

INDEPENDENT ENVIRONMENTAL AUDIT 2014-2016

CAMDEN GAS PROJECT

8 February 2017

Prepared for:
AGL Upstream Investments Pty Ltd

J0054/080217 (Rev3)



Treo Environment Pty Ltd

78 Denison Street
Bondi Junction NSW 2022
Australia
T: 02 9389 7699

8 February 2017

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Project Director



.....
Denise Corish
Director

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Abbreviations

| Term | Definition |
|-----------|---|
| AEPR | Annual Environmental Performance Report |
| CCC | Community Consultative Committee |
| CGP | Camden Gas Project |
| DA | Development Application |
| DG | Director General |
| DPE | Department of Planning and Environment |
| DPI Water | Department of Primary Industries, Water |
| DRE | Department of Industry – Division of Resources and Energy |
| EMP | Environmental Management Plan |
| EPA | Environment Protection Authority |
| EPL | Environment Protection Licence |
| POP | Petroleum Operations Plan |
| PPL | Petroleum Production Lease |
| RPGP | Rosalind Park Gas Plant |

1. Executive Summary

The Camden Gas Project (CGP) is located 60 km southwest of Sydney in the Wollondilly, Camden and Campbelltown Local Government Areas. The project consists of the Rosalind Park Gas Plant (RPGP), 144 gas wells, low-pressure underground gas gathering lines and a high pressure supply line enabling the production, gathering and sale of coal seam gas.

The development of the CGP has occurred in a staged manner with exploration activities commencing in 1998 under Sydney Gas (Camden) Operations. Since that time, the ownership of the project has changed and now operates as AGL Upstream Investments Pty Limited (AGL). A total of ten development approvals and project approvals have been granted to the project by the now Department of Planning and Environment (DPE).

The scope of the audit was limited to an assessment of construction and operational activities of the CGP undertaken between 1 July 2014 and 30 June 2016. Nominated development approvals, licences and leases formed the reference point against which performance was measured (**Appendix A**). The findings of this report reflect conditions and documentation presented during the period 17 October 2016 to 12 December 2016, including a site inspection on 1 November 2016.

The requirement to conduct an independent environmental audit is reflected in the conditions of a number of development approvals. The key requirements of the conditions are detailed below (bold italics) together with a summary of the audit findings.

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.

This audit comprised the sixth independent environmental audit for the project and was commissioned within 2 years of completion of the previous 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;***

The audit was conducted by Denise Corish, a Director of Treo Environment and a registered Environmental Lead Auditor with Exemplar Global (formerly RABQSA International). Ms Corish was approved to conduct the independent audit by the Director-General on 5 October 2016.

In carrying out the duties of an environmental auditor, the judgement of Ms. Corish was not impaired by reason of any relationship with or interest in AGL or any of its subsidiaries. Ms. Corish is independent of AGL with respect to employment relationships, financial relationships and the provision of non-audit services.

- b. be consistent with ISO 19011:2002 – Guidelines for Quality and/or Environmental Management Systems Auditing, or updated versions of these publications;***

The audit was conducted in accordance with the Independent Audit Guideline (NSW Government, October 2015) and ISO 19011:2011 – Guidelines for Auditing Management Systems.

- c. assess the environmental performance of the development, and its effects on the surrounding environment;***

Given the limited works undertaken during the audit period, significant environmental aspects were considered within the context of three operational activities. The environmental performance of each activity is summarised as follows:

- Rosalind Park Gas Plant (**RPGP**) – The audit identified that the RPGP is largely compliant with development consents, licences and leases. During the audit period, water storage and management was notably improved with all major facilities upgraded. However, the audit identified one low risk non-compliance with respect to continuous monitoring of air emissions. This matter was previously reported by AGL Management on 9 July 2012. Further, an observation was identified in regards to nitrogen oxide emissions due to the potential for a non-compliance. While quarterly air monitoring reports demonstrate compliance against relevant requirements, it is noted that the maximum allowable concentration of nitrogen oxides (sampling point 4) was recorded on a number of occasions during the audit period.
- Plug and Abandonment – The audit determined that rehabilitation works completed during the audit period were conducted in accordance with development consents, licence conditions and documented plans.
- Workover Maintenance – The audit determined that adequate operational and environmental controls have been established by AGL to manage workover maintenance risks.

With respect to the audit scope, there were no penalty infringement notices or fines issued to AGL during the audit period. It was determined by AGL that there were no pollution incidents that caused or threatened material harm to the environment.

It is noted that a major flood event occurred on 5 June 2016 at the Nepean River, Menangle Park ('Menangle Park Flood Event'). As a result of the overland flow, produced water tanks associated with MP15, MP16/MP25 and EM21 were adversely effected. The tank contents (produced water) discharged into flood waters. The EPA subsequently issued a Notice to Provide Information and/or Records.

The audit determined that the Emergency Response Plan (20/11/15) and the Field Production Flood Management Procedure (Version 5 and Version 6) were largely implemented during the Menangle Park Flood Event. Isolated issues of concern were identified with respect to asset access, flood level monitoring and flood level documentation.

d. assess whether the development is complying with the relevant standards, performance measures, and statutory requirements;

Within the defined scope, the audit determined that AGL is largely compliant with relevant development approvals, licences and leases. While a limited number of non-compliances were identified, substantial improvement was demonstrated over the previous independent environmental audit.

e. review the adequacy of the Applicant's Environmental Management Plan; and

Adequate evidence was provided to demonstrate that the EMS provides an effective framework for the identification and management of significant environmental risks. A number of noteworthy achievements were identified which reflect system maturity and the focus on continual improvement including risk assessment processes, training, environmental controls and monitoring and assurance processes.

f. recommend measures or actions to improve the environmental performance of the development and/or its environmental management and monitoring systems.

Recognising the continual improvement that occurred during the audit period, there were no further measures or actions identified for the consideration of AGL.

2. Introduction

2.1 Camden Gas Project

The Camden Gas Project (**CGP**) is located 60 km southwest of Sydney in the Wollondilly, Camden and Campbelltown Local Government Areas. The project consists of the Rosalind Park Gas Plant (**RPGP**), 144 gas wells, low-pressure underground gas gathering lines and a high pressure supply line enabling the production, gathering and sale of coal seam gas.

The development of the CGP has occurred in a staged manner with exploration activities commencing in 1998 under Sydney Gas (Camden) Operations. Since that time, the ownership of the project has changed and now operates as AGL Upstream Investments Pty Limited (AGL). A total of ten development approvals and project approvals have been granted to the project by the now Department of Planning and Environment (**DPE**).

2.2 Independent Environmental Audit Requirement

The requirement to conduct an independent environmental audit is reflected in the conditions of a number of development approvals (**Appendix A**). The key requirements of the conditions are detailed below and provide the basis for this audit:

“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:

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

The findings of this report reflect conditions and documentation presented during the period 17 October 2016 to 12 December 2016, including a site inspection on 1 November 2016.

2.3 Objectives

The objective of the audit was to assess the environmental performance of the development and its effect on the surrounding environment in accordance to the audit criteria detailed in Section 2.4; and thereby:

- Provide reasonable assurance of compliance against development consents, licences and leases;
- Evaluate the capability of the Environmental Management Plan to achieve legislative requirements and drive performance improvements; and
- Identify opportunities to strengthen environment controls and reduce risk.

2.4 Scope and Criteria

The scope of the audit was limited to an assessment of construction and operational activities of the CGP undertaken between 1 July 2014 and 30 June 2016. The following development approvals (and modifications), licences and leases formed the reference point against which performance was measured:

- DA 15-1-2002-I (Apap, Joe Stanley, Johndilo, Loganbrae, Lipscombe and Mahon);
- DA 246-8-2002-I (Kay Park);
- DA 282-6-2003-I (RPGP, Rosalind Park, Wandinong, EMAI (EM01-20, 40));
- DA 183-8-2004-I (Mt Taurus and Menangle Park);
- DA 9-1-2005 (Glenlee Wells);
- DA 75-4-2005 (Sugarloaf Farm);
- Environment Protection Licence (**EPL**) 12003;
- Water Access Licences (**WAL**) (2);
- Works and Usage Approvals (**WUA**) (2);
- Industrial bore licences (8); and
- Petroleum Production Leases (**PPL**) (5).

Each of the above is detailed in **Appendix A**.

2.5 Methodology

The audit was conducted in accordance with the Independent Audit Guideline (NSW Government, October 2015) and ISO 19011:2011 – Guidelines for Auditing Management Systems. Specific tasks included:

2. **Opening meeting** – An opening meeting was held at the commencement of the audit to:
 - a. Confirm the audit objectives, scope, and criteria;
 - b. Confirm the audit schedule; and
 - c. Establish methods and procedures for conducting the audit, including testing methods.
3. **Compliance register** – Reflecting the audit criteria, a register of compliance obligations was developed.
4. **Agency and community consultation** – The following agencies were contacted by the auditor to obtain feedback and identify issues within the audit scope: DPE, Environment Protection Authority (**EPA**), Department of Industry - Division of Resources & Energy (**DRE**), Department of Primary Industries, Water (**DPI Water**), Camden Council, Campbelltown City Council and Wollondilly Shire Council. The Chair of the Community Consultative Committee was similarly contacted. A summary of feedback is provided in **Section 2.6**.
5. **Site Inspection** – A site inspection was conducted on 1 November 2016. The purpose of the site inspection was to assess implementation of environmental controls, determine the status of the operations and assess overall environmental performance. Key aspects of the CGP were included in the inspection including the RPGP and nominated well sites (AP01, LB05, LB07, MP15, MP16/MP25, RP03, RP05 and RP11).
6. **Interviews** – The following employees with responsibility for environmental management and site operations were interviewed:

- a. Aaron Clifton (Environment Business Partner NSW, Gas Operations);
 - b. Tom Rofe (HSE Officer, CGP);
 - c. Pardip Kumar (Gas Plant/E&I Supervisor); and
 - d. Chris Covington (Health and Safety Business Partner, Upstream Gas).
7. **Document review** – Relevant documents, records and systems were reviewed for accuracy and completeness.
8. **Compliance assessment** – The compliance status was determined for all relevant conditions in accordance with the Independent Audit Guideline definitions (**Table 2.1**). Matters of non-compliance were risk ranked as per the levels detailed in **Table 2.2**.
9. **Reporting** – Draft and final reports were prepared detailing the outcomes of the audit and compliance assessment. Revisions to the draft report were undertaken to reflect additional information or correct errors in fact.

