



Camden Gas Project Aboriginal Cultural Heritage Management Plan

FINAL REPORT

Prepared for AGL Upstream Investments Pty Ltd

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Glossary

ACHA	Aboriginal Cultural Heritage Assessment
ACHMP	Aboriginal Cultural Heritage Management Plan (referred to as 'The Plan')
AHIMS	Aboriginal Heritage Information Management System
CBNTCAC	Cubbitch Barta Native Title Claimants Aboriginal Corporation
CGP	Camden Gas Project area (referred to as 'The Project')
DECCW	Department of Environment, Climate Change and Water (now Heritage NSW)
DV	Disturbance Visibility
EMP	Environment Management Plan
EMS	Environmental Management System
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
GGL	Gas Gathering Lines
GPS	Global Positioning System
GSV	Ground Surface Visibility
Heritage NSW	Heritage NSW, Department of Premier and Cabinet (DPC)
ICOMOS	International Council on Monuments and Sites
LALC	Local Aboriginal Land Council
LEP	Local Environment Plan
LGA	Local Government Area
NPW Act	<i>National Parks and Wildlife Act 1974</i>
NSW	New South Wales
NTCAC	Native Title Claimants Aboriginal Corporation
PAD	Potential Archaeological Deposit
POA	<i>Petroleum (Onshore) Act 1991</i>
RPGP	Rosalind Park Gas Plant
Study area	Camden Gas Project area, located across the Camden, Campbelltown and Wollondilly Local Government Areas
SGL	<i>Sydney Gas Operations Pty Limited</i>
the Code	<i>Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW</i> (DECCW 2010)

1 Introduction

This Aboriginal Cultural Heritage Management Plan (ACHMP referred to as 'The Plan') describes the process for the ongoing management of Aboriginal cultural heritage sites and places located within the Camden Gas Project area ('the project' or 'CGP') and has been prepared to supplement the Environment Management Plan (EMP) for the project. Along with the EMP, this ACHMP and other sub plans form part of the Environmental Management System (EMS) of the CGP.

The Plan has been developed based on requirements of the previously prepared and approved Aboriginal Cultural Heritage Management Plans, Environment Health and Safety Management Plans and the AGL Energy Life Guard system and more information is available in the EMP.

It describes the process for the ongoing management of recorded Aboriginal archaeological sites, and identified areas of Potential Archaeological Deposit (PAD), to guide the design, location and implementation of future works within the Camden Gas Project.

Through ongoing consultation, the ACHMP will also detail the inclusion of relevant Aboriginal stakeholders in the management of their cultural heritage, including archaeological sites and Aboriginal resources.

The ACHMP has been developed in consultation with the Tharawal Local Aboriginal Land Council (TLALC) and the Cubbitch Barta Native Title Claimants Aboriginal Corporation (CBNTCAC), and the Department of Environment and Climate Change and Water (DECCW), now Heritage NSW, Department of Premier and Cabinet (Heritage NSW)

The current ACHMP has been updated to ensure that archaeological methods and management strategies are in line with best practice cultural heritage management, in particular, those archaeological requirements outlined in *The Code of Practice* that came into effect on 1 October 2010 within the *NSW National Parks and Wildlife Amendment Act 2010*.

1.1 Project background

The CGP activities can be summarised as the construction, operation, maintenance and rehabilitation of well sites, the gas gathering systems and access tracks, and the operation and maintenance of the Rosalind Park Gas Plant (RPGP) and the sales gas pipeline. More specific information on the project, the activities and overall environmental management is available in the EMP.

The CGP is located across the Camden, Campbelltown and Wollondilly Local Government Areas.

Aboriginal cultural heritage is assessed as part of all development applications in consultation with representatives of the local Aboriginal groups and to date 34 archaeological assessments have been carried out throughout the life of the CGP.

The Plan describes the rationale and methodology for the ongoing management and mitigation strategies for all Aboriginal archaeological sites and areas of Aboriginal archaeological potential for the project.

Specific Aboriginal cultural heritage management measures including the Spring Farm, Menangle Park, Wandinong and Glenlee gas fields are included in the Appendices 3, 4 and 5 of this Plan (as required).

2 Rationale for the ACHMP

This ACHMP is intended to facilitate the implementation of the mitigation and conservation strategies by clearly setting out a process for the management of Aboriginal cultural heritage prior to, during and subsequent to the construction stages of the CGP. To this end, the ACHMP will be incorporated into the EMS for the project.

The ACHMP is designed to be a foundation for management of Aboriginal cultural heritage that ongoing site specific consultation can build upon. Therefore when this sub plan is finalised in consultation with the Aboriginal groups to the satisfaction of the Director General of the Department of Planning and Infrastructure, the agreed management measures for individual cultural heritage sites for parts of the project can be appended to become a part of this sub plan. This will provide an overall process for the CGP that will avoid the duplication of general methodologies and mitigation measures, and allow a streamlined consultation process for the registered Aboriginal groups and AGL.

This ACHMP seeks to implement best practice heritage management. In the first instance, this would involve the avoidance and conservation of Aboriginal archaeological sites. This includes:

- Consideration of Aboriginal cultural heritage during the project design phase of new gas field proposals to ensure that wells and other infrastructure are sited to avoid significant heritage sites where possible.
- The possible relocation, removal or redesign of infrastructure before the proposal is submitted for approval.
- Consideration of Aboriginal cultural heritage during the project design phase of future works within existing gas fields to ensure that the works and infrastructure are sited to remain within existing and/ or previously disturbed areas where possible.

Where heritage sites cannot be avoided, impact would be minimised by:

- Development of management and mitigation measures developed in consultation with Aboriginal stakeholders and using the results of the cultural and archaeological assessments relevant to individual sites. This may include onsite monitoring, salvage and relocation of cultural material.
- Ensuring the direct involvement of the relevant Aboriginal stakeholder groups in the development and implementation of this ACHMP, in accordance with the approved Part 3A Environmental Assessment. This process follows the *Guidelines For Aboriginal Cultural Heritage Impact Assessment and Community Consultation* (DECCW 1995, now Heritage NSW) for development applications assessed under *Part 3A of the Environmental Planning and Assessment Act 1979*.
- Promoting conservation of Aboriginal archaeological sites and cultural heritage at all times.

The ACHMP seeks to allow AGL to meet its commercial goals, its obligations to operate the project in an economic and efficient way whilst working in partnership with the Tharawal LALC and Cubbitch Barta NTCAC to manage and promote the Aboriginal cultural heritage values of the area.

3 Legislative and Regulatory Framework

The CGP operates pursuant to the *Petroleum (Onshore) Act 1991* (POA) and the *NSW Environmental Planning and Assessment Act 1979* (EP&A Act).

The EP&A Act requires that environmental impacts are considered in land-use planning and decision making. The definition of 'environmental impacts' includes impacts on the cultural heritage of the project area. The Act has three relevant parts: Part 3, which governs the preparation of planning instruments; Part 4, which relates to development where consent is required under an environmental planning instrument (EPI); and Part 5, which relates to activity where development consent is not required but some other government approval assessments are needed.

Project approval under Part 4 of the EP&A Act requires compliance with Section 86 and Section 90 under Part 6 of the *National Parks and Wildlife Act 1974* (NPW Act).

Section 86 of the NPW Act identifies that it is an offence to knowingly or unknowingly harm or desecrate an Aboriginal object or Aboriginal places. This section of the Act clearly describes penalties should an offence occur. There are a number of defences and exemptions to the offence of harming an Aboriginal object or Aboriginal place. These defences are defined under s.87 of the Act. These include:

- The harm is carried out under an Aboriginal Heritage Impact Permit (AHIP). AHIPs are required for impacts to Aboriginal objects and places, issued under s.90 of the NPW Act.
- Reasonable due diligence has been exercised to determine whether the proposed activity would harm an Aboriginal object or Aboriginal place.
- Reasonable due diligence has been exercised in accordance with a code of practice adopted or prescribed by the regulations (a code of practice might include the Code or NSW Minerals Council 2010 Codes of Practice).
- The proposed activity is specified in the regulations as a low impact activity (as defined under s.80B of the regulations).

Aboriginal places (areas of cultural significance to the Aboriginal Community declared by the Minister) are protected under Section 84 of the Act.

Section 90 of the Act outlines the process and requirements for obtaining an AHIP from Heritage NSW. Specifically,

An Aboriginal heritage impact permit may be issued in relation to a specified Aboriginal object, Aboriginal place, land, activity or person or specified types or classes of Aboriginal objects, Aboriginal places, land, activities or persons. (P6.D2 (s.90 (3))).

The most recent development applications for the CGP have been approved under Part 3A of the EP&A Act. Under this part of the Act, the project does not have to comply with requirements under Part 6 of the NPW Act. Instead, conditions outlined by the Director-General on approval of the Development Consent will require commitments regarding cultural heritage, including consideration of Heritage NSW and NPW Act guidelines and processes for the purposes of 'best practice' heritage management.

3.1 Key Licence/ Development Consent Requirements

Table 1 Approval Conditions relating to Aboriginal Heritage for the Camden Gas Project

Approval reference and field	Approval condition / requirement
<p>DA 15-1-2002-i Sch 3, condition 70-71 Field – RPTP, Apap, Joe Stanley, Johndilo, Loganbrae, Lipscombe, Mahon</p>	<p>70. 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.</p> <p>71. 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 <i>Heritage Act 1977</i>, shall be obtained from the NSW Heritage Office.</p> <p>Note: a relic is defined under the Heritage Act as any deposit, object or material evidence:</p> <ul style="list-style-type: none"> a) Which relates to the settlement of the area that comprises NSW, not being Aboriginal settlement. b) Which are more than 50 years old. <p>Note: All works required under these conditions have previously been completed.</p>
<p>DA 282-6-2003i Sch 4 conditions 87-88 Fields - RPGP, Rosalind Park, Wandinong, EMAI (EM01-20, 38-40), Glenlee (GL05, 07-10, 14-17)</p>	<p>87. 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.</p> <p>88. The Applicant shall provide a report of the Indigenous Heritage Monitoring undertaken for the Stage II project to DECCW and the Director-General within two months of the Heritage Monitoring being completed.</p> <p>Note: Under Section 86 of the <i>National Parks and Wildlife Act 1974</i>, it is an offence to disturb or excavate any land with the purpose of discovering an Aboriginal object without first obtaining a Section 87 Permit.</p> <p>Aboriginal Heritage – EM38</p> <p>88A. 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 <i>“Aboriginal Cultural Heritage Survey and Assessment Report – Camden Gas Joint Venture Project – Proposed Gas Well Location and Gas Gathering System Modifications, Camden, NSW”</i> dated February 2007, and <i>“Aboriginal Heritage Assessment – Sugarloaf Twin Gathering Line, Rosalind Park”</i> dated 8 September 2006.</p> <p>Aboriginal Heritage – EM39 and GL17</p> <p>88B. 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 <i>“Camden Gas Project Joint Venture – EM39 and GL17 Modification Project”</i>.</p> <p>Note: All works required under these conditions have previously been completed.</p>
<p>DA 183-8-2004-i Fields – Mount Taurus (MP16, MP25, MP13/30)</p>	<p>If any potential Aboriginal Object is discovered during construction of the proposed works, the Proponent will ensure that procedures listed in the <i>Camden Gas Project Environmental Management Plan (Aboriginal Cultural management Sub Plan)</i> (AGL Gas</p>

Approval reference and field	Approval condition / requirement
<p>and gas gathering line MP16 to MP30)</p> <p>Statement of Commitments</p>	<p>production Camden 2008) are followed. This includes:</p> <p>All the works within immediate vicinity should cease until the potential Aboriginal Object(s) can be assessed and recorded by a qualified archaeologist.</p> <p>The extent and significance of the Aboriginal Object(s) will be determined.</p> <p>The Aboriginal Object(s) will be recorded and collected, and later relocated to an appropriate location at the completion of works. Immediately after collection, construction may then continue.</p> <p>Should any of these Aboriginal Object(s) be deemed culturally significant, then further investigation with a qualified archaeologist should be undertaken to determine the need for further archaeological investigation. If the Aboriginal Object(s) are not regarded to be significant, these will be collected for analysis, and relocation.</p> <p>Note: All construction work covered by this Commitment has previously been completed.</p>
<p>DA 75-4-2005</p> <p>Sch 2, conditions 47-48</p> <p>Field - Sugarloaf</p>	<p>47. 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 <i>National Parks and Wildlife Act 1974</i>.</p> <p>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.</p>
<p>DA 171-7-2005</p> <p>Sch 3 conditions 40-43</p> <p>Field - El Bethel</p> <p>NB Not commenced.</p>	<p>40. 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.</p> <p>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.</p> <p>41. 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:</p> <ul style="list-style-type: none"> 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.

