: No

Number of Conditions: 69
 Number Non-Compliant: 0
 Number Noted: 63
 Number N/A: 0
 Closed out previously: 0
 Compliance Score: 100%

DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
DA 171-7-2005	<p>4 The Applicant shall prepare and implement a Construction Noise Management Protocol for construction of the development. The Protocol shall be submitted for the approval of the DEC and the Director-General at least one week prior to commencement of construction. The Protocol must include but is not limited to:</p> <p>(a) A primary objective of attaining a noise goal of LA10 (15 minutes) 54 DB(A) during all construction activities when assessed at sensitive locations including residences and schools (particularly to avoid noise impacts during exam or other sensitive times);</p> <p>(b) Details of the proposed drill rig focussing on the noise emission characteristics for all phases of well establishment, including percussion drilling, setting and casing, and fracturing;</p> <p>(c) Identification of sensitive receivers likely to be impacted by noise levels exceeding the noise goal in (a) above;</p> <p>(d) Details of proposed best practice mitigation measures to seek achieve the noise goal in (a) above;</p> <p>(e) The consideration of best practice mitigation required in (d) above must include but is not necessarily limited to optimum orientation of drill rigs and temporary barriers;</p> <p>(f) Community consultation including advance notice of commencement of construction activities and site contact details;</p> <p>(g) A system to receive, document, respond, action and monitor complaints; and</p> <p>(h) Monitoring methods and program.</p>		Noted. To date, no wells have been drilled under this consent.	Noted.	
DA 171-7-2005	<p>5 At least one month prior to operation of the development the Applicant shall prepare and submit for the Director-General's approval, a Well Gathering System and Trunk Line Maintenance Noise Management Protocol to be used for the premises for the life of the consent. The Protocol shall include but is not limited to:</p> <p>(a) A primary objective of attaining the noise limits in condition 3;</p> <p>(b) Community consultation;</p> <p>(c) Advance notice to affected members of the community for planned well maintenance activities;</p> <p>(d) Complaints handling monitoring system;</p> <p>(e) Site contact person to follow up complaints;</p> <p>(f) Mitigation measures;</p> <p>(g) The design/orientation of the proposed mitigation methods demonstrating best practice;</p> <p>(h) Construction times;</p> <p>(i) Contingency measures where noise complaints are received; and</p> <p>(j) Monitoring methods and programs.</p>		Noted. To date, no wells have been drilled under this consent.	Noted.	
DA 171-7-2005	<p>6 Noise Compliance Monitoring</p> <p>Within 3 months of commissioning of the wells, the Applicant shall submit a Noise Compliance Assessment to the DEC. The Noise Assessment shall be prepared by a suitably qualified and experienced acoustical consultant, who shall assess compliance with the noise limits in Condition 3.</p>		Noted. To date, no wells have been drilled under this consent.	Noted.	
DA 171-7-2005	<p>7 Hours of Operation</p> <p>All construction work must be conducted between 7.00am and 6.00pm Monday to Friday and between 8.00am and 1.00pm Saturdays and at no time on Sundays and Public Holidays, unless inaudible at any residential premises.</p>		Noted. To date, no wells have been drilled under this consent.	Noted.	
DA 171-7-2005	<p>8 Planned maintenance activities at any of the wells must only be conducted between:</p> <p>(a) 7.00 am to 6.00 pm on weekdays; and</p> <p>(b) 8.00am and 1.00pm on Saturdays (excluding Sundays and Public Holidays).</p> <p><i>Note: This condition does not apply to the delivery of material outside the hours of operation under condition 7. if that delivery is required by police or other authorities for safety reasons; and /or the operation or personnel or equipment are endangered. In such circumstances, prior notification is to be provided to the EPA and affected residents as soon as possible, or within a reasonable period in the case of an emergency.</i></p>		Noted. To date, no wells have been drilled under this consent.	Noted.	

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DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
DA 171-7-2005	<p>9 Air Quality The Applicant shall carry out the development in a manner that will minimise emissions of dust from the site.</p> <p><i>Note: The Protection of the Environment Operations Act 1997 states that no offensive odour may be emitted from particular premises unless potentially offensive odours are identified in the Licence and the odours are emitted in accordance with conditions specifically directed at minimising the odours are permitted. Where it is appropriate for a Licence to identify and control odours, conditions for the Licence should be developed in consultation with Air Policy.</i></p>		Noted. To date, no wells have been drilled under this consent.	Noted.	
DA 171-7-2005	<p>Odour</p> <p><i>Note: The POEO Act states that no offensive odour may be emitted from particular premises unless potentially offensive odours are identified in the licence and odours are emitted in accordance with conditions specifically directed at minimising the odours are permitted. Where it is appropriate for a Licence to identify and control offensive odours, conditions for the Licence should be developed in consultation with DEC's Air Policy.</i></p>		Noted. To date, no wells have been drilled under this consent.	Noted.	
DA 171-7-2006	<p>10 Water Except as may be expressly provided by a Licence, the Applicant shall comply with section 120 of the Protection of the Environment Operations Act 1997 during the carrying out of the development.</p> <p><i>Note: Section 120 of the Protection of the Environment Operations Act 1997 applies to the disposal of wastewater.</i></p>		Noted. To date, no wells have been drilled under this consent.	Noted.	
DA 171-7-2007	<p>11 Stormwater/Sediment Control At least one week prior to the commencement of construction, the Applicant shall submit for the approval of the Director-General, an Erosion and Sediment Control Plan. The Plan must be implemented and used for the duration of all construction activities associated with the development. The Plan must describe the measures that will be employed to minimise soil erosion and the discharge of sediment and other pollutants to land and/or waters during construction activities. The Plan should be prepared in accordance with the requirements for such plans outlined in Managing Urban Stormwater: Soils and Construction Volume 1,4th Edition, 2004 (Landcom).</p>		Noted. To date, no wells have been drilled under this consent.	Noted.	
DA 171-7-2008	<p>12 Flood Management The Applicant is required to prepare and implement a Flood Management Plan for the sites for the life of the development. The Flood Management Plan will include (and not be limited to) measures to minimise and mitigate flooding impacts. The Applicant shall submit the Flood Management Plan for the Director-General's approval within one month of the date of this consent.</p>		Noted. To date, no wells have been drilled under this consent.	Noted.	
DA 171-7-2009	<p>13 Waste The Applicant must not cause, permit or allow any waste generated outside the site to be received at the site for storage, treatment, processing, reprocessing or disposal or any waste generated at the site to be disposed of at the site, except as expressly permitted by a licence under the Protection of the Environment Operations Act 1997.</p> <p><i>Note: this condition only applies to the storage, treatment, processing, reprocessing or disposal of waste at the site if it requires an environment protection licence under the Protection of the Environment Operations Act 1997.</i></p>		Noted. To date, no wells have been drilled under this consent.	Noted.	
DA 171-7-2010	<p>14 The Applicant must ensure that any hazardous, industrial or Group A waste is assessed and classified in accordance with the EPA's Environmental Guidelines: "Assessment Classification and Management of Liquid and Non-Liquid Wastes".</p>		Noted. To date, no wells have been drilled under this consent.	Noted.	

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DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
DA 171-7-2011	<p>15 Safety and Risk Management</p> <p>Prior to construction of the wellhead, the Applicant shall provide a Report to the Department from an independent and suitably qualified person approved by the Director-General, to confirm that the design and operation of the wellhead complies with the Department's Locational Guidelines - Development in the Vicinity of Operating Coal Seam Methane Wells (May 2004) for an Automatically Controlled Well (with Separator/Optional Pump). In particular, the Report shall confirm that all safety related systems required by the Guidelines have been included.</p>		Noted. To date, no wells have been drilled under this consent.	Noted.	
DA 171-7-2012	<p>16 The Applicant shall develop and implement an Emergency Plan and Safety Management System for the development. The plan/system shall be submitted for the approval of the Director-General, at least one month prior to the commissioning of the development, or within such further period as the Director-General may agree. Commissioning shall not commence until the Director-General has approved the plan/system.</p> <p>(a) Emergency Plan A comprehensive emergency plan and detailed emergency procedures for the development shall be prepared in accordance with the DIPNR Hazardous Industry Planning Advisory Paper No. 1, "Industry Emergency Planning Guidelines".. The plan shall include detailed procedures for the safety of all people outside of the development who may be at risk from the development.</p> <p>(b) Safety Management System A document setting out a comprehensive safety management system, covering all operations on the gas wells and gathering system shall be developed in accordance with the DIPNR Hazardous Industry Planning Advisory Paper No. 9, "Safety Management".</p> <p>The document shall clearly specify all safety related procedures, responsibilities and policies, along with details of mechanisms for ensuring adherence to procedures. Records shall be kept on site and shall be made available for inspection by the Director-General and the independent auditor upon request. In particular records shall be maintained to demonstrate that management of change procedures were followed for the connection of the new gas lines to the existing network and for the integration of the new wells into the automatic control system. <i>Note: The Applicant may update the current approved version of the relevant study/plan/system prepared to comply with Schedule 4 Condition 92 of development consent DA-282-6-2003-i, dated 16 June 2004. The updated version shall incorporate and adequately address the relevant aspects of the additional wells and related plant.</i></p>		Noted. To date, no wells have been drilled under this consent.	Noted.	
DA 171-7-2013	<p>17 Compliance Report</p> <p>Three months after commencement of operation of the development, the Applicant shall submit to the Director-General a compliance report detailing compliance with Condition 16, including:</p> <p>(a) Dates of study/plan/system completion/submission and commencement of construction and commissioning; (b) Actions taken or proposed, to implement recommendations made in the studies/plans/systems; and (c) Responses to any requirement imposed by the Director-General under Condition 19.</p> <p>This report shall verify that:</p> <p>(a) The Emergency Plan required under Condition 16(a) is effectively in place and that at least one emergency exercise has been conducted; and (b) The Safety Management System required under Condition 16(b) has been fully implemented and that records required by the system are being kept.</p> <p>The report shall include a signed commitment by the Applicant's representative responsible for the operation of the development, that for each study/plan/system:</p> <p>(a) The required study/plan/system has been undertaken or prepared to the relevant Hazardous Industry Planning Advisory Paper; (b) All recommendations of each study/plan/system have been implemented; and (c) All safety management system and their associated risk controls have been implemented and are being maintained.</p>		Noted. To date, no wells have been drilled under this consent.	Noted.	
	<p>Redrilling and fracture stimulation Management Plan</p> <p>Note: For the purposes of this consent the redrilling and/or additional fracture stimulation of a well does not constitute wellhead maintenance.</p>				

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DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
DA 171-7-2014	18 The Applicant shall obtain the prior approval of the Director-General for the redrilling and/or additional fracture stimulation of a gas well.		Noted. To date, no wells have been drilled under this consent.	Noted.	
DA 171-7-2015	19 The Applicant shall prepare a Redrilling and Fracching Management Plan in consultation with the Department of Primary Industries for the redrilling and/or refracching of an existing well. The Plan shall be submitted to the Director-General no later than one month prior to the commencement of the work or within such period as agreed by the Director-General. The Plan shall include, but not necessarily be limited to: (a) A description of all the activities to be undertaken on the well site during the redrilling and/or refracching work; (b) Details of how the environmental performance of the work will be monitored and what actions will be taken to address identified adverse environmental impacts; (c) Reference to the relevant parts of the Environmental Management Plan required under Schedule 4, Conditions 1 and 2; (d) Compliance with all the relevant environmental performance requirements of this consent; and (e) Arrangements for complaints handling procedures during the redrilling and/or refracching work.		Noted. To date, no wells have been drilled under this consent.	Noted.	
(20 The Applicant shall give written notification of the proposed redrilling and/or refracching work to potentially affected residences and other noise sensitive receivers at least fourteen days prior to work commencing.		Noted. To date, no wells have been drilled under this consent.	Noted.	
DA 171-7-2017	21 Gas Gathering System and Access Roads Road access crossing may consist of a bed level crossing. The finished surface of the crossing is to be at the same height as the existing bed level of the creek. There is to be no obstruction to water flow or fish passage along the creek as a result of the construction of the crossing. The crossing is to be evenly aligned with the adjoining bank and floodplain profile and must not reduce the capacity of protected waters in any way.		Noted. To date, no wells have been drilled under this consent.	Noted.	
DA 171-7-2018	22 The Applicant shall ensure that the route of the gas gathering system follows previously or currently disturbed areas wherever possible.		Noted. To date, no wells have been drilled under this consent.	Noted.	
DA 171-7-2019	23 Gas gathering stream crossings may be trenched. For all trenched crossings, the natural bed and bank profiles are to be restored to their original condition, with smooth and even surfaces, following installation of the gas pipe.		Noted. To date, no wells have been drilled under this consent.	Noted.	
DA 171-7-2020	24 The Applicant shall ensure that trenches constructed during the construction of gas gathering lines are not left open overnight unless otherwise agreed by the Director-General.		Noted. To date, no wells have been drilled under this consent.	Noted.	
DA 171-7-2021	25 The Applicant shall comply with the following in the construction of the gas gathering system pipeline: (a) Works within 20 m of watercourses are to be undertaken during dry weather conditions; (b) Signs stating the presence of a buried gas pipeline shall be erected periodically along the length of the trench once the pipeline has been laid; (c) Trenches are to be restored and reseeded with local grass seeds on completion of the work; (d) Construct the gas gathering system so as not to impeach lateral water flows; (e) Ensure that no crown or camber remains along the gas gathering systems, following construction; (f) Design, construct and operate the pipeline in accordance with the Australian Standard for the Installation and Maintenance of Plastic Pipe Systems for Gas AS 3723-1989 (or its latest version); and (g) Notify the Department on the completion of any trenching works.		Noted. To date, no wells have been drilled under this consent.	Noted.	
DA 171-7-2022	26 Site rehabilitation must protect any remnant local native riparian vegetation at the site and restore any riparian zones disturbed or otherwise affected by the work to a state that is reasonably representative of the natural ecotone of the protected waters system, in accordance with the endorsed plans and these conditions.		Noted. To date, no wells have been drilled under this consent.	Noted.	
DA 171-7-2023	27 Rehabilitated areas must be maintained to ensure successful native plant establishment. Maintenance must include any watering, weed control, replacement of plant losses, disease and insect control, mulching etc, necessary for successful plant establishment.		Noted. To date, no wells have been drilled under this consent.	Noted.	
DA 171-7-2024	28 All erosion control matting used is to consist of biodegradable materials. No plastic netting is to be used for any purpose unless such netting is of a rapidly biodegradable variety.		Noted. To date, no wells have been drilled under this consent.	Noted.	

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DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
DA 171-7-2025	<p>29 The Applicant shall prepare a Road Reserve Environment Management Plan (EMP) in consultation with Wollondilly Shire Council. The Road Reserve EMP shall be submitted to the Director-General for approval one month prior to the construction of the gas gathering line within the Road Reserve or within such period as approved the Director-General. The Road Reserve EMP shall include:</p> <p>(a) Proposed construction methods; (b) Soil erosion and sediment control measures for works undertaken during construction and following completion of the works; and (c) Traffic control plans.</p> <p><i>Note: The Applicant may update the current approved version of the Road Reserve Environment Management Plan prepared to comply with Schedule 4 Condition 112 of development consent DA-282-6-2003-i, dated 16 June 2004. The updated version shall incorporate and adequately address the relevant aspects of the additional wells and related gas gathering system.</i></p>		Noted. To date, no wells have been drilled under this consent.	Noted.	
DA 171-7-2026	<p>30 Underbore of M5 Menangle</p> <p>The Applicant shall conduct the underboring of the M5 road to the satisfaction of the RTA. The Applicant shall ensure that the M5 underbore:</p> <p>(a) Has a minimum depth of 1.2 m below the road at all times; (b) Excavation for the thrust pits are outside the road reserve; (c) Requires no access from within the Freeway for construction or maintenance purposes; (d) In the road reserve the pipeline is to be placed outside the table drain at a depth of not less than 800 mm below the natural surface; (e) All areas within the road reserve that are disturbed are to be restored to their original condition on completion of the work; (f) The gas gathering system is to be sleeved within the road reserve for ease of future maintenance; (g) Pipeline markers are to be placed either side of the M5 in the road reserve to enable ease of location; and (h) The Applicant (and its contractors) are to be fully responsible for matters regarding: (i) Occupational health and safety; (ii) Environmental control and restoration; and (iii) Traffic control. unless otherwise agreed by the RTA.</p>		Noted. To date, no wells have been drilled under this consent.	Noted.	
DA 171-7-2027	<p>31 Underbore of Main Southern Railway Line</p> <p>No work is permitted within the rail corridor or its easements unless the prior approval or a Rail Site Works Licence has been entered into with the Australian Rail Track Corporation.</p>		Noted. To date, no wells have been drilled under this consent.	Noted.	
DA 171-7-2028	<p>32 As the proposal is located in the immediate vicinity of a heritage item (Nepean River underbridge Menangle – rail ref: 64.8 km, and Menangle Station (old building), the Applicant must retain the services of a heritage expert/architect to supervise works that are in close proximity to the heritage items in order to conserve heritage values.</p>		Noted. To date, no wells have been drilled under this consent.	Noted.	
DA 171-7-2029	<p>33 Flora and Fauna</p> <p>The Applicant shall take all practicable measures to minimise potential flora and fauna impacts of the development.</p>		Noted. To date, no wells have been drilled under this consent.	Noted.	
DA 171-7-2030	<p>34 The Applicant shall not remove mature trees as part of this development unless otherwise agreed by the Director-General.</p>		Noted. To date, no wells have been drilled under this consent.	Noted.	
DA 171-7-2031	<p>The Applicant shall prepare a translocation strategy for the threatened Cumberland Plain Snail, which will be submitted for the Director-General's approval prior to construction. The translocation strategy shall be implemented should any individuals or populations of the Cumberland Plain Snail be identified.</p>		Noted. To date, no wells have been drilled under this consent.	Noted.	
DA 171-7-2032	<p>35 The Applicant shall prepare and implement a Weed Management Plan for the site for the life of the development. The Applicant shall submit the Weed Management Plan for the Director-General's approval within one month of the date of this consent.</p>		Noted. To date, no wells have been drilled under this consent.	Noted.	