Table 2.1 Compliance Status Definitions

| Compliance Status | Description |
|-------------------------------|--|
| Compliant | Where the auditor has collected sufficient verifiable evidence to demonstrate that the intent and all elements of the requirement of the regulatory approval have been complied with within the scope of the audit. |
| Not Verified | Where the auditor has not been able to collect sufficient verifiable evidence to demonstrate that the intent and all elements of the requirement of the regulatory approval have been complied with within the scope of the audit. In the absence of sufficient verifiable evidence the auditor may in some instances be able to verify by other means (visual inspection, personal communication, etc.) that a requirement has been met. In such a situation, the requirement should still be assessed as not verified. However, the auditor could note in the report that they have no reasons to believe that the operation is non-compliant with that requirement. |
| Non-Compliant | Where the auditor has collected sufficient verifiable evidence to demonstrate that the intent of one or more specific elements of the regulatory approval have not been complied with within the scope of the audit. |
| Administrative Non-Compliance | A technical non-compliance with a regulatory approval that would not impact on performance and that is considered minor in nature (e.g. report submitted but not on the due date, failed monitor or late monitoring session). This would not apply to performance-related aspects (e.g. exceedance of a noise limit) or where a requirement had not been met at all (e.g. noise management plan not prepared and submitted for approval). |
| Not Triggered | A regulatory approval requirement has an activation or timing trigger that had not been met at the time of the audit inspection, therefore a determination of compliance could not be made. |
| Observation | Observations are recorded where the audit identified issues of concern which do not strictly relate to the scope of the audit or assessment of compliance. Further observations are considered to be indicators of potential non-compliances or areas where performance may be improved. |
| Note | A statement or fact, where no assessment of compliance is required. |

Table 2.2 Risk Levels for Non-Compliances

| Risk Level | Description |
|-------------------------------|--|
| High | Non-compliance with potential for significant environmental consequences, regardless of the likelihood of occurrence. |
| Medium | Non-compliance with: <ul style="list-style-type: none">- Potential for serious environmental consequences, but is unlikely to occur; or- Potential for moderate environmental consequences, but is likely to occur. |
| Low | Non-compliance with: <ul style="list-style-type: none">- Potential for moderate environmental consequences, but is unlikely to occur; or- Potential for low environmental consequences, but is likely to occur. |
| Administrative Non-Compliance | Only to be applied where the non-compliance does not result in any risk of environmental harm (e.g. submitting a report to government later than required under approval conditions). |

2.5.1 Audit Team

The audit was conducted by Denise Corish, a Director of Treo Environment and a registered Environmental Lead Auditor with Exemplar Global (formerly RABQSA International).

With over 19 years' experience in environmental management, Denise has held senior positions in consulting firms and corporations in Australia, Singapore and the UK. Ms Corish has extensive audit experience and previously completed the 2010-2012 Independent Environmental Audit of the CGP.

In carrying out the duties of an environmental auditor, the judgement of Ms. Corish was not impaired by reason of any relationship with or interest in AGL or any of its subsidiaries. Ms. Corish is independent of AGL with respect to employment relationships, financial relationships and the provision of non-audit services.

Ms Corish was approved to conduct the independent audit by the Director-General on 5 October 2016.

2.6 Agency and Community Consultation

Reflecting the requirements of the Independent Audit Guideline (NSW Government, October 2015), the following stakeholders were contacted at the commencement of the audit to request feedback and identify key issues within the defined scope of the audit:

- DPE;
- EPA;
- DPI Water;
- DRE;
- Camden Council;
- Campbelltown City Council;
- Wollondilly Shire Council; and
- Community Consultative Committee.

The outcomes of the consultation are detailed in Table 2.3.

Table 2.3 Agency and Community Consultation

| Agency | Matters Raised | Action Taken |
|--------|--|---|
| DPE | Ensure that the Independent Environmental Audit is conducted in accordance with Independent Audit Guideline (NSW Government, October 2015). | Refer to Section 2.5 which reflects the noted guideline. |
| EPA | Flood Management Protocols – This includes the management and response procedures of those wells in close proximity to the Nepean River. | An assessment was conducted of the adequacy of the Emergency Response Plan (20/11/15) and the Field Production Flood Management plan (Versions 5 and 6). Further, the audit assessed the extent to which the plans comply with the relevant conditions of consent. Refer to Section 3.4.1 and Appendix B , Table B4 (DA183-8-2004, Condition 15) and Table B5 (DA 9-1-2005, Condition 20). |
| | Oxides of Nitrogen (NOx) monitoring – Emissions monitoring requirement at the RPGP for compression engines 2 and 3 are currently being reviewed by AGL. | Air monitoring reports (including oxides of nitrogen) were reviewed to determine compliance against air monitoring conditions. Refer to Appendix B , Table B3, and Appendix C , Table C1 (EPL 12003, Condition L3.1). |
| | Produced water storage and management at the RPGP – An EPA compliance audit identified improvement for underground produced water storage. AGL is now storing produced water in above ground tanks rather than the flare pit. | The recently completed upgrades of the RPGP produced water storage system were reviewed against the requirements of the EPL12003. Refer to Appendix C , Table C1 (EPL 12003, Condition O1.1 and U3.1). |
| | Plug and Abandonment program – Methodology to determine gas well priority list, plug and abandonment works, as well as site rehabilitation. | The plug and abandonment works completed during the audit period (within the defined scope) were assessed against the requirements of the Petroleum Operations Plan and the Rehabilitation and Landscape Management Plan. The gas well priority list methodology was reviewed to determine the potential impact on the environmental performance of the development. Refer to Section 3.3.2 and Appendix B : <ul style="list-style-type: none"> • Table B1 (DA 15-1-2002, Condition 25, 72 and 73); and • Table B3 (DA 282-6-2003, Condition 4-120 to 4-125). |
| | Water Access Licences and Approvals – Include a check of all the wells (both operational and non-operational) and the associated approvals for them which have been issued under the Water Management Act 2000 and/or the Water Act 1912. Provide the well name, the Combined Approval or Work Approval reference number, the expiry date of the approval, and list any exemption. | Water access licences and approvals were reviewed for all operational and non-operational wells. Refer to Section 4.2.1 and Appendix D . |

| Agency | Matters Raised | Action Taken |
|--------|---|--|
| EPA | <p>Petroleum Title conditions for PPL1, PPL2, PPL4, PPL5, PPL6 to assess against environmental and operating conditions. Including consideration of:</p> <ul style="list-style-type: none"> • The Petroleum Operation Plan (POP); • AGL’s compliance management system (CMO Compliance); • The Environmental Management System (EMS) including the Environmental Management Plan (EMP) and associated sub plans; • The Annual Environmental Performance Report (AEPR); and • AGLs compliance register. | <p>The scope of the audit was amended to include an assessment of compliance against relevant conditions of the Petroleum Title conditions for PPL1, PPL2, PPL4, PPL5 and PPL6.</p> <p>Refer to Section 3, Section 4.2.2 and Appendix C, Table C5.</p> |
| | <p>Assessment of environmental conditions on Development Consents. The proposed scope currently only focusses on construction and operational activities:</p> <ul style="list-style-type: none"> • DA 9-1-2005 states that any associated wells should be included in the audit for DA 282-6-2003i; • DA 183-8-2004-I states that any associated wells should be included in the audit for DA 282-6-2003i; and • DA 246-8-2002-I states that any associated wells should be included in the audit for DA No 15-1-2002-i. | <p>The audit scope included an assessment of compliance of all conditions included in the following development consents:</p> <ul style="list-style-type: none"> • DA 15-1-2002-I; • DA 246-8-2002-I; • DA 282-6-2003-I; • DA 183-8-2004-I; • DA 9-1-2005; and • DA 75-4-2005. <p>Refer to Appendix B.</p> |
| | <p>Assessment of Project Approval conditions where sites have only been rehabilitated to maintenance pad or well compound status:</p> <ul style="list-style-type: none"> • PA 06_0138; • PA06_0291; and • PA06_0137. | <p>Project Approval conditions (PA 06_0138, PA06_0291, PA06_0137) were recently assessed as part of the CGP Independent Environmental Audit 2012-2015 (Golder Associates, 04/12/15). As such, Project Approval conditions were not re-assessed as part of this audit.</p> |
| | <p>Assessment of AGL’s workover maintenance program to ensure it is effective from an operational, environmental and performance perspective.</p> | <p>Workover maintenance works completed during the audit period (within the defined scope) were assessed against relevant requirements of the Environmental Management Plan and Sub Plans. This assessment included operational, environmental and overall performance matters.</p> <p>Refer to Section 3.3.3 and Appendix B, Table B3 (DA 282-6-2003) and Table B4 (DA 183-8-2004).</p> |
| | <p>The EPA also encourages Treo Environment to consider the environmental performance information in the Minutes of the CGP Community Consultation Committee which provides a focus for discussion between AGL and the community.</p> | <p>The minutes of the CGP Community Consultation Committee were considered as part of the audit.</p> |