Approval reference and field	Approval condition / requirement
	<p>j) Details of the procedures that adequately consult and notify the Aboriginal community throughout construction and operation.</p> <p>42. All activities in connection to the construction and rehabilitation of the development must cease within a 50 metre 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.</p> <p>43. The Applicant must effectively record and manage previously unrecorded Aboriginal sites. 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>Notes</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 <i>National Parks and Wildlife Act 1974</i>. • The Applicant must ensure that appropriate section 87 and section 90 of the <i>National Parks and Wildlife Act 1974</i> consents are in place where appropriate.
<p>PA 06_0137 Sch 3, condition 13 Field – Razorback Revised Statement of Commitments</p>	<p>13.The Proponent shall prepare and implement an Aboriginal Heritage Management Plan, in consultation with the DEC and relevant Aboriginal communities, and to the satisfaction of the Director-General for affected well sites, gathering lines and access roads associated with this Project which are likely to impact on the archaeological relics listed below. The plan shall be submitted to the Director General prior to commencing construction of those works, and shall include:</p> <p>a) A description of the measures that would be implemented for the salvage, relocation or mapping of the archaeological relics on site RB 5 IF 1, RB 5 Site 1 and RB11 IF2.</p> <p>b) A description of the measures that would be implemented if any new Aboriginal objects are discovered during the project.</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>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.</p>
<p>PA 06_0138 Sch 3, condition 15 Field - EMAI (EM23-37) Revised Statement of Commitments</p>	<p>15. The Proponent shall prepare and implement an Aboriginal Heritage Management Plan, in consultation with the DEC and relevant Aboriginal communities, and to the satisfaction of the Director-General for well sites, gathering lines and access roads associated with this Project which are likely to impact on the archaeological relics listed below. The plan shall be submitted to the Director General prior to commencing construction of those works, and shall include:</p> <p>a) A description of the measures that would be implemented for the salvage, relocation or mapping of the archaeological relics on EMAI sites 1, 2, 4, 5, 6 and 7; CP OS 3; and IF 1 and IF 2.</p>

Approval reference and field	Approval condition / requirement
	<ul style="list-style-type: none"> b) A description of the measures that would be implemented if any new Aboriginal objects are discovered during the project. 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>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.</p>
<p>PA 06_0291 Sch 3, condition 20 and Statement of Commitment 17 Fields - Spring Farm, Menangle Park</p>	<p>The Proponent shall prepare and implement an Aboriginal Heritage Management Plan for each well surface location, in consultation with the DECCW and relevant Aboriginal communities, and to the satisfaction of the Director-General. The plan shall be submitted to the Director-General prior to construction commencing at each well surface location (or as otherwise agreed by the Director General) and shall include:</p> <ul style="list-style-type: none"> a) A description of the measures that would be implemented for the mapping, and salvage or relocation of archaeological relics. b) A description of the measures that would be implemented if any new Aboriginal objects are discovered during the project. 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>PEL 2 sch 2 condition 15</p>	<p>The licence holder must not knowingly destroy, deface or damage any Aboriginal object or Aboriginal place within the licence area except in accordance with an authority issued under the <i>National Parks and Wildlife Act 1974</i>, and must take every precaution in drilling, excavating or disturbing the land against any such destruction, defacement or damage.</p>
<p>PPL 1, 2 condition 12 Fields - Apap, EMAI (part), Johndilo, Joe Stanley, Kay Park, Loganbrae, Lipscombe, Mahon</p>	<p>The leaseholder must not destroy, deface or damage any aboriginal place or relic within the subject area except in accordance with an authority issued under the <i>National Parks and Wildlife Act 1974</i>, and must take every precaution in drilling, excavating or disturbing the land against any such destruction, defacement or damage.</p>

4 Consultation

4.1 Overview of Aboriginal Community Consultation

Aboriginal community liaison for the CGP, was initiated by the former operator of the CGP, *Sydney Gas Operations Pty Limited* (SGL) at an early stage of the planning process (February 2005). The initial Aboriginal community consultation program included a process of public notification and liaison that was completed according to the requirements of the DECCW *Interim Community Consultation Requirements for Applicants* guidelines introduced in January 2005.

The Tharawal LALC and Cubbitch Barta NTCAC registered an interest in being involved in the consultation/assessment process of the subject land at that time, and no additional notification from any other Aboriginal community organisation has been received by AGL relating to this ACHMP.

Consultation for all archaeological and cultural heritage assessments for the CGP has been undertaken with only the Tharawal LALC and Cubbitch Barta NTCAC. Both groups have been involved in archaeological and cultural heritage assessments completed as part of this project.

Consultation for this ACHMP document has been undertaken with the following Aboriginal stakeholders:

- Tharawal Local Aboriginal Land Council.
- Cubbitch Barta Native Title Claimants Aboriginal Corporation.

A copy of written correspondence with the Aboriginal stakeholder groups has been provided in Appendix 2.

4.2 ACHMP Consultation Framework

As part of the ACHMP, consultation with identified Aboriginal stakeholders with regard to managing archaeological sites and cultural heritage values for the project will be ongoing. AGL will continue consultation in respect to the following:

- Identified Aboriginal community stakeholder groups to be consulted include the Tharawal LALC and the Cubbitch Barta NTCAC.
- Representatives of the Aboriginal community groups will be invited to participate in any active management of archaeological sites and objects, including consultation, survey, monitoring, excavation, salvage, relocation etc.
- Representatives of the Aboriginal community groups will be invited to participate in any active management of other materials of traditional significance.
- Aboriginal community groups will be consulted regarding maintaining cultural values of the landscape. This might include use of indigenous plants and in particular, plants of cultural value for Aboriginal people, in rehabilitation and general revegetation works at well surface locations and along gas gathering lines.
- Systematic review of this ACHMP will be performed with the Aboriginal communities/stakeholder groups in line with the review requirements of the EMP.

Consultation of this ACHMP to date (September 2021) has been carried out in accordance with Part 3A of the EP&A Act and will continue to follow these guidelines as the project is operating under an existing approval. Aboriginal Consultation will not be undertaken under Part 6 of the NPW Act: *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010*.

5 Aboriginal Archaeological Context

5.1 Previous Archaeological Survey

Table 2 summarises the archaeological studies that have been undertaken as part of the CGP area. These assessments have involved targeted archaeological survey of proposed exploration holes and production well sites, and associated gas gathering lines and access tracks. Other archaeological and Aboriginal cultural heritage assessments that were undertaken in the area were also included in this review. This work has resulted in the identification of a number of new Aboriginal archaeological sites and the re-assessment of a number of previously recorded sites.

Table 2 Previously completed archaeological assessments for the CGP area

Author	Year	Findings	Gas Field (s)
Dibden J	2000	No Aboriginal archaeological site or areas of potential were identified.	Loganbrae, Treatment Plant
Dibden J	2001a	Identification of 13 Aboriginal sites within project area	Kay Park, Loganbrae, Johndilo
Dibden J	2001b	No Aboriginal archaeological site or areas of potential were identified.	Kay Park, Loganbrae, Johndilo
Dibden J	2002a	Identification of 1 Aboriginal site within the project area	Glenlee
Dibden J	2002b	No Aboriginal archaeological site or areas of potential were identified.	Glenlee
Dibden J	2002c	No Aboriginal archaeological site or areas of potential were identified.	Glenlee Stage 2
Dibden J	2002d	Identification of 2 Aboriginal archaeological sites within project area	Kay Park
Dibden J	2002e		
Dibden J	2002f	No Aboriginal archaeological site or areas of potential were identified.	EMAI Stage 1
Dibden J	2003a	Identification of 20 Aboriginal archaeological sites within project area	EMAI Stage 1, Mt Taurus, Wandinong, Glenlee, Rosalind Park, Menangle Park,
Dibden J	2003b	No Aboriginal archaeological site or areas of potential were identified.	Menangle Park Stage 1
Dibden J	2003c	No Aboriginal archaeological site or areas of potential were identified.	EMAI Stage 1 and Glenlee
Dibden J	2004a	Identification of 1 Aboriginal archaeological site	Mt Taurus

Author	Year	Findings	Gas Field (s)
Dibden J	2004b	No Aboriginal archaeological sites were identified, however, 2 Aboriginal PAD areas were identified MT3 and MT6.	Mt Taurus
Dibden J	2004c	Excavation of Aboriginal archaeological PAD Areas MT3 and MT6 – cultural material recovered – each PAD is now a registered Aboriginal archaeological site.	Mt Taurus
Dibden J	2004d	No Aboriginal archaeological site or areas of potential were identified.	EMAI Stage 1
Dibden J	2004e	No Aboriginal archaeological site or areas of potential were identified.	EMAI Stage 1
Dibden J	2006	Salvage excavation of Aboriginal archaeological sites EMAI2 and EMAI 3	EMAI Stage 1
Steele D	2005a	No Aboriginal archaeological site or areas of potential were identified.	El Bethel
Steele D	2005b	Identification of 10 Aboriginal archaeological sites within the project area	Razorback
Steele D	2005c	Identification of 15 Aboriginal archaeological sites	EMAI Stage 2
Steele D	2006	No Aboriginal archaeological site or areas of potential were identified.	Rosalind Park Gas Plant Access Road
Steele D	2007a	Aboriginal Cultural Heritage Management Plan including previously recorded Aboriginal archaeological sites	EMAI (EM23-37) Stage 2
Steele D	2007b	Aboriginal Cultural Heritage Management Plan including previously recorded Aboriginal archaeological sites	Razorback
Steele D	2007c	No new Aboriginal archaeological site or areas of potential were identified.	EMAI Stage1, EMAI Stage 2 and Glenlee
Steele D	2007d	No new Aboriginal archaeological site or areas of potential were identified.	Spring Farm and Menangle Park
Steele D	2007e	Identification of 2 Aboriginal artefacts within EMAI project area	EMAI Stage 1, Sugarloaf, Rosalind Park, Menangle Park, Glenlee, Kay Park, Apap
HLA- ENSR Pty Ltd	2007	Identification of 21 Aboriginal sites within project area	Spring Farm and Menangle Park
Biosis Research	2007a	No Aboriginal cultural material recovered from sub-surface investigations	EMAI Stage 1
Biosis Research	2007b	Aboriginal cultural material collected – to be	EMAI Stage 2

Author	Year	Findings	Gas Field (s)
		relocated at the completion of the gas well site	
Biosis Research	2008a	No archaeological issues identified at previously disturbed gas well locations EM 39 and GL17.	EMAI Stage 1
Biosis Research	2008b	Identification of 1 Aboriginal archaeological site within project area	Exploration ED02
Biosis Research	2008c	No archaeological sites identified, and no areas of archaeological potential located at this site	Exploration RB02
Biosis Research	2008d	Avoided 2 Aboriginal archaeological sites No new archaeological sites identified	Kay Park and Loganbrae
Biosis Research	2008e	The extent of recorded site Elderslie GWS1 was accurately defined based on the results of the sub-surface investigations.	Exploration ED02
Biosis Research	2009a	No archaeological sites identified, and no areas of archaeological potential located within proposed gas gathering line	Glenlee Stage 2
Biosis Research	2009b	Avoided 2 known Aboriginal archaeological sites and 1 new archaeological sites located within the gas gathering line envelope	Spring Farm/ Menangle Park
Biosis Research	2009c	Alternative gas gathering line alignment avoided 3 known Aboriginal archaeological sites. One area of Aboriginal Potential Archaeological Deposit was identified close to the creek.	Spring Farm/ Menangle Park
Biosis Research	2009d	Monitoring of WSL SF 20. Located 1 isolated stone artefact that was collected and relocated.	Spring Farm/ Menangle Park
Kayandel Archaeological Services	2009c	One potential archaeological deposit (PAD) was identified, SFPAD5 (AHIMS 52-2-3780). It is outside of the gas gathering lines envelopes.	Spring Farm
Biosis Research	2010a	Excavations of previously identified PAD resulted in the identified of 1 new Aboriginal site and 1 new historic feature.	Spring Farm/ Menangle Park
Biosis Research	2010b	Identification and relocation of two Aboriginal sites, M5 and M8.	Menangle Park
EMGA Mitchell McLennan	2010	Field inspection for the proposed access road to the existing well location MP03	Menangle Park

Author	Year	Findings	Gas Field (s)
		identified two artefacts within the corridor. The artefacts were collected and relocated.	
Biosis Research	2011	Archaeological salvage excavations between surface wells MP11 and MP22 identified 1 new Aboriginal site.	Spring Farm/ Menangle Park
Biosis	2020	Field inspection of the proposed access roads to and decommissioning of gas wells identified 6 previously known sites and two new sites in the study area. Collection of 5 sites was undertaken under AHIP C0005662 as these were located in works locations.	Wandinong
Biosis	2021	Field inspection of proposed access roads to and decommissioning of gas wells identified two artefacts within the corridor. The artefacts were collected and relocated.	Glenlee

5.1.1 Aboriginal Archaeological Sites

A total of 233 Aboriginal archaeological sites are identified within and in adjacent to the overall CGP area. Most of these sites have already been considered and managed as part of currently operating gas fields, and a significant number fall beyond proposed areas of impact based on AGL's 'envelope' assessment approach. These Aboriginal sites are not considered further in this ACHMP. The location of all Aboriginal sites within the CGP area are given in Figure 3. The locations of Aboriginal sites in relation to gas wells and gas gathering lines within Spring Farm and Menangle Park are given in Appendix 3.