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DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
DA 171-7-2033	36 Bushfire Management The Applicant shall: (a) Ensure that the development is suitably equipped to respond to any fires on the site; and (b) Assist the Rural Fire Service and emergency services as much as possible if there is a fire on the site.		Noted. To date, no wells have been drilled under this consent.	Noted.	
DA 171-7-2034	37 Prior to operation the Applicant shall prepare a Bushfire Management Plan for the development, to the satisfaction of the Director-General. The Applicant shall consult with Council and the Rural Fire Service in the preparation of the Plan. <i>Note: The Applicant may update the current approved version of the Bushfire Management Plan prepared to comply with Schedule 4 Condition 110 of development consent DA-282-6-2003-i, dated 16 June 2004. The updated version shall incorporate and adequately address the relevant aspects of the additional wells and related gas gathering system.</i>		Noted. To date, no wells have been drilled under this consent.	Noted.	
DA 171-7-2035	38 Aboriginal Heritage The Applicant must not excavate for drill sites or for other plant and equipment in connection to the development within the alluvial terraces bordering the Nepean River. Note: The alluvial terraces are those referred to in section 3.2 of the Aboriginal Archaeological Survey and Assessment report dated June 2005 and shown in "Approved Sand/Alluvial Mining" area on map reference M240449R15 titled "El Bethel Pty Ltd Well Locations, Access and Gathering" dated 23 September 2005.		Noted. To date, no wells have been drilled under this consent.	Noted.	
DA 171-7-2036	39 At least one month prior to construction commencing, the applicant shall prepare and submit a Cultural Heritage Management Protocol to DEC. The Protocol must include, but is not limited to: (a) Details of local Aboriginal community consultation undertaken to develop this Protocol; (b) Details of the procedures that adequately record previously recorded Aboriginal sites; (c) Details of construction times; (d) A list of 24-hour site contact person covering all construction and operation activities; (e) Details of the protective barriers and site markings to be used and dedicated to Aboriginal Cultural Heritage matters; (f) Details of the programs that will adequately monitor, maintain and remove protective barriers and site markings to be used and dedicated to Aboriginal Cultural Heritage matters throughout construction, rehabilitation and operation; (g) Details of the procedure that will ensure all employees and contractors are informed of the requirements for the management and protection of Aboriginal sites and the specific protocols in place; (h) Details of a complaints handling monitoring system that relate to any Aboriginal Cultural Heritage matters; (i) Details to follow up complaints that relate to Aboriginal Cultural Heritage matters; and (j) Details of the procedures that adequately consult and notify the Aboriginal community through		Noted. To date, no wells have been drilled under this consent.	Noted.	
DA 171-7-2037	40 All activities in connection to the construction and rehabilitation of the development must cease within a 50 m radii of a previously unrecorded Aboriginal site at all times prior to the implementation of the measures detailed in the Cultural Heritage Management Protocol submitted in accordance with condition 41		Noted. To date, no wells have been drilled under this consent.	Noted.	

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DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
DA 171-7-2038	<p>41 The Applicant must effectively record and manage previously unrecorded Aboriginal sites.</p> <p>For the purposes of this condition "effectively record and manage" includes the procedures and programs set up in the Cultural Heritage Management Protocol.</p> <p><i>Notes</i></p> <ul style="list-style-type: none"> • For the purposes of Condition 41, previously unrecorded Aboriginal sites may be uncovered during the duration of construction, rehabilitation and maintenance activities. • For the purposes of Condition 41, previously unrecorded Aboriginal sites mean sites that have not been in a study that was published prior to the submission of this application. • All monitoring for Aboriginal objects must be undertaken under a section 87 of the National Parks and Wildlife Act 1974. • The Applicant must ensure that appropriate section 87 and section 90 of the National Parks and Wildlife Act 1974 consents are in place where appropriate. 		Noted. To date, no wells have been drilled under this consent.	Noted.	
	<p>SCHEDULE 4 ENVIRONMENTAL MANAGEMENT AND MONITORING</p>				
DA 171-7-2039	<p>1 Construction Environmental Management Plan (CEMP)</p> <p>The Applicant shall prepare and implement a Construction Environmental Management Plan (CEMP) to provide environmental management, practices and procedures to be followed during the construction phases of the proposed development. A framework plan outlining key practices, procedures and environmental management practices should be approved by the Director-General prior to the commencement of construction.</p> <p><i>Note: The Applicant may update the current approved version of the CEMP prepared to comply with Schedule 5 Condition 1 of development consent DA-282-6-2003-i, dated 16 June 2004. The updated version shall incorporate and adequately address the relevant aspects of the additional wells and related plant.</i></p>		Noted. To date, no wells have been drilled under this consent.	Noted.	
DA 171-7-2040	<p>2 Operational Environmental Management Plan (OEMP)</p> <p>The Applicant shall prepare and implement an Operational Environmental Management Plan (OEMP) to provide environmental management practices and procedures to be followed during the operation of the development. The OEMP shall be forwarded to the Director-General for approval within one month of the date of this consent. The OEMP shall include, but not necessarily be limited to:</p> <ul style="list-style-type: none"> (a) Identification of all statutory and other obligations that the Applicant is required to fulfil in relation to operation of the development, including all consents, licences, approvals and consultations; (b) A description of the roles and responsibilities for all key personnel involved in the operation of the development; (c) The overall environmental policies and principles to be applied to the operation of the development; (d) Standards and performance measures to be applied to the development, and a means by which environmental performance can be periodically reviewed and improved; and (e) Management policies to ensure that environmental performance goals are met and to comply with conditions of this consent. <p><i>Note: The Applicant may update the current approved version of the OEMP prepared to comply with Schedule 5 Condition 2 of development consent DA-282-6-2003-i, dated 16 June 2004. The updated version shall incorporate and adequately address the relevant aspects of the additional wells and related plant.</i></p>		Noted. To date, no wells have been drilled under this consent.	Noted.	

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DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
DA 171-7-2041	<p>3 Annual Return</p> <p>The Applicant shall provide an annual return to the EPA in relation to the development as required by any Licence under the Protection of the Environment Operations Act 1997 in relation to the development. In the return the Applicant must report on the annual monitoring undertaken (where the activity results in pollutant discharges), provide a summary of complaints relating to the development, report on compliance with Licence conditions and provide a calculation of licence fees (administrative fees and where relevant, load based fees) that are payable.</p>		Noted. To date, no wells have been drilled under this consent.	Noted.	
DA 171-7-2042	<p>4 Annual Environmental Performance Reporting</p> <p>Within twelve months of the date of this consent, and annually thereafter during the life of the development, the Applicant shall submit an Annual Environmental Performance Report to the Director-General. This report shall include, but not be limited to:</p> <p>(a) The standards, performance measures and statutory requirements the development is required to comply with;</p> <p>(b) An assessment of the environmental performance of the development to determine whether it is complying with these standards, performance measures, and statutory requirements;</p> <p>(c) Copy of the Complaints Register for the preceding twelve month period and indicating what actions were (or are being) taken to address these complaints;</p> <p>(d) Indication of what actions were taken to address any issue and/or recommendation raised by the Camden Gas Project's Community Consultative Committee;</p> <p>(e) Provision of the detailed results of all the monitoring required by this consent;</p> <p>(f) Identify any non-compliance during the year;</p> <p>(g) Identify any significant trends in the data; and</p> <p>(h) If any non-compliance is detected, describe what actions and measures would be carried out to ensure compliance, clearly indicating who would carry out these actions and measures, when they would be carried out, and how the effectiveness of these measures would be monitored over time.</p> <p><i>Note: The Applicant may include the operation of wells EB1 to EB10 and the associated gas gathering system and the conditions of this consent, in the Annual Environmental Performance Report required under Schedule 5 Condition 5 of development consent DA-282-6-2003-i, dated 16 June 2004.</i></p>		Noted. To date, no wells have been drilled under this consent.	Noted.	
DA 171-7-2043	<p>5 he Director-General may require the Applicant to address certain matters identified in the Annual Environmental Performance Report. Any action required to be undertaken shall be completed within such period as the Director-General may agree.</p>		Noted. To date, no wells have been drilled under this consent.	Noted.	
DA 171-7-2044	<p>6 The Applicant shall also submit a copy of the Annual Environmental Performance Report to the DEC, Department of Primary Industries and Council. The Applicant shall make a copy of the Report publicly available.</p>		Noted. To date, no wells have been drilled under this consent.	Noted.	
DA 171-7-2045	<p>7 Independent Environmental Audit – Operation</p> <p>7. Within two years of the date of this consent and every two years thereafter, unless the Director-General directs otherwise, the Applicant shall commission and pay the full costs of an Independent Environmental Audit. The Independent Environmental Audit shall:</p> <p>(a) Be conducted by a suitably qualified, experienced, and independent person(s) whose appointment has been approved by the Director-General;</p> <p>(b) Be consistent with ISO 19011:2002 - Guidelines for Quality and/or Environmental Management Systems Auditing, or updated versions of these guidelines/manuals;</p> <p>(c) Assess the environmental performance of the development, and its effects on the surrounding environment;</p> <p>(d) Assess whether the development is complying with the relevant standards, performance measures, and statutory requirements;</p> <p>(e) Review the adequacy of the Applicant's Operational Environmental Management Plan; and</p>		Noted. To date, no wells have been drilled under this consent.	Noted.	

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DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
	<p>(f) Recommend measures or actions to improve the environmental performance of the development, and/or its environmental management and monitoring systems.</p> <p>Within one month of completion of the audit, the Applicant must submit a copy of the audit report to the Director-General, DEC and Council. The Director-General may require the Applicant to address certain matters identified in the report and any comments received from DEC and the Council. Any action required to be undertaken shall be completed within such period as the Director-General may agree.</p> <p><i>Note: The Applicant may include the operation of wells EB1 to EB10 and the associated gas gathering system and the conditions of this consent, in the Independent Environmental Audit required under Schedule 5 Condition 10 of development consent DA-282-6-2003-i, dated 16 June 2004.</i></p>				
DA 171-7-2046	<p>8 Independent Environmental Audit – Construction at El Bethel</p> <p>On completion of all construction works, the Applicant shall commission and pay the full costs of an Independent Environmental Audit of the drilling and fracing of gas wells and construction of the gas gathering system and access roads on the site. The objective of the audit is to monitor the performance and effect of construction activities on the site. The Environmental Audit shall:</p> <p>(a) Be conducted by a suitably qualified, experienced, and independent person(s) whose appointment has been approved by the Director-General; and</p> <p>(b) Be consistent with ISO 19011:2002 - Guidelines for Quality and/or Environmental Management Systems Auditing, or updated versions of these guidelines/manuals.</p> <p>The Audit shall:</p> <p>(a) Assess the environmental performance of the construction of the development on the site, and its effects on the surrounding environment;</p> <p>(b) Assess whether the development is complying with the relevant standards, performance measures, and statutory requirements;</p> <p>(c) Consider the Applicant's Construction Environmental Management Plan; and</p> <p>(d) Recommend measures or actions to improve the environmental performance of the construction of the development, and/or its environmental management and monitoring systems (if required).</p> <p>Within one month of completion of the audit, the Applicant must submit a copy of the audit report to the Director-General and Council. The Director-General may require the Applicant to address certain matters identified in the report and any comments received from Council. Any action required to be undertaken shall be completed within such period as the Director-General may agree.</p>		Noted. To date, no wells have been drilled under this consent.	Noted.	
DA 171-7-2047	<p>9 Complaints Register</p> <p>The Applicant shall keep a legible record of all complaints made to the applicant or any employee or agent of the Applicant in relation to pollution arising from any activity of the development. The Register must:</p> <p>(a) Record the date and time of the complaint;</p> <p>(b) Record the method by which the complaint was made;</p> <p>(c) Note any personal details of the complainant or, if no such details were provided, a note to that effect;</p> <p>(d) The nature of the complaint</p> <p>(e) The action taken by the applicant in relation to the complaint, including any follow-up contact with the complainant; and</p> <p>(f) State, if no action was taken by the Applicant, the reasons why no action was taken.</p> <p>The record of a complaint must be kept for at least 4 years after the complaint was made, and must be produced to any authorised officer of the DEC or the Department who asks to see them.</p>		Noted. To date, no wells have been drilled under this consent.	Noted.	

DA NUMBER: 171-7-2005
 LOCATION: El Bethel
 MODIFICATION:
 WORKS: No

Number of Conditions: 69
 Number Non-Compliant: 0
 Number Noted: 63
 Number N/A: 0
 Closed out previously: 0
 Compliance Score: 100%

DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
DA 171-7-2048	<p>10 The Applicant must:</p> <p>(a) Operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted on the site or by the vehicle or mobile plant, unless otherwise specified in the Licence; and</p> <p>(b) Notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint.</p>		Noted. To date, no wells have been drilled under this consent.	Noted.	
DA 171-7-2049	<p>11 Community Liaison</p> <p>The Applicant shall ensure the continuation of the existing Camden Gas Project Community Consultative Committee to oversee the environmental performance of the development.</p>		Noted. To date, no wells have been drilled under this consent.	Noted.	

Appendix H PA06-0137 Compliance Checklist

DA NUMBER: PA06_0137
 LOCATION: Razorback
 MODIFICATION:
 WORKS: Yes, refracting of RB08/10.

Number of Conditions: 35
 Closed out previously: 0
 Number Noted: 3
 Number N/A: 0
 Number of Non-Compliant: 4
 Compliance Score: 88%

DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
PA06_0137	1 Obligation to Minimise Harm to the Environment The Proponent shall implement all practicable measures to prevent or minimise any harm to the environment that may result from the construction or operation of the project.	Site observations. Interviews with site personnel.	It was reported that wells were drilled during in the previous audit period and has since been rehabilitated. The site appeared to be managed to minimise environmental harm. There were no environmental incidences (including complaints) recorded in relation to operations at these locations.	Compliant.	
PA06_0137	2 Terms of Approval The Proponent shall carry out the project generally in accordance with the: (a) Project Application 06_0137; (b) EA titled "Environmental Assessment – Camden Gas Project Joint Venture Stage 2 Drilling Program, Razorback Wells (RB03-RB12)", dated 20 July 2006, and prepared by HLA Envirosiences Pty Ltd; (c) proposed changes to works in the EMAI and Razorback projects contained in a letter from AGL to the Department, dated 23 November 2006; (d) revised Statement of Commitments contained in a letter from AGL to the Department, dated 4 December 2006; and (e) conditions of this approval.	Site observations. Interviews with site personnel.	Prior to the audit period, wells were drilled at the Razorback gas field. During the audit period, RB08 and RB10 was refracted. It appears that the development was carried out in general accordance with terms of approval.	Compliant.	
PA06_0137	3 If there is any inconsistency between the above documents, the latter document shall prevail over the former to the extent of the inconsistency. However, the conditions of this consent shall prevail over all other documents to the extent of any inconsistency.			Noted.	
PA06_0137	4 The Proponent shall comply with any reasonable requirement/s of the Director-General arising from the Department's assessment of: (a) any reports, plans or correspondence that are submitted in accordance with this approval; and (b) the implementation of any actions or measures contained in these reports, plans or correspondence.	Refrac Management Plan, dated 09/10/2009 DECCW confirmation letter, dated 12/10/2009	It was reported that there were no additional requirements made by the Director-General. During the audit period, the refracting management plan addressing proposed methodologies and environmental management issues such as noise was issued to DoP - sighted letter of confirmation from DECCW (dated 2010).	Compliant.	
PA06_0137	5 Limits on Approval This approval shall lapse 21 years after the date of this approval or on the expiry date of Petroleum Production Lease No. 4, whichever is the sooner.		This consent expires in 2026 and PPL4 expires in 2025.	Noted.	
PA06_0137	6 Nothing in this approval permits the drilling and operation of any additional gas wells (beyond the approved 10 wells for gas production).	Site observations. Interviews with site personnel.	It was reported that there were ten wells approved however only seven wells (RB06-12) were drilled (RB03-05 were not drilled). It was reported that AGL has no plans in place to drill the remaining wells. The AEPR indicates results for the seven operational wells only.	Compliant.	
PA06_0137	7 The Proponent shall surrender the approval for any well that has not been drilled within 5 years of the date of this approval.		It was reported that AGL has no plans in place to drill the remaining wells.	Noted.	
PA06_0137	8 Notification Within 3 months of the commissioning of the wells, the Proponent shall provide Council with: (a) the Geographical Positioning System (GPS) co-ordinates and digital survey data for the gas well sites and gas gathering system, in a format suitable to the Council; and (b) the wellhead configuration of each gas well.		It was reported that AGL had not complied with the requirement to prepare spatial data (in map and spreadsheet format) and submit to local councils. This would form part of the role of the Land & Approval group at AGL.	Non-Compliant.	Provide data to Council as per requirements for each well.

DA NUMBER: PA06_0137
 LOCATION: Razorback
 MODIFICATION:
 WORKS: Yes, refracting of RB08/10.