| Agency | Matters Raised | Action Taken |
|----------------------------------|---|--|
| EPA | In addition, the EPA Public Register provides a summary of EPA regulation of AGL. | Noted. |
| DPI Water | Assessment as to whether the project holds the required water entitlements and licences under the Water Management Act 2000 or Water Act 1912 (as applicable). Does the proponent have enough licensed water entitlement to cater for active and passive take of water? | A sample of field records was reviewed against produced water volumes recorded by AGL to determine the accuracy of AGL records. Refer to Appendix C , Table C2. |
| | Compliance with the conditions of any water licences/approvals held. | The scope of the audit included an assessment of compliance against Water Access Licences, Works and Use Approvals and Bore Licences. Refer to Appendix C , Tables C2, C3 and C4. |
| | Identification of all water storages for the complex and identification of their licensing status being either exempt, subject to harvestable rights or regulated via a water access licence. Do any exemptions under the <i>Water Management (General) Regulation 2011</i> or Harvestable Rights Order (gazetted 31 March 2006) apply to the capture of water? | It was reported by AGL that water storages are limited to the flare pond at the RPGP. Insufficient evidence was provided to assess licensing status. However, records were provided to demonstrate that the flare pond is lined and therefore unlikely to interact with groundwater. |
| | Quantification of both active and passive take of water by the project from each relevant water source and a comparison against previous predictions. Are adequate records kept to enable determination of the volume and source of surface and groundwater taken? | A sample of field records was reviewed against produced water volumes recorded by AGL to determine the accuracy of AGL records. Produced water volumes were compared against previous predictions where available. Refer to Appendix C , Table C2 (Condition MW0547-00001). |
| DRE | No specific issues raised. | Noted. |
| Camden Council | No specific issues raised. | Noted. |
| Campbelltown City Council | No specific issues raised. | Noted. |
| Wollondilly Shire Council | The adequate management and rehabilitation of discontinued gas wells over the next few years is the major issue associated with the CGP by Council. | The plug and abandonment works completed during the audit period (within the defined scope) were assessed against the requirements of the Petroleum Operations Plan and the Rehabilitation and Landscape Management Plan. Refer to Section 3.3.2 and Appendix B : <ul style="list-style-type: none"> Table B1 (DA 15-1-2002, Condition 25, Condition 72, Condition 73); and Table B3 (DA 282-6-2003, Condition 4-120 to 4-125). |
| Community Consultative Committee | No specific issues raised. | Noted. |

3. Environmental Performance

3.1 Introduction

Reflecting the scope of the audit and the requirements of the Independent Audit Guideline (NSW Government, October 2015), this section presents an assessment of the environmental systems of the CGP and a review of environmental performance including compliance.

3.2 Systems

3.2.1 Environmental Management System

The CGP Environmental Management System (**EMS**) was developed by AGL to manage compliance obligations and promote continual improvement of environmental performance. Guided by the AGL Energy Environmental Policy, the system is documented in the Environmental Management Plan (**EMP**) and Sub Plans.

Adequate evidence was provided to demonstrate that the EMS provides an effective framework for the identification and management of significant environmental risks. A number of noteworthy achievements were identified during the audit period, summarised below, which reflect system maturity and the focus on continual improvement:

- Risk Assessment – The process by which environmental aspects are identified and assessed was revised during the audit period. In addition to the annual risk assessment process, operational risks are identified and mitigated through the Job Safety and Environmental Analysis process and toolbox meetings.
- Training – The EMP (March 2016) details the training framework including induction programs and role-specific training. The online induction system (Rapid Induct), includes relevant risks and controls as detailed in the EMP. Records and competency assessments are maintained within Rapid Induct and the system includes adequate controls to ensure induction currency is maintained. In addition, job specific training was delivered during the audit period on Leak Detection and Repair and the Pollution Incident Response Management Plan.
- Environmental Controls – Implementation of the Sub Plans was demonstrated through the Minimum Environmental Controls Form. Commencing in 2015, this process includes the documentation of site specific controls as relevant to workover and plug and abandonment works.
- Monitoring and Assurance – Compliance audits were undertaken during the audit period to assess implementation of Sub Plans. In addition, periodic inspections were conducted against the requirements of the Minimum Environmental Controls Form.

3.2.2 Compliance Management

Compliance obligations arising from licences, leases, environmental/planning approvals and legislation are managed through a web-based database compliance management system (CMO Compliance). The system enables the documentation and tracking of all relevant compliance obligations. On completion, evidence is lodged within the system by the responsible person and internally verified.

The audit determined that CMO Compliance effectively manages compliance obligations. The system was reviewed extensively in conducting the audit and evidence of compliance was generally adequate for assessed conditions.

3.3 Environmental Performance

An assessment was undertaken of the environmental performance of the CGP. Given the limited works undertaken during the audit period (**Appendix A**), significant environmental aspects were considered within the context of the following operational activities, each of which is detailed in the sections that follow:

- Rosalind Park Gas Plant (**RPGP**);
- Plug and Abandonment; and
- Workover Maintenance.

3.3.1 Rosalind Park Gas Plant

The audit identified that the RPGP is largely compliant with development consents, licences and leases. Environmental risks are adequately addressed and the control environment is effective. Significant environmental risks, namely air quality and water management, are detailed below.

Air Quality

Air emission criteria for six nominated sampling points within the RPGP are reflected in the relevant development approval (DA282-6-2003) and the EPL (EPL 12003). Both the development approval and the licence include continuous monitoring and quarterly monitoring obligations.

In accordance with the definitions detailed in **Section 2.5**, the audit identified one low risk non-compliance (multiple conditions) and one observation, each of which is detailed below.

A non-compliance was identified with respect to continuous emissions monitoring. This matter was previously reported to the EPA by AGL Management on 9 July 2012. Due to ongoing emissions monitoring equipment failure, AGL remained non-compliant with relevant development approval and licence conditions during the audit period.

As a result of the above non-compliance, AGL entered into a Pollution Reduction Plan (PRP) during the audit period to conduct a 6-month trial of a Predictive Emissions System (PEMS) (EPL 12003, Condition U1.1). On completion, a Pollution Study and Reduction Program was established to refine the PEMS (EPL 12003, Condition U1). The audit determined that AGL is compliant with the requirements of the PRP and Pollution Study and Reduction Program.

An observation was identified in regards to nitrogen oxide emissions. While quarterly air monitoring reports demonstrated compliance against relevant requirements, it is noted that the maximum allowable concentration of nitrogen oxides (sampling point 4) was recorded on a number of occasions during the audit period. Given the potential non-compliance, an observation was noted against DA282-8-2002 (Condition 3-48) and EPL12003 (Condition L3.1). It is recommended that operations be reviewed to ensure continued compliance with concentration limits.

Water Storage and Management

The audit identified that water storage and management was notably improved at the RPGP during the audit period. Significant environmental risks were addressed and all major facilities were upgraded.

The water storage facility improvements were proposed by AGL subsequent to an EPA Compliance Audit (17/06/14). The key elements of the project, summarised below, were reflected in an Environmental Improvement Program (EPL 12003, Condition U3):

- Installation of 70kL above ground double walled tanks (4) and associated pipework, tank level indicators and controls;

- Installation of 4.5kL pump tank and associated pipework, tank level indicators and controls;
- Upgrade of the SCADA system, including high water alarms and auto shut-down of pumps; and
- Upgrade of the existing 15kL underground storage tank (additional liner).

The audit determined that the above water storage improvement program was significantly progressed during the audit period. The site was inspected on 31/10/16 and it was noted that the above facilities were installed and the upgrades were complete.

During commissioning of the water storage facilities, a carbon build-up was identified within transfer pumps P704 (on Tank T704) and P702 (on Tank T702) which were subsequently removed from service and returned to the supplier. The pumps were re-installed on 01/11/16 and 02/11/16.

Given that the storage facilities were commissioned prior to 31 October 2016, the auditor determined that AGL demonstrated substantial compliance against the requirements of the Environmental Improvement Program.

3.3.2 Plug and Abandonment

The audit identified that rehabilitation works completed during the audit period were conducted in accordance with development consents, licence conditions and documented plans.

As detailed in the EMP (March 2016), gas wells are suspended on cessation of gas production (typically within 15 years of construction). Following suspension, plug and abandonment works are undertaken and sites are rehabilitated. The auditor sighted the Stage One schedule detailing rehabilitation works to be undertaken during the next two years. It was reported by AGL that plug and abandonment works will be progressively staged to enable closure of the facility in 2023.

Key requirements of rehabilitation works are detailed in the Petroleum Operations Plan (POP) (Appendix F, 09/12/15) and the Rehabilitation and Landscape Management Plan (April 2016). Rehabilitation criteria for individual well sites, developed in consultation with the DRE and individual landowners, are reflected in the POP.

During the audit period, plug and abandonment works were commenced and/or completed for a number of well sites as detailed in **Table 3.1**. A sample of well sites was selected by the auditor and inspected to determine compliance against the POP (Appendix F, 09/12/15) and the Rehabilitation and Landscape Management Plan (April 2016) (rows shaded in **Table 3.1**). The rehabilitation works were noted to be adequate and in compliance with consents, licences and plans.

