

# **AGL UPSTREAM INVESTMENTS PTY LTD CAMDEN GAS PROJECT**

Annual Leak Detection and Repair Summary Report

**Reporting Period: 22 December 2020 – 21 December 2021**

**AGL Upstream Investments Pty Ltd**

**ABN 58 115 063 744**

**Locked Bag 3013, Australia Square, NSW 1215**

**200 George Street, Sydney NSW 2000**

**Telephone: 02 9921 2999 Facsimile: 02 9921 2472**

**Complaints Line (24 hours): 1800 039 600**





# Foreword

**PREMISES**

Rosalind Park Gas Plant

Lot 35 Medhurst Road

GILEAD NSW 2560

**LICENCE DETAILS**

[Environment Protection Licence 12003](#)

**LICENCEE**

AGL Upstream Investments Pty Limited (AGL)

**LICENCEE'S ADDRESS**

Locked Bag 3013, Australia Square, NSW 1215

**REPORTING PERIOD**

22 December 2020 – 21 December 2021

**REPORT DATE**

30 December 2021

**REPORT PREPARED BY**

David Mudd, Environment Business Partner

# 1. Introduction

## 1.1 Background

The Camden Gas Project (CGP) is owned and operated by AGL and is located in the Macarthur region 65 km southwest of Sydney, in the Wollondilly, Camden and Campbelltown Local Government Areas. The CGP has been producing gas for the Sydney region since 2001 and currently consists of 144 gas wells, low-pressure underground gas gathering pipes and the Rosalind Park Gas Plant (RPGP).

The Environment Protection Licence for the CGP (EPL 12003) includes requirements for the operation and reporting of a Leak Detection and Repair (LDAR) program.

This LDAR Summary Report has been prepared to satisfy the LDAR reporting requirements of the EPL.

## 1.2 EPL 12003: Leak Detection and Repair Program

EPL 12003 includes the following requirements for Leak Detection and Repair:

- Condition M7.2: The licensee must operate a Leak Detection and Repair Program for all relevant components of plant and equipment.
- Condition M7.3: The LDAR Program must, unless otherwise approved by the EPA, monitor for the detection of leaks in accordance with US EPA Method 21- Determination of Volatile Organic Compound (VOC) Leaks (40 CFR Part 60, Appendix A, Method 21).
- Condition R4.2: The licensee must submit a brief summary report on the Leak Detection and Repair (LDAR) program with the annual return. The summary report must include, but may not be limited to:
  - The total number of components inspected, as well as the number and percentage of minor, major and significant leaking components found by component types;
  - The type of components and the scale of the leak for any equipment where leaks are found;
  - The emission level of leaking equipment and emission level of re-check after leak was repaired;
  - The repair responses and times as listed in **Table 1**.

**Table 1 – Scale of Leaks and Classifications**

Scale of Leak (ppmv)	Classification
1000 - <10,000	Minor
≥10,000 - <50,000	Major
≥50,000	Significant

- Condition R4.3: Where a leak is identified, AGL should aim to have the component repaired as follows:
  - Within a period of 14 days if the concentration of the fugitive VOCs emission is greater than or equal to 1,000 parts per million by volume (ppmv) but not more than 10,000 ppmv (minor leak), as methane, above background.
  - Within a period of 5 days if the concentration of the fugitive VOCs emission is greater than or equal to 10,000 ppmv but not more than 50,000 ppmv (major leak), as methane, above background.

- Within a period of one day if the concentration of the fugitive VOCs emission is greater than or equal to 50,000 ppmv (significant leak > 50,000 ppmv), as methane, above background.

## 1.3 Methodology

The LDAR program was undertaken at the CGP by independent third-party specialists, Heath Pipeline Services Pty Ltd (HPS). The LDAR program was conducted over 13 working days from 08 to 20 October 2018, and assessed 106 wellheads, associated above ground facilities and gas gathering lines, and RPGP vessels and piping.

The LDAR program was undertaken in accordance with US EPA Method 21 – Determination of Volatile Organic Compound Leaks (40 CFR Part 60, Appendix A, Method 21).

The LDAR program was undertaken using a GMI leak surveyor operating at 1 part per million (ppm) sensitivity level.

## 2. LDAR Program Results

### 2.1 Field

The results of the LDAR program for the Camden field (including wellheads and associated above ground facilities and infrastructure, and gas gathering lines) are provided in **Table 2**.

**Table 2 – Leak detection results for the Camden field LDAR program**

Component		Detected Leaks					
		Minor		Major		Significant	
Type	No.	Total	%	Total	%	Total	%
Wells (including valves, instrumentation, vessels, flanges, pipe threads and well heads)	12,394	1	0.01	0	-	0	-
Gas gathering line (km)	50.71	0	-	0	-	0	-

Where leaks were identified during the field LDAR program, the scale, emission level (pre and post repair), and the repair response and response times were recorded and are summarised in **Table 3**.

**Table 3 – Camden field LDAR program repair response**

Equipment	Component	Leak Scale	Repair Response	Repair Time	Pre- Repair (ppmv methane)	Post Repair (ppmv methane)
Well – GL02	Threaded fitting	Minor	Tightened Fitting	1 day	1650	0

## 2.2 RPGP

The results of the LDAR program for RPGP (including valves, vessels, instrumentation, piping and compressors) are provided in **Table 4**. Compressors #2 and #3 were tested but were not operating at the time of the leak survey.

**Table 4 – Leak detection results for the RPGP LDAR program**

Component		Detected Leaks					
		Minor		Major		Significant	
Type	No.	Total	%	Total	%	Total	%
RPGP (including valves, vessels, instrumentation, piping and compressors)	5,923	1	0.02	0	-	2	0.03

Where leaks were identified during the RPGP LDAR program, the scale, emission level (pre and post repair), and the repair response and response times were recorded and are summarised in **Table 5**.

**Table 5 – Rosalind Park Gas Plant LDAR program repair response**

Equipment	Component	Leak Scale	Repair Response	Repair Time	Pre-Repair (ppmv methane)	Post Repair (ppmv methane)
Compressor 2	Threaded fitting	Minor	Tightened Fitting	1 day	4310	0
Glycol Skid	Regulator	Significant	Cycled regulator through pressure range	1 day	63% VOL	85% LEL
Glycol Skid	Regulator	Significant	Cycled regulator through pressure range	1 day	38% VOL	40% LEL

Note: Regulators have since been repaired, retested and recommissioned with no leaks.

## 3. Conclusion

The LDAR program was implemented at the CGP and included an assessment of field and RPGP facilities and infrastructure.



The LDAR program was undertaken by third party leak detection specialists in accordance with US EPA Method 21 – Determination of Volatile Organic Compound Leaks (40 CFR Part 60, Appendix A, Method 21).

Leaks that were identified during the LDAR program were classified in accordance with methane emission levels and repairs were undertaken within the target period recommended in EPL 12003.

## **4. References**

1. Gas Leakage Audit Report - Camden Gas Project, Heath Pipeline Services, issued 14 November 2019.