Number of Conditions: 35
 Closed out previously: 0
 Number Noted: 3
 Number N/A: 0
 Number of Non-Compliant: 4
 Compliance Score: 88%

DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION																	
PA06_0137	<p>9 Operation of Plant and Equipment The Proponent shall ensure that all plant and equipment used at the site is: (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient condition.</p>	<p>Site observations. Interviews with site personnel. Preventative Maintenance Register and sighted calibration records for gas monitors within the RPPG offices.</p>	<p>Plant and equipment used for refracting are supplied and maintained by Contractors. Noise-generating equipment would include pumps, mostly operating on diesel. For the duration of drilling activities, there is a Contractor Supervisor on site supervising and checking implementation of JSEAs, induction, HSE management plans etc.</p> <p>Workshop for preventative maintenance and repair was inspected. Observations of plant and equipment and records indicated that it was maintained effectively and operated appropriately.</p>	Compliant.																		
	<p>SCHEDULE 3 ENVIRONMENTAL PERFORMANCE CONDITIONS</p>																					
PA06_0137	<p>1 NOISE Construction and Maintenance Hours The Proponent shall comply with the construction and maintenance hours in Table 1:</p> <table border="1"> <thead> <tr> <th>Activity</th> <th>Day</th> <th>Time</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Construction</td> <td>Monday – Friday</td> <td>7:00am to 6:00pm</td> </tr> <tr> <td>Saturday</td> <td>8:00am to 1:00pm</td> </tr> <tr> <td>Sunday and Public Holidays</td> <td>Nil</td> </tr> <tr> <td rowspan="3">Planned maintenance activities</td> <td>Monday – Friday</td> <td>7:00am to 6:00pm</td> </tr> <tr> <td>Saturday</td> <td>8:00am to 1:00pm</td> </tr> <tr> <td>Sunday and Public Holidays</td> <td>Nil (unless inaudible at any residential receiver)</td> </tr> </tbody> </table> <p>Table 1: Construction and Maintenance Hours for the Project</p> <p>Notes: • <i>Inaudible means that the construction activity cannot be heard by the human ear at the nearest affected residential receivers</i> • <i>This condition does not apply to the delivery of material if that delivery is required by the police or other authorities for safety reasons; and/or the operation or personnel or equipment is endangered. In such circumstances, prior notification is to be provided to affected residents where possible.</i></p>	Activity	Day	Time	Construction	Monday – Friday	7:00am to 6:00pm	Saturday	8:00am to 1:00pm	Sunday and Public Holidays	Nil	Planned maintenance activities	Monday – Friday	7:00am to 6:00pm	Saturday	8:00am to 1:00pm	Sunday and Public Holidays	Nil (unless inaudible at any residential receiver)	<p>Interviews with site personnel. Refrac Management Plan, dated 09/10/2009</p>	<p>Refracting at Razorback was carried out by BJ's Well Services between 7am - 6pm on Monday to Friday only. These hours are consistent with construction hours adopted across the Camden Gas Project. Each well takes between 45 minutes to one hour to fracc. Maintenance of pumps and general site was carried out by AGL site personnel that generally work between 7.30am - 6.00pm.</p>	Compliant.	
Activity	Day	Time																				
Construction	Monday – Friday	7:00am to 6:00pm																				
	Saturday	8:00am to 1:00pm																				
	Sunday and Public Holidays	Nil																				
Planned maintenance activities	Monday – Friday	7:00am to 6:00pm																				
	Saturday	8:00am to 1:00pm																				
	Sunday and Public Holidays	Nil (unless inaudible at any residential receiver)																				
PA06_0137	<p>2 Construction Noise Goals The Proponent shall use its best endeavours to undertake construction activities to comply with the construction noise goal specified in Table 2.</p> <table border="1"> <thead> <tr> <th>Location</th> <th>Day</th> </tr> </thead> <tbody> <tr> <td>Any residential receiver</td> <td>54</td> </tr> </tbody> </table> <p>Table 2: Construction Noise Goal dB(A) LA10(15 min)</p> <p>Note: See notes to condition 4</p>	Location	Day	Any residential receiver	54		<p>Noise monitoring was not conducted on site as the refracting was a short term activity carried out during normal hours of operation i.e. 45 minutes to one hour per well. There were no noise related complaints recorded as a result of fracture stimulation activities at RB08/10.</p> <p>The noise assessment (Wilkinson Murray) indicated that some surrounding residential properties to RB08 and RB10 would be temporarily impacted as a result of the refracting activities. However, in accordance with the EMS (including Noise Management Sub Plan), Construction Noise Management Plan and Schedule 3 Condition 3 of the Project Approval, the local community was notified prior to the refracting activities.</p>	Compliant.														
Location	Day																					
Any residential receiver	54																					

DA NUMBER: PA06_0137
 LOCATION: Razorback
 MODIFICATION:
 WORKS: Yes, refracting of RB08/10.

Number of Conditions: 35
 Closed out previously: 0
 Number Noted: 3
 Number N/A: 0
 Number of Non-Compliant: 4
 Compliance Score: 88%

DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION																				
PA06_0137	<p>3 Construction Noise Management Plan</p> <p>The Proponent shall prepare and implement a Construction Noise Management Plan for construction of the project to the satisfaction of the Director-General. The plan shall be submitted to the Director-General prior to commencing construction and shall include:</p> <p>(a) a detailed description of the measures that would be implemented to achieve the construction noise goal in condition 2;</p> <p>(b) a community notification protocol for the proposed construction activities (including any redrilling or re-fracing of wells);</p> <p>(c) a description of the measures that would be implemented where the construction noise goal in condition 2 is unlikely to be achieved or is not being achieved; and</p> <p>(d) details of who would be responsible for monitoring, reviewing and implementing the plan.</p>	EMS (2008) and Noise Management Sub Plan. Refrac Management Plan, dated 09/10/2009	<p>The EMS (2008) and corresponding Noise Management Sub Plan contains general measures to manage noise from construction and operation activities across the Camden Gas Project. It was reported that the previous Noise Monitoring Plan produced by AGL (2006) was approved by the Director-General.</p> <p>The Refrac Management Plan adopts procedures for ensuring that potential noise emissions from these activities are minimised, as detailed in the EA, the previously approved Construction Noise Management Plan prepared by Wilkinson Murray in December 2006 and in Appendix C of the EMS (Noise Management Sub Plan). In addition, drilling will occur during daylight hours and residents are informed of fracture stimulation prior to operation.</p>	Compliant.																					
PA06_0137	<p>4 Operational Noise Criteria</p> <p>The Proponent shall ensure that the noise generated by the project does not exceed the noise impact assessment criteria in Table 3.</p> <table border="1"> <thead> <tr> <th rowspan="2">Location</th> <th colspan="2">Day</th> <th colspan="2">Evening</th> <th colspan="2">Night</th> </tr> <tr> <th><i>L_{Aeq}(15 minute)</i></th> <th><i>L_{Aeq}(15 minute)</i></th> <th><i>L_{Aeq}(15 minute)</i></th> <th><i>L_{Aeq}(15 minute)</i></th> <th><i>L_A(1 minute)</i></th> <th><i>L_A(1 minute)</i></th> </tr> </thead> <tbody> <tr> <td>Any residential receiver</td> <td>39</td> <td>39</td> <td>35</td> <td>35</td> <td>45</td> <td>45</td> </tr> </tbody> </table> <p>Table 3: Noise Impact Assessment Criteria dB(A)</p> <p>Notes:</p> <ul style="list-style-type: none"> Noise from the site is to be measured at the most affected point within the residential boundary, or at the most affected point within 30 metres of the dwelling where the dwelling is more than 30 metres from the boundary, to determine compliance with the identified noise limits, except where otherwise specified below. Noise from the project is to be measured at 1 metre from the dwelling facade to determine compliance with the LA1 (1 minute) noise level. Where it can be demonstrated that direct measurement of noise from the project is impractical, alternative means of determining compliance may be acceptable (see Chapter 11 of the NSW Industrial Noise Policy). The modification factors presented in Section 4 of the NSW Industrial Noise Policy shall also be applied to the measured noise level where applicable. The identified noise emission limits apply under meteorological conditions of wind speed up to 3m/s at 10 metres above ground level, and temperature inversion conditions. 	Location	Day		Evening		Night		<i>L_{Aeq}(15 minute)</i>	<i>L_{Aeq}(15 minute)</i>	<i>L_{Aeq}(15 minute)</i>	<i>L_{Aeq}(15 minute)</i>	<i>L_A(1 minute)</i>	<i>L_A(1 minute)</i>	Any residential receiver	39	39	35	35	45	45	EMS (2008) and Noise Management Sub Plan. Refrac Management Plan, dated 09/10/2009	<p>Observations made during site inspection and interviews with site personnel confirmed that general well operation does not generate significant noise levels. As there was no change in operations during the audit period, no further operational noise monitoring was carried out. It was reported that general well operation was inaudible at residences.</p> <p>As a result of observed levels (i.e. inaudible at nearest sensitive receptors), noise testing is not regularly conducted. It was reported that noise monitoring is conducted in response to complaints only. It may be appropriate to provide evidence to DoP to confirm that regular monitoring of sound pressure levels is not necessary.</p> <p>Operational noise sources during refracting include pumps and truck movements. Levels from refracting RB08 and RB10 were measured at the nearby tennis courts (not within 30 m from boundary) and were not consistent with the requirements for measurement stated in this condition; therefore the results were inconclusive.</p> <p>Local residents were advised prior to refracting activities taking place. No noise-related complaints were recorded.</p>	Compliant.	It is recommended that the Noise Management Sub Plan and Monitoring Program are updated to reflect monitoring practices adopted onsite and submitted to DoP for review/approval.
Location	Day		Evening		Night																				
	<i>L_{Aeq}(15 minute)</i>	<i>L_{Aeq}(15 minute)</i>	<i>L_{Aeq}(15 minute)</i>	<i>L_{Aeq}(15 minute)</i>	<i>L_A(1 minute)</i>	<i>L_A(1 minute)</i>																			
Any residential receiver	39	39	35	35	45	45																			
PA06_0137	<p>5 Continuous Improvement</p> <p>The Proponent shall, to the satisfaction of the Director-General:</p> <p>(a) implement all reasonable and feasible best practice noise mitigation measures;</p> <p>(b) investigate ways to reduce the noise generated by the project; and</p> <p>(c) report on these investigations and the implementation and effectiveness of these measures in the AEPR</p>	Interviews with site personnel. Refrac Management Plan, dated 09/10/2009	It was reported that introduction of nitrogen-fracturing had reduced noise levels i.e. eliminate 25 heavy vehicle movements required to support preparation, mobilisation and demobilisation of normal fracture stimulation operations. Only two nitrogen trucks required for fracturing.	Compliant.																					

DA NUMBER: PA06_0137
 LOCATION: Razorback
 MODIFICATION:
 WORKS: Yes, refracing of RB08/10.

Number of Conditions: 35
 Closed out previously: 0
 Number Noted: 3
 Number N/A: 0
 Number of Non-Compliant: 4
 Compliance Score: 88%

DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
PA06_0137	<p>6 Noise Monitoring Program</p> <p>The Proponent shall prepare and implement a Noise Monitoring Program for the construction and operation of the project to the satisfaction of the Director-General. The Program shall be submitted to the Director-General prior to construction commencing and shall include a noise monitoring protocol for evaluating compliance with the construction noise goals and the operational noise impact assessment criteria in this approval.</p>	EMS (2008) and Noise Management Sub Plan. Refrac Management Plan, dated 09/10/2009	A Noise Monitoring Program was prepared and presented as part of the EMS (2008) and Noise Management Plan (previously approved by the Director General in 2006). The Plan requires that noise is monitored on installation and at 3 months at 7m from the well. As noise monitoring is inconsistently implemented across the project and generally not in accordance with the plan, the development was considered non-compliant with the requirement to implement the Noise Monitoring Program.	Non-Compliant.	It is recommended that the Noise Management Sub Plan and Monitoring Program are updated to reflect monitoring practices adopted onsite and submitted to DoP for review/approval.
PA06_0137	<p>7 AIR QUALITY</p> <p>The Proponent shall implement all practicable measures to minimise dust emissions generated by the construction and operation of the project to the satisfaction of the Director-General.</p>	EMS (2008) and Air Quality Management Sub Plan.	<p>Site observations and interviews with site personnel indicated that the Razorback gas field had been effectively rehabilitated to grass cover. This means when fracture stimulation occurred during the current audit period, operations had a reduced footprint of disturbance and less vehicles were used (because of nitrogen fracing) minimising the dust emissions from the works.</p> <p>Based on observations made at other Project sites, AGL adopt measures outlined in the EMS including water sprays, restricted speeds, designated access routes and rehabilitation etc.</p>	Compliant.	
PA06_0137	<p>8 SURFACE WATER</p> <p>The Proponent shall prepare and implement a Soil and Water Management Plan for the project to the satisfaction of the Director-General. The plan shall be submitted to the Director-General prior to commencing construction and shall:</p> <p>(a) be consistent with the requirements in Managing Urban Stormwater: Soils and Construction, Volume 1, 4th Edition, 2004 (Landcom);</p> <p>(b) identify construction and operational activities that could cause soil erosion and generate sediment;</p> <p>(c) describe measures to minimise soil erosion and the potential for the transport of sediment to downstream waters;</p> <p>(d) describe the location, function, and capacity of erosion and sediment control structures for both construction and operation;</p> <p>(e) describe what measures would be implemented to maintain the structures over time; and</p> <p>(f) describe the procedures that would be followed for planned and unplanned water discharges from the site.</p> <p><i>Note: To fulfil this condition, the Proponent may prepare and implement an updated version of the Soil and Water Management Plan prepared under Schedule 4 Condition 84 of development</i></p>	EMS (2008) including Soil and Water Management Sub Plan.	The Soil and Water Management Plan within the EMS (2008) was previously submitted electronically to DoP as part of EHSMP and approved. A supplementary Soil and Water Management Plan was produced for Razorback wells, dated 18 December 2006. The SWMP complies with the requirement of this condition.	Compliant.	
PA06_0137	<p>9 WASTE MANAGEMENT</p> <p>The Proponent shall ensure that any waste or wastewater is assessed and classified in accordance with the DEC's Environmental Guidelines: "Assessment Classification and Management of Liquid and Non-Liquid Wastes", and disposed of at a licensed waste disposal facility or as otherwise agreed with the DEC.</p>	Annual footprint, includes records of waste disposal and transfer/disposal dockets.	Waste management practices remain unchanged since past audits. During operation of the wells, wastewaters (containing coal fines) produced from the wells are collected and removed by a licensed waste transporter for treatment at a wastewater treatment facility (Wentworth) or used in drilling operations (DEC aware) or stored temporarily in fracc tanks.	Compliant.	

DA NUMBER: PA06_0137
 LOCATION: Razorback
 MODIFICATION:
 WORKS: Yes, refracing of RB08/10.

Number of Conditions: 35
 Closed out previously: 0
 Number Noted: 3
 Number N/A: 0
 Number of Non-Compliant: 4
 Compliance Score: 88%

DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
PA06_0137	<p>10 HAZARDS AND RISK Safety and Risk Management</p> <p>The Proponent shall prepare and implement an Emergency Plan for the project to the satisfaction of the Director-General. The plan shall be submitted to the Director-General prior to commissioning of the project and shall be prepared in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 1- Industry Emergency Planning Guidelines.</p> <p><i>Note: To fulfil this condition the Proponent may prepare and implement an updated version of the Plan prepared under Schedule 4 condition 92(a) development consent DA-282-6-2003-i, dated 16 June 2004.</i></p>	Emergency management plan approved in August 2004. Camden South Emergency Response Plan, dated 08/09/2010.	The Emergency Response Plan developed and approved (August 2004) then subsequently updated to include Razorback, Spring Farm and Menangle Park gas fields.	Compliant.	
PA06_0137	<p>11 The Proponent shall prepare and implement Safety Management System (SMS) for the project, to the satisfaction of the Director-General. The SMS shall be submitted to the Director-General prior to commissioning of the project and shall be prepared in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 9 - Safety Management. The SMS shall:</p> <p>(a) cover all operations on the wells and gas gathering system;</p> <p>(b) clearly specify all safety related procedures, responsibilities and policies, along with details of mechanisms for ensuring adherence to procedures;</p> <p>(c) include a summary of records to demonstrate that management of change procedures were followed for the connection of new gas lines to the existing network and for the integration of new wells into the automatic control system; and</p> <p>(d) confirm that the design and operation of all wellheads comply with the Department's Locational Guidelines - Development in the Vicinity of Operating Coal Seam Methane Wells (May 2004) for an Automatically Controlled Well (with Separator/Optional Pump) and that all safety related systems required by the guidelines have been included.</p> <p><i>Note: To fulfil this condition the Proponent may prepare and implement an updated version of the SMS prepared under Schedule 4 condition 92(b) of development consent DA-282-6-2003-i, dated 16 June 2004.</i></p>	Safety Management System (online) HSE Policy Statement, endorsed January 2008 and displayed in office	<p>Safety Management System (SMS) separated from EMS and managed by Alex Secerbergovic (H&S Manager).</p> <p>Observed implementation of Safety Management System, which is maintained on the AGL server. Responsibilities and procedures established. Records such as risk assessments, JSAs, audit reports and incident reports/investigations inspected to verify implementation.</p> <p>Sighted use of Management of Change Procedure (MOC-ECR002) for alternative free flow well head configuration.</p>	Compliant.	
PA06_0137	<p>12 Compliance Report</p> <p>Within 3 months of commissioning of the project, the Proponent shall prepare a compliance report to the satisfaction of the Director-General. The report shall be prepared by a suitably qualified, experienced, and independent expert whose appointment has been endorsed by the Director-General and shall include:</p> <p>(a) dates of commencement of construction and commissioning;</p> <p>(b) actions taken (or proposed to be taken) to implement conditions 10 and 11; and</p> <p>(c) a signed statement that:</p> <ul style="list-style-type: none"> • the Emergency Plan required under condition 10 is effectively in place and that at least one emergency exercise has been conducted; • the SMS required under condition 11 has been fully implemented and that records required by the system are being kept; • the Emergency Plan and SMS have been prepared in accordance with the relevant Hazardous Industry Planning Advisory Paper; • all recommendations of the Emergency Plan and SMS have been implemented and are being maintained; and • all safety management systems and their associated risk controls have been implemented and are being maintained. 		It was reported that the project was commissioned in 2007; however the compliance report had not been completed.	Non-Compliant.	Compliance report to be completed and submitted with evidence retained to demonstrate compliance with this condition.

DA NUMBER: PA06_0137
 LOCATION: Razorback
 MODIFICATION:
 WORKS: Yes, refracting of RB08/10.