It is noted that the decommissioning of gas wells RP03, RP04, RP05 and RP11 was temporarily suspended during the audit period due to issues identified in the sealing/plugging of the wells. A revised decommissioning process was subsequently developed by AGL (detailed in correspondence from AGL to the DRE dated 14/07/16) and approved by the DRE (01/11/16).

Table 3.1 Audit Period Plug and Abandonment Works

| Plug and Abandonment Commenced | Plug and Abandonment Completed |
|--------------------------------|--------------------------------|
| RP03 | AP01 |
| RP04 | JD07a |
| RP05 | JD05 |
| RP11 | MH01 |
| | LB07 |
| | LB05 |

| Plug and Abandonment Commenced | Plug and Abandonment Completed |
|--------------------------------|--------------------------------|
| | GL10 |
| | EM02 |
| | EM03 |
| | EM04 |

3.3.3 Workover Maintenance

Workover maintenance is conducted as required during the production or operational phases of well sites to maintain gas production efficiency. The works are undertaken over a period of one to five days and require a workover rig to run or remove a pipe to clear the bore of fill or obstructions. Potential environmental issues, as identified in the EMP (March 2016), include erosion, groundwater impacts, waste and noise.

The audit determined that adequate operational and environmental controls have been established by AGL to manage identified risks. Key controls sighted during the audit include:

- Program and Procedures – A program of works is documented to guide workover activities. Commonly undertaken tasks are also reflected in Standard Operating Procedures.
- Induction Training – A site-specific and role-specific induction program is delivered to all AGL employees and contractors (refer to **Section 3.2.1**).
- Daily Completion/Workover Report – A daily report is completed by the workover crew detailing the plan of works, operations completed, weather conditions, safety reports and waste disposed.
- Preventative Maintenance – The preventative maintenance of plant and equipment is managed through the MEX system. The system effectively monitors maintenance requirements based on the use of plant and equipment. A 'Compliance - Improvement Recommended' finding was reported in the 2012-2014 Independent Environmental Audit (22/01/15) with respect to the MEX system. It was reported that 40% of planned maintenance tasks were overdue. During the current audit, the percentage of overdue actions was reduced to 3%.
- Minimum Environmental Controls – Commencing in 2015, this process includes the documentation of site specific controls as relevant to workover maintenance. Periodic inspections are then undertaken to assess implementation and identify performance improvements.
- Community Notification – Potentially impacted residents are notified of workover maintenance in advance of works.

3.4 Environmental Compliance

With respect to the audit scope, there were no penalty infringement notices or fines issued to AGL during the audit period.

There were 23 environmental incidents reported internally by AGL during the audit period. The incidents were minor in nature and largely related to gas leaks which were reported in the Leak Detection and Repair Program (EPL 12003, Condition R4.2). It was determined by AGL that there were no pollution incidents that caused or threatened material harm to the environment.

3.4.1 Menangle Park Flood Event

A major flood event occurred on 5 June 2016 at the Nepean River, Menangle Park ('Menangle Park Flood Event'). As a result of the overland flow, produced water tanks associated with MP15, MP16/MP25 and EM21 were adversely effected. The tank contents (produced water) discharged into flood waters. The EPA subsequently issued a Notice to Provide Information and/or Records.

Procedures for managing flood events are detailed in the Emergency Response Plan (20/11/15) and the Field Production Flood Management Procedure (Version 5, 02/06/14). Subsequent to the Menangle Park Flood Event, AGL reviewed and revised the Field Production Flood Management Procedure (Version 6, 26/6/16). Notable amendments are summarised as follows:

- Precautionary measures – All equipment kept at wells in Flood Groups 1-4 (including water tanks) are to be secured to avoid loss during a flood event.
- Precautionary monitoring – Regular monitoring of the Bureau of Meteorology website is to be undertaken for predicted rainfall in the Campbelltown area. In the event that 100mm or more rainfall is predicted, water tanks at well sites in Flood Groups 1, 2 and 3 are to be emptied and Group 4 tanks are to be assessed.

As part of the audit, an assessment was conducted of the adequacy of the Emergency Response Plan (20/11/15) and the Field Production Flood Management Procedure (Version 5 and Version 6). The audit determined that the documents were largely implemented during the Menangle Park Flood Event. Isolated issues of concern are detailed as follows:

1. **Flood Group Assets** – The Field Production Flood Management Procedure categorises assets on a risk basis and requires each asset group to be shutdown in response to defined flood water levels. The well site EM21 is categorised as 'Flood Group 3'. In the event of a 'Flood Response Level 3' (flood waters that measure 10m on the Bureau of Meteorology website), EM21 must be shutdown. During the Menangle Park Flood Event, the road to EM21 was not accessible at 'Flood Response Level 2'. As a result, the well site could not be accessed in advance of flood waters. It is recommended that AGL review the flood response trigger levels to ensure assets remain accessible at the required time.
2. **Flood Level Monitoring** – The Field Production Flood Management Procedure (Version 5 and Version 6) requires continuous review of water levels on the Bureau of Meteorology website and under the Menangle River Bridge. Monitoring during the Menangle Park Flood Event was limited to the Bureau of Meteorology website and was conducted four to six times on the day of the event. It is recommended that AGL consider if monitoring is required of both the Bureau of Meteorology website and under the Menangle River Bridge. Further, it is recommended that the Field Production Flood Management Procedure be reviewed and revised to include practical guidance on the frequency of monitoring activities.
3. **Flood Level Documentation** – The Field Production Flood Management Procedure (Version 5 and Version 6) specifies that flood levels must be documented at each observation. Documentation did not occur during the Menangle Park Flood Event. It is recommended that AGL consider if documentation is a necessary procedural requirement.

4. Audit Findings

4.1 Previous Audit (2012-2014)

The 2012-2014 CGP Independent Environmental Audit was conducted by Golder Associates (22/01/15). The scope of the audit was limited to the development approvals and excluded the following:

- Environment Protection Licence (EPL 12003);
- Bore water licences;
- WALs;
- WUAs; and
- PPLs.

The audit identified a number of 'Level 2 Non-Compliances'¹, 'Observations'² and matters of 'Compliance - Improvement Recommended'³.

The recommended actions were recorded in CMO Compliance and adequately addressed by AGL with the exception of continuous emissions monitoring (DA282-6-2003, Condition 58 and Schedule 6, 'Maintenance of Plant and Equipment'). This matter was discussed in **Section 3.3.1** of this report.

4.2 Current Audit (2014-2016)

Within the defined scope, the audit determined that AGL is largely compliant with relevant development approvals and licences. With the exception of the Section 3 matters, there were no additional non-compliances identified against the conditions of the development approvals and the EPL. Several non-compliances were identified with respect to water licences and the PPLs as detailed in the sections that follow.

4.2.1 Water Compliance

A compliance assessment was undertaken against the conditions of relevant WALs, WUAs and industrial bore licences (**Appendix C, Table C2, C3 and C4**). In addition, a review was conducted to determine if well sites are appropriately licensed (**Appendix D**).

Compliance Assessment

The compliance assessment identified one matter of non-compliance (low risk) as detailed in **Table 4.1**.

¹ A 'Level 2 Non-Compliance' was defined in the 2012-2014 Independent Environmental Audit as an isolated lapse or absence of control in the implementation of an operations element which may not be of significant risk.

² An 'Observation' was defined in the 2012-2014 Independent Environmental Audit as a finding which is not likely to significantly affect the operation, which does not strictly relate to the scope of the audit of compliance and which could lead to performance improvement.

³ A 'Compliance – Improvement Recommended' was described in the 2012-2014 Independent Environmental Audit a condition where the intent was met. However, it is considered that either the issue has the potential to deteriorate to a non-compliance if not further addressed or further improvement is recommended.

Table 4.1 Matters of Non-Compliance

| Matter | Risk Level | Requirement | Assessment and Recommendation |
|-------------|------------|--|---|
| Flow Meters | Low | <p>Industrial Bore Licences, Condition 8</p> <p>The licensee must install to the satisfaction of the NSW Office of Water in respect of type and construction an appliance(s) to measure the quantity of water extracted from the works where extraction exceeds 50 KL in any 12 month period.</p> | <p>It was reported by AGL that there are no water flow meters installed at any well site. AGL previously reported to DPI Water (2012/2013 Technical Report, 30/09/13) that flow meters were unsuccessfully trialed in 2012.</p> <p>There are currently nine gas wells producing more than 50KL of water. Produced water is contained at individual well sites within agricultural tanks and volumes are measured on collection by the haulage contractor.</p> <p>It is recommended that AGL seek approval from DPI Water of the current method of measuring water volumes (measurement on collection by the haulage contractor) or install appropriate flow meters.</p> |

Licence Review

During the audit period the following administrative non-compliances occurred, all of which were previously reported by AGL to DPI Water.

- Expired Industrial Bore Licences – The industrial bore licences for eight well sites were not converted to WUAs before the existing licence expired in July 2016. The auditor sighted minutes of a meeting held on 10/08/16 between AGL and DPI Water. It was noted by DPI Water that the eight bore licences will be included on the revised WUAs when issued.
- Unlicensed Wells – AGL does not hold a valid licence for six well sites (LB10, RP03, RP04, RP05, RP06 and RP11). The auditor sighted minutes of a meeting held on 10/08/16 between AGL and DPI Water. It was noted by DPI Water that the amended works application submitted by AGL to NOW in early 2013 for the unlicensed wells has not been processed. As such, AGL has complied to the extent practicable.
- Works and Use Approval – The individual wells reflected in each WUA are incorrect. It was reported by AGL (2014/15 Annual DPI Water Compliance Report and 2015/16 Annual DPI Water Compliance Report) that DPI Water have advised that the schedules will be corrected in 2016/17.