6 Heritage Management Principles

6.1 Avoiding harm to Aboriginal heritage

Cultural heritage and archaeological site management often involves mitigation through the salvage of features or artefacts and retrieval of information through excavation or collection, and interpretation. There are three basic levels of management options available for the Aboriginal archaeological sites that will be impacted. In order of preference these are:

- Conservation through avoidance.
- Preservation through ongoing management such as relocation.
- Destruction mitigated by salvage and interpretation.

All management strategies have been formulated in consultation with the Tharawal LALC and Cubbitch Barta NTCAC.

From the outset, AGL have attempted to avoid impacts to Aboriginal archaeological sites, where practicable, through changes at the project design stage to gas well locations or changes to the alignment of gas gathering lines and access tracks, using the 'envelope' approach.

However, in some instances, avoiding or minimising impacts to archaeological sites is not possible, due to other land uses, such as the future development of roads and housing within the Spring Farm and Menangle Park areas. This means that some well surface locations, gas gathering lines and access tracks cannot deviate or be moved from their identified locations.

Site specific management options are provided below for Aboriginal archaeological sites located within the Spring Farm and Menangle Park Gas Fields in Appendix 3, the Wandinong Gas Field in Appendix 4 and the Glenlee Gasfield in Appendix 5.

6.1.1 General Recommendations

Ideally, heritage management involves conservation of sites through the preservation and conservation of fabric and context within a framework of 'doing as much as necessary, as little as possible' (Marquis-Kyle & Walker 1994, p.13). In cases where conservation is not practical, several options for management are available. For sites, management often involves the salvage of features or artefacts, retrieval of information through excavation or collection (especially where impact cannot be avoided) and interpretation.

Avoidance of impact to archaeological and cultural heritage sites through design of the development is the primary mitigation and management strategy, and should be implemented where practicable. Avoidance of sites through design changes, such as relocation of well surface locations and alignment changes to gas gathering lines should be undertaken where sites can be avoided, and where there is no risk of impact to other cultural material from the infrastructure relocation.

Implementation of appropriate mitigation measures and contingencies if required, including procedures for detailed site recording, collection of cultural material, excavation of cultural deposits, monitoring of initial ground disturbance works, relocation of cultural material and detailed documentation of sites prior to the commencement of any proposed impacts are described below and in Appendix 1. These measures would be undertaken in conjunction with an archaeologist and the relevant Aboriginal stakeholder groups.

6.1.1.1 Procedure to follow in the event of unexpected Aboriginal finds

In the event that unexpected Aboriginal objects or sites are located, an assessment will need to be made as to the significance of the object. The NPW Act defines an Aboriginal object as:

'...any deposit, object or material evidence (not being a handicraft made for sale) relating to the Aboriginal habitation of the area that comprises New South Wales, being habitation before or concurrent with (or both) the occupation of that area by persons of non-Aboriginal extraction, and includes Aboriginal remains...'

The following process should be followed with respect to unexpected finds:

- Should any unexpected Aboriginal objects be encountered during works the works must cease in the vicinity and the find should not be moved until assessed by a qualified archaeologist.
- A suitable no-go area should be established around the suspected Aboriginal object, and clearly demarcated with flagging tape or similar.
- The archaeologist will investigate and assess the Aboriginal object to determine the nature, extent and significance of the find. This will enable recommendations to be provided on how work can proceed and whether any further work is required. The archaeologist must supply written advice to the project Manager within 24 hours stating:
 - A determination of whether the find is an Aboriginal object.
 - Advice on whether how the project is to proceed and whether the establishment of any no-go areas is necessary.
 - A recommendation on further works that may be required and timeframe for completion of these works.
- Heritage NSW and Aboriginal stakeholders will be notified. This will include a statement concerning the find, management measures implemented and notification of any further works arising. Aboriginal stakeholders are to be involved in any further assessments or works as required.
- AHIMS (Aboriginal Heritage Information Management System) site cards will be prepared for each new site identified and submitted to AHIMS in accordance with the Code.

Should any Aboriginal objects be identified, this will trigger a review of this ACHMP.

6.1.1.2 Procedure to follow in the event of the discovery of human remains

If any suspected human remains are discovered within the study area, all activity must cease. The following process must be undertaken:

- Immediately cease all work at that location and not further move or disturb the remains.
- Notify the NSW Police, Planning and Infrastructure and Heritage NSW Environmental Line on 131 555 as soon as practicable and provide details of the remains and their location.
- Establish an appropriate no-go area. This will need to be established in consultation with NSW Police, Heritage NSW and if necessary, a qualified archaeologist.
- Works will not be able to recommence within the location of the find until confirmation from NSW Police and Heritage NSW is obtained. If the remains are confirmed as not being human then works may recommence. In the event that remains are human then consultation, with NSW Police, Heritage NSW and the Aboriginal stakeholders to establish a plan of management.

- Works in the vicinity of the find will only be able to commence once the plan of management has been established and approval has been obtained from all relevant parties.

Should any human remains be identified, this will trigger a review of this ACHMP.

6.1.1.3 Contingency plan if Aboriginal heritage items outside the approved disturbance area are damaged

In the event that Aboriginal heritage items outside of the approved disturbance areas are damaged, AGL must notify Heritage NSW immediately. Heritage NSW should be contacted through the Environmental Line on 131 555 as soon as practical. An appropriate no-go zone should be established until the area can be inspected and advice sought from the Heritage NSW on how to proceed.

A report should be prepared by the Project Manager and the archaeologist to be sent to Heritage NSW and should include:

- Any contravention to the strategies outlined in the ACHMP.
- The nature of the incident.
- The actual or likely impact of the incident on Aboriginal objects and/or Aboriginal places.
- The nature and location of the Aboriginal objects and/or places, referring to and providing maps and photos where appropriate.
- The measures which have been taken or will be taken to prevent a recurrence of the incident.

6.1.1.4 Procedure to follow for conducting further archaeological assessments in the event Aboriginal sites may be impacted by new works

For any new works with the potential to impact known or unexpected Aboriginal sites, an Aboriginal Cultural Heritage Assessment (ACHA) should be undertaken.

An ACHA must be prepared in accordance with the *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* (OEH 2011). This includes an Archaeological Report prepared in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (the code) (DECCW 2010b) and consultation with Aboriginal community in accordance with *the Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (DECCW 2010a).

Interpretive Signage

Where appropriate, interpretative signage may be placed at some operational infrastructure locations to identify and acknowledge the significance and cultural values of a site to the local Aboriginal people. This should be undertaken at the request of the Aboriginal stakeholder groups. The interpretative signage may include information about Aboriginal plant uses, prehistory, land use, stone tool manufacture and use and should be designed in consultation with Aboriginal stakeholder groups. Any information used on the interpretative signage must have prior permission from the registered Aboriginal stakeholders.

Process Review and documentation

This ACHMP will be reviewed:

- In conjunction with the EMP.
- At any time with the mutual agreement of the Tharawal LALC, Cubbitch Barta and AGL.
- Following completion of additional archaeological assessments.

- Following discovery of unexpected Aboriginal sites or human remains.
- In the event Aboriginal sites are impacted without appropriate approvals or in accordance with management measures.

On 1 October 2010 the Department of Environment, Climate Change and Water (subsequently transferred to the Office of Environment and Heritage (now Heritage NSW) on 4 April 2011) made changes to the *National Parks and Wildlife Amendment Act 2010*. The new amendments included changes to procedures with the introduction of the Due Diligence guidelines and the Code to regulate archaeological investigations. With these changes, the process for the project was updated to follow the new best practices.

References

- Biosis Research 2007a. *Archaeological Sub-surface Testing of EM30 PAD Elizabeth Macarthur Agricultural Institute, Camden, NSW*, A report to AGL Gas Production (Camden) Pty Limited.
- Biosis Research 2007b. *Section 90 Application, Approval and Subsequent Site Management and Relocation*, A letter report to AGL Gas Production (Camden) Pty Limited.
- Biosis Research 2007c. *West Cliff Colliery Stage 3 Coal Wash Emplacement Area Cultural Heritage Management Plan*, A report to BHP Billiton Illawarra Coal.
- Biosis Research 2008a. *Cultural Heritage Assessment for the Proposed Additional Gas Well Sites EM39 and GL17 for the Camden Gas II Project*, A letter report to AGL Gas Production (Camden) Pty Limited.
- Biosis Research 2008b. *Archaeological and Cultural Heritage Assessment of a Proposed Stratigraphic Exploration Hole / Drill Site at Elderslie, NSW*, A report for AGL Gas Developments (Sydney) Pty Limited.
- Biosis Research 2008c. *Archaeological and Cultural Heritage Assessment of a Proposed Stratigraphic Exploration Hole / Drill Site at Razorback, NSW*, A report for AGL Gas Developments (Sydney) Pty Limited.
- Biosis Research 2008d. *Cultural Heritage Assessment – Kay Park Gas Gathering Line between existing gas production wells KP01/05 and an AGL storage compound, north of gas production well LB07*, A letter report to AGL Gas Production (Camden) Pty Limited.
- Biosis Research 2008e. *Proposed Elderslie 2 Exploration Hole / Drill Site Compound and Access Track Aboriginal Archaeological Sub-surface Testing Program, Elderslie, NSW*, A report for AGL Gas Developments (Sydney) Pty Limited.
- Biosis Research. 2009a. *Flora, Fauna and Cultural Heritage Assessment of replacement of a gas gathering line between existing Glenlee gas wells GL 06 and GL07/16 for the Camden Gas Project*. A report for AGL Gas Developments (Sydney) Pty Limited.
- Biosis Research 2009b. *Flora, Fauna and Cultural Heritage reports for the proposed additional gas gathering lines between gas well sites MP03 and MP05 for the Spring Farm, and Menangle Park Gas Field for the Camden Gas Project*, A report for AGL Gas Developments (Sydney) Pty Limited.
- Biosis Research 2009c. *Flora, Fauna and Cultural Heritage reports for the proposed additional gas gathering lines between gas well sites MP11 and MP 22, via MP19*, A report for AGL Gas Developments (Sydney) Pty Limited.
- Biosis Research 2009d. *Monitoring near Well Surface Location SF 20 for the Spring Farm, and Menangle Park Gas Field for the Camden Gas Project*, A report for AGL Gas Developments (Sydney) Pty Limited.
- Biosis Research 2010a. *Aboriginal archaeological excavation of identified Potential Archaeological Deposit, Spring Farm/ Menangle Park Gas Field for the Camden Gas Project*, A report for AGL Gas Developments (Sydney) Pty Limited.

Biosis Research 2010b. *Identification and Relocation of Aboriginal Sites M5 and M8*, A letter report to AGL Upstream Investments Pty Ltd.

Biosis Research 2011. *Spring Farm / Menangle Park Salvage Excavations: Area of Aboriginal Archaeological Sensitivity on a section of Gas Gathering Line between MP11 and MP22*, Report for AGL Camden Operations Pty Ltd.

Biosis. 2020. *Wanindong Gasworks Aboriginal Cultural Heritage Assessment*, Report for AGL Camden Operations Pty Ltd.

Biosis. 2021. *Glenlee Gasworks Aboriginal Cultural Heritage Assessment*, Report for AGL Camden Operations Pty Ltd.

Department of Environment, Climate Change and Water 2010a. *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales 2010*, NSW Department of Environment, Climate Change and Water, Sydney NSW.

Department of Environment, Climate Change and Water 2010b. *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010*, NSW Department of Environment, Climate Change and Water, Sydney NSW.

Dibden J 2000. *Coal Bed Methane Treatment Plant, Cawdor – Camden, NSW. Aboriginal Archaeology*, A report to Harvest Scientific Services.

Dibden J 2001a. *Camden Coal Bed Methane Project Archaeological and Heritage Assessment*, A report to Harvest Scientific Services on behalf of Sydney Gas Operations NL.

Dibden J 2001b. *Aboriginal Heritage Assessment of Exploration Drilling Sites, Sydney Gas Operations NL Coal Bed Methane Project*, Letter to Harvest Scientific Services.