Number of Conditions: 35
 Closed out previously: 0
 Number Noted: 3
 Number N/A: 0
 Number of Non-Compliant: 4
 Compliance Score: 88%

DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
PA06_0137	<p>13 ABORIGINAL HERITAGE</p> <p>The Proponent shall prepare and implement an Aboriginal Heritage Management Plan for the project, in consultation with the DEC and relevant Aboriginal communities, and to the satisfaction of the Director-General. The plan shall be submitted to the Director-General prior to commencing construction (unless otherwise agreed with the Director-General) and shall include:</p> <p>(a) a description of the measures that would be implemented for the test pit excavation, mapping and salvage or relocation of the archaeological relics on RB5 IF 1, RB5 Site 1, and RB11 IF 2;</p> <p>(b) a description of the measures that would be implemented if any new Aboriginal objects are discovered during the project; and</p> <p>(c) a protocol for the ongoing consultation and involvement of the Aboriginal communities in the conservation and management of Aboriginal cultural heritage on the site.</p> <p><i>Note: The archaeological site references in conditions 13 are the same as those in the "Aboriginal Archaeological Survey and Assessment Report for Twelve Proposed Gas Production Well Sites, Gathering Systems & Access Routes The Razor Back Property" prepared by Dominic Steele Consulting Archaeology, and dated July 2005.</i></p>	EMS (2008) including Aboriginal Cultural Heritage Management Sub Plan (Appendix F) and European Heritage Management Sub Plan (Appendix G).	Aboriginal Heritage Management Plan prepared by Biosis (August, 2008) was updated as part of EMS and outlines measures to be implemented where relics are discovered and for ongoing management and consultation.	Compliant.	
PA06_0137	<p>14 ONGOING OPERATIONS</p> <p>Redrilling and Re-fracing</p> <p>The Proponent shall obtain the prior approval of the Director-General prior to undertaking work involving the redrilling and/or re-fracing of wells approved under this approval.</p> <p><i>Note: For the purposes of this approval the redrilling and/or re-fracing of a well does not constitute wellhead maintenance.</i></p>	Refrac Management Plan, dated 09/10/2009. DoP approval (letter dated 12/10/2009).	The refrac management plan was prepared and addresses construction methodologies and environmental management measures to minimise impacts such as noise. This plan was issued to DoP and approved (letter dated 12/10/2009).	Compliant.	
PA06_0137	<p>15 Gas Gathering System</p> <p>The Proponent shall, to the satisfaction of the Director-General, ensure that:</p> <p>(a) pipelines are designed, constructed and operated in accordance with the Australian Standard for the Installation and Maintenance of Plastic Pipe Systems for Gas AS 3723-1989 (or its latest version);</p> <p>(b) the route of gas gathering and water transport systems and access roads follow previously or currently disturbed areas wherever possible</p> <p>(c) trenches are not left open overnight, unless adequately covered;</p> <p>(d) routes of gas gathering and water transport lines are rehabilitated and reseeded with local grasses on completion of pipe laying;</p> <p>(e) works within 20 metres of watercourses are only undertaken during dry weather conditions;</p> <p>(f) the pipeline crossing of Finns Road is located at a depth of at least 1.2 metres below the road surface</p> <p>(g) construction activities do not impede lateral water flows;</p> <p>(h) no crown or camber remains along any gas gathering system line, following rehabilitation; and</p> <p>(i) signs are erected at intervals along all gas gathering system lines indicating the presence of a buried gas pipeline.</p>	EMS (2008)	Sighted updated EMS (2008) and associated Environmental Management Sub Plans, which adequately address the requirements (a) to (i) in this consent condition.	Compliant.	
PA06_0137	<p>16 REHABILITATION</p> <p>The Proponent shall progressively rehabilitate the site to the satisfaction of the Director-General, in a manner that is generally consistent with the landform of the surrounding land.</p>	EMS (2008) and Landscape and Rehabilitation Management sub plan.	RB08 was inspected during the audit demonstrating that the site had been rehabilitated consistent with the surrounding landform. However works are required on the site to maintain the exclusion zone around the old well and to ensure adequate signage and fencing is maintained. Rehabilitation was initially completed with minimal disturbance from refracting operation (minor levelling and minor rehabilitation following refracting of two wells) observed.	Compliant.	

DA NUMBER: PA06_0137
 LOCATION: Razorback
 MODIFICATION:
 WORKS: Yes, refracring of RB08/10.

Number of Conditions: 35
 Closed out previously: 0
 Number Noted: 3
 Number N/A: 0
 Number of Non-Compliant: 4
 Compliance Score: 88%

DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
	<p>17 The Proponent shall prepare and implement a Rehabilitation Management Plan to the satisfaction of the Director-General. The Plan shall be submitted to the Director-General within 6 months of the date of this approval and shall:</p> <p>(a) identify the areas likely to be disturbed by the project; and (b) describe the measures that would be implemented to rehabilitate the site.</p>	<p>EMS (2008) and Landscape and Rehabilitation Management sub plan. Refrac Management Plan, dated 09/10/2009</p>	<p>Effective measures for rehabilitation management are presented in the EMS and Refrac Management Plan. The refracting operation included minor levelling and minor rehabilitation following refracring of two wells. It was reported that very limited rehabilitation was required at Razorback following fraccing.</p>	Compliant.	
	<p>SCHEDULE 4 ENVIRONMENTAL MANAGEMENT AND MONITORING CONDITION!</p>				
PA06_0137	<p>1 OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN (OEMP) The Proponent shall prepare and implement an Operational Environmental Management Plan (OEMP) for the project to the satisfaction of the Director-General. The OEMP shall be submitted to the Director-General prior to commissioning of the project and shall:</p> <p>(a) incorporate the various environmental management plans, monitoring programs and other requirements set out in Schedule 3 of this approval; (b) identify statutory and other obligations that the Proponent is required to fulfil during the operation of the project; (c) describe the environmental policies and principles to be applied to the operation of the project; (d) describe in general how the environmental performance of the project would be monitored and managed; (e) describe the procedures that would be implemented to:</p> <ul style="list-style-type: none"> • keep the local community and relevant agencies informed about the environmental performance of the project; • receive, handle, respond to, and record complaints; • resolve any disputes that may arise during the course of the project; • respond to any non-compliance; • manage cumulative impacts; and • respond to emergencies (including bushfires); and <p>(f) describe the role, responsibility, authority, and accountability of all the key personnel involved in environmental management of the project.</p> <p><i>Note: To fulfil this condition, the Proponent may prepare and implement an updated version of the OEMP prepared under Schedule 5 condition 2 of development consent DA-282-6-2003-i, dated 16 June 2004.</i></p>	<p>EMS (2008).</p>	<p>The EMS (2008) covers environmental management and monitoring for operation of the Camden Gas Project, including wells covered by this DA. An earlier version of the EMS (refer EHSMP) was approved pre-audit period. A site-specific OEMP has not been developed. The EMS includes:</p> <p>Legislative requirements (Section 2.1) Structure and Responsibility (Section 5.1) HSE Policy (Jan 2008) Objectives, targets and KPI (section 4.2) Policies and procedures within the EMS; and additional Management Sub Plans for noise, soil, water, traffic, waste and rehabilitation.</p>	Compliant.	
PA06_0137	<p>2 INCIDENT REPORTING Within 7 days of detecting an exceedence of the goals/limits/performance criteria in this approval or an incident causing (or threatening to cause) material harm to the environment; the Proponent shall report the exceedence/incident to the Department (and any relevant agency). The report shall:</p> <p>(a) describe the date, time, and nature of the exceedence/incident; (b) identify the cause (or likely cause) of the exceedence/incident; (c) describe what action has been taken to date; and (d) describe the proposed measures to address the exceedence/incident.</p>	<p>EMS (2008) incident register</p>	<p>AEPR summarises incidents relating to safety and environmental non-compliances. There were no incidents logged at the Razorback site. Incident reporting database used for all incidents on site (Connect First).</p> <p>Site maintains a database of environmental related complaints and incidences (Connect First). Where incidences are logged these are raised to supervisor for action. There were no complaints or incidents raised in relation to this site.</p>	Compliant.	

DA NUMBER: PA06_0137
 LOCATION: Razorback
 MODIFICATION:
 WORKS: Yes, refracing of RB08/10.

Number of Conditions: 35
 Closed out previously: 0
 Number Noted: 3
 Number N/A: 0
 Number of Non-Compliant: 4
 Compliance Score: 88%

DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
PA06_0137	<p>3 ANNUAL REPORTING</p> <p>Within 12 months of the date of this approval, and annually thereafter during the life of the project, the Proponent shall prepare an Annual Environmental Performance Report (AEPR) for the project to the Director-General. The AEPR shall:</p> <p>(a) identify the standards, performance measures and statutory requirements that apply to the project;</p> <p>(b) assess the environmental performance of the project to determine whether it is complying with these standards, performance measures, and statutory requirements;</p> <p>(c) identify any non-compliance during the year with the conditions of this approval or any standard, performance measure or statutory requirement that applies to the project;</p> <p>(d) describe, if any non-compliance is identified, the actions and measures carried out or being carried out to ensure compliance, clearly indicating who would carry out these actions and measures, when they would be carried out, and how the effectiveness of these measures would be monitored over time;</p> <p>(e) include a copy of complaints for the year and a description of actions taken or being taken to address registered complaints;</p> <p>(f) include a discussion of issues or recommendations raised by the Camden Gas Project's Community Consultative Committee and a description of actions taken or being taken to address these issues or recommendations; and</p> <p>(g) include a detailed summary of results of all monitoring required by this approval and a discussion of any significant results, trends or exceptions in these results.</p> <p><i>Note: The Proponent may include this report in the Annual Environmental Performance Report required under Schedule 5 condition 5 of development consent DA-282-6-2003-i, dated 16 June 2004. The due date for a combined report shall be the earlier of the due dates for the separate reports.</i></p>	Sighted Annual Environmental Performance Report (July 06-June 07; July 07-June 08; July 08-June 09; July 09-June 10).	AEPRs have been completed as required.	Compliant.	
PA06_0137	<p>4 The Proponent shall submit a copy of the AEPR to the DPI, DEC and Council.</p>		<p>It was reported that the AEPR 2008-09 was submitted to relevant authorities. Evidence to verify submission and distribution was made available for inspection.</p> <p>AEPR 2009-10 is in final draft form and yet to be submitted. It was reported that DoP was to provide final sign-off on AEPR for 2008-09, before AEPR 2009-10 was submitted.</p>	Compliant.	
PA06_0137	<p>5 INDEPENDENT ENVIRONMENTAL AUDIT</p> <p>Within 2 years of the date of this approval and every 3 years thereafter, unless the Director-General directs otherwise, the Proponent shall commission and pay the full costs of an Independent Environmental Audit. The Independent Environmental Audit shall:</p> <p>(a) be conducted by a suitably qualified, experienced, and independent person(s) whose appointment has been approved by the Director-General;</p> <p>(b) be consistent with ISO 19011:2002 - Guidelines for Quality and/or Environmental Management Systems Auditing, or updated versions of these guidelines/manuals;</p> <p>(c) assess the environmental performance of the project, and its effects on the surrounding environment;</p> <p>(d) include a hazard audit of the project in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 5, "Hazard Audit Guidelines";</p> <p>(e) assess whether the project is complying with the relevant standards, performance measures, and statutory requirements;</p> <p>(f) review the adequacy of the OEMP; and</p> <p>(g) recommend measures or actions to improve the environmental performance of the project, and/or its environmental management and monitoring systems.</p> <p><i>Note: The Proponent may include audit in the Independent Environmental Audit required under Schedule 5 condition 10 of development consent DA-282-6-2003-i, dated 16 June 2004. The due date for a combined audit shall be the earlier of the due dates for the separate audits</i></p>		This audit covers the scope of the Independent Environmental Audit.	Compliant.	

DA NUMBER: PA06_0137
 LOCATION: Razorback
 MODIFICATION:
 WORKS: Yes, refracing of RB08/10.

Number of Conditions: 35
 Closed out previously: 0
 Number Noted: 3
 Number N/A: 0
 Number of Non-Compliant: 4
 Compliance Score: 88%

DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
PA06_0137	6 Within 1 month of completion of each Independent Environmental Audit, the Proponent shall submit a copy of the audit report to the Director-General, DPI and DEC, with a response to any of the recommendations contained in the audit report.		Reportedly submitted. Notes regarding audits, audit findings and response to recommendations were included in the AEPR.	Compliant.	
PA06_0137	7 Following each Independent Environmental Audit, the Proponent shall review and if necessary revise the OEMP (and any documents contained in the plan), to the satisfaction of the Director-General. The revised OEMP shall be submitted to the Director-General within 6 months of completing the audit.	Environmental Management Plan available on AGL's website (10/9/2008)	It was reported that the OEMP was written after last audit and submitted to DoP; however evidence to verify submission and timing was not made available for inspection.	Non-Compliant.	Evidence to verify submission of OEMP to DoP to be obtained and retained to demonstrate compliance with the requirements of this condition.
PA06_0137	8 COMMUNITY CONSULTATIVE COMMITTEE The Proponent shall ensure that the construction and operation of the project is subject to the consideration of the Camden Gas Project Community Consultative Committee, as established under Schedule 5 Condition 17 of development consent DA No. 282-6-2003-I, dated 16 June 2004.	Sighted Community Consultation Committee Minutes. #20 25/09/08, #21 27/11/08, #22 19/03/09 #23 16/07/09 #24 18/02/10 and #25 15/07/10.	It was reported that the frequency of community consultation meetings had been adjusted from quarterly to every four months with agreement from committee members. Recently quarterly meetings were reinstated.	Compliant.	
PA06_0137	9 ACCESS TO INFORMATION From 31 March 2007, and during the life of the project thereafter, the Proponent shall place a copy of the following documents and information (and any subsequent revisions) required under this approval on its website: (a) all current environmental management plans, strategies and programs; (b) all Independent Environmental Audits; (c) all AEPRs; and (d) a summary of all environmental monitoring results required under this consent (to be updated at least every 6 months),	AGL website	Refer website: http://www.agl.com.au/about/EnergySources/indevelopment/Pages/Camden-Gas-Project.aspx The website was reviewed and found to be up to date and provided public access to information as required by this condition.	Compliant.	

**APPENDIX 1
 SCHEDULE OF LAND**

Property	Facility	Lot and DP Number
20 Dawsons Road, Menangle	RB03 and RB04 and gas gathering line	Lot 1, DP 959711
25-75 Dawsons Road, Menangle	RB05 and gas gathering line	Lot 2 DP 572954
90 Dawsons Road, Razorback	RB07 and gas gathering line	Lot 81, DP 588337
125 Finns Road, Menangle	RB06, RB08 and RB09 and gas gathering line	Lot 124, DP 809576
82 Dawsons Road, Menangle	RB10 and gas gathering line	Lot 82, DP 588337
40 Carrolls Road, Menangle	RB11 and RB12 and gas gathering line	Lot 123, DP 809576
Dawsons Road and Finns Road	gas gathering line	road reserve of Dawsons Road and Finns Road

Appendix I PA06_0138 Compliance Checklist

DA NUMBER: PA 06_0138
 LOCATION: Elizabeth Macarthur
 MODIFICATION: MOD1
 WORKS: Yes, Refracking of EM27, EM31 and fracture stimulation of EM34

Number of Conditions: 37
 Closed out previously: 0
 Number Noted: 4
 Number N/A: 0
 Number Non-Compliant: 5
 Compliance Score: 85%

DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
	SCHEDULE 2 Administrative Conditions				
PA 06_0138	1 Obligation to Minimise Harm to the Environment The Proponent shall implement all practicable measures to prevent or minimise any harm to the environment that may result from the construction or operation of the project.		It was reported that works in the Elizabeth Macarthur gas field during the audit period included fracture stimulation of EM34 and refracking of EM27 and EM3. There were no known or reported environmental incidences (including complaints) recorded in relation to operations at these locations.	Compliant.	
PA 06_0138	2 Terms of Approval The Proponent shall carry out the project generally in accordance with the: (a) Project Application 06_0138; (b) EA titled "Environmental Assessment – Camden Gas Project Joint Venture Stage 2 Drilling Program, Elizabeth Macarthur Agricultural Institute Wells (EM23-EM36)", dated 20 July 2006, and prepared by HLA Envirosciences Pty Ltd; (c) EM32 and EM34 Additional Noise Assessment contained in a letter from AGL to the Department, dated 26 September 2006; (d) proposed changes to works in the EMAl and Razorback projects contained in a letter from AGL to the Department, dated 23 November 2006; (e) raptor breeding seasons and revised Statement of Commitments contained in a letter from AGL to the Department, dated 4 December 2006; (f) modification application (06_0138 Mod 1) titled "EM37 Well Modification Project Environmental Assessment", dated 21 March 2007; (g) letter concerning EM32 from AGL Gas Production (Camden) Pty Limited to the Department, dated 31 May 2007; and (h) conditions of this approval.		It was reported that works in the Elizabeth Macarthur gas field during the audit period included fracture stimulation of EM34 and refracking of EM27 and EM3. Prior to the audit period the following wells were drilled: EM23-25, EM27, EM30-32, EM28, EM33, EM34, EM37 (MOD 6 August 2007), EM38 (MOD 4 July 2007), EM39 (Mod 11 April 2008). The remaining wells (EM26, EM29, EM35 and EM36) approved by this consent have not yet been drilled. It was reported that the gas field had operated in general accordance with the terms of approval during the audit period.	Compliant.	
PA 06_0138	3 If there is any inconsistency between the above documents, the latter document shall prevail over the former to the extent of the inconsistency. However, the conditions of this consent shall prevail over all other documents to the extent of any inconsistency.		Noted.	Noted.	
PA 06_0138	4 The Proponent shall comply with any reasonable requirement/s of the Director-General arising from the Department's assessment of: (a) any reports, plans, programs or correspondence that are submitted in accordance with this approval; and (b) the implementation of any actions or measures contained in these reports, plans, programs or correspondence.		It was reported that there were no additional requirements made by the Director-General during the audit period.	Compliant.	
PA 06_0138	5 Limits on Approval This approval shall lapse 21 years after the date of this approval or on the expiry date of Petroleum Production Lease No. 1 or Petroleum Production Lease No. 4, whichever is the sooner.		This consent expires in 2027 and PPL1 expires in 2023 and PPL4 expires in 2025.	Noted.	
PA 06_0138	6 Nothing in this approval permits the drilling and operation of any additional gas wells (beyond the approved 15 wells for gas production).		To date, 14 wells have been drilled under this consent. Three of these were approved by modification to this consent.	Noted.	
PA 06_0138	7 The Proponent shall surrender the approval for any well that has not been drilled within 5 years of the date of this approval.		Noted.	Noted.	
PA 06_0138	8 Notification of Council Within 3 months of the commissioning of the wells, the Proponent shall provide Council with: (a) the Geographical Positioning System (GPS) co-ordinates and digital survey data for the gas well sites and gas gathering system, in a format suitable to the Council; and (b) the wellhead configuration of each well.		It was reported that AGL had not complied with the requirement to prepare spatial data (in map and spreadsheet format) and submit to local councils.	Non-Compliant.	Compile and reissue data to Council as per requirements for each well.