Subsequent to the audit period (08/12/16), DPI Water issued a revised Water Supply Works which addressed the above matters. As such, no further action is required.

It is also noted that the WUAs (10WA112288 and 10WA112294) expired on 22/05/16 and 03/04/16 respectively. However, the WUAs note that if an application for extension is lodged prior to expiry, the term of the expiring approval is extended until either the date of the final decision on the application, or a date fixed by the Minister for the approval.

Adequate evidence was provided to demonstrate that a renewal was sought by AGL prior to the date of expiry.

4.2.2 Petroleum Production Licences

A compliance assessment was undertaken against the conditions of the PPLs (**Appendix C, Table C5**). While AGL demonstrated substantial compliance against the licence conditions, the assessment identified several non-compliances, all of which were assessed as low risk (**Table 4.2**).

Subsequent to completion of this audit, additional evidence was provided by AGL. The records were generated during the audit period and as such were assessed by the auditor and reflected in an addendum report (**Appendix E**).

Table 4.2 Matters of Non-Compliance

| Matter | Requirement | Assessment and Recommendation |
|-------------------------------|--|--|
| Gathering Pipelines Notice | Schedule A, Condition 7a Notice must be given to the Director-General prior to commencement of the gas gathering pipeline installation program and while trenches are open to allow inspection prior to backfilling. | During the audit period, gas gathering line was installed between WG04 and WG01 (374m). Notice was not provided to the Director-General to allow inspection prior to backfilling. It is noted that the works were initiated and completed over one day. In the event of further gas gathering installation works, it is recommended that notice be provided to the Director-General. |
| Gathering Pipelines Reporting | Schedule A, Condition 7d A progress report must be submitted to the Director General on or before the 15th day of each month during construction and installation of gas gathering pipeline. | It was reported by AGL that a progress report was not submitted to the Director General during the construction and installation of the WG04 gas gathering line (374m). It is noted that the works were initiated and completed over one day. In the event of further gas gathering installation works, it is recommended that a progress report be provided to the Director-General on or before the 15 th day of each month. |
| Well Abandonment | Schedule A, Condition 10a At the completion of production, steel casing must be removed from the vertical interval of any potentially mineable coal seam as determined by the Executive Director, Mineral Resources. Downhole geophysical surveys and/or cameras must be used to confirm the removal of all casing throughout the prescribed interval. | The auditor sighted the Plug and Abandonment Record prepared by AGL and submitted to the DRE for nominated well sites plugged and abandoned during the audit period. The records note that the production casing did not extend into the mineable coal seam for a number of well sites. In the event that the casing extended into the coal seam, open hole completion occurred or the DRE approved an alternative method (correspondence sighted). An exception was noted with respect to well sites EM04 and GL10 which extend into the mineable coal seam. Evidence was not available to demonstrate DRE approval of the decommissioning process. It is recommended that AGL obtain approval from DRE where steel casing is not removed from the vertical interval of any potentially mineable coal seam. |

| Matter | Requirement | Assessment and Recommendation |
|------------------|--|--|
| Well Abandonment | <p>Schedule A, Condition 10b</p> <p>A well must not be plugged and abandoned except in accordance with the schedule of Onshore Exploration and Production Safety Requirements, and any other guidelines in force from time to time.</p> | <p>The auditor sighted the EMP (March 2016) which notes that sealing/plugging and abandonment of wells occurs in accordance with the NSW Code of Practice for Coal Seam Gas Well Integrity and PPL conditions.</p> <p>Correspondence was sighted from the DRE to AGL noting approval of the plug and abandonment program for nominated well sites. An exception was noted with respect to EM04 and GL10.</p> |
| Well Abandonment | <p>Schedule A, Condition 10c</p> <p>All wells must be fully sealed in accordance with the Department's guidelines.</p> | <p>It is recommended that AGL obtain approval from the DRE prior to commencing plug and abandonment programs that deviate from guidelines and requirements.</p> |
| Reporting | <p>Schedule A, Condition 10d</p> <p>The Lease Holder must, within 2 weeks of the abandonment of any well, submit to the Director-General a report providing details on the following items:</p> <ul style="list-style-type: none"> - Location of abandoned well. - Termination depth of drill hole and depth to worked seam. - details of drill hole diameter and casing used. - Gas and water makes and composition during the drilling and production test phases. The commencement and completion date of each phase of the operation and the date of any other significant events. - The estimated and actual quantities of grout used to seal the drill hole. - Evidence of removal of steel casing from the interval encompassing any potentially mineable coal seam. | <p>With respect to well sites abandoned during the audit period, the following matters of non-compliance were identified:</p> <ol style="list-style-type: none"> 1. Plug and Abandonment Records prepared by AGL largely address reporting requirements with the exception of gas and water makes and composition. 2. Evidence was not consistently available to demonstrate that Plug and Abandonment Records were submitted to the DRE within 14 days of abandonment. Specifically, Records were not submitted within the specified time for LB05, LB07 and GL10. 3. Evidence was not available to demonstrate DRE approval of the decommissioning process of well sites EM04 and GL10 which extend into the mineable coal seam. <p>It is recommended that Plug and Abandonment Records, including data on gas and water makes and composition, be submitted to the DRE within two weeks of abandonment. Further, it is recommended that AGL obtain approval from DRE where steel casing is not removed from the vertical interval of any potentially mineable coal seam.</p> |

| Matter | Requirement | Assessment and Recommendation |
|--------------------------|---|---|
| Mineability of Coal Seam | <p>Schedule A, Condition 11a</p> <p>The Lease Holder must undertake all activities with due regard to identifying, managing and minimising the impact of the activities on the potential mineability of coal seams at the expiration of the lease.</p> | <p>The auditor sighted the Plug and Abandonment Record prepared by AGL and submitted to the DRE for nominated well sites plugged and abandoned during the audit period. The records note that the production casing did not extend into the mineable coal seam for a number of well sites. In the event that the casing extended into the coal seam, open hole completion occurred or the DRE approved an alternative method (correspondence sighted).</p> <p>An exception was noted with respect to well sites EM04 and GL10 which extend into the mineable coal seam. Evidence was not available to demonstrate DRE approval of the decommissioning process.</p> <p>It is recommended that AGL obtain approval from DRE where steel casing is not removed from the vertical interval of any potentially mineable coal seam.</p> |

Appendix A Approvals and Licences

A1. Development Approvals

| Approval | Issue Date | Description | Audit Period Works |
|---|------------|---|--|
| DA 15-1-2002-I (Apap, Joe Stanley, Johndilo, Loganbrae, Lipscombe and 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. | <ul style="list-style-type: none"> • Operated selected wells and gas gathering line. • Completed plug and abandonment of AP01, JD07a, JD05, MH01, LB07 and LB05. |
| MOD 53-4-2006 | 16/05/2006 | Modification of DA 15-1-2002-i granted for: <ul style="list-style-type: none"> • Construction, drilling and operation of a directional well from LB09. | <ul style="list-style-type: none"> • Operated well. |
| | 9/02/2007 | Modification granted for: <ul style="list-style-type: none"> • Re-drilling of wells Apap 01 and Mahon 01. | <ul style="list-style-type: none"> • N/A. |
| MOD24-3-2007 | 4/07/2007 | Modification of DA 15-1-2002-i granted for: <ul style="list-style-type: none"> • Construction, drilling and operation of two surface to in-seam wells (AP02/AP03) at AP01. | <ul style="list-style-type: none"> • N/A. |
| MOD3 | 1/07/2008 | Modification of DA 15-1-2002-i granted for: <ul style="list-style-type: none"> • Modification Application DA 15-1-2002-i MOD 3 and “Camden Gas Project: Kay Park and Loganbrae Gas Gathering Line Modification Project Statement of Environmental Effects”, dated July 2008. | <ul style="list-style-type: none"> • Operated gas gathering line. |
| DA 246-8-2002-I (Kay Park) | 20/09/2002 | Project approval granted for: <ul style="list-style-type: none"> • Connection of 3 existing wells (KP1, KP2, and KP3) to the Ray Beddoe Treatment Plant (in accordance with the attached plan); and • Continued production and sale of methane gas from the 3 wells. | <ul style="list-style-type: none"> • Operated wells. |
| MOD25-3-2007 | 4/07/2007 | Modification of DA 246-8-2002-i granted for: <ul style="list-style-type: none"> • Construction, drilling and operation of 2 Surface to in-seam wells (KP05 and KP06) from KP01. | <ul style="list-style-type: none"> • Operated KP05. |