Dibden J 2002a. *Glenlee Coal Bed Methane Project – Archaeological and Heritage Assessment*, A report to Harvest Scientific Services.

Dibden J 2002b. *Glenlee Coal Bed Methane Project – Archaeological and Heritage Assessment – Addendum*, A report to Harvest Scientific Services.

Dibden J 2002c. *Glenlee Coal Bed Methane Project Stage 2 – Archaeological and Heritage Assessment – Addendum*, A report to Harvest Scientific Services.

Dibden J 2002d. *Camden Coal Bed Methane Project – Kay Park Pipeline Archaeological Assessment*, A report to Harvest Scientific Services on behalf of Sydney Gas Operations NL.

Dibden J 2002e. *Addendum to Report Camden Coal Bed Methane Project – Kay Park Pipeline Archaeological Assessment*, A report to Harvest Scientific Services on behalf of Sydney Gas Operations NL.

Dibden J 2002f. *Camden Coal Bed Methane Project – Elizabeth Macarthur Agricultural Institute Gas Well Project. Archaeological and Heritage Assessment*, A report to Harvest Scientific Services on behalf of Sydney Gas Operations NL.

Dibden J 2003a. *Camden Gas Project Stage 2 – Camden, New South Wales; Archaeological Heritage Assessment*, A report to Sydney Gas Operations Pty Ltd.

Dibden J 2003b. *Camden Gas Project Stage 2 – Five Gas Production Well Sites and Associated Gathering System, Menangle Park, New South Wales. Archaeological and Heritage Assessment*, A report to Sydney Gas Operations Pty Ltd.

Dibden J 2003c. *Addendum 3. Camden Gas Project Stage 2 – Camden, New South Wales. Archaeological and Heritage Assessment*, A report to Sydney Gas Operations Pty Ltd.

Dibden J 2004a. *Proposed Sydney Gas Wells and Gathering Lines at Mt Taurus, Menangle, NSW; Aboriginal Archaeological Assessment*, A report to Sydney Gas Operations Pty Ltd.

Dibden J 2004b. *Seven Production Well Sites and Associated Gathering Systems, Sugarloaf Farm, near Campbelltown, New South Wales*, A report to Sydney Gas Operations Pty Ltd.

Dibden J 2004c. *Proposed Sydney Gas Wells and Gathering Lines at Mt Taurus, Menangle, NSW; Subsurface Test Excavation*, A report to Sydney Gas Operations Pty Ltd.

Dibden J 2004d. *Camden Gas Project Stage 2, Camden, NSW. EMAI Gathering Lines Aboriginal Archaeological Assessment; Addendum 5*, A report to Sydney Gas Operations Pty Ltd.

Dibden J 2004. *Camden Gas Project Stage 2, Camden, NSW. EMAI Gathering Lines Aboriginal Archaeological Assessment; Addendum 6*, A report to Sydney Gas Operations Pty Ltd.

EMGA Mitchell McLennan 2010. *Camden Gas Project – Proposed MP03 Access road Modification – Environmental Assessment*, A report to AGL.

HLA ENSR 2006a. *Environmental Assessment – Camden Gas Joint Venture Stage 2 Drilling Program., EMAI Wells (RB03-RB12)*, Prepared for the Camden Gas Project Joint Venture.

HLA ENSR 2006b. *Environmental Assessment Scoping Report – Expansion of Stage 2 of the Camden Gas Project*, Prepared for AGL Gas Production (Camden) Pty Ltd.

HLA ENSR 2007. *Aboriginal Heritage Assessment: Camden Gas Project Stage 2 Concept Plan Spring Farm and Menangle Park Project Areas*, A report to AGL Gas Production (Camden) Pty Ltd.

Steele D 2005a. *Aboriginal Archaeological Survey and Assessment Report For Ten Proposed Gas Production Wells & Gathering Systems, El Bethel Property, Menangle, NSW*, A report to Sydney Gas Limited.

Steele D 2005b. *Aboriginal Archaeological Survey and Assessment Report For Twelve Proposed Gas Production Wells & Gathering Systems, Razorback Property, Menangle, NSW*, A report to Sydney Gas Limited.

Steele D 2005c. *Aboriginal Cultural Heritage Survey and Assessment Report For Fifteen New Proposed Gas Production Well Sites, Gathering Systems & Access Routes. Camden Gas Project Stage II – The Elizabeth Macarthur Agricultural Institute Property*, A report to Sydney Gas Limited.

Steele D 2007a. *Aboriginal Cultural Heritage Management Plan. Camden Gas Project Joint Venture. Elizabeth Macarthur Agricultural Institute, Menangle, NSW*, Report to AGL Gas Production Pty Limited and Sydney Gas Operations Pty Limited.

Steele D 2007b. *Aboriginal Cultural Heritage Management Plan. Camden Gas Project Joint Venture. Razorback Property, Menangle, NSW*, Report to AGL Gas Production Pty Limited and Sydney Gas Operations Pty Limited.

Steele D 2007c. *Aboriginal Cultural Heritage Survey and Assessment Report. Camden Gas Production Project Stage II. Proposed Gas Well Locations & Gas Gathering System Modifications*, Report to AGL Gas Production Pty Limited and Sydney Gas Operations Pty Limited.

Steele D 2007d. *Aboriginal Cultural Heritage Survey and Assessment Report. Camden Gas Joint Venture Project – Stage II – Menangle Park and Spring Farm, Camden, NSW. Four New Proposed Gas Wells & Gathering Systems*, Report to AGL Gas Production Pty Limited and Sydney Gas Operations Pty Limited.

Figures

Figure 1: Camden Gas Project in a Regional Context

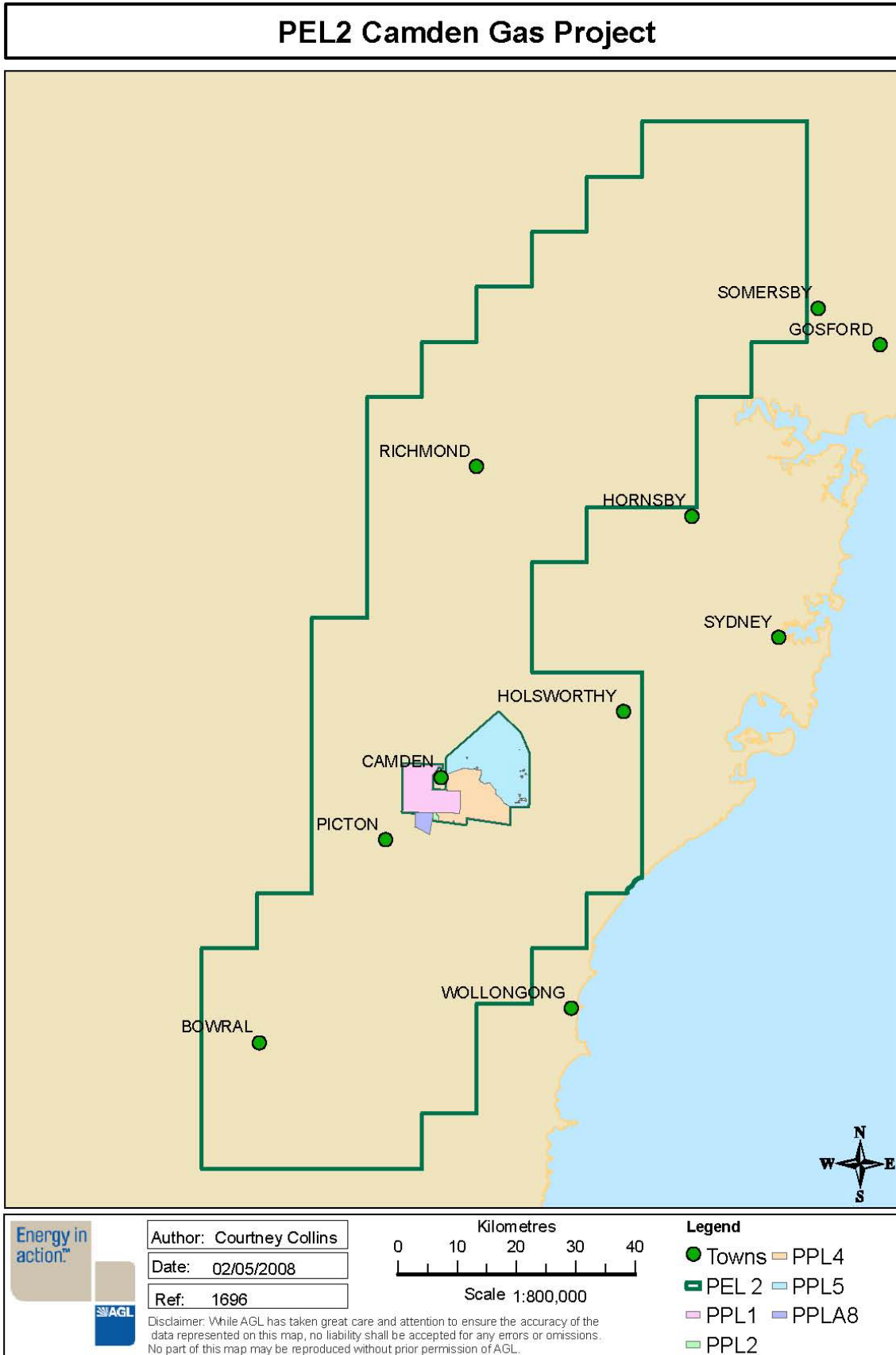
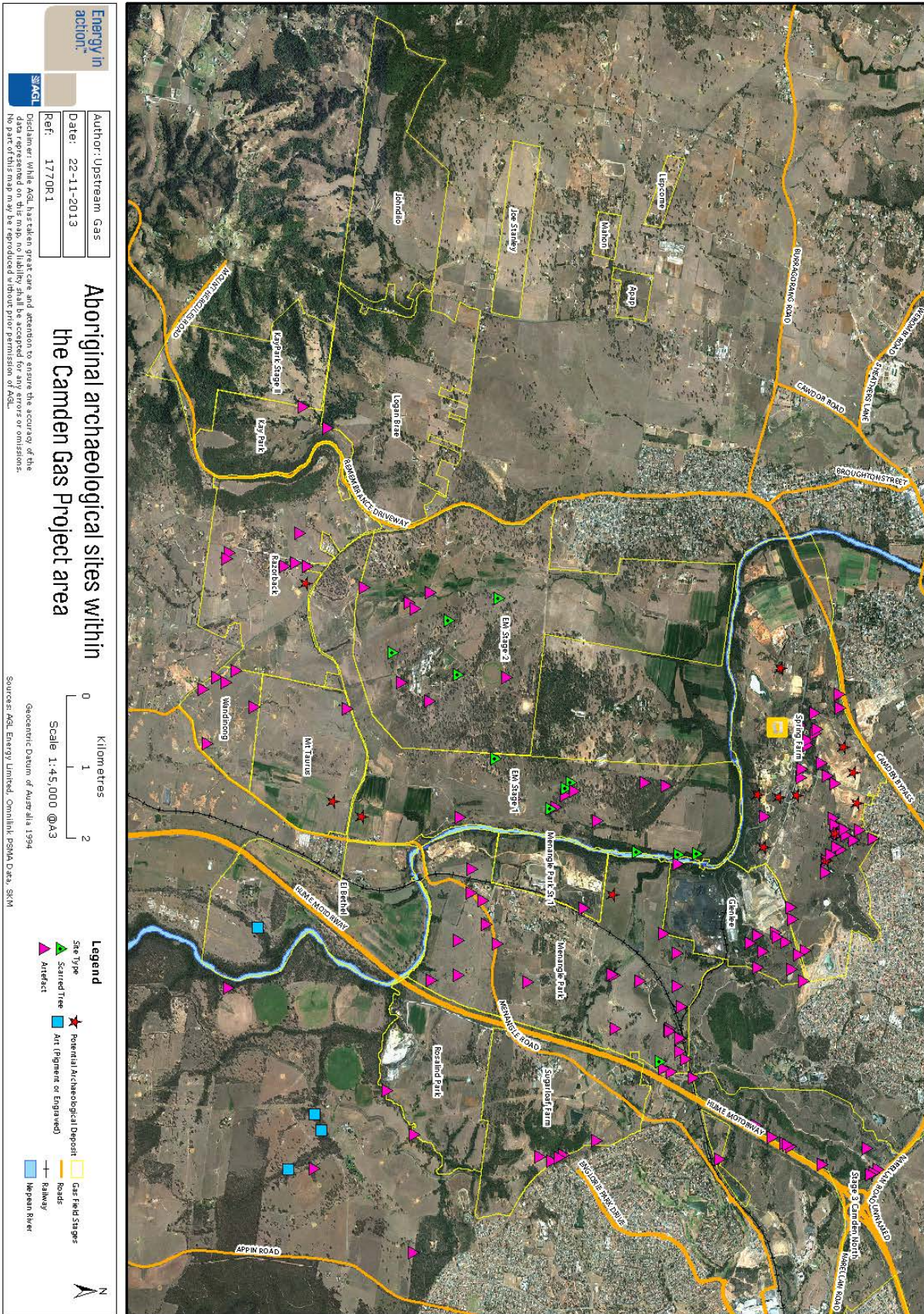


Figure 2: Location of Camden Gas Project Gas Fields



Figure 3: Registered Aboriginal archaeological sites within the Camden Gas Project Area



Appendices

Appendix 1 Typical Research Design / Methodology

Archaeological Methods / Research Design

The archaeological methodology proposed below has been devised in line with the Code that supports the process of investigating and assessing Aboriginal cultural heritage by specifying the minimum standards for archaeological investigation undertaken in NSW under the NPW Act. The methodologies described are not designed to be exhaustive or to limit changes, so that an alternative methodology can be agreed provided it is in consultation with the registered Aboriginal stakeholders. The methodologies will be determined on a site by site basis.