DA NUMBER: PA 06_0138
 LOCATION: Elizabeth Macarthur
 MODIFICATION: MOD1
 WORKS: Yes, Refracking of EM27, EM31 and fracture stimulation of EM34

Number of Conditions: 37
 Closed out previously: 0
 Number Noted: 4
 Number N/A: 0
 Number Non-Compliant: 5
 Compliance Score: 85%

DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION																	
PA 06_0138	<p>9 Operation of Plant and Equipment The Proponent shall ensure that all plant and equipment used at the site is: (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient condition.</p>	Site observations. Interviews with site personnel. Induction package. Preventative Maintenance Register and sighted calibration records for gas monitors within the RGP offices.	<p>Where plant and equipment is used for general maintenance of site and wells, these are subject to preventative maintenance carried out in the workshop. Operation and maintenance is covered in induction.</p> <p>Workshop for preventative maintenance and repair was inspected. Observations of plant and equipment and records indicated that it was maintained effectively and operated appropriately.</p>	Compliant.																		
PA 06_0138	<p>SCHEDULE 3 ENVIRONMENTAL PERFORMANCE CONDITIONS</p>																					
PA 06_0138	<p>1 NOISE Construction and Maintenance Hours Except for the drilling (including well casing and grouting) of SIS wells EM32 and EM34, the Proponent shall comply with the construction and maintenance hours in Table 1:</p> <table border="1"> <thead> <tr> <th>Activity</th> <th>Day</th> <th>Time</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Construction</td> <td>Monday – Friday</td> <td>7:00am to 6:00pm</td> </tr> <tr> <td>Saturday</td> <td>8:00am to 1:00pm</td> </tr> <tr> <td>Sunday and Public Holidays</td> <td>Nil</td> </tr> <tr> <td rowspan="3">Planned maintenance activities</td> <td>Monday – Friday</td> <td>7:00am to 6:00pm</td> </tr> <tr> <td>Saturday</td> <td>8:00am to 1:00pm</td> </tr> <tr> <td>Sunday and Public Holidays</td> <td>Nil (unless inaudible at any residential receiver)</td> </tr> </tbody> </table> <p>Table 1: Construction and Maintenance Hours for the Project</p> <p>Notes: • Inaudible means that the construction activity cannot be heard by the human ear at the nearest affected residential receivers • This condition does not apply to the delivery of material if that delivery is required by the police or other authorities for safety reasons; and/or the operation or personnel or equipment is endangered. In such circumstances, prior notification is to be provided to affected residents where possible.</p>	Activity	Day	Time	Construction	Monday – Friday	7:00am to 6:00pm	Saturday	8:00am to 1:00pm	Sunday and Public Holidays	Nil	Planned maintenance activities	Monday – Friday	7:00am to 6:00pm	Saturday	8:00am to 1:00pm	Sunday and Public Holidays	Nil (unless inaudible at any residential receiver)	Interviews with site personnel. Induction package.	<p>It was reported that all works completed on site during this audit period were restricted to the operating hours consistently applied across all the Camden Gas Project.</p> <p>Work hours are covered in the induction and managed via work scheduling.</p>	Compliant.	
Activity	Day	Time																				
Construction	Monday – Friday	7:00am to 6:00pm																				
	Saturday	8:00am to 1:00pm																				
	Sunday and Public Holidays	Nil																				
Planned maintenance activities	Monday – Friday	7:00am to 6:00pm																				
	Saturday	8:00am to 1:00pm																				
	Sunday and Public Holidays	Nil (unless inaudible at any residential receiver)																				
PA 06_0138	<p>2 Construction Noise Goals</p> <p>The Proponent shall use its best endeavours to undertake construction activities to comply with the construction noise goals specified in Table 2.</p> <table border="1"> <thead> <tr> <th>Location</th> <th>Day</th> <th>Evening</th> <th>Night</th> </tr> </thead> <tbody> <tr> <td>Any residential receiver</td> <td>54</td> <td>39</td> <td>35</td> </tr> </tbody> </table> <p>Table 2: Construction Noise Goals dB(A) LA10(15 min)</p> <p>Note: See notes to condition 4</p>	Location	Day	Evening	Night	Any residential receiver	54	39	35	EMS (2008) including Noise Management Sub Plan. Field noise monitoring records for wells EM24, 25, 27, 28, 30-37, 34, 39 and cottages near EM39.	<p>The Noise Management Plan (August 2008) adopts the stated goals for construction noise.</p> <p>Operational noise sources during refracking include pumps and truck movements. Field noise monitoring was completed for wells EM24, 25, 27, 28, 30-37, 34, 39 and cottages near EM39.</p> <p>No noise-related complaints were recorded during the audit period.</p>	Compliant.										
Location	Day	Evening	Night																			
Any residential receiver	54	39	35																			
PA 06_0138	<p>3 Construction Noise Management Plan</p> <p>The Proponent shall prepare and implement a Construction Noise Management Plan for construction of the project to the satisfaction of the Director-General. The plan shall be submitted to the Director-General prior to construction commencing and shall include: (a) a detailed description of the measures that would be implemented to achieve the construction noise goals in condition 2; (b) a community notification protocol for the proposed construction activities (including any re-drilling or re-fracking of wells); (c) a description of the measures that would be implemented where the construction noise goals in condition 2 are unlikely to be achieved or are not being achieved; and (d) details of who would be responsible for monitoring, reviewing and implementing the plan.</p>	EMS (2008) including Noise Management Sub Plan	Sighted Noise Management Plan, including Monitoring Program (2008) which identifies measures to minimise noise impacts, community notification processes and relevant noise limits to be adopted for construction and operation activities carried out at the Camden Gas Project. It was reported that the previous Noise Monitoring Plan produced by AGL (2006) was approved by the Director-General.	Compliant.																		

DA NUMBER: PA 06_0138
 LOCATION: Elizabeth Macarthur
 MODIFICATION: MOD1
 WORKS: Yes, Refracking of EM27, EM31 and fracture stimulation of EM34

Number of Conditions: 37
 Closed out previously: 0
 Number Noted: 4
 Number N/A: 0
 Number Non-Compliant: 5
 Compliance Score: 85%

DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION														
PA 06_0138	<p>4 Operational Noise Criteria The Proponent shall ensure that the noise generated by the project does not exceed the noise impact assessment criteria in Table 3.</p> <table border="1"> <thead> <tr> <th rowspan="2">Location</th> <th>Day</th> <th>Evening</th> <th colspan="2">Night</th> </tr> <tr> <th>L_{Aeq}(15 minute)</th> <th>L_{Aeq}(15 minute)</th> <th>L_{Aeq}(15 minute)</th> <th>L_{A1}(1 minute)</th> </tr> </thead> <tbody> <tr> <td>Any residential receiver</td> <td>39</td> <td>39</td> <td>35</td> <td>45</td> </tr> </tbody> </table> <p>Table 3: Noise Impact Assessment Criteria dB(A)</p> <p>Notes:</p> <ul style="list-style-type: none"> Noise from the site is to be measured at the most affected point within the residential boundary, or at the most affected point within 30 metres of the dwelling where the dwelling is more than 30 metres from the boundary, to determine compliance with the identified noise limits, except where otherwise specified below. Noise from the project is to be measured at 1 metre from the dwelling facade to determine compliance with the LA1 (1 minute) noise level. Where it can be demonstrated that direct measurement of noise from the project is impractical, alternative means of determining compliance may be acceptable (see Chapter 11 of the NSW Industrial Noise Policy). The modification factors presented in Section 4 of the NSW Industrial Noise Policy shall also be applied to the measured noise level where applicable. The identified noise emission limits apply under meteorological conditions of wind speed up to 3m/s at 10 metres above ground level, and temperature inversion conditions. 	Location	Day	Evening	Night		L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{A1} (1 minute)	Any residential receiver	39	39	35	45	Interviews with site personnel.	<p>The Noise Management Plan adopts the stated goals for operational noise. Noise management and monitoring are covered in the EMS (2008) and Sub Plan and these noise measures were reportedly implemented. It was reported that operational noise monitoring was not conducted at these locations as noise levels were inaudible.</p> <p>It was reported that noise monitoring is conducted in response to complaints only. It may be appropriate to provide evidence to DoP to confirm that regular monitoring of sound pressure levels is not necessary.</p>	Compliant.	
Location	Day		Evening	Night															
	L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{A1} (1 minute)															
Any residential receiver	39	39	35	45															
PA 06_0138	<p>5 Continuous Improvement The Proponent shall, to the satisfaction of the Director-General: (a) implement all reasonable and feasible best practice noise mitigation measures; (b) investigate ways to reduce the noise generated by the project; and (c) report on these investigations and the implementation and effectiveness of these measures in the AEPR.</p>	Interviews with site personnel.	Ongoing implementation of EMP and relevant management plans, including site inspection and actions to manage any observations.	Compliant.															
PA 06_0138	<p>6 Noise Monitoring Program The Proponent shall prepare and implement a Noise Monitoring Program for the construction and operation of the project to the satisfaction of the Director-General. The Program shall be submitted to the Director-General prior to construction commencing and shall include a noise monitoring protocol for evaluating compliance with the construction noise goals and the operational noise impact assessment criteria in this approval.</p>	EMS (2008) and Noise Management Sub Plan.	<p>A Noise Monitoring Program was prepared and presented as part of the EMS (2008) and Noise Management Plan (previously approved by the Director General in 2006). The Plan requires that noise is monitored on installation and at 3 months at 7m from the well. As noise monitoring is inconsistently implemented across the project and generally not in accordance with the plan, the development</p> <p>was considered non-compliant with the requirement to implement the Noise Monitoring Program.</p>	Non-Compliant.	It is recommended that the Noise Management Sub Plan and Monitoring Program are updated to reflect monitoring practices adopted onsite and submitted to DoP for review/approval.														
PA 06_0138	<p>7 AIR QUALITY The Proponent shall implement all practicable measures to minimise dust emissions generated by the construction and operation of the project to the satisfaction of the Director-General.</p>	EMS (2008) and Air Quality Management Sub Plan.	Based on observations made at other Project sites, AGL adopt measures outlined in the EMS including water sprays, restricted speeds, designated access routes and rehabilitation etc.	Compliant.															

DA NUMBER: PA 06_0138
 LOCATION: Elizabeth Macarthur
 MODIFICATION: MOD1
 WORKS: Yes, Refracking of EM27, EM31 and fracture stimulation of EM34

Number of Conditions: 37
 Closed out previously: 0
 Number Noted: 4
 Number N/A: 0
 Number Non-Compliant: 5
 Compliance Score: 85%

DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
PA 06_0138	<p>8 SURFACE WATER</p> <p>The Proponent shall prepare and implement a Soil and Water Management Plan for the project to the satisfaction of the Director-General. The plan shall be submitted to the Director-General prior to construction commencing and shall:</p> <p>(a) be consistent with the requirements in Managing Urban Stormwater: Soils and Construction, Volume 1, 4th Edition, 2004 (Landcom);</p> <p>(b) identify construction and operational activities that could cause soil erosion and generate sediment;</p> <p>(c) describe measures to minimise soil erosion and the potential for the transport of sediment to downstream waters;</p> <p>(d) describe the location, function, and capacity of erosion and sediment control structures for both construction and operation;</p> <p>(e) describe what measures would be implemented to maintain the structures over time; and</p> <p>(f) describe the procedures that would be followed for planned and unplanned water discharges from the site.</p> <p><i>Note: To fulfil this condition, the Proponent may prepare and implement an updated version of the Soil and Water Management Plan prepared under Schedule 4 Condition 84 of development consent DA-171-7-2005i, dated 25 March 2006.</i></p>	EMS (2008) and Soil and Water Management Sub Plan.	The Soil and Water Management Plan within the EMS (2008) was previously submitted electronically to DoP as part of EHSMP and approved. The SWMP complies with the requirement of this condition.	Compliant.	
PA 06_0138	<p>9 FLOOD MANAGEMENT</p> <p>The Proponent shall prepare and implement a Flood Management Plan for wells EM34 and EM35 located within the 1 in 100 year flood level, to the satisfaction of the Director-General. The plan shall be submitted to the Director-General prior to commissioning of wells EM34 and EM35, and shall include measures to minimise and mitigate flooding impacts associated with the project.</p> <p><i>Note: To fulfil this condition, the Proponent may prepare and implement an updated version of the Flood Management Plan prepared under Schedule 3 condition 12 of development consent DA-171-7-2005i, dated 25 March 2006.</i></p>	Emergency Response Plan - Section 2.13 Flooding and Field Production Flood Management Procedure (DCS-CM-FO-PR-204).	General provisions relating to flood response are outlined within the Emergency Response Plan and specific response is outlined in the Field Production Flood Management Procedure.	Compliant.	
PA 06_0138	<p>10 WASTE MANAGEMENT</p> <p>The Proponent shall ensure that any waste or wastewater is assessed and classified in accordance with the DEC's Environmental Guidelines: "Assessment Classification and Management of Liquid and Non-Liquid Wastes", and disposed of at a licensed waste disposal facility or as otherwise agreed with the DEC.</p>	Annual footprint report	It was reported that no hazardous, industrial or Group A wastes originated from development under this DA - confirmed by annual footprint report.	Compliant.	
PA 06_0138	<p>11 HAZARDS AND RISK</p> <p>Safety and Risk Management</p> <p>The Proponent shall prepare and implement an Emergency Plan for the project to the satisfaction of the Director-General. The plan shall be submitted to the Director-General prior to commissioning of the project and shall be prepared in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 1 - Industry Emergency Planning Guidelines.</p> <p><i>Note: To fulfil this condition the Proponent may prepare and implement an updated version of the Plan prepared under Schedule 4 condition 92(a) development consent DA-282-6-2003-i, dated 16 June 2004.</i></p>	Sighted Emergency Response Plan - implemented, maintained on the AGL server. Sighted Camden South Emergency Response Plan map with locations of well sites, fire stations, hospital, main roads, access routes and rivers.	Sighted Emergency Response Plan - implemented, maintained on the AGL server. Sighted Camden South Emergency Response Plan map with locations of well sites, fire stations, hospital, main roads, access routes and rivers.	Compliant.	
PA 06_0138	<p>12 The Proponent shall prepare and implement a Safety Management System (SMS) for the project, to the satisfaction of the Director-General. The SMS shall be submitted to the Director-General prior to commissioning of the project and shall be prepared in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 9 - Safety Management. The SMS shall:</p> <p>(a) cover all operations on the wells and gas gathering system;</p> <p>(b) clearly specify all safety related procedures, responsibilities and policies, along with details of mechanisms for ensuring adherence to procedures;</p> <p>(c) include a summary of records to demonstrate that management of change procedures were followed for the connection of new gas lines to the existing network and for the integration of new wells into the automatic control system; and</p>	Emergency Response Plan, update 08/09/2010 to include Menangle Park and Spring Farm Safety Management System (online) HSE Policy Statement, endorsed January 2008 and displayed in office Associated HSE documentation such as JSAs, risk assessments and incident reports and investigations.	Observed implementation of Safety Management System, which is maintained on the AGL server. Responsibilities and procedures established. Records such as risk assessments, JSAs and incident reports/investigations inspected to verify implementation. Alex Secervegovic has been appointed as the Health and Safety Representative.	Compliant.	

DA NUMBER: PA 06_0138
 LOCATION: Elizabeth Macarthur
 MODIFICATION: MOD1
 WORKS: Yes, Refracking of EM27, EM31 and fracture stimulation of EM34

Number of Conditions: 37
 Closed out previously: 0
 Number Noted: 4
 Number N/A: 0
 Number Non-Compliant: 5
 Compliance Score: 85%

DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
	<p>(d) confirm that the design and operation of all wells comply with the Department's Locational Guidelines - Development in the Vicinity of Operating Coal Seam Methane Wells (May 2004) for an Automatically Controlled Well (with Separator/Optional Pump) and that all safety related systems required by the guidelines have been included.</p> <p><i>Note: To fulfil this condition the Proponent may prepare and implement an updated version of the SMS prepared under Schedule 4 condition 92(b) of development consent DA-282-6-2003-i, dated 16 June 2004.</i></p>		<p>Camden South Emergency Response Plan dated 08/09/2010 indicates access, waterways, emergency services etc</p> <p>Sighted use of Management of Change Procedure (MOC-ECR002) for alternative free flow well head configuration.</p>		
PA 06_0138	<p>13 Compliance Report</p> <p>Within 3 months of commissioning of the project, the Proponent shall prepare a compliance report to the satisfaction of the Director-General. The report shall be prepared by a suitably qualified, experienced, and independent expert whose appointment has been endorsed by the Director-General and shall include:</p> <p>(a) dates of commencement of construction and commissioning;</p> <p>(b) actions taken (or proposed to be taken) to implement conditions 11 and 12; and</p> <p>(c) a signed statement that:</p> <ul style="list-style-type: none"> • the Emergency Plan required under condition 11 is effectively in place and that at least one emergency exercise has been conducted; • the SMS required under condition 12 has been fully implemented and that records required by the system are being kept; • the Emergency Plan and SMS have been prepared in accordance with the relevant Hazardous Industry Planning Advisory Paper; <ul style="list-style-type: none"> • all recommendations of the Emergency Plan and SMS have been implemented and are being maintained; and • all safety management systems and their associated risk controls have been implemented and are being maintained. 		It was reported that the project was commissioned in 2007; however the compliance report had not been completed.	Non-Compliant.	Compliance report to be completed and submitted with evidence retained to demonstrate compliance with this condition.
PA 06_0138	<p>14 FLORA AND FAUNA</p> <p>The Proponent shall only undertake drilling and fracture stimulation of EM23, EM27, EM33 and EM36, and construction of gas gathering lines and access roads located within the raptor zones outside of the recognised breeding season (June to January) of raptor species nesting in the EMAI's raptor zones.</p>		EM23, EM27 and EM33 were reported to be drilled in late 2007 outside the Raptor breeding season. Fracture stimulation of EM27 occurred on 07/10/2008, which is within the raptor breeding season (June - January). Sufficient evidence was not provided to indicate approval was granted for this activity and as such it is considered non-compliant.	Non-Compliant.	Drilling and fracture stimulation should only be conducted outside of the raptor breeding season.
PA 06_0138	<p>15 ABORIGINAL HERITAGE</p> <p>The Proponent shall prepare and implement an Aboriginal Heritage Management Plan for the project, in consultation with the DEC and relevant Aboriginal communities, and to the satisfaction of the Director-General. The plan shall be submitted to the Director-General prior to commencing construction (or as otherwise agreed by the Director-General) and shall include:</p> <p>(a) a description of the measures that would be implemented for the mapping, and salvage or relocation of the archaeological relics on EMAI Sites 1, 2, 4, 5, 6, and 7; CP OS 3; and IF 1 and IF 2;</p> <p>(b) a description of the measures that would be implemented if any new Aboriginal objects are discovered during the project; and</p> <p>(c) a protocol for the ongoing consultation and involvement of the Aboriginal communities in the conservation and management of Aboriginal cultural heritage on the site.</p> <p><i>Note: The archaeological site references in condition 15 are the same as those in the "Aboriginal Cultural Heritage Survey and Assessment Report for Fifteen New Proposed Gas Production Well Sites, Gathering Systems & Access Routes Camden Gas Project Stage 2 The Elizabeth Macarthur Agricultural Institute Property" prepared by Dominic Steele Consulting Archaeology, and dated December 2005.</i></p>	EMS (2008) including Aboriginal Cultural Heritage Management Sub Plan (Appendix F) and European Heritage Management Sub Plan (Appendix G).	The Aboriginal and Cultural Heritage Management Plan was previously submitted electronically to DoP as part of EHSMP and approved; however evidence was not sighted as part of the current audit. The Plan appeared to comply with the requirements of this condition.	Compliant.	