| Approval | Issue Date | Description | Audit Period Works |
|--|---------------------------------|--|---|
| MOD29-3-2007 | 4/08/2008 | Modification of DA 246-8-2002-i granted for: <ul style="list-style-type: none"> • Kay Park and Loganbrae gas gathering line modification project. | <ul style="list-style-type: none"> • Operated gas gathering line. |
| | 3/12/2008 | Modification of DA 246-8-2001i was issued for: <ul style="list-style-type: none"> • Construction and operation of one SIS well (KP05) and one direction well (KP06) from KP01. | <ul style="list-style-type: none"> • Operated KP05. |
| | 20/04/2011 | Modification of DA 246-8-2001i was issued for: <ul style="list-style-type: none"> • Construction, drilling and operation of 2 surface to in-seam wells (KP05 and KP06). | <ul style="list-style-type: none"> • Operated KP05 and KP06. |
| DA 282-6-2003-I (RPGP, Rosalind Park, Wandinong, EMAI (EM01-20, 40)) | 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. | <ul style="list-style-type: none"> • Operated wells, gas gathering line and RPGP. • Installed a new section of approximately 375m of gas gathering line to convey extracted gas from WG04 to WG01. • Completed plug and abandonment of GL10. • Commenced plug and abandonment of RP03, RP04, RP05 and RP11. |
| MOD72-7-2004-i | 26/08/2004 | Modification of DA 282-6-2003-i 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. | <ul style="list-style-type: none"> • Completed plug and abandonment of EM02, EM03 and EM04. • Conducted workover maintenance of EM40. |
| MOD5-1-2005 | 1/02/2005 | Modification of DA 282-6-2003-i 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). | <ul style="list-style-type: none"> • N/A. |
| MOD42-3-2005 | 1/06/2005 | Modification of DA 282-6-2003-i 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 Camden Gas Project Stage I&I – Modification Application, and the accompanying attachments. | <ul style="list-style-type: none"> • N/A. |

| Approval | Issue Date | Description | Audit Period Works |
|----------------|------------|--|--|
| MOD52-4-2006 | 16/05/2006 | Modification of DA 282-6-2003-i granted for: <ul style="list-style-type: none"> Construction, drilling and operation of 1 directional well from GL07 and two directional wells from GL10. | <ul style="list-style-type: none"> Operated wells. |
| MOD119-10-2006 | 22/10/2006 | Modification of DA 282-6-2003-i granted for: <ul style="list-style-type: none"> Construction, drilling and operation of 1 directional well (GL16) from GL7 and 1 directional well (GL15) and 1 Surface to in-seam well (GL14) from GL10; and Additional limits on hours of operation and sound pressure levels. | <ul style="list-style-type: none"> Operated wells. |
| MOD124-10-2006 | 1/11/2006 | Modification of DA 282-6-2003-i 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. | <ul style="list-style-type: none"> Operated wells. |
| MOD11-2-2007 | 2/05/2007 | Modification of DA 282-6-2003-i granted for: <ul style="list-style-type: none"> Relocation of an Existing Internal Road at Rosalind Park Gas Plant (RPGP) off Medhurst Road, Menangle, dated February 2007. | <ul style="list-style-type: none"> Used road. |
| MOD26-3-2007 | 4/07/2007 | Modification of DA 282-6-2003-i 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. | <ul style="list-style-type: none"> Operated well and gas gathering lines. |
| MOD9 | 11/04/2008 | Modification of DA 282-6-2003-i 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. | <ul style="list-style-type: none"> Operated well and gas gathering lines. Workover maintenance of GL17 |
| MOD10 | 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 RP09 gas well; and Twinning of a small section of the existing gas gathering line between RP08 and RPGP. | <ul style="list-style-type: none"> Operated gas gathering line. |
| MOD11 | 18/09/2009 | Modification of DA 282-6-2003-i granted for: <ul style="list-style-type: none"> Rerouting damaged gas gathering line at Glenlee-06. | <ul style="list-style-type: none"> Operated gas gathering line. |

| Approval | Issue Date | Description | Audit Period Works |
|---|------------|---|--|
| MOD12 | 25/11/2010 | Modification of DA 282-6-2003-i granted for: <ul style="list-style-type: none"> Modification of RGP noise monitoring requirements, air emission concentration limits and waste storage and generation volumes. | <ul style="list-style-type: none"> N/A. |
| DA 183-8-2004-I (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 Rosalind Park Gas Plant from the Mount Taurus and Menangle Park properties, for the production of methane gas; and Construction of a dam at the MT1 gas well site. | <ul style="list-style-type: none"> Operated wells and gas gathering lines. Workover maintenance of MP25. |
| MOD27-3-2007 | 4/07/2007 | Modification of DA 183-8-2004-i 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. | <ul style="list-style-type: none"> Operated well and gas gathering lines. |
| DA 9-1-2005 (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. | <ul style="list-style-type: none"> Operated gas gathering line. |
| 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. | <ul style="list-style-type: none"> Operated wells. |
| MOD28-3-2007 | 4/07/2007 | Modification of DA 9-1-2005 granted for: <ul style="list-style-type: none"> Upgrading (twinning) of gas gathering line between GL02 and GL05. | <ul style="list-style-type: none"> Operated gas gathering line. |
| | 16/11/2010 | Modification of DA 9-1-2005 granted for: <ul style="list-style-type: none"> Modification of Schedule 2, Condition 26 | <ul style="list-style-type: none"> N/A. |
| DA 75-4-2005 (Sugarloaf Farm) | 7/10/2005 | 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. | <ul style="list-style-type: none"> Operation of wells and gas gathering lines. |

| Approval | Issue Date | Description | Audit Period Works |
|--------------|------------|---|--|
| MOD29-3-2007 | 4/07/2007 | 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. | <ul style="list-style-type: none"> Operated wells. |
| MOD2 | 10/01/2010 | Modification of DA 75-4-2005 granted for: <ul style="list-style-type: none"> Twinning of a gas gathering line from well surface locations SL03 and SL09 to the RPPG. | <ul style="list-style-type: none"> Operated gas gathering line. |

A2. Licences

| Approval | No. | Issue Date | Authority | Compliance Assessment |
|--------------------------------|------------|------------|-----------|-----------------------|
| Environment Protection Licence | 12003 | 16/06/16 | EPA | Appendix C, Table C1 |
| Water Access Licence | 24856 | 02/12/15 | DPI Water | Appendix C, Table C2 |
| Water Access Licence | 24736 | 02/12/15 | DPI Water | Appendix C, Table C2 |
| Works and Use Approval | 10WA112288 | 01/07/11 | DPI Water | Appendix C, Table C3 |
| Works and Use Approval | 10WA112294 | 01/07/11 | DPI Water | Appendix C, Table C3 |
| Water Monitoring Bore No. | 10BL604888 | 13/07/11 | DPI Water | Appendix C, Table C4 |
| Water Monitoring Bore No. | 10BL604884 | 13/07/11 | DPI Water | Appendix C, Table C4 |
| Water Monitoring Bore No. | 10BL604885 | 13/07/11 | DPI Water | Appendix C, Table C4 |
| Water Monitoring Bore No. | 10BL604886 | 13/07/11 | DPI Water | Appendix C, Table C4 |
| Water Monitoring Bore No. | 10BL604887 | 13/07/11 | DPI Water | Appendix C, Table C4 |
| Water Monitoring Bore No. | 10BL604878 | 13/07/11 | DPI Water | Appendix C, Table C4 |
| Water Monitoring Bore No. | 10BL604879 | 13/07/11 | DPI Water | Appendix C, Table C4 |
| Water Monitoring Bore No. | 10BL604880 | 13/07/11 | DPI Water | Appendix C, Table C4 |
| Petroleum Production Lease | 1 | 04/09/02 | DRE | Appendix C, Table C5 |
| Petroleum Production Lease | 2 | 16/10/02 | DRE | Appendix C, Table C5 |
| Petroleum Production Lease | 4 | 06/10/04 | DRE | Appendix C, Table C5 |
| Petroleum Production Lease | 5 | 28/02/07 | DRE | Appendix C, Table C5 |

| Approval | No. | Issue Date | Authority | Compliance Assessment |
|----------------------------|-----|------------|-----------|-----------------------|
| Petroleum Production Lease | 6 | 29/05/08 | DRE | Appendix C, Table C5 |