Collection and Relocation of Identified Aboriginal Objects

The objective of collection and relocation of Aboriginal objects is to avoid unmitigated impact to the objects and rather have controlled impact through: identification; recording of objects; relocation of objects; documentation of the relocation.

The Aboriginal objects shall be collected using the following methodology:

- Each site will be photographed, its location recorded using GPS and additional information recorded as appropriate.
- The archaeologist and relevant Aboriginal stakeholders will collect the surface Aboriginal objects from each site to be impacted.
- The collected Aboriginal objects will be bagged and temporarily stored in a locked cabinet located at Biosis offices in Wollongong.
- Upon completion of archaeological works under this ACHMP, the archaeologist will analyse (see methodology outlined below) the Aboriginal objects as part of the requirements for this ACHMP.
- Following completion of the reporting requirements, collected Aboriginal objects will be relocated adjacent to their former location on-site. If this cannot be achieved, an alternative for all collected cultural material must be agreed upon by the identified Aboriginal Stakeholder Groups, such as a common 'keeping place'.

Archaeological Survey and Data Collection

Aims of the Survey

The principle aims of the survey are to:

- Identify and record Aboriginal archaeological sites visible at or on the ground surface, or exposed in sections or visible as features (rock art, scarred trees).
- Identify and record areas of PADs, i.e. areas where it can be inferred that, although not visible, evidence of Aboriginal land use have a likelihood of being present under the ground surface.

Survey Methodology

The survey methods are intended to assess and understand the landforms and to determine whether any archaeological material from Aboriginal occupation or land use exists within the Study Area. Identification of natural soil deposits within the Study Area will be undertaken if possible. Photographs and recording techniques will be incorporated into the survey including representative photographs of survey units, landforms, vegetation coverage, ground surface visibility and the recording of soil information for each survey unit. Any Aboriginal objects observed during the survey will be documented and photographed.

Specific information that will be recorded during the survey includes:

- Aboriginal objects or sites present in the Study Area.

- Survey coverage.
- Survey effectiveness.
- Any resources that may have potentially have been exploited by Aboriginal people.
- Landforms and general soil information.
- Photographs of the site indicating landforms.
- Evidence of disturbance.
- Aboriginal artefacts, culturally modified trees, shell middens or any other Aboriginal sites.

Distinguishing landform elements and their association with Aboriginal cultural heritage will assist with the identification of site patterning, though with the awareness of the following limitations:

- The degree of ground surface visibility (GSV) and amount of exposed areas can significantly bias the discovery of surface artefacts.
- Cultural material exposed on the surface is not necessarily representative of the potential extent of the site (either horizontally or vertically).

Information about the presence of potentially exploitable resources helps contribute to predictions of the Aboriginal sites that may occur within the Study Area. Information about GSV, Disturbance Visibility (DV) and areas of exposures help to provide a general indication of the effectiveness of the survey for identifying Aboriginal cultural heritage exposed to the surface. Observable disturbances are also considered when assessing the integrity of known or potential sites in an area.

The location of Aboriginal cultural heritage and points marking the boundary of the landform elements will be recorded using a hand-held Global Positioning System and the Map Grid of Australia (94) coordinate system. An AHIMS Site Recording Form will be completed for all newly identified Aboriginal objects and sites.

Archaeological Test Excavation

The objective of archaeological excavation is to: accurately determine site contents and values prior to impact; and mitigate impact through the retrieval, salvage and recording of artefacts.

If a PAD or PADs are identified in the Study Area during the survey and the proposed development is unable to avoid impacts to these areas then sub-surface investigations will be undertaken in accordance with the Code to determine the extent, nature and significance of any potential Aboriginal cultural material. The proposed sub-surface investigation methodology will be undertaken in the following manner:

- PADs will be systematically gridded at 10 metre, 20 metre or other justifiable and regular spacing intervals depending on the size of the PAD (testing grid).
- Within the testing grid, a 1 metre x 1 metre test pit will be the first test excavation excavated in each PAD and each landform covered by the PAD to inform on the sub-surface nature of the PAD. Each test trench will be excavated in 5 centimetre spits.
- Barring the 1 metre x 1 metre test trenches, a 50 centimetre x 50 centimetre test pit will be excavated in each other location on the testing grid in 10 centimetre spits.
- All test excavation locations will be excavated using hand tools only.

- All material excavated from each test location will be sieved using a 5 millimetre and 3 millimetre aperture wire-mesh sieves.
- All recovered cultural material will be temporarily stored at the Biosis office for a detailed analysis.
- All test excavation locations will be excavated to a culturally sterile layer.
- Records of each test excavation location will be undertaken which will include the following:
 - Unique test pit identification number.
 - Soil colour and texture.
 - Amount and location of artefacts within deposit.
 - Nature of disturbance if present.
 - Stratigraphy.
 - Archaeological features (if present).
 - Photographic records.
 - Spit records.

For safety reasons all test pits will be backfilled with sieved spoil at the end of the excavation to ensure a level surface within the study area.

Prior to sub-surface investigations taking place, a revised sub-surface investigation methodology will be forwarded to relevant Aboriginal stakeholders.

On-site Monitoring at the commencement of ground disturbance works

The purpose of on-site monitoring is to implement a mitigation strategy in cases where archaeological excavation is not warranted but there is agreement between the Tharawal LALC, Cubbitch Barta NTCAC and AGL that a residual risk of artefacts being present remains. The mitigation of the monitoring would be the salvage, retrieval, recording and relocation of artefacts, rather than the unmitigated impact of the artefacts.

The on-site monitoring for the presence of artefacts would be conducted by a representative from the Aboriginal Groups and an archaeologist. The standard monitoring method would involve the removal of controlled depth and area scrapes of top-soil, and the inspection of the resultant exposed areas and spoil. The monitoring would take place only during the top-soil removal phase of construction, and would circumvent the *procedure for previously undiscovered Aboriginal Objects*.

If artefacts are identified during monitoring then these will be recorded, collected and relocated as agreed. The use of this methodology requires agreement on the objectives for the monitoring on a case by case basis depending on the residual archaeological potential, level of previous disturbance, nature of construction and other issues relevant to the site. In all cases the monitoring will be designed to fit with the relevant operational and construction requirements of the site.

Analysis of Aboriginal Objects

The following requirements apply for recording and analysis of stone artefacts:

- Before picking up any artefact, the position of each artefact to be observed or recorded must be marked with a stake, flag, nail or similar.

- Once their positions are marked, each artefact may then be picked up or moved and recorded (attributes, measurements, photography or drawing).
- The artefact must then be replaced to its original position prior to repeating the process for the next and subsequent artefacts.
- Artefacts should not be removed from the site.
- The attributes that must be recorded for artefacts are contained within the Heritage NSW AHIMS Feature Recording Form and Feature Recording Table – Artefact.
- Up to six diagnostic or representative artefacts may be collected at a time for group photography or drawing.
- All photographs must include an appropriate graded metric scale – mm or cm graded scales (such as an IFRAO standard scale) for macro artefact photography, and tens of cm or m graded scales (such as a range pole, surveying staff or tape measure) for wider angle or context photography.

Consultation with Aboriginal groups should be undertaken to determine an appropriate Care Agreement for relocation or storage of any artefacts recovered after the completion of the works.

Appendix 2 Aboriginal Community Comments

Appendix 3 Spring Farm and Menangle Park

Management and Mitigation Measures

There are 39 Aboriginal archaeological sites currently identified within the Spring Farm and Menangle Park Project areas that will require some level of management. The following recommendations and mitigation measures are based on the findings of previous archaeological assessments, the assessment of impacts from proposed works associated with well surface locations, gas gathering lines (GGL) and access tracks and through consultation with the relevant Aboriginal groups (see Table 3 below). It should be noted that AGL has completed all construction works including gas gathering lines and associated access roads at MP03, MP05, MP22, MP23, SF17 and SF20 well surface locations.

Table 3 Summary of recommendations and mitigation measures for Aboriginal archaeological sites within the Spring Farm and Menangle Park gas fields

Well / GGL / Access	Heritage Site / No.	Management Recommendations and Mitigation Measures
Menangle Park		
MP02	52-2-2277	<ul style="list-style-type: none"> AGL is to avoid this site and a revised location and/or alternatives for the MP02 surface location within the assessed area are to be determined in consultation with the Aboriginal Groups.
	M8 – relocated from the original location	<ul style="list-style-type: none"> AGL will avoid the tree where this site was relocated by flagging and/ or fencing for identification prior to development.
Access to MP02 from Gilchrist Drive	No Sites	<ul style="list-style-type: none"> No issues or recommendations for this access.
Access to MP02 from Gilchrist Drive	No Sites	<ul style="list-style-type: none"> No issues or recommendations for this access.
GGL and Access MP02 to MP03	M6 and M7 – could not be relocated	<ul style="list-style-type: none"> The cultural material associated with these two sites could not be relocated during the site visit in 2010 (Biosis 2010b). Construction works should remain on existing, previously disturbed tracks.
	M5 – relocated from the original location	<ul style="list-style-type: none"> AGL will avoid the tree where this site was relocated by flagging and/ or fencing for identification prior to development.

Well / GGL / Access	Heritage Site / No.	Management Recommendations and Mitigation Measures
	52-2-2277	<ul style="list-style-type: none"> Avoid the site by flagging and/ or fencing for identification prior to proposed development. The proposed works should remain on existing, previously disturbed tracks.
MP03	No Sites	<ul style="list-style-type: none"> No issues or recommendations for this well surface location.
GGL MP03 to MP04	52-2-3723	<ul style="list-style-type: none"> Avoid the site by flagging and/ or fencing for identification prior to proposed development. The proposed works should remain on existing, previously disturbed tracks.
	52-2-3316	
GGL MP04 to MP05	52-2-3316	<ul style="list-style-type: none"> Avoid the site by flagging and/ or fencing for identification prior to development. Consultation with the landowner is required given unknown landowner actions.
	52-2-3317	
	52-2-3318	
Access to MP04 from Glenlee Road	52-2-2274	<ul style="list-style-type: none"> Avoid the site by flagging and/ or fencing for identification prior to proposed development. The proposed works should remain on existing, previously disturbed tracks. Consultation with the landowner is required.
	52-2-2281	<ul style="list-style-type: none"> Avoid the site by flagging and/ or fencing for identification prior to proposed development. Vehicle access should remain on existing, previously disturbed tracks.
	52-2-3316	<ul style="list-style-type: none"> Avoid the site by flagging and/ or fencing for identification prior to proposed development. Vehicle access should remain on existing, previously disturbed tracks.
MP06 GGL and Access from MP05 and MP06	52-2-3908	<ul style="list-style-type: none"> Unlikely to be impacted by the MP06 well surface location. GGL works should remain on the existing track. Avoid the site by flagging and/ or fencing for identification prior to development.
GGL and Access from	52-2-3837	