DA NUMBER: PA 06_0138
 LOCATION: Elizabeth Macarthur
 MODIFICATION: MOD1
 WORKS: Yes, Refracing of EM27, EM31 and fracture stimulation of EM34

Number of Conditions: 37
 Closed out previously: 0
 Number Noted: 4
 Number N/A: 0
 Number Non-Compliant: 5
 Compliance Score: 85%

DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
PA 06_0138	<p>16 ONGOING OPERATIONS Redrilling and Re-fracing The Proponent shall obtain the approval of the Director-General prior to undertaking work involving the redrilling and/or re-fracing of wells approved under this approval.</p> <p><i>Note: For the purposes of this approval the redrilling and/or re-fracing of a well does not constitute wellhead maintenance.</i></p>	Refrac Management Plan, dated 30/07/2008	<p>There was no drilling under this project approval during the audit period.</p> <p>A Refrac Management Plan was prepared for refracing of EM27, EM31 and fracture stimulation of EM34. It addresses construction methodologies and environmental management measures to minimise impacts such as noise. DoP approved the refracing management Plan (letter dated 20/8/2008).</p>	Compliant.	
PA 06_0138	<p>17 Gas Gathering System The Proponent shall, to the satisfaction of the Director-General, ensure that:</p> <p>(a) pipelines are designed, constructed and operated in accordance with the Australian Standard for the Installation and Maintenance of Plastic Pipe Systems for Gas AS 3723-1989 (or its latest version);</p> <p>(b) the route of gas gathering and water transport systems and access roads follow previously or currently disturbed areas wherever possible</p> <p>(c) trenches are not left open overnight, unless adequately covered;</p> <p>(d) works within 20 metres of watercourses are only undertaken during dry weather conditions;</p> <p>(e) the pipeline crossing of Remembrance Drive is located at a depth of at least 1.2 metres below the road surface;</p> <p>(f) construction activities do not impede lateral water flows;</p> <p>(g) no crown or camber remains along any gas gathering system line, following rehabilitation; and</p> <p>(h) signs are erected at intervals along all gas gathering system lines indicating the presence of a buried gas pipeline.</p>	EMS (2008)	Sighted updated EMS (2008) and associated Environmental Management Sub Plans, which adequately address the requirements (a) to (h) in this consent condition.	Compliant.	
PA 06_0138	<p>18 REHABILITATION The Proponent shall progressively rehabilitate the site to the satisfaction of the Director-General, in a manner that is generally consistent with the landform of the surrounding land.</p>	EMS (2008) and Landscape and Rehabilitation Management sub plan. Photos of rehabilitation on site EM37, EM31/32, EM34	It was reported that the sites where wells were fracture stimulated during the audit period (EM27, EM31 and EM34) were rehabilitated in accordance with the requirements of the EMS and generally consistent with the surrounding land; however visual inspection was not conducted as part of the audit. General site and well maintenance occurring during the audit period did not cause disturbance requiring rehabilitation. Photographic evidence was provided and indicated suitable rehabilitation.	Compliant.	
PA 06_0138	<p>19 The Proponent shall prepare and implement a Rehabilitation Management Plan to the satisfaction of the Director-General. The Plan shall be submitted to the Director-General within 6 months of the date of this approval and shall:</p> <p>(a) identify the areas likely to be disturbed by the project; and</p> <p>(b) describe the measures that would be implemented to rehabilitate the site.</p>	EMS (2008) and Landscape and Rehabilitation Management sub plan. Refrac Management Plan, dated 30/07/2008	Effective measures for rehabilitation management are presented in the EMS and Refrac Management Plan. It was reported that the sites where wells were fracture stimulated during the audit period (EM27, EM31 and EM34) were rehabilitated in accordance with the requirements of the EMS and generally consistent with the surrounding land; however visual inspection was not conducted as part of the audit. General site and well maintenance occurring during the audit period did not cause disturbance requiring rehabilitation.	Compliant.	

DA NUMBER: PA 06_0138
 LOCATION: Elizabeth Macarthur
 MODIFICATION: MOD1
 WORKS: Yes, Refracking of EM27, EM31 and fracture stimulation of EM34

Number of Conditions: 37
 Closed out previously: 0
 Number Noted: 4
 Number N/A: 0
 Number Non-Compliant: 5
 Compliance Score: 85%

DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
	<p>SCHEDULE 4 ENVIRONMENTAL MANAGEMENT AND MONITORING CONDITION: 1 OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN (OEMP) The Proponent shall prepare and implement an Operational Environmental Management Plan (OEMP) for the project to the satisfaction of the Director-General. The OEMP shall be submitted to the Director-General prior to commissioning of the project and shall:</p> <p>(a) incorporate the various environmental management plans, monitoring programs and other requirements set out in Schedule 3 of this approval; (b) identify statutory and other obligations that the Proponent is required to fulfil during the operation of the project; (c) describe the environmental policies and principles to be applied to the operation of the project; (d) describe in general how the environmental performance of the project would be monitored and managed; (e) describe the procedures that would be implemented to:</p> <ul style="list-style-type: none"> • keep the local community and relevant agencies informed about the environmental performance of the project; • receive, handle, respond to, and record complaints; • resolve any disputes that may arise during the course of the project; • respond to any non-compliance; • manage cumulative impacts; and • respond to emergencies (including bushfires); and <p>(f) describe the role, responsibility, authority, and accountability of all the key personnel involved in environmental management of the project.</p> <p><i>Note: To fulfil this condition, the Proponent may prepare and implement an updated version of the OEMP prepared under Schedule 5 condition 2 of development consent DA-282-6-2003-i, dated 16 June 2004.</i></p>	EMS (2008).	The EMS (2008) covers environmental management and monitoring for operation of the Camden Gas Project, including wells covered by this DA. An earlier version of the EMS (refer EHSM) was approved pre-audit period. A site-specific OEMP has not been developed. The EMS includes: Legislative requirements (Section 2.1) Structure and Responsibility (Section 5.1) HSE Policy (Jan 2008) Objectives, targets and KPI (section 4.2) Policies and procedures within the EMS; and additional Management Sub Plans for noise, soil, water, traffic, waste and rehabilitation.	Compliant.	
PA 06_0138	<p>2 INCIDENT REPORTING Within 7 days of detecting an exceedence of the goals/limits/performance criteria in this approval or an incident causing (or threatening to cause) material harm to the environment; the Proponent shall report the exceedence/incident to the Department (and any relevant agency). The report shall:</p> <p>(a) describe the date, time, and nature of the exceedence/incident; (b) identify the cause (or likely cause) of the exceedence/incident; (c) describe what action has been taken to date; and (d) describe the proposed measures to address the exceedence/incident.</p>	EMS (2008) incident register	AEPR summarises incidents relating to safety and environmental non-compliances. There were no incidents logged at the EMAI site. Incident reporting database used for all incidents on site (Connect First). Site maintains a database of environmental related complaints and incidences (Connect First). Where incidences are logged these are raised to supervisor for action. There were no complaints or incidents raised in relation to this site.	Compliant.	
PA 06_0138	<p>3 ANNUAL REPORTING Within 12 months of the date of this approval, and annually thereafter during the life of the project, the Proponent shall prepare an Annual Environmental Performance Report (AEPR) for the project to the satisfaction of the Director-General. The AEPR shall:</p> <p>(a) identify the standards, performance measures and statutory requirements that apply to the project; (b) assess the environmental performance of the project to determine whether it is complying with these standards, performance measures, and statutory requirements; (c) identify any non-compliance during the year with the conditions of this approval or any standard, performance measure or statutory requirement that applies to the project; (d) describe, if any non-compliance is identified, the actions and measures carried out or being carried out to ensure compliance, clearly indicating who would carry out these actions and measures, when they would be carried out, and how the effectiveness of these measures would be monitored over time;</p>	Sighted Annual Environmental Performance Report (July 06-June 07; July 07-June 08; July 08-June 09; July 09-June 10).	AEPRs have been completed as required.	Compliant.	

DA NUMBER: PA 06_0138
 LOCATION: Elizabeth Macarthur
 MODIFICATION: MOD1
 WORKS: Yes, Refracking of EM27, EM31 and fracture stimulation of EM34

Number of Conditions: 37
 Closed out previously: 0
 Number Noted: 4
 Number N/A: 0
 Number Non-Compliant: 5
 Compliance Score: 85%

DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
	<p>(e) include a copy of complaints for the year and a description of actions taken or being taken to address registered complaints;</p> <p>(f) include a discussion of issues or recommendations raised by the Camden Gas Project's Community Consultative Committee and a description of actions taken or being taken to address these issues or recommendations; and</p> <p>(g) include a detailed summary of results of all monitoring required by this approval and a discussion of any significant results, trends or exceptions in these results,</p> <p><i>Note: The Proponent may include this report in the Annual Environmental Performance Report required under Schedule 5 condition 5 of development consent DA-282-6-2003-i, dated 16 June 2004. The due date for a combined report shall be the earlier of the due dates for the separate reports.</i></p>				
PA 06_0138	4 The Proponent shall submit a copy of the AEPR to the DPI, DEC and Council.		<p>It was reported that the AEPR 2008-09 was submitted to relevant authorities. Evidence to verify submission and distribution was made available for inspection.</p> <p>AEPR 2009-10 is in final draft form and yet to be submitted. It was reported that DoP was to provide final sign-off on AEPR for 2008-09, before AEPR 2009-10 was submitted.</p>	Compliant.	
PA 06_0138	<p>5 INDEPENDENT ENVIRONMENTAL AUDIT</p> <p>Within 2 years of the date of this approval, and every 3 years thereafter, unless the Director-General directs otherwise, the Proponent shall commission and pay the full costs of an Independent Environmental Audit. The Independent Environmental Audit shall:</p> <p>(a) be conducted by a suitably qualified, experienced, and independent person(s) whose appointment has been approved by the Director-General;</p> <p>(b) be consistent with ISO 19011:2002 - Guidelines for Quality and/or Environmental Management Systems Auditing, or updated versions of these guidelines/manuals;</p> <p>(c) assess the environmental performance of the project, and its effects on the surrounding environment;</p> <p>(d) include a hazard audit of the project in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 5, "Hazard Audit Guidelines";</p> <p>(e) assess whether the project is complying with the relevant standards, performance measures and statutory requirements;</p> <p>(f) review the adequacy of the OEMP; and</p> <p>(g) recommend measures or actions to improve the environmental performance of the project, and/or its environmental management and monitoring systems.</p> <p><i>Note: The Proponent may include this audit in the Independent Environmental Audit required under Schedule 5 condition 10 of development consent DA-282-6-2003-i, dated 16 June 2004. The due date for a combined audit shall be the earlier of the due dates for the separate audits.</i></p>		This audit covers the scope of the Independent Environmental Audit.	Compliant.	
	6 Within 1 month of completion of each Independent Environmental Audit, the Proponent shall submit a copy of the audit report to the Director-General, DPI and DEC, with a response to any of the recommendations contained in the audit report.		Reportedly submitted. Notes regarding audits, audit findings and response to recommendations were included in the AEPR.	Compliant.	
	7 Following each Independent Environmental Audit, the Proponent shall review and if necessary revise the OEMP (and any documents contained in the plan), to the satisfaction of the Director-General. The revised OEMP shall be submitted to the Director-General within 6 months of completing the audit.	AGL Environmental Management Plan	It was reported that the OEMP was written after last audit and submitted to DoP (now DoPI); however evidence to verify submission and timing was not made available for inspection.	Non-Compliant.	Evidence to verify submission of OEMP to DoP (now DoPI) to be obtained and retained to demonstrate compliance with the requirements of this condition.
	<p>8 COMMUNITY CONSULTATIVE COMMITTEE</p> <p>The Proponent shall ensure that the construction and operation of the project is subject to the consideration of the Camden Gas Project Community Consultative Committee, as established under Schedule 5 condition 17 of development consent DA No. 282-6-2003-I, dated 16 June 2004.</p>	Sighted Community Consultation Committee Minutes. #20 25/09/08, #21 27/11/08, #22 19/03/09 #23 16/07/09 #24 18/02/10 and #25 15/07/10.	It was reported that the frequency of community consultation meetings had been adjusted from quarterly to every four months with agreement from committee members. Recently quarterly meetings were reinstated.	Compliant.	

DA NUMBER: PA 06_0138
 LOCATION: Elizabeth Macarthur
 MODIFICATION: MOD1
 WORKS: Yes, Refracking of EM27, EM31 and fracture stimulation of EM34

Number of Conditions: 37
 Closed out previously: 0
 Number Noted: 4
 Number N/A: 0
 Number Non-Compliant: 5
 Compliance Score: 85%

DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
	<p>9 ACCESS TO INFORMATION From 31 March 2007, and during the life of the project thereafter, the Proponent shall place a copy of the following documents and information (and any subsequent revisions) required under this approval on its website: (a) OEMP; (b) all Independent Environmental Audits; (c) all AEPRs; and (d) a summary of all environmental monitoring results required under this consent (to be updated at least every 6 months).</p>	AGL website	<p>Refer website: http://www.agl.com.au/about/EnergySources/indevelopment/Pages/Camden-Gas-Project.aspx The website was reviewed and found to be up to date and provided public access to information as required by this condition.</p>	Compliant.	

**APPENDIX 1
 SCHEDULE OF LAND**

Property	Facility	Lot and DP Number
Elizabeth Macarthur Agricultural Institute	15 wells and gas gathering lines	Lot 2, DP 1050479 Lot 1, DP 130288 Lot 1, DP 1067320
Logan Brae	gas gathering line	Lot 6 DP 808589 Lot 8, DP 808569
Remembrance Drive	gas gathering line	road reserve of Remembrance Drive

Appendix J PA06_0291 Compliance Checklist

DA NUMBER: PA 06_0291
 LOCATION: Spring Farm and Menangle Park Project
 MODIFICATION:
 WORKS: Yes, drilled three wells (MP05, MP07 and MP08) in Menangle Park and seven wells (SF17 and SF20) in Spring Farm gas fields.

Number of Conditions: 52
 Closed out previously: 0
 Number Noted: 7
 Number N/A: 1
 Number Non-Compliant: 5
 Compliance Score: 89%

DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
	SCHEDULE 2 Administrative Conditions				
PA 06_0291	1 Obligation to Minimise Harm to the Environment The Proponent shall implement all practicable measures to prevent or minimise any harm to the environment that may result from the construction or operation of the project.	Site observations. Interviews with site personnel.	It was reported that wells (SF17, SF20, MP05 (includes MP05a, MP07 and MP08)) were drilled during the audit period and had since been rehabilitated. MP08 was fraced. The sites inspected appeared to be managed to minimise environmental harm. There were no environmental incidences (including complaints) recorded in relation to operations at these locations.	Compliant.	
PA 06_0291	2 Terms of Approval The Proponent shall carry out the project generally in accordance with the: a) Project Application 06-0291 b) EA titled "Environmental Assessment - Expansion of Stage 2 of the Camden Gas Project Stage 2 Concept Area Spring Farm Project Area Menangle Park Project Area", Volume 1 and 2 prepared by ENSR Australia Pty Ltd and dated December 2007. c) Submissions Report prepared by ENSR Australia Pty Ltd, and dated December 2007; d) Statement of Commitments; and e) conditions of this approval.	Documentation review. Site observations. Interviews with site personnel.	It was reported that wells (SF17, SF20, MP05 (includes MP05a, MP07 and MP08)) were drilled during the audit period and had since been rehabilitated. MP08 was fraced. SF04 and SF10 have not been drilled and there are currently no plans to drill. It appears that the development was carried out in general accordance with terms of approval.	Compliant.	
PA 06_0291	3 If there is any inconsistency between the above documents, the latter document shall prevail over the former to the extent of the inconsistency. However, the conditions of this consent shall prevail over all other documents to the extent of any inconsistency.			Noted.	
PA 06_0291	4 The Proponent shall comply with any reasonable requirements of the Director-General arising from the Department's assessment of: (a) any reports, plans, programs or correspondence that are submitted in accordance with this approval; and (b) the implementation of any actions or measures contained in these reports, plans, programs or correspondence.	Documentation review. Site observations. Interviews with site personnel.	It was reported that the Director-General made no additional requests of the Proponent relating to the site during the audit period.	Compliant.	
PA 06_0291	5 Limits on Approval This approval shall lapse 21 years after the date of this approval or on the expiry date of petroleum production lease No.4 or Petroleum Lease No. 5 whichever is the sooner.		This approval will expire in 2029 and PPL 5 will expire in 2028.	Noted.	
PA 06_0291	6 Nothing in this approval permits the drilling and operation of more than four well surface locations in Spring Farm and more than 12 in Menangle Park.	Documentation review. Site observations. Interviews with site personnel.	During the audit period, two well surface locations at Spring Farm (SF17 and SF20) and one well surface location at Menangle Park (MP05) were operational. The initial civil earthworks and drilling of MP23 well commenced in June 2010 i.e. MP03 was drilled and MP23 was commissioned after the audit period. Currently, there are three well surface locations.	Compliant.	
PA 06_0291	7 This approval permits the drilling of well surface locations SF04A, SF10, SF17, and SF20 in Spring Farm. The Proponent shall not drill well surface location SF04.	Documentation review. Site observations. Interviews with site personnel.	During the audit period, there were two surface well locations drilled and operating in Spring Farm, including SF17 and SF20.	Compliant.	
PA 06_0291	8 This approval permits the drilling of well surface locations MP02, MP03, MP04, MP05, MP06, MP11, MP19, MP21, MP22, MP23, MP24, and MP33 in Menangle Park.	Documentation review. Site observations. Interviews with site personnel.	Currently, there were two surface well locations drilled and operating in Menangle Park, including MP05a and MP23.	Compliant.	
PA 06_0291	9 The Proponent shall not drill more than 6 co-located wells within each well surface location.	Documentation review. Site observations. Interviews with site personnel.	During the audit period, maximum co-located wells was four at Menangle Park (i.e. MP05).	Compliant.	
PA 06_0291	10 The Proponent shall surrender the approval for any well surface location where work has not been commenced within 5 years of the date of this approval.			Noted.	