Appendix B Development Approvals

B1. DA 15-1-2002-i

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|---|---|--------------|
| | SCHEDULE 3 | | |
| | Obligation to Minimise Harm to the Environment | | |
| 1 | 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>An EMS has been developed and implemented to manage environmental risks and achieve performance improvements. The EMS consists of an EMP, Sub Plans and a compliance management system.</p> <p>A number of controls are in place to monitor and measure implementation of the EMS including Environmental Management Sub Plan Compliance Audits, Daily Workover Reports, Monthly Dam Inspection Reports, air quality monitoring and noise monitoring. The auditor sighted a sample of monitoring controls and noted compliance with the requirements of the EMP.</p> <p>Compliance obligations arising from licences, leases, environmental/ planning approvals and legislation are monitored through a web-based database compliance management system (CMO Compliance). The auditor sighted CMO Compliance and determined that the tool effectively monitors compliance against obligations.</p> <p>A 'Compliance - Improvement Recommended' was reported against this condition in the 2012-2014 Independent Environmental Audit (22/01/15). The auditor recommended that each condition within CMO Compliance be checked to ensure it accurately reflects the documented consent. This matter has been adequately addressed.</p> | Compliant |
| | Terms of Approval | | |
| 2 | The Applicant shall carry out the development generally in accordance with the: | It was reported by AGL that the development is undertaken in accordance with the EMP and Sub Plans which reflect the requirements of the Consent Conditions. On receipt of an approved consent or modification, the EMP is reported to be revised to reflect the new requirements. This was evidenced by the frequent revision history of the document. | Not Verified |
| | (a) DA submitted to the Department on 31 January 2002; | | Not Verified |
| | (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; | | Not Verified |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|---|---|---|
| | (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; | The DA and subsequent modifications were submitted by Sydney Gas and as such were not available for the purpose of this assessment. | Not Verified |
| | (d) Letter from Sydney Gas Company dated 8 April 2002 to the EPA in relation to background noise level monitoring; | | Not Verified |
| | (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; | | Not Verified |
| | (f) Letter from Sydney Gas Company dated 11 April 2002 to the EPA in relation to nitrogen dioxide impact assessment and odour issues; | | Not Verified |
| | (g) Letter from Sydney Gas Company dated 12 April 2002 to the EPA in relation to the 3 additional wells, and maintenance activities; | | Not Verified |
| | (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; | | Not Verified |
| | (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; | | Not Verified |
| | (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; | | Not Verified |
| | (k) Modification Application MOD 24-3-2007 and "Camden Gas Project Joint Venture Gas Well and Gathering Line Modification Project Statement of Environmental Effects" dated March 2007; and | | Not Verified |
| | (l) Conditions of this consent | | Refer to relevant conditions for an assessment of compliance. |
| | 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. | Condition noted. | Note |
| | Period of Approval | | |
| 3 | This approval is for a period of twenty one (21) years from the date of granting of the production lease. | Condition not triggered during the audit period. | Not Triggered |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|---|---|---------------|
| | Special Conditions of Approval | | |
| 4 | 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. | Condition closed in a previous audit. | Not Triggered |
| 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. | Condition not triggered during the audit period. It was reported by AGL (AEPR 2014-2015, 15/10/15 and AEPR 2015-2016, 31/10/16) that there were no wells drilled during the audit period. | Not Triggered |
| 6 | <p>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).</p> <p>Note: The Production Lease to be granted by the DOPE will apply to the PAL 1 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 wells, treatment plant, site depot, gas gathering system and pipeline. To minimize the impact of the development on the area, the Production Lease will include a condition which requires the Applicant to relinquish areas that have not been tested for gas production within 10 years of the granting of the lease. The Production Lease would include a condition which requires the Applicant to submit a development application for development of the Stage II production area within 3 years of the date of the production lease.</p> | Condition closed in a previous audit. | Not Triggered |
| | Further Approvals | | |

B1. DA 15-1-2002-i

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|--|--|---|
| 7 | <p>Nothing in this consent permits the drilling and operation of any additional wells (beyond the approved 26 wells) or a new treatment plant. These shall be the subject of another development consent or development consents.</p> <p>Note: The drilling of new gas wells within the production lease area and the production of gas from them, and a new treatment plant would require development consent under the Environmental Planning and Assessment Act, 1979.</p> | The auditor reviewed the gas wells reported in the AEPR against the development consents and confirmed that no additional wells have been drilled or operated. | Compliant |
| | Redrilling and Refracting Management Plan | | |
| 8 | For the purposes of this consent the redrilling and/or additional fraccing of a well does not constitute wellhead maintenance. | Condition not triggered during the audit period. It was reported by AGL (AEPR 2014-2015, 15/10/15 and AEPR 2015-2016, 31/10/16) that there were no re-drilling or fraccing activities undertaken during the audit period with respect to DA15-1-2002. | Not Triggered |
| 9 | The Applicant shall obtain the approval of the Director-General for the redrilling and/or additional fraccing of a well. | Condition not triggered during the audit period. It was reported by AGL (AEPR 2014-2015, 15/10/15 and AEPR 2015-2016, 31/10/16) that there were no re-drilling or fraccing activities undertaken during the audit period with respect to DA15-1-2002. | Not Triggered |
| 10 | <p>The Applicant shall prepare a Redrilling and Refracting Management Plan in consultation with the DOPE 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:</p> <p>(a) A description of all the activities to be undertaken on the well site during the redrilling and/or refracting work;</p> <p>(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;</p> <p>(c) reference to the relevant parts of the Environmental Management Plan required under condition 15 of this consent;</p> <p>(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.</p> | Condition not triggered during the audit period. It was reported by AGL (AEPR 2014-2015, 15/10/15 and AEPR 2015-2016, 31/10/16) that there were no re-drilling or fraccing activities undertaken during the audit period with respect to DA15-1-2002. | <p>Not Triggered</p> <p>Not Triggered</p> <p>Not Triggered</p> <p>Not Triggered</p> |

B1. DA 15-1-2002-i

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|---|---|-----------|
| | Compliance | | |
| 11 | Throughout the life of the development, the Applicant shall secure, renew, maintain, and comply with all the relevant statutory approvals applying to the development. | <p>The auditor sighted the EMP and noted the inclusion of legislative requirements, including reporting requirements, approvals, licences, permits and leases.</p> <p>Compliance obligations arising from licences, leases, environmental/ planning approvals and legislation are monitored through a web-based database compliance management system (CMO Compliance). The auditor sighted CMO Compliance and determined that the tool effectively monitors compliance against obligations.</p> <p>It is noted that there were no reported environmental incidents or non-compliances during the audit period.</p> <p>An Opportunity for Improvement was reported against this condition in the 2012-2014 Independent Environmental Audit (22/01/15). The auditor recommended that each condition within CMO Compliance be checked to ensure it accurately reflects the documented consent. This matter has been adequately addressed.</p> | Compliant |
| 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. | <p>The EMP (March 2016) details the training framework including induction programs and role-specific training. The online induction system (Rapid Induct), includes relevant risks and controls as detailed in the EMP. Records and competency assessments are maintained within Rapid Induct and the system includes adequate controls to ensure induction currency is maintained. In addition, job specific training was delivered during the audit period on Leak Detection and Repair (28/04/15) and the Pollution Incident Response Management Plan (29/04/15).</p> <p>The auditor sighted the above training programs and attendance records.</p> | Compliant |
| 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 has not had a licence suspended or revoked during the audit period and as such would be considered to be a fit and proper person. | Compliant |
| | PRODUCTION OPERATIONS PLAN | | |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|--|--|-----------|
| 14 | The Applicant shall prepare a Production Operations Plan (POP) for the approval of the DOPE. 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: | The auditor sighted the POP, Version 9 (09/12/15) and noted compliance with the requirements of this condition. The POP was approved by the Department of Industry, Resources and Energy on 12/01/16 and provided to the DPE on 15/01/16. | Compliant |
| | (a) ongoing operations and environmental management; and | | Compliant |
| | (b) ongoing monitoring of the development. | | Compliant |
| | A copy of the POP shall be forwarded to the Department within fourteen days of the DMR's acceptance. | | Compliant |
| | ENVIRONMENTAL MANAGEMENT | | |
| | Environmental Management Plan | | |
| 15 | 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: | <p>The auditor sighted the EMP (March 2016) and noted compliance with the requirements of this condition.</p> <p>A number of controls are in place to monitor and measure implementation of the EMS including Environmental Management Sub Plan Compliance Audits, Daily Workover Reports, Monthly Dam Inspection Reports, air quality monitoring and noise monitoring. The auditor sighted a sample of monitoring controls and noted compliance with the requirements of the EMP.</p> <p>It was reported by AGL that the EMP was developed by Sydney Gas in consultation with the nominated agencies in 2002. However, documented evidence of the consultation was not available.</p> <p>A 'Compliance - Improvement Recommended' was reported against this condition in the 2012-2014 Independent Environmental Audit (22/01/15). The auditor recommended that nominated authorities be provided with a copy of the updated EMP for review and comment. Following revision of the EMP and sub-plans in 2015, AGL requested feedback from the DPE (17/04/15, 30/06/15 and 04/09/15), EPA (26/06/15 and 04/09/15), DPI Water (26/06/15) and the DRE (26/06/15). As such, AGL have demonstrated compliance with the requirements of this condition.</p> | Compliant |
| | (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; | | Compliant |
| | (b) a description of the roles and responsibilities for all key personnel involved in the drilling and operation of the development; | | Compliant |
| | (c) the overall environmental policies and principles to be applied to the operation of the development; | | Compliant |
| | (d) standards and performance measures to be applied to the development, and a means by which environmental performance can be periodically reviewed and improved; | | Compliant |
| | (e) management policies to ensure that environmental performance goals are met and to comply with conditions of this consent; and | | Compliant |
| | (f) include the following detailed plans: | | Compliant |
| | i Noise Management Plan; | | Compliant |
| | i Soil and Water Management Plan; | | Compliant |
| | i Water Quality Management Plan; | | Compliant |