Well / GGL / Access	Heritage Site / No.	Management Recommendations and Mitigation Measures
MP11 to MP19	M2	<ul style="list-style-type: none"> Avoid the sites by flagging for identification prior to development.
	M3	<ul style="list-style-type: none"> Move the GGL AND access track to the north beyond the break of slope within the surveyed 25 metre corridor.
	M4	<ul style="list-style-type: none"> Avoid the sites by flagging for identification prior to development.
GGL and Access from Menangle Road between MP02, MP03, MP05 and MP19	No Sites	<ul style="list-style-type: none"> No issues or recommendations for these sections of gas gathering line or associated access tracks.
GGL and Access from Cummins Road between MP11, MP19, MP21, MP22 and MP23	52-2-3918	<ul style="list-style-type: none"> Avoid the sites by flagging for identification prior to development.
	52-2-3837	
	52-2-3915	
GGL and Access to MP24	No Sites	<ul style="list-style-type: none"> No issues or recommendations for this well surface location, GGL or access.
GGL and Access to MP33	52-2-1597	<ul style="list-style-type: none"> Avoid the sites by flagging for identification prior to development.
MP04, MP05, MP11, MP19, MP21, MP22, MP23, MP24 and MP33	No Sites	<ul style="list-style-type: none"> No issues or recommendations for these well surface locations.
<ul style="list-style-type: none"> Spring Farm 		
SF10	52-2-3753	<ul style="list-style-type: none"> Avoid all sites within 200 metres of SF10 by flagging and/ or fencing each site for identification prior to development.
	52-2-3754	
	52-2-3755	<ul style="list-style-type: none"> This should be undertaken in consultation with the Aboriginal groups.
	52-2-3756	
	52-2-3757	
	52-2-3261	
	52-2-3758	
	52-2-3256	
	52-2-3257	
	52-2-3258	
	52-2-3260	

Well / GGL / Access	Heritage Site / No.	Management Recommendations and Mitigation Measures
	52-2-3262	
	52-2-3810	
	52-2-3811	
GGL and access track from SF10 to SF20	52-2-3753	<ul style="list-style-type: none"> • Unlikely to be impacted by the gas gathering line and access track. • Avoid the site by flagging and/ or fencing each site for identification prior to development.
SF20	52-2-3754	<ul style="list-style-type: none"> • Unlikely to be impacted by the SF20 well surface location.
	52-2-3755	<ul style="list-style-type: none"> • Flag and/ or fence sites in the vicinity for identification prior to development–these sites will be dealt with in the SF10 recommendations.
	52-2-3756	
	52-2-3757	
	52-2-3758	
	52-2-3759	
	52-2-3238	
	52-2-3260	
GGL and access from SF17 to SF20	52-2-3757	<ul style="list-style-type: none"> • Avoid the sites by flagging and/or fencing for identification prior to GGL construction. • The cultural material associated with the site should be collected and relocated prior to the commencement of construction works.
	52-2-3759	<ul style="list-style-type: none"> • At the commencement of ground disturbance works, the Aboriginal stakeholder groups will be given the opportunity to inspect the ground surface for any Aboriginal additional Aboriginal cultural material.
	52-2-3810	<ul style="list-style-type: none"> • All works should remain on existing, previously disturbed tracks.
	52-2-3811	<ul style="list-style-type: none"> • Remove direct access road (east-west) between SF20 and SF17.
SF17	No Sites	<ul style="list-style-type: none"> • During the first day of construction of the well surface location, the area should be carefully stripped of all topsoil. The topsoil should be stockpiled to the side and replaced back across the site at the completion of the works. • The Aboriginal stakeholders groups should be given the opportunity on the first day of construction to inspect the stripped area, to determine the presence of any cultural material on this ridge. • Any recovered cultural material will be recorded in detail by a qualified archaeologist and collected until

Well / GGL / Access	Heritage Site / No.	Management Recommendations and Mitigation Measures
		<p>the completion of works- the material will then be relocated on site at the time of topsoil spreading.</p> <ul style="list-style-type: none"> • Interpretative signage will be placed at the site to recognize the cultural values of this place to Aboriginal people. This will be developed in consultation with the Aboriginal stakeholder groups.
GGL and access from SF17 to existing GL02/12	S11	<ul style="list-style-type: none"> • Unlikely to be impacted by the gas gathering line and access track.
	52-2-0917	<ul style="list-style-type: none"> • Avoid the sites by flagging and/or fencing for identification prior to development.
	52-2-1888	
Access track to SF20 and SF17 from Jacks Gully Management Facility Road	52-2-3238	<ul style="list-style-type: none"> • Avoid the sites where possible by flagging and/or fencing for identification prior to development.
	S12	
	S13	
SF04 and SF04A GGL from existing GL06 to SF04 and SF04A Access from Springs Road	52-2-3805	<ul style="list-style-type: none"> • Unlikely to be impacted by the gas gathering line and access track.
	52-2-3806	<ul style="list-style-type: none"> • Avoid the sites by flagging and/or fencing for identification prior to development.
	52-2-3807	
	52-2-3808	