DA NUMBER: PA 06_0291
 LOCATION: Spring Farm and Menangle Park Project
 MODIFICATION:
 WORKS: Yes, drilled three wells (MP05, MP07 and MP08) in Menangle Park and seven wells (SF17 and SF20) in Spring Farm gas fields.

Number of Conditions: 52
 Closed out previously: 0
 Number Noted: 7
 Number N/A: 1
 Number Non-Compliant: 5
 Compliance Score: 89%

DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
PA 06_0291	11 The Proponent shall not construct well surface locations MP04, MP19 and MP21 without the written approval of the Director-General. In seeking the Director-General's approval, the Proponent shall: (a) in relation to MP04, submit evidence that the Proponent has consulted with Transgrid and/or Integral Energy on the design and location of MP04 and considered the safety issues of the location of gas well(s) adjacent to the Macarthur Substation and its earthing system; (b) in relation to MP19 and MP21, submit evidence that the Proponent has consulted with Landcom and Campbelltown City Council on the design and location of MP19 and MP21 in relation to the proposed Spring Farm arterial road and the relevant Menangle Park draft urban layout; and (c) provide a detailed site layout plan(s) of the well surface location (condition 1 of Schedule 3); to the satisfaction of the Director-General.	Documentation review. Site observations. Interviews with site personnel.	It was reported that these wells not drilled and there were currently no plans to drill at these locations. Requirement noted.	Compliant.	
PA 06_0291	12 The Proponent shall not produce gas from any well unless a Production Lease under the Petroleum (Onshore) Act 1991 has been obtained from the full length of the well.	PPL4, PPL5	PPL4 and PPL5 were current and valid for the production area during gas production from these wells. PPL1-6 apply to Camden Gas Project.	Compliant.	
PA 06_0291	13 Within three months of commissioning the wells, the Proponent shall provide Camden Council and Campbelltown City Council with: (a) the Geographical Positioning System (GPS) co-ordinates and digital survey data for the well surface locations and gas gathering system, in a format suitable to the councils; and (b) the wellhead configuration of each well. The Proponent shall provide a copy of this information to the landowner on request.	Documentation review. Site observations. Interviews with site personnel.	During the audit period, only well surface locations MP08 and SF17 (SF01-03) were commissioned. It was reported that AGL had not complied with the requirement to prepare spatial data (in map and spreadsheet format) and submit to local councils. This would form part of the role of the Land & Approval group at AGL. It was reported that a process had commenced to systematically record and formalise reporting of GPS coordinates and wellhead configurations. At this stage, this information has not been provided to councils.	Non-Compliant.	Provide spatial data to Council as per requirements for each well.
PA 06_0291	14 The Proponent shall: a) Repair, or pay all reasonable costs associated with repairing public infrastructure that is damaged by the project; and b) relocate, or pay all reasonable cost associated with relocating public infrastructure that needs to be relocated as a result of the project. Where agreement is not reached with the owner on the cost of repairs, the Director-General shall determine the amount considered reasonable.	Documentation review. Site observations. Interviews with site personnel.	It was reported that during rehabilitation activities near SF17, the Contractor (Fetter Place Civil) had damaged an overhead powerline. The repair had to be done by Integral Energy. The Contractor was invoiced for the cost of repair (sighted). The incident was reported to DII; however evidence of notification being made was not sighted.	Compliant.	
PA 06_0291	15 Operation of Plant and Equipment The Proponent shall ensure that all plant and equipment used at the site is: (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient condition.	Site observations. Interviews with site personnel. Preventative Maintenance Register and sighted calibration records for gas monitors within the RGP offices.	Workshop for preventative maintenance and repair was inspected. Observations of plant and equipment and records indicated that it was maintained effectively and operated appropriately. As a result of an incident that was reported to occur at SF17, two pieces of equipment were decommissioned (including workover rig and high pressure cementing unit). However site personnel indicated that the equipment had not caused the incident, but there was an opportunity to improve the equipment design. It was reported that the incident was the result of operator error.	Compliant.	

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PA 06_0291	SCHEDULE 3 Environmental Performance																																																
PA 06_0291	Prior to construction commencing at an individual well surface location, the proponent shall submit a Site Layout Plan of the well surface location to the satisfaction of the Director-General. The Site Layout Plan must be prepared in consultation with the Landowner and include details of: (a) the site construction layout and construction footprint; (b) the wellheads and production compound layout; (c) the route of the gas gathering lines and access roads; and (d) initial rehabilitation works following construction.	Spring Farm Site Layout plan DoP letter of approval, dated 04/12/2009	The site layout plan for SF20 was prepared and submitted to DoP for approval - sighted letter of approval, dated 04/12/2009.	Compliant.																																													
PA 06_0291	2 NOISE Construction and Maintenance Hours Except for the drilling (including well casing and grouting) of wells, the Proponent shall comply with the construction and maintenance hours in Table 1: Table 1: Construction and Maintenance Hours for the Project.	EMS (2008) including Noise Management Sub Plan. Induction package.	It was reported that consistent hours apply across the Camden Gas Project, with the exception of drilling which occurs 24 hours per day, 7 days per week. The construction and maintenance hours are outlined in the Noise Management Plan within EMS (2008) and is covered as part of the Contractor induction. It was reported that construction and maintenance activities was restricted to the hours specified in this condition.	Compliant.																																													
	<table border="1"> <thead> <tr> <th>Activity</th> <th>Day</th> <th>Time</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Construction</td> <td>Monday – Friday</td> <td>7:00am – 6:00pm</td> </tr> <tr> <td>Saturday</td> <td>8:00am – 1:00pm</td> </tr> <tr> <td>Sunday and Public Holidays</td> <td>Nil</td> </tr> <tr> <td rowspan="3">Planned maintenance activities (includes well workover)</td> <td>Monday – Friday</td> <td>7:00am – 6:00pm</td> </tr> <tr> <td>Saturday</td> <td>8:00am – 1:00pm</td> </tr> <tr> <td>Sunday and Public Holidays</td> <td>Nil (unless inaudible at the residential receiver)</td> </tr> </tbody> </table>	Activity	Day	Time	Construction	Monday – Friday	7:00am – 6:00pm	Saturday	8:00am – 1:00pm	Sunday and Public Holidays	Nil	Planned maintenance activities (includes well workover)	Monday – Friday	7:00am – 6:00pm	Saturday	8:00am – 1:00pm	Sunday and Public Holidays	Nil (unless inaudible at the residential receiver)																															
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PA 06_0291	3 Construction Noise Goals The Proponent shall use its best endeavours to undertake construction activities to comply with the construction noise goals specified in Table 2: Table 2: Construction Noise Goals dB(A) Laeq(15min).	AEPR 2008/09 and AEPR 2009/10	The 2009-10 AEPR presents a summary of noise monitoring SF17 and SF20 (prepared on basis of full noise monitoring data provided by AGL), which indicates minor occasional exceedences (1-7dBA predominantly during night time) measured at sensitive receivers adjacent to SF20. Two community complaints were recorded in response to noise from operations at SF20. The 2008-09 AEPR presents a summary of noise monitoring at MP05 (prepared on basis of full noise monitoring data provided by AGL) which demonstrated that the noise levels from construction of MP05 complied with the noise goals specified in this condition.	Compliant.																																													
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PA 06_0291	4 Construction Noise Management Plan The Proponent shall prepare and implement a Construction Noise Management Plan construction of the project to the satisfaction of the Director-General. The plan shall be submitted to the Director-General prior to construction commencing and shall include: (a) a detailed description of the measure that would be implemented to achieve the construction noise goals in condition 3; (b) a community notification protocol for the proposed construction activities (including any re-drilling or re-fracking of wells (c) a description of the measures that would be implemented where the construction noise goals in condition 3 are likely to be achieved or are not being achieved; and (d) details of who would be responsible for monitoring, reviewing and implementing the plan.	Construction Noise Management Protocol sighted within EMS, approved by Director-General.	The EMS (2008) and corresponding Noise Management Sub Plan contains general measures to manage noise levels from construction and operation activities across the Camden Gas Project, including community notification processes and relevant noise limits to be adopted. It was reported that the previous Noise Monitoring Plan produced by AGL (2006) was approved by the Director-General (refer pas audits).	Compliant.																																													

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PA 06_0291	<p>5 Operational Noise Criteria The proponent shall ensure that the noise generated by the project does not exceed the noise impact assessment criteria in Table 3: Table 3: Noise Impact Assessment Criteria dB(A)_{L_{Aeq}}</p> <table border="1"> <thead> <tr> <th rowspan="2">Location (nearest residential building)</th> <th>Day</th> <th>Evening</th> <th>Night</th> </tr> <tr> <th>L_{Aeq}(15 Minute)</th> <th>L_{Aeq}(15 Minute)</th> <th>L_{Aeq}(15 Minute)</th> </tr> </thead> <tbody> <tr> <td>SF10</td> <td>43</td> <td>42</td> <td>37</td> </tr> <tr> <td>SF04A, SF17, SF20</td> <td>43</td> <td>41</td> <td>36</td> </tr> <tr> <td>MP05, MP06, MP11</td> <td>40</td> <td>40</td> <td>40</td> </tr> <tr> <td>MP19, MP21, MP24, MP33</td> <td>42</td> <td>42</td> <td>40</td> </tr> <tr> <td>MP02, MP03, MP04, MP22, MP23</td> <td>49</td> <td>45</td> <td>40</td> </tr> </tbody> </table>	Location (nearest residential building)	Day	Evening	Night	L _{Aeq} (15 Minute)	L _{Aeq} (15 Minute)	L _{Aeq} (15 Minute)	SF10	43	42	37	SF04A, SF17, SF20	43	41	36	MP05, MP06, MP11	40	40	40	MP19, MP21, MP24, MP33	42	42	40	MP02, MP03, MP04, MP22, MP23	49	45	40		<p>It was reported that operational noise monitoring was not conducted at these locations as noise levels were inaudible. Observations made by the auditor during site inspection indicated that the operational noise levels of the well head locations was minor and likely inaudible at adjacent sensitive receivers.</p> <p>As a result of observed levels (i.e. inaudible at nearest sensitive receptors), noise testing is not regularly conducted. It was reported that noise monitoring is conducted in response to complaints only. It may be appropriate to provide evidence to DoP to confirm that regular monitoring of sound pressure levels is not necessary.</p>	Compliant.	
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PA 06_0291	<p>6 Continuous Improvement The Proponent shall, to the satisfaction of the Director-General: (a) implement all reasonable and feasible best practice noise mitigation measures; (b) investigate ways to reduce the noise generated by the project; and (c) report on these investigations and the implementation and effectiveness of these measures in the AEMR.</p>		<p>Observed that temporary noise barriers were installed around perimeter of drilling site adjacent to sensitive receivers. In addition, focussed noise attenuation on drill rig equipment e.g. noise walls on cooling fans with elevated noise levels to reduce noise impacts. Works and deliveries are scheduled to reduce heavy vehicle movements.</p>	Compliant.																												
PA 06_0291	<p>7 Noise Monitoring Program The Proponent shall prepare and implement a Noise Monitoring Program for the construction and operation of the project to the satisfaction of the Director-General. The Program shall be submitted to the Director-General prior to construction commencing and shall include a noise monitoring protocol for evaluating compliance with the construction noise goals and the operational noise impact assessment criteria in this approval.</p>	<p>EMS contains details on noise control measures, including the Noise Management Sub Plan.</p>	<p>A Noise Monitoring Program was prepared and presented as part of the EMS (2008) and Noise Management Plan (previously approved by the Director General in 2006). The Plan requires that noise is monitored on installation and at 3 months at 7m from the well. As noise monitoring is inconsistently implemented across the project and generally not in accordance with the plan, the development was considered non-compliant with the requirement to implement the Noise Monitoring Program.</p>	Non-Compliant.	Update plan to reflect current monitoring program and ensure implementation.																											
PA 06_0291	<p>8 Air Quality The Proponent shall implement all practicable measures to minimise dust emissions generated by the construction and operation of the project to the satisfaction of the Director-General.</p>	<p>EMS (2008) including Air Quality Management Sub Plan.</p>	<p>Based on observations made at drilling and well sites, AGL adopt measures outlined in the EMS including water sprays, restricted speeds, designated access routes and rehabilitation etc.</p> <p>Site observations confirmed that rehabilitation of SF17 had commenced in general accordance with the measures outlined in the EMS (2008) e.g. planting, mulch etc to minimise windblown dust.</p> <p>However SF20 and MP05 had not been rehabilitated to the same standard. SF20 initial rehabilitation commenced (e.g. scale down site, remove unnecessary equipment, landshaping) but to confirm final landform/landscape. MP05 consistent with surrounding land - located within rail corridor.</p>	Compliant.																												

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PA 06_0291	<p>9 WATER Soil and Water Management Plan The proponent shall prepare and implement a Soil and Water Management Plan for th project to the satisfaction of the Director-General. The plan shall be submitted to the Director-General prior to construction commencing and shall:</p> <p>(a) be consistent with the requirements in <i>Managing Urban Stormwater: Soils and Construction, Volume 1, 4th Edition, 2004</i> (Landcom); (b) identify construction and operation activities that could cause soil erosion and generate sediment; (c) describe measure to minimise soil erosion and the potential for the transport of sediment to downstream waters; (d) describe the location, function, and capacity of erosion and sediment control structures for both construction and operation; (e) describe what measures would be implemented to maintain the structures over time; and (f) describe the procdures that would be followed for planned and unplanned water discharges from the site.</p>	Site designs used for construction created by Lena Hayward. EMS (2008) including Soil and Water Management Plan.	Sighted EMS Sub-Plan for Soil and Water Management, dated August 2008 which was previously submitted electronically to DoP as part of EHSMP and approved. The SWMP complies with the requirement of this condition. Contractors are supervised by AGL representative responsible for environmental management, including inspection and maintenance of sediment and erosion controls on site.	Compliant.	
PA 06_0291	<p>10 Gas Gathering System The Proponent shall, to the satisfaction of the Director-General, ensure that:</p> <p>(a) pipelines are designed, constructed and operated in accordance with the Australian Standard for the Installation and Maintenance of Plastic Pipe Systems for Gas AS 3723-1989 (or its latest version); (b) the route of gas gathering and water transport systems and access roads follow previously or currently disturbed areas wherever possible (c) trenches are not left open overnight, unless adequately covered; (d) works within 20 metres of watercourses are only undertaken during dry weather conditions; (e) the pipeline crossing of Remembrance Drive is located at a depth of at least 1.2 metres below the road surface; (f) construction activities do not impede lateral water flows; (g) no crown or camber remains along any gas gathering system line, following rehabilitation; and (h) signs are erected at intervals along all gas gathering system lines indicating the presence of a buried gas pipeline.</p>	Interviews with site personnel. Site observations.	There was no gas gathering line construction completed under this consent during the audit period. Observations of the gas gathering system indicates that the requirements of this condition were complied with.	Compliant.	
PA 06_0291	<p>11 Should the future urban development of the Spring Farm and Menangle Park urban release areas identify the need to relocate any gas gathering lines the subject of this approval, that infrastructure shall be relocated by, and at the cost of the Proponent to the satisfaction of the Director-General, following consultation with the relevant council and/or landowner. The requirement to relocate at the cost of the Proponent shall be limited to one occasion.</p>	Interviews with site personnel.	To date, urban development has not caused AGL to relocate the gas gathering lines.	Noted.	
PA 06_0291	<p>12 FLOOD MANAGEMENT The Proponent shall prepare and implement a Flood Management Plan for well surface location within the 1 in 100 year flood level, to the satisfaction of the Director-General. The plan shall be submitted to the Director-General prior to the commissioning of the wells and shall include measure to minimise and mitigate flooding impacts associated to one occasion.</p>	Emergency Response Plan.	Emergency Response Plan includes procedure for Field Production Flood Management dated 1/11/2008, which identifies risk level and response. It was reported that wells can be remotely shut down and unnecessary surface equipment removed (eg. tanks, pumps etc) in the event of flood threat.	Compliant.	