Figure 4: Camden Gas Project-Spring Farm Area: Aboriginal Archaeological Sites

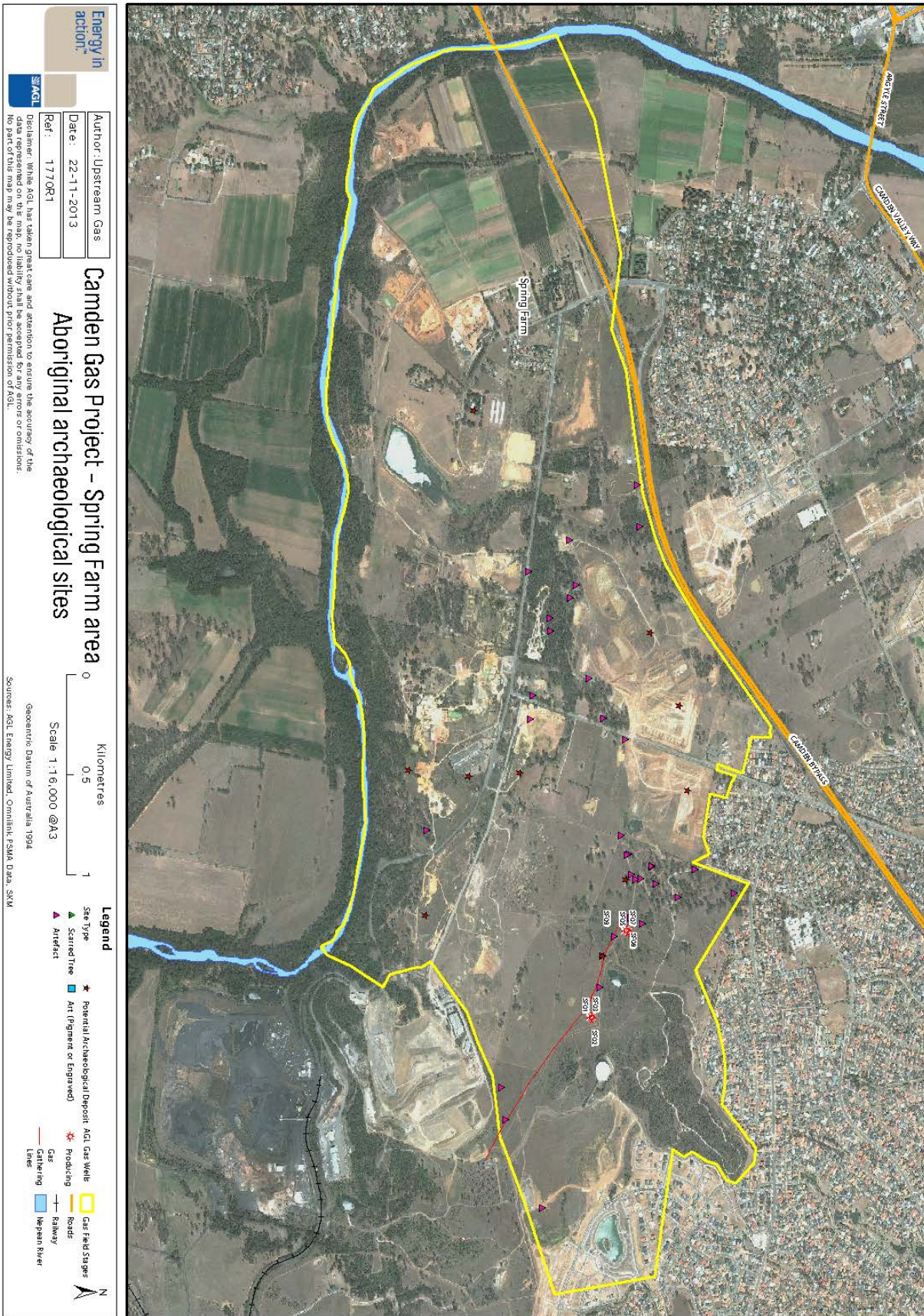


Figure 5: Camden Gas Project-Spring Farm Wells: Aboriginal Archaeological Sites

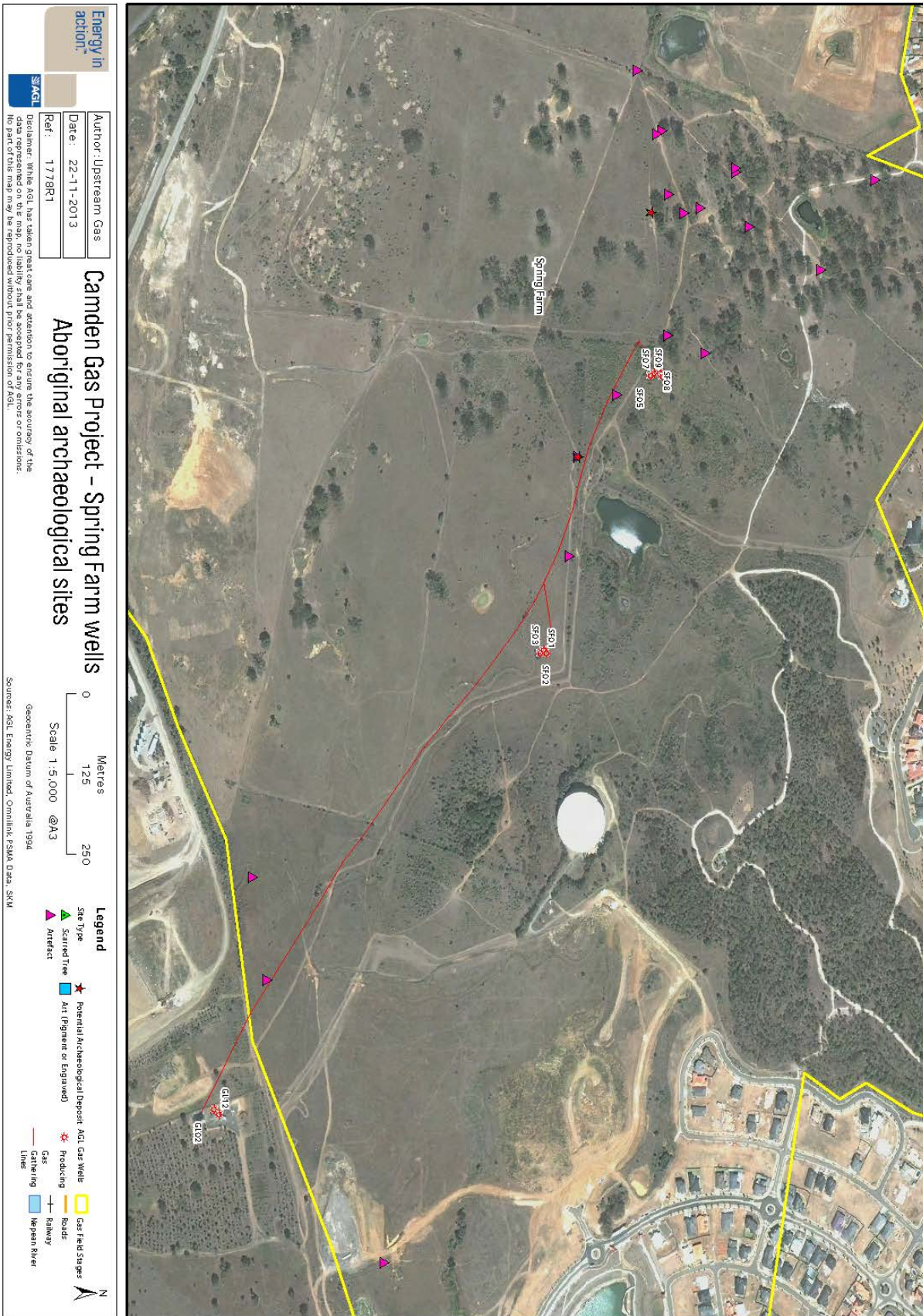


Figure 6: Camden Gas Project–Menangle Park Area: Aboriginal Archaeological Sites

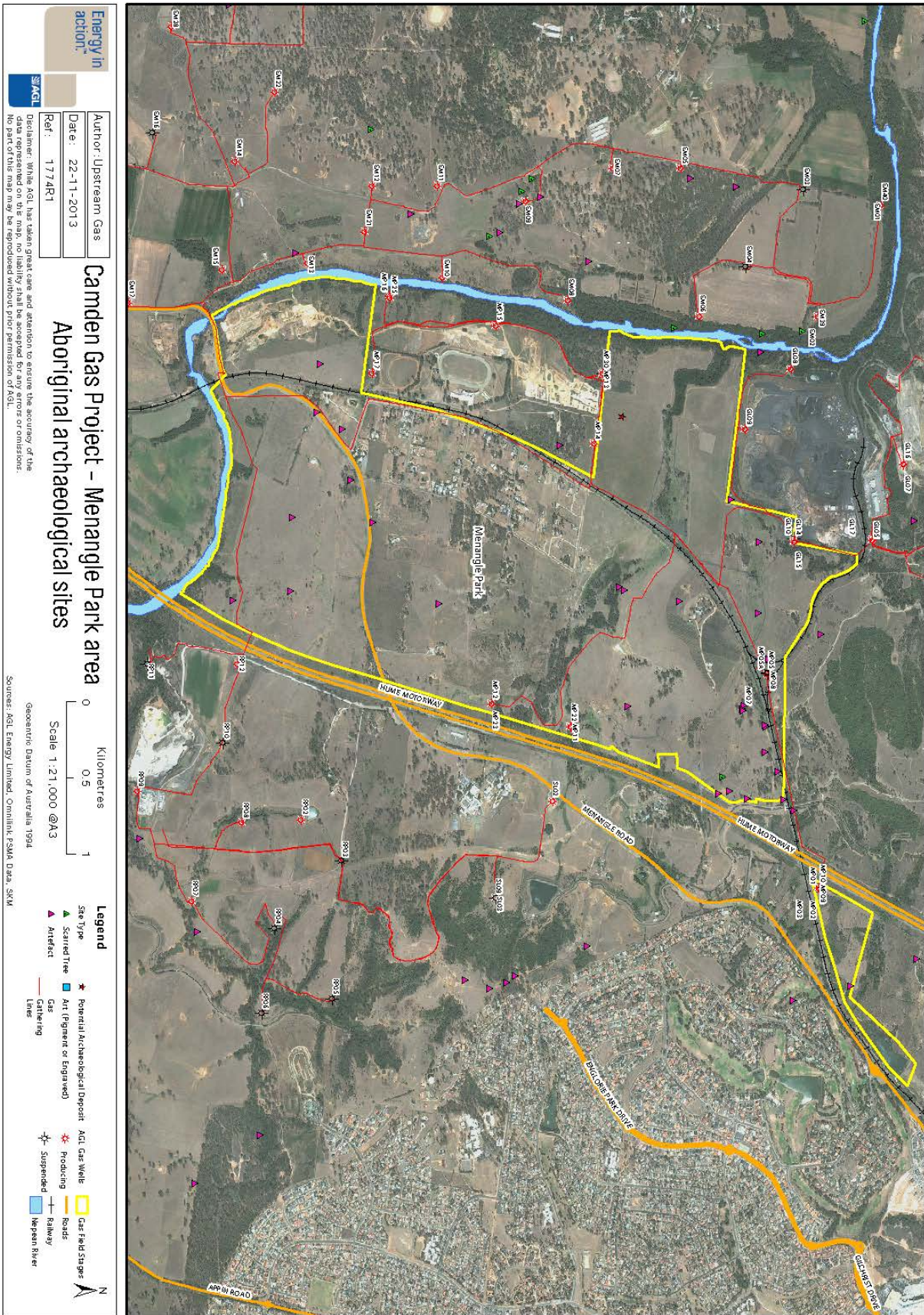


Figure 7: Camden Gas Project–Menangle Park Wells: Aboriginal Archaeological Sites 1/3

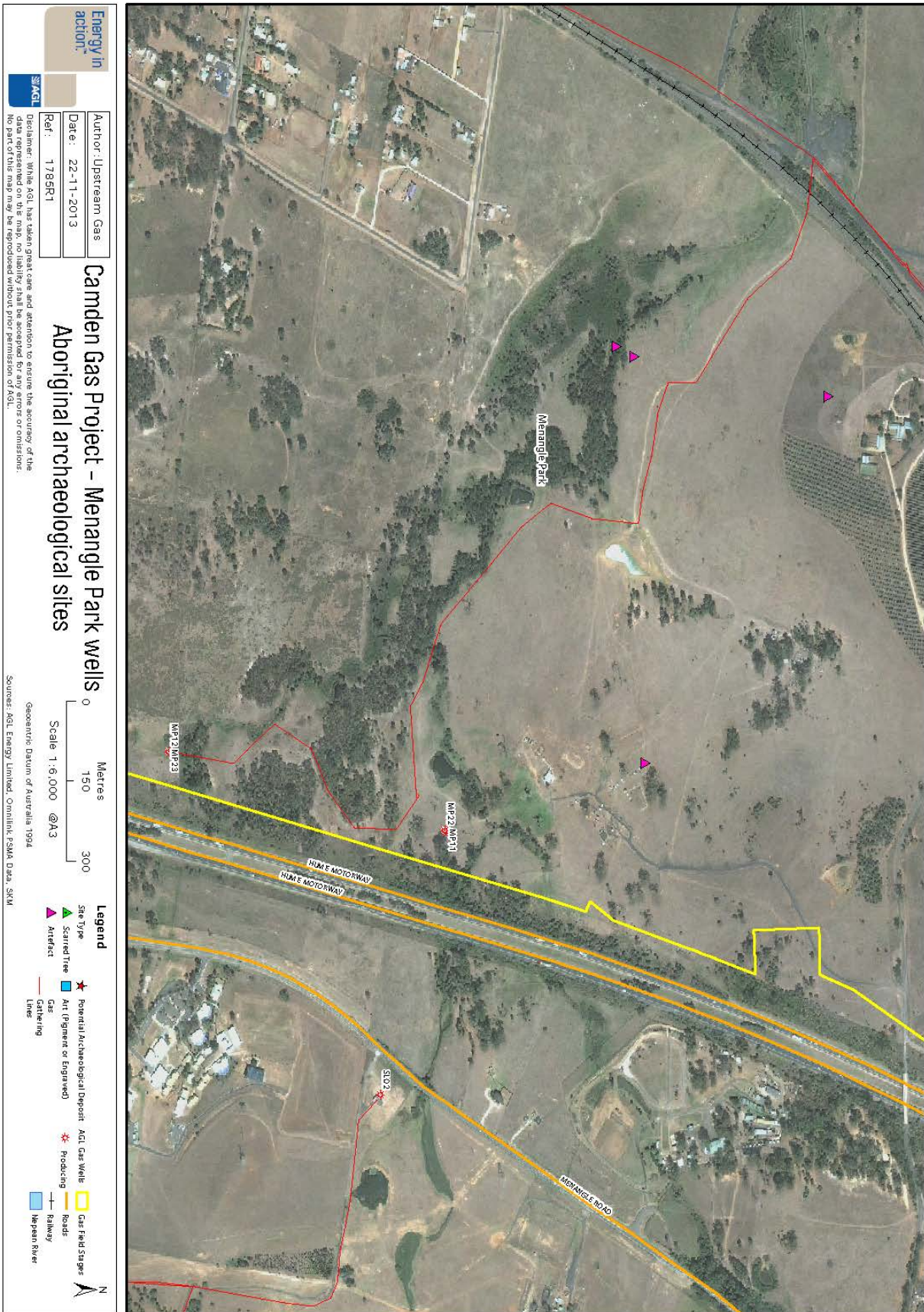


Figure 8: Camden Gas Project–Menangle Park Wells: Aboriginal Archaeological Sites 2/3

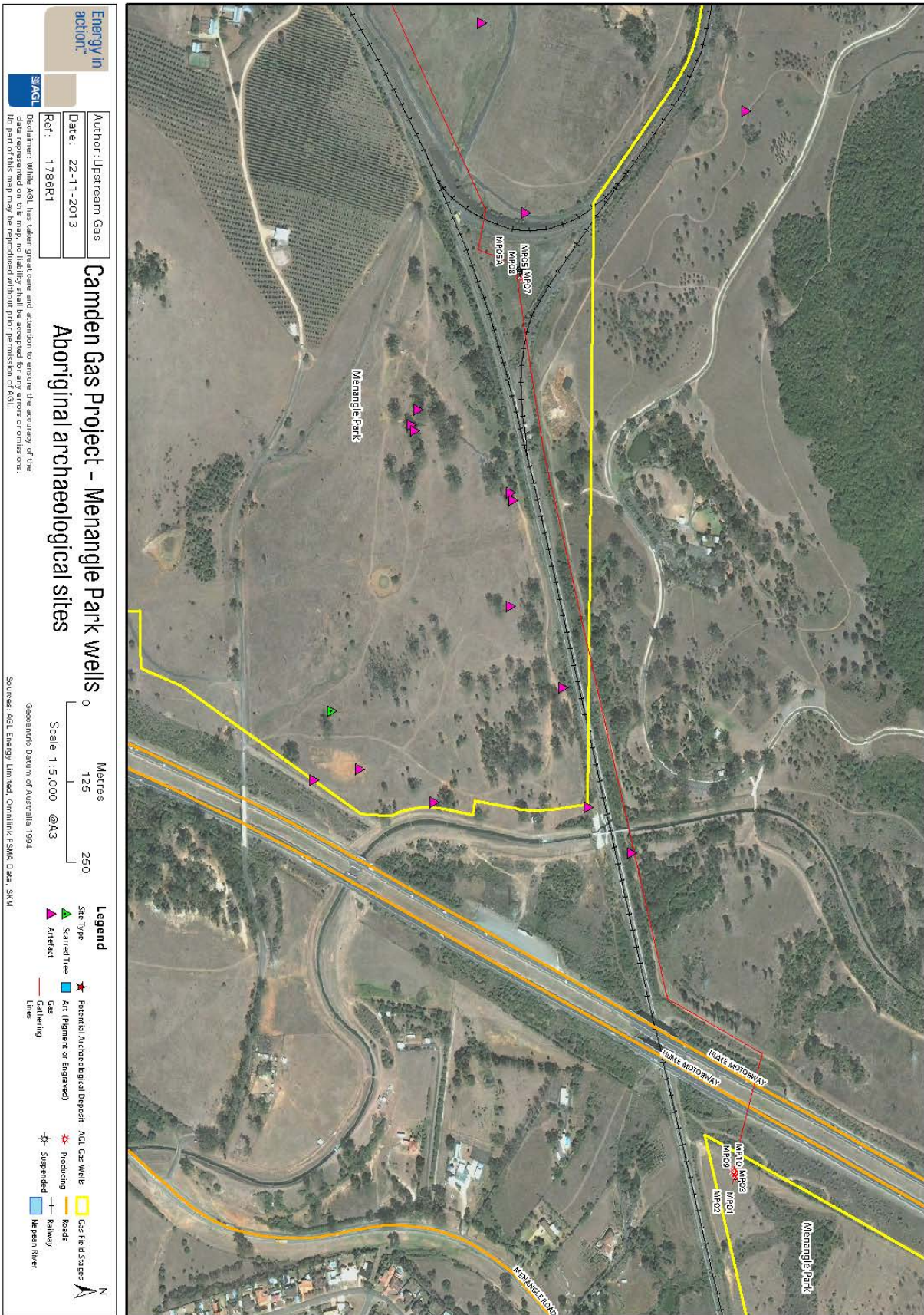


Figure 9: Camden Gas Project–Menangle Park Wells: Aboriginal Archaeological Sites 3/3

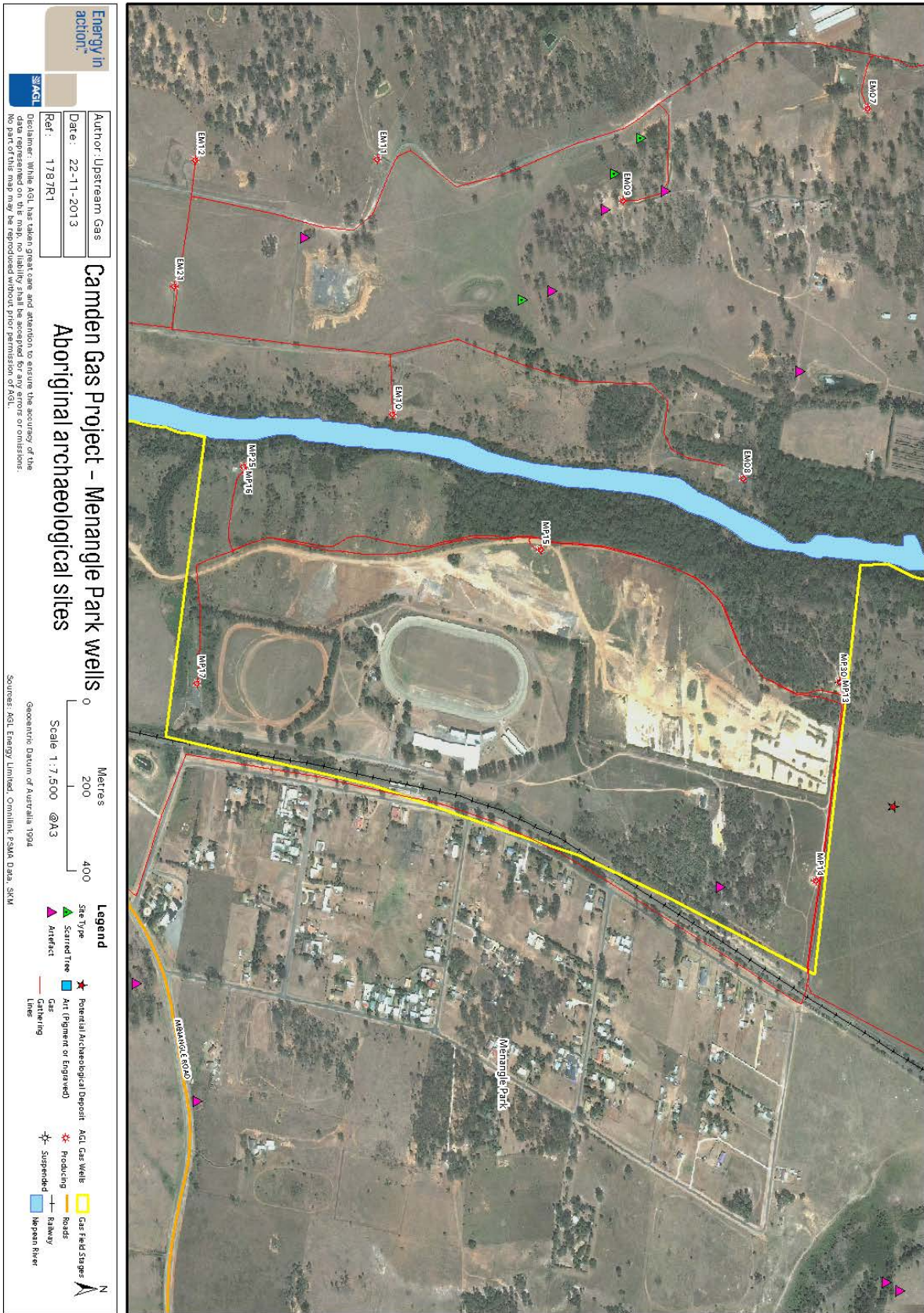


Figure 10: AGL Infrastructure on Landcom Land at Menangle Park



Appendix 4 Wandinong

Background

Biosis was commissioned by AGL to undertake an ACHA for the proposed upgrades to access tracks and well sites at 310 Menangle Road, Menangle, NSW. The Aboriginal community was consulted regarding the heritage management of the project throughout its lifespan. Consultation was undertaken as per the process outlined in the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (DECCW 2010a) (consultation requirements).

An archaeological survey was conducted on 14 March 2019. The assessment identified seven existing AHIMS sites within the study area. Background research conducted as part of this assessment found that AHIMS 52-2-3056 and AHIMS 52-2-3053 were duplicate recordings of the same site and that site locations for AHIMS 52-2-3192, AHIMS 52-2-3056/AHIMS 52-2-3053, and AHIMS 52-2-3194 on AHIMS did not match actual locations in the field or according to the assessment undertaken by Dibden (2003). Two newly recorded Aboriginal sites were identified during the field investigation. These sites consisted of isolated or low density artefact scatters and were located on all landforms within the study area, including crests, hillslopes and flats. Analysis of these sites has demonstrated that the area was utilised by Aboriginal people; however the low density artefact scatters and isolated finds reflect a common site type in the Cumberland region (AMBS 2012).

Management and Mitigation Measures

There were 8 Aboriginal archaeological sites currently identified within the Wandinong study area. The following recommendations and mitigation measures were made in Biosis, and were based on the findings of previous archaeological assessments, the assessment of impacts from proposed works associated with well surface locations, gas gathering lines and access tracks and through consultation with the relevant Aboriginal groups (see Table 4 below). The works have been completed under the approved Aboriginal Heritage Impact Permit (AHIP) C0005662.

Table 4 Summary of recommendations and mitigation measures for Aboriginal archaeological sites within the Wandinong Gas gathering area

Well / GGL / Access	Heritage Site / No.	Management Recommendations and Mitigation Measures
Access from WG01 to WG02	52-2-3190	<ul style="list-style-type: none"> Site not located within any works zones. Avoid impact to this site.
Access to WG04	52-2-3056/52-2-3053	<ul style="list-style-type: none"> The site was collected by Biosis and Cubitch Barta representatives in accordance with AHIP C0005662. When works are completed, artefacts will be reburied in a safe location in consultation with Aboriginal parties.
	52-2-3191	<ul style="list-style-type: none"> Site not located within any works zones. Avoid impact to this site.

Well / GGL / Access	Heritage Site / No.	Management Recommendations and Mitigation Measures
	52-2-3192	<ul style="list-style-type: none"> • Site not located within any works zones. • Avoid impact to this site.
Access from WG04 WG01	52-2-3193 52-2-4507	<ul style="list-style-type: none"> • These sites were collected by Biosis and Cubitch Barta representatives in accordance with AHIP C0005662. • When works are completed, artefacts will be reburied in a safe location in consultation with Aboriginal parties.
Access to WG05	52-2-3194	<ul style="list-style-type: none"> • The site was collected by Biosis and Cubitch Barta representatives in accordance with AHIP C0005662. • When works are completed, artefacts will be reburied in a safe location in consultation with Aboriginal parties.
WG05	52-2-4508	<ul style="list-style-type: none"> • The site was collected by Biosis and Cubitch Barta representatives in accordance with AHIP C0005662. • When works are completed, artefacts will be reburied in a safe location in consultation with Aboriginal parties.

Appendix 5 Glenlee (In prep)

Background

Biosis was commissioned by AGL to undertake an ACHA of the proposed works associated within the decommissioning of gas wells and maintenance of associated dirt roads in the Glenlee gathering area, Glenlee NSW. The Aboriginal community was consulted regarding the heritage management of the project throughout its lifespan. Consultation was undertaken as per the process outlined in the consultation requirements.

There were 89 Aboriginal cultural heritage sites registered with the AHIMS register. Seven of these sites are located in or within the study area, however only five sites are located within 50 metres of the study area. These five sites consist of surface artefact scatters or isolated scatters, with two of the five sites, AHIMS 52-2-2270/GLA and 52-2-3963/Glenlee OS1 2007, located within the proposed works footprint.

An archaeological survey was conducted on 12 March 2021. The overall effectiveness of the survey for examining the ground for Aboriginal sites was deemed high as the proposed works areas consist of graded access tracks and gas well pads which do not retain much surface vegetation.

No areas of potential sub-surface deposit were identified and neither of the two sites, 52-2-2270/GLA and 52-2-3963/Glenlee OS1 2007, located within the proposed impacts areas could be re-identified; however, one new silcrete artefact was identified at the location of 52-2-3963/Glenlee OS1 2007. This artefact had been deposited by surface run off and was located adjacent to the access track.

Management and Mitigation Measures

There were 7 Aboriginal archaeological sites currently identified within the Glenlee study area. The following recommendations and mitigation measures were made in Biosis (2021), and were based on the findings of previous archaeological assessments, the assessment of impacts from proposed works associated with well surface locations, gas gathering lines and access tracks and through consultation with the relevant Aboriginal groups (see Table 5 below). The works have been completed under the approved Aboriginal Heritage Impact Permit (AHIP) (pending).

Table 5 Summary of recommendations and mitigation measures for Aboriginal archaeological sites within the Glenlee Gas gathering area

Well / GGL / Access	Heritage Site / No.	Management Recommendations and Mitigation Measures
Access to GL12	52-2-2270	<ul style="list-style-type: none"> The site was collected by Biosis and Cubitch Barta representatives in accordance with AHIP. When works are completed, artefacts will be reburied in a safe location in consultation with Aboriginal parties.
Access to GL4	52-2-3963	<ul style="list-style-type: none"> The site was collected by Biosis and Cubitch Barta representatives in accordance with AHIP XXXX. When works are completed, artefacts will be reburied in a safe location in consultation with Aboriginal parties.
	52-2-4559	<ul style="list-style-type: none"> Site not located within any works zones Avoid impact to this site.
	52-2-1887	<ul style="list-style-type: none"> Site not located within any works zones. Avoid impact to this site.

Well / GGL / Access	Heritage Site / No.	Management Recommendations and Mitigation Measures
	52-2-3964	<ul style="list-style-type: none">• Site not located within any works zones.• Avoid impact to this site.
	52-2-3962	<ul style="list-style-type: none">• Site not located within any works zones.• Avoid impact to this site.
	52-2-3965	<ul style="list-style-type: none">• Site not located within any works zones.• Avoid impact to this site.

Figure 13: Camden Gas Project–Glenlee: Aboriginal Archaeological Sites

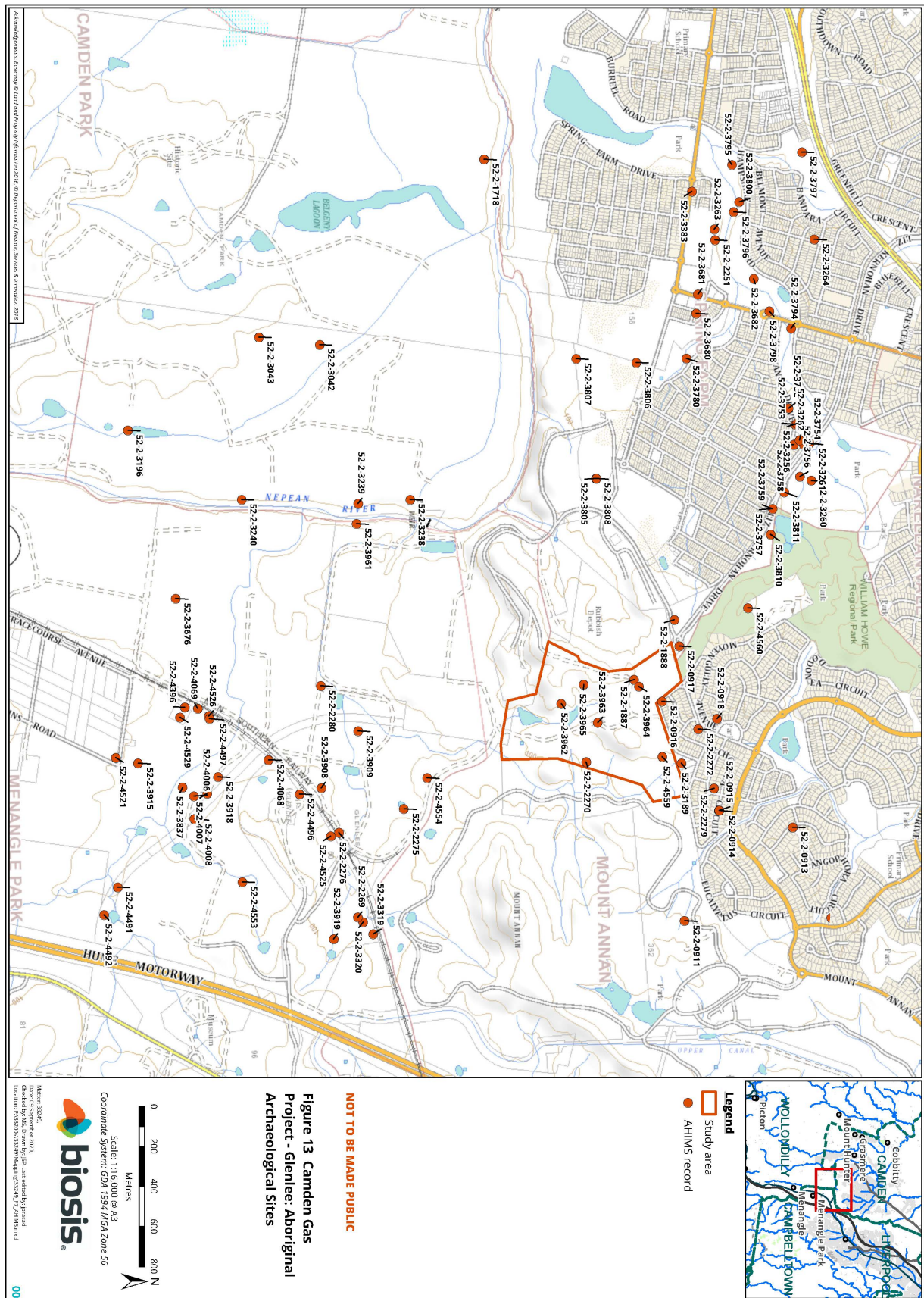


Figure 14: Camden Gas Project-Glenlee AHIP area