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PA 06_0291	<p>13 WASTE MANAGEMENT</p> <p>The Proponent shall ensure that any waste or wastewater (including drill pits and drill/formation waters) is assessed and classified in accordance with the DECC's Environmental Guidelines: "Assessment Classification and Management of Liquid and Non-Liquid Wastes", and disposed of at a licensed waste disposal facility or as otherwise agreed with the DECC.</p>	<p>AEPR 2008/09 and AEPR 2009/10</p> <p>Annual footprint, includes records of waste disposal and transfer/disposal dockets.</p>	<p>General waste classification and management practices outlined in Waste Management Plan within EMS (2008). This Waste Management Plan does not cover drilling wastes.</p> <p>The major contractors appointed to undertake drilling and construction works provide waste management plans that respond to drilling muds and wastewaters.</p> <p>Annual environmental report summarises waste volumes and corresponding treatment and disposal.</p> <p>During construction of SF20, discovered exposed asbestos pipe by Contractor that was removed and disposed offsite by a licensed contractor (Transpacific).</p>	Compliant.	
PA 06_0291	<p>14 HAZARD AND RISK Safety and Risk Management</p> <p>The Proponent shall prepare and implement an Emergency Plan for the project to the satisfaction of the Director-General. The plan shall be submitted to the Director-General prior to commissioning of the project and shall be prepared in accordance with the Department's <i>Hazardous Industry Planning Advisory paper No. 1 - Industry Emergency Planning Guidelines</i>.</p>	<p>Emergency management plan approved in August 2004. Camden South Emergency Response Plan, dated 08/09/2010.</p>	<p>The Emergency Response Plan developed and approved (August 2004) then subsequently updated to include Razorback, Spring Farm and Menangle Park gas fields.</p>	Compliant.	
PA 06_0291	<p>15 The Proponent shall prepare and implement a Safety Management System (SMS) for the project, to the satisfaction of the Director-General</p>	<p>Safety Management System (online)</p> <p>HSE Policy Statement, endorsed January 2008 and displayed in office</p>	<p>Safety Management System (SMS) separated from EMS and managed by Alex Secerbergovic (H&S Manager).</p> <p>Observed implementation of Safety Management System, which is maintained on the AGL server. Responsibilities and procedures established. Records such as risk assessments, JSAs, audit reports and incident reports/investigations inspected to verify implementation.</p> <p>Sighted use of Management of Change Procedure (MOC-ECR002) for alternative free flow well head configuration.</p>	Compliant.	
PA 06_0291	<p>16 Compliance Report</p> <p>Within 3 months of commissioning of the project, the Proponent shall prepare a compliance report to the satisfaction of the Director-General. The report shall be prepared by a suitably qualified, experienced, and independent expert whose appointment has been endorsed by the Director-General and shall include:</p> <p>(a) dates of commencement of construction and commissioning;</p> <p>(b) actions taken (or proposed to be taken) to implement conditions 10 and 11; and</p> <p>(c) a signed statement that:</p> <ul style="list-style-type: none"> • the Emergency Plan required under condition 14 is effectively in place and that at least one emergency exercise has been conducted; • the SMS required under condition 15 has been fully implemented and that records required by the system are being kept; • the Emergency Plan and SMS have been prepared in accordance with the relevant Hazardous Industry Planning Advisory Paper; • all recommendations of the QRA, Emergency Plan and SMS have been implemented and are being maintained; and • all safety management systems and their associated risk controls have been implemented and are being maintained. 		<p>It was reported that while compliance documentation has been prepared, it has not been verified independently.</p>	Non-Compliant.	<p>Compliance report to be completed and submitted with evidence retained to demonstrate compliance with this condition.</p>

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PA 06_0291	17 LANDSCAPE AND REHABILITATION The Proponent shall progressively rehabilitate the site to the satisfaction of the Director-General, in a manner that is generally consistent with the landform of the surrounding land.	EMS (2008). Landscape and Rehabilitation Management Plan for SF17. DoP letter dated 04/06/2010	Evidence sighted to confirm that Landscape and Rehabilitation Management Plan for SF17 was submitted to DoP and was satisfactory - refer letter dated 04/06/2010. SF17 was observed to be rehabilitated effectively as agreed with landowner. SF20 initial rehabilitation commenced (e.g. scale down site, remove unnecessary equipment, landshaping) but to confirm final landform/landscape. MP05 consistent with surrounding land as it is located within rail corridor.	Compliant.	
PA 06_0291	18 The Proponent shall prepare and implement a Landscape and Rehabilitation Management Plan for each well surface location, to the satisfaction of the Director-General. This Plan must: (a) be prepared in consultation with the landowner by suitably qualified experts; (b) be submitted to the Director-General for approval prior to commissioning; (c) describe in detail the short, medium and long term measures that would be implemented to: - rehabilitate the site - implement planting of native vegetation; - manage the remnant vegetation and habitat on the site; and - landscape the site to mitigate visual impacts of the project; (d) include a description of what measures would be implemented to rehabilitate the site; and (e) provide details on who is responsible for monitoring, reviewing and implementing the plan.	Detailed landscape and rehabilitation plan for SF17, agreed with landowner and approved by Director-General (refer letter dated 04/06/2010).	Rehabilitation plan in EMS (2008) including detailed landscape plans for each site as required, agreed with landowner and submitted to Director-General for approval.	Compliant.	
PA 06_0291	19 The Proponent shall consult with the landowner in the selection of fencing and other material to be used for landscaping, to the satisfaction of the Director-General.	Detailed landscape and rehabilitation plan for SF17, agreed with landowner and approved by Director-General (refer letter dated 04/06/2010).	Evidence sighted to confirm that Landscape and Rehabilitation Management Plan for SF17 was submitted to DoP and was satisfactory - refer letter dated 04/06/2010. SF17 was observed to be rehabilitated effectively as agreed with landowner.	Compliant.	
PA 06_0291	20 ABORIGINAL HERITAGE The Proponent shall prepare and implement an Aboriginal Heritage Management Plan for the project, in consultation with the DEC and relevant Aboriginal communities, and to the satisfaction of the Director-General. The plan shall be submitted to the Director-General prior to commencing construction (or as otherwise agreed by the Director-General) and shall include: (a) a description of the measures that would be implemented for the mapping, and salvage or relocation of the archaeological relics on EMAI Sites 1, 2 4, 5, 6, and 7; CP OS 3; and IF 1 and IF 2; (b) a description of the measures that would be implemented if any new Aboriginal objects are discovered during the project; and (c) a protocol for the ongoing consultation and involvement of the Aboriginal communities in the conservation and management of Aboriginal cultural heritage on the site.	EMS (2008) including Aboriginal Cultural Heritage Management Sub Plan (Appendix F) and European Heritage Management Sub Plan (Appendix G).	As a result of site-specific aboriginal heritage identified near SF17, adopted underboring and general management practices outlined in EMS (2008) such as register of surveys and locations for 21 sites. Initiated process for consultation with native title / aboriginal communities during construction activities through Community Liaison Committee.	Compliant.	
PA 06_0291	21 HERITAGE The Proponent shall ensure that the location of wells or other infrastructure avoid or minimise any impacts on the heritage significance of any state heritage register listed items in the project area.	EMS (2008) including Aboriginal Cultural Heritage Management Sub Plan (Appendix F) and European Heritage Management Sub Plan (Appendix G).	There is no register of heritage items relevant to this site.	Noted.	

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DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
PA 06_0291	<p>22 TRAFFIC AND TRANSPORT</p> <p>The Proponent shall prepare and implement a Construction Traffic Management Plan for the project, in consultation with the RTA, Camden Council and Campbelltown City Council, and to the satisfaction of the Director-General. The Plan shall be submitted to the Director-General prior to construction commencing (or as otherwise agreed by the Director-General) and shall include:</p> <p>(a) a description of the measures that would be implemented to:</p> <ul style="list-style-type: none"> - maintain access; - minimise the potential noise and safety impacts associated with the construction of the gas gathering lines and construction traffic; and - keep the community informed of any traffic disruptions that would be caused by the project. <p>(b) traffic control plans where appropriate.</p>	EMS (2008) including Traffic Management Sub Plan (Appendix K).	A Traffic Management Plan is presented within EMS (2008) that was approved by the Director-General. The Traffic Management Plan provides general management and monitoring measures to be implemented during construction and operation activities. Site-specific traffic control plans are not included. It was reported that the Traffic Management Plan was developed in consultation with RTA and local councils; however no evidence was sighted.	Compliant.	Obtain and retain records to verify consultation with RTA and local councils for development of the Traffic Management Plan.
PA 06_0291	<p>23 Should the installation of the gas gathering line require an underbore of the South Western (F5 Freeway), the underbore works shall be undertaken to the satisfaction of the RTA and:</p> <p>(a) have a minimum depth of 1.2 metre below the lowest point of the road formation, 300mm below invert of the table drains and 900mm below the natural surface elsewhere in the road reserve;</p> <p>(b) excavation of thrust pits must be conducted outside the F5 reserve; and</p> <p>(c) require no access for construction or maintenance from the F5.</p>	Interviews with site personnel. Camden South Emergency Response Plan, dated 08/09/2010.	The gas gathering line has not yet passed under F5; therefore this condition is not relevant to the current audit period.	N/A	
PA 06_0291	<p>24 ONGOING OPERATIONS</p> <p>Community Notification</p> <p>The Proponent shall give written notification of planned maintenance activities (including well workover) to landowners, potentially affected residences and identified noise sensitive receivers at least 14 days prior to work commencing. The notification is to include:</p> <p>(a) information explaining the maintenance procedures to be undertaken;</p> <p>(b) an estimate of the length of works at each site;</p> <p>(c) contact details for a representative of the Proponent; and</p> <p>(d) information regarding a 24 hour telephone contact number.</p>		As no well was completed or drilled prior to the auditing period, there have been no major planned maintenance activities undertaken at this early stage of development. Some minor maintenance has occurred with no community impact. It was reported that written notification would be provided to landowners and sensitive receivers within fourteen days of planned maintenance activities. No planned maintenance activities are currently planned.	Compliant.	
PA 06_0291	<p>25 Redrilling and Refracting</p> <p>The Proponent shall obtain the approval of the Director-General prior to undertaking work involving the redrilling and/or re-fracturing of wells approved under this approval.</p>		MP05A was drilled in the current audit period, following approval of the Director-General in September 2008 as part of this development consent. No redrilling or refracting occurred during the audit period.	Compliant.	
PA 06_0291	<p>26 Reporting</p> <p>The Proponent may satisfy conditions 4, 7, 9, 12, 15, 18, 20 and 22 in schedule 3 of this approval by demonstrating to the satisfaction of the Director-General that existing equivalent documentation has been appropriately updated to reflect the expansion of stage 2 of the Camden Gas Project.</p>			Noted.	
PA 06_0291	<p>1 SCHEDULE 4</p> <p>ENVIRONMENTAL MANAGEMENT AND MONITORING</p> <p>Environmental Management Plan</p> <p>The Proponent shall prepare and implement an Environmental Management Plan (EMP) for the construction and operation of the project to the satisfaction of the Director-General. The EMP shall be submitted to the Director-General prior to the construction of the project and shall:</p> <p>(a) incorporate the various environmental management plans, monitoring programs and other requirements set out in schedule 3 of this approval;</p> <p>(b) identify statutory and other obligations that the Proponent is required to fulfil during the construction and operation of the project;</p> <p>(c) describe the environmental policies and principles to be applied to the project;</p>	EMS (2008).	The EMS (2008) covers environmental management and monitoring for operation of the Camden Gas Project, including wells covered by this DA. An earlier version of the EMS (refer EHSMP) was approved pre-audit period. A site-specific OEMP has not been developed. The EMS includes: <ul style="list-style-type: none"> Legislative requirements (Section 2.1) Structure and Responsibility (Section 5.1) HSE Policy (Jan 2008) Objectives, targets and KPI (section 4.2) 	Compliant.	

DA NUMBER: PA 06_0291
 LOCATION: Spring Farm and Menangle Park Project
 MODIFICATION:
 WORKS: Yes, drilled three wells (MP05, MP07 and MP08) in Menangle Park and seven wells (SF17 and SF20) in Spring Farm gas fields.

Number of Conditions: 52
 Closed out previously: 0
 Number Noted: 7
 Number N/A: 1
 Number Non-Compliant: 5
 Compliance Score: 89%

DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
	<p>(d) describe in general how the environmental performance of the project would be monitored and managed;</p> <p>(e) describe the procedure that would be implemented to:</p> <ul style="list-style-type: none"> - keep the local community and relevant agencies informed about the environmental performance of the project; - receive, handle and respond to, and record complaints - resolve disputes that may arise during the course of the project; - respond to any non-conformance; - manage cumulative impacts; and - respond to emergencies (including bushfires); and <p>(f) describe the role, responsibility, authority and accountability of all the key personnel involved in the environmental management of the project</p>		<p>Policies and procedures within the EMS; and additional Management Sub Plans for noise, soil, water, traffic, waste and rehabilitation.</p>		
PA 06_0291	<p>2 INCIDENT REPORTING</p> <p>Within 7 days of detecting an exceedence of the goals/limits/performance criteria in this approval or an incident causing (or threatening to cause) material harm to the environment; the Proponent shall report the exceedence/incident to the Department (and any relevant agency). The report shall:</p> <ul style="list-style-type: none"> (a) describe the date, time, and nature of the exceedence/incident; (b) identify the cause (or likely cause) of the exceedence/incident; (c) describe what action has been taken to date; and (d) describe the proposed measures to address the exceedence/incident. 	<p>EMS (2008) incident register and investigation reports</p>	<p>AEPR summarises incidents relating to safety and environmental non-compliances. Site maintains a database of environmental related complaints and incidences (Connect First). Where incidences are logged these are raised to supervisor for action.</p> <p>During the audit period, incidences included damaged overhead powerline (by Contractor) that started minor grass fire, which was attended by fire services; and, minor exceedences of noise criteria (not material environmental harm and not reported). No other incidents relevant to this site reported.</p>	Compliant.	
PA 06_0291	<p>3 ANNUAL REPORTING</p> <p>Within 12 months of the date of this approval, and annually thereafter during the life of the project, the Proponent shall prepare an Annual Environmental Performance Report (AEPR) for the project to the satisfaction of the Director-General. The AEPR shall:</p> <ul style="list-style-type: none"> (a) identify the standards, performance measures and statutory requirements that apply to the project; (b) assess the environmental performance of the project to determine whether it is complying with these standards, performance measures, and statutory requirements; (c) identify any non-compliance during the year with the conditions of this approval or any standard, performance measure or statutory requirement that applies to the project; (d) describe, if any non-compliance is identified, the actions and measures carried out or being carried out to ensure compliance, clearly indicating who would carry out these actions and measures, when they would be carried out, and how the effectiveness of these measures would be monitored over time; (e) include a copy of complaints for the year and a description of actions taken or being taken to; (f) include a discussion of issues or recommendations raised by the Camden Gas Project's Cor (g) include a detailed summary of results of all monitoring required by this approval and a disc <p>Note: The Proponent may include this report in the Annual Environmental Performance Report</p>	<p>Sighted Annual Environmental Performance Report (July 06-June 07; July 07-June 08; July 08-June 09; July 09-June 10).</p>	<p>AEPRs have been completed as required.</p>	Compliant.	
PA 06_0291	<p>4 The Proponent shall submit a copy of the AEPR to the DPI, DEC and Council.</p>		<p>It was reported that the AEPR 2008-09 was submitted to relevant authorities. Evidence to verify submission and distribution was made available for inspection.</p> <p>AEPR 2009-10 is in final draft form and yet to be submitted. It was reported that further correspondence regarding AEPR 2008/09 and rehabilitation was expected from DII. It was reported that DoP was to provide final sign-off on AEPR for 2008-09, before AEPR 2009-10 was submitted.</p>	Compliant.	

DA NUMBER: PA 06_0291
 LOCATION: Spring Farm and Menangle Park Project
 MODIFICATION:
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Number of Conditions: 52
 Closed out previously: 0
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DA/MOD	CONSENT CONDITION	EVIDENCE	COMMENTS	COMPLIANCE STATUS	RECOMMENDED ACTION
PA 06_0291	5 INDEPENDENT ENVIRONMENTAL AUDIT Within 2 years of the date of this approval, and every 3 years thereafter, unless the Director-General directs otherwise, the Proponent shall commission and pay the full costs of an Independent Environmental Audit. The Independent Environmental Audit shall: (a) be conducted by a suitably qualified, experienced, and independent person(s) whose appointment has been approved by the Director-General; (b) be consistent with ISO 19011:2002 - Guidelines for Quality and/or Environmental Management Systems Auditing, or updated versions of these guidelines/manuals; (c) assess the environmental performance of the project, and its effects on the surrounding environment; (d) include a hazard audit of the project in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 5, "Hazard Audit Guidelines"; (e) assess whether the project is complying with the relevant standards, performance measures and statutory requirements; (f) review the adequacy of the OEMP; and (g) recommend measures or actions to improve the environmental performance of the project, and/or its environmental management and monitoring systems.		This audit covers the scope of the Independent Environmental Audit.	Compliant.	
PA 06_0291	6 Within 3 month of completion of each Independent Environmental Audit, the Proponent shall submit a copy of the audit report to the Director-General, DPI and DEC, with a response to any of the recommendations contained in the audit report.		Reportedly submitted. Notes regarding audits, audit findings and response to recommendations were included in the AEPR.	Compliant.	
	7 Following each Independent Environmental Audit, the Proponent shall review and if necessary revise the EMP (and any documents contained in the plan), to the satisfaction of the Director-General. The revised EMP shall be submitted to the Director-General within 6 months of completing the audit.		It was reported that the OEMP was written after last audit and submitted to DoP; however evidence to verify submission and timing was not made available for inspection.	Non-Compliant.	Evidence to verify submission of OEMP to DoP to be obtained and retained to demonstrate compliance with the requirements of this condition.
PA 06_0291	8 COMMUNITY CONSULTATIVE COMMITTEE The Proponent shall ensure that the construction and operation of the project is subject to the consideration of the Camden Gas Project Community Consultative Committee, as established under Schedule 5 condition 17 of development consent DA No. 282-6-2003-I, dated 16 June 2004.	Sighted Community Consultation Committee Minutes. #20 25/09/08, #21 27/11/08, #22 19/03/09 #23 16/07/09 #24 18/02/10 and #25 15/07/10.	It was reported that the frequency of community consultation meetings had been adjusted from quarterly to every four months with agreement from committee members. Recently quarterly meetings were reinstated.	Compliant.	
PA 06_0291	9 ACCESS TO INFORMATION Within 1 month of the approval of any plan/strategy/program required under this approval (or any subsequent revision of these plans/strategies/programs), or the completion of the audits or AEMR required under this approval, the Proponent shall: (a) provide a copy of the relevant document(s) to the relevant agencies and the CCC; and (b) ensure that a copy of the relevant document(s) is made publicly available on its website.	AGL website	Refer website: http://www.agl.com.au/about/EnergySources/indevelopment/Pages/Camden-Gas-Project.aspx The website was reviewed and found to be up to date and provided public access to information as required by this condition.	Compliant.	
PA 06_0291	10 During the project, the Proponent shall: (a) make a summary of all environmental monitoring results required under this approval publicly available on the website; and (b) update these results on a regular basis (at least every 6 months) or as required.	AGL website	It was reported that the monitoring results are updated annually and made publicly available on the website. The AGL website is currently not up to date, as required by this condition.	Non-Compliant.	
PA 06_0291	11 Reporting The Proponent may satisfy conditions 1, 3 and 5 in schedule 4 of this approval by demonstrating to the satisfaction of the Director-General that existing equivalent documentation has been appropriately updated to reflect the expansion of Stage 2 of the Camden Gas Project.			Noted.	
PA 06_0291	Statement of COMMITMENTS				
	END OF REQUIREMENT IN DA				



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