B1. DA 15-1-2002-i

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|--|---|---------------|
| | i Traffic Management Plan; | | Compliant |
| | i Vegetation and Landscape Management Plan; | | Compliant |
| | i Waste Management Plan; and | | Compliant |
| | i Site Rehabilitation Management Plan | | Compliant |
| 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. | Condition closed in a previous audit. | Not Triggered |
| 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. | Condition closed in a previous audit. | Not Triggered |
| 18 | The Applicant shall review and update the EMP regularly, 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. | During the audit period, the EMP was reviewed annually as evidenced by the revision history recorded within the document. All of the Sub Plans were reviewed during the audit period and most were reviewed annually. | Compliant |
| | Noise Management Plan | | |
| 19 | The Applicant shall prepare and implement a Noise Management Plan for the whole site. The Plan shall include, but not necessarily be limited to: | The auditor sighted the Noise Management Sub Plan (April 2016) and noted compliance with the requirements of this condition. | Compliant |
| | (a) identification of the potential sources of noise during drilling and operation; | Implementation was evidenced by the induction program and notification letters provided to landowners in advance of workover and plug and abandonment works. | Compliant |
| | (b) the noise criteria for these activities; | | Compliant |
| | (c) details of what actions and measures would be implemented to ensure that these operations would comply with the relevant noise criteria; | | Compliant |
| | (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 | There were no reported noise complaints during the audit period. | Compliant |
| | (e) describe what procedures would be followed to ensure compliance. | | Compliant |
| | Soil and Water Management Plan | | |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|--|---|-----------|
| 20 | 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: | The auditor sighted the Soil and Water Management Sub Plan (May 2016) and noted compliance with the requirements of this condition. | Compliant |
| | (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; | Implementation of the Sub Plan was demonstrated through the Minimum Environmental Controls Form. Commencing in 2015, this process includes the documentation of site specific controls as relevant to workover and plug and abandonment works. Periodic inspections are then undertaken to assess implementation and identify performance improvements. | Compliant |
| | (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; | | Compliant |
| | (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; | | Compliant |
| | (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; | | Compliant |
| | (e) measures to rehabilitate erosion-affected areas and areas the subject of excavation, including tree, shrub and/or cover crop species and implementation; and | | Compliant |
| | (f) management procedures for all surface and groundwater collection and storage structures on the site, including a maintenance program for associated infrastructure (e.g. pipes, pumps, dam walls, etc.) and a program for desilting of those structures, where relevant. | | Compliant |
| | Water Quality Management Plan | | |
| 21 | 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: | The auditor sighted the Soil and Water Management Sub Plan (May 2016) and the Groundwater Management Plan for the CGP (October 2015). The Plans comply with the requirements of this condition. | Compliant |
| | (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; | Implementation of the Sub Plan was demonstrated through the Minimum Environmental Controls Form. Commencing in 2015, this process includes the documentation of site specific controls as relevant to workover and plug and abandonment works. Periodic inspections are then undertaken to assess implementation and identify performance improvements. | Compliant |
| | (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 | | Compliant |
| | (c) details of the well maintenance procedures to ensure the integrity of the well isolation components to prevent the cross contamination of groundwater aquifers. | | Compliant |
| | Traffic Management Plan | | |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|--|--|-----------|
| 22 | The Applicant shall prepare and implement a Traffic Management Plan for the whole site. This plan shall include, but not necessarily be limited to: | The auditor sighted the Traffic Management Sub Plan (April 2016) and noted compliance with the requirements of this condition. | Compliant |
| | (a) Identification of the potential traffic and transport impacts associated with the development and measures to limit traffic movements in the PAL 1 area; | Implementation of the Sub Plan was demonstrated through the Minimum Environmental Controls Form. Commencing in 2015, this process includes the documentation of site specific controls as relevant to workover and plug and abandonment works. Periodic inspections are then undertaken to assess implementation and identify performance improvements. A 'Non-Compliance - Level 2' was reported against condition 22d) in the 2012-2014 Independent Environmental Audit (22/01/15). The auditor noted that measures to reduce the transportation of plant material and/or dirt off site were not included in the Sub Plan. This matter has been adequately addressed. | Compliant |
| | (b) restrictions on the movement of heavy vehicles during school pick-up/drop-off times; | | Compliant |
| | (c) details of traffic management measures associated with the construction of pipelines within public roads; and | | Compliant |
| | (d) measures to reduce the transportation of plant material and/or dirt off site. | | Compliant |
| | Vegetation and Landscape Management Plan | | |
| 23 | 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: | The auditor sighted the Flora and Fauna Management Sub Plan (April 2016) and Rehabilitation and Landscape Management Sub Plan (April 2016). The plans comply with the requirements of this condition. | Compliant |
| | (a) measures to protect mature trees as part of the well drilling or gas gathering pipeline construction activities; | It was noted that no landscaping works were undertaken under this Development Consent during the audit period. | Compliant |
| | (b) details of all landscaping to be undertaken on the site; | | Compliant |
| | (c) ensure that tree and shrub species used for landscaping of the site are indigenous to the locality; and | | Compliant |
| | (d) details of a program to ensure that all landscaped areas are maintained in a tidy, healthy state. | | Compliant |
| | Waste Management Plan | | |
| 24 | The Applicant shall prepare and implement a Waste Management Plan for the whole site. This plan shall include, but not necessarily be limited to: | The auditor sighted the Waste Management Sub Plan (April 2016) and noted compliance with the requirements of this condition. | Compliant |
| | (a) Measures to minimise the production and impact of waste produced at the site during drilling and operation; | Implementation of the Sub Plan was demonstrated through the AGL | Compliant |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|---|---|-----------|
| | (b) implementation of waste reduction, reuse and recycling principles; | Environmental Footprint spreadsheet for the financial years 2014/15 and 2015/16. The spreadsheets detail waste generated during the audit period. The auditor sighted a sample of disposal records and reconciled against the Environmental Footprint. There were no errors or omissions identified. | Compliant |
| | (c) details of the reuse and recycling of waste water produced/collected on the site, including collection and handling procedures; | <p>A 'Compliance - Opportunity for Improvement' was reported against this condition in the 2012-2014 Independent Environmental Audit (22/01/15). The auditor recommended that the Waste Management Sub Plan reference the Vacuum Truck Operations Procedure (which details the reuse and recycling of wastewater).</p> <p>The auditor sighted the Waste Management Sub Plan (April 2016) and noted that the AGL procedure, Removal of Produced Water from RPGP Flare Pit by Tanker (DCS_CM_HSE_SOP_026) is appropriately referenced. The AGL procedure provides adequate guidance on the collection and handling of produced water. The auditor sighted a sample of produced water dockets demonstrating implementation of the procedure.</p> | Compliant |
| | (d) details of appropriate disposal methods in the event that reuse and recycling are not available or are not practicable; and | The auditor sighted the Waste Management Sub Plan (April 2016) and noted compliance with the requirements of this condition. | Compliant |
| | (e) programs for involving and encouraging employees and contractors to minimise domestic waste production on the site and reuse/recycle where appropriate. | Implementation of the Sub Plan was demonstrated through the AGL Environmental Footprint spreadsheet for the financial years 2014/15 and 2015/16. The spreadsheets detail waste generated during the audit period. The auditor sighted a sample of disposal records and reconciled against the Environmental Footprint. There were no errors or omissions identified. | Compliant |
| | Site Rehabilitation Management Plan | | |
| 25 | 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: | The auditor sighted the Rehabilitation and Landscape Management Sub Plan (April 2016) and noted compliance with the requirements of this condition. | Compliant |
| | (a) details of the staging and timing for rehabilitation works; | | Compliant |
| | (b) ongoing management strategies to ensure the success of rehabilitation works; | The auditor sighted a sample of plug and abandonment works | Compliant |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|---|--|---------------|
| | (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 | completed and/or commenced during the auditor period. Of relevance to this consent were well sites AP01, LB05 and LB07 where rehabilitation works were completed during the audit period. Well sites were adequately rehabilitated in accordance with criteria developed in consultation with the landowner and the DRE (Petroleum Operations Plan, Appendix F, 09/12/15). | Compliant |
| | (d) the measures to remediate sites following the decommissioning of the wells, pipelines and treatment plant. | | Compliant |
| | PERFORMANCE REPORTING | | |
| | Condition Report | | |
| 26 | The Applicant shall prepare a Condition Report on residences and structures that may be potentially affected by drilling/fracking work, including the redrilling and refracking 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. | Condition closed in a previous audit. | Not Triggered |
| | Incident Reporting | | |
| 27 | 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. | The auditor sighted the Pollution Incident Response Management Plan (PIRMP) and Emergency Response Plan (20/11/15) for the CGP and noted compliance with the requirements of this condition. There were no reported environmental incidents associated with this Development Consent during the audit period. | Compliant |
| 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. | Condition not triggered during the audit period. | Not Triggered |
| | Complaints Register | | |
| 29 | 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: | The auditor sighted Consultation Manager, a software program used for managing stakeholder engagement, including complaints. Records retained within Consultation Manager comply with the requirements of this condition. | Compliant |
| | (a) the date and time, where relevant of the complaint; | | Compliant |
| | (b) the means by which the complaint was made; | | Compliant |

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|-----|---|---|---------------|
| | (c) any personal details of the complainant that were provided, or if no details were provided, a note to that effect; | There were no complaints associated with this Development Consent during the audit period. | Compliant |
| | (d) the nature of the complaints; | | Compliant |
| | (e) any action(s) taken by the Applicant in relation to the complaint, including any follow-up contact with the complainant; and | | Compliant |
| | (f) if no action was taken by the Applicant in relation to the complaint, the reason(s) why no action was taken. | | Compliant |
| | 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. | | Compliant |
| | Risk Assessment | | |
| 30 | 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. | Condition closed in a previous audit. | Not Triggered |
| 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. | Condition closed in a previous audit. | Not Triggered |
| 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's Hazardous Industry Planning Advisory Paper No. 9 Guidelines for the Development of Safety Management Systems. | <p>The Auditor sighted the Health and Safety Management Plan, Camden Project NSW (March 2015) and noted compliance with the requirements of this condition.</p> <p>Implementation was demonstrated through the following documents/systems:</p> <ol style="list-style-type: none"> 1. Induction program (Rapid Induct); 2. Audit program and sample of completed audits ; 3. Audit Actions Tracker; and 4. Standard methodologies for common works (e.g. confined space). | Compliant |

B1. DA 15-1-2002-i

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|---|---|-----------|
| | EPA Annual Return | | |
| 33 | 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. | The auditor sighted the December 2014 and December 2015 Annual Returns and noted compliance against the relevant requirements of this condition. | Compliant |
| | Annual Environmental Performance Reporting | | |
| 34 | 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: | The auditor sighted the AEPR 2014-2015 (15/10/15) and the AEPR 2015-2016 (31/10/16) and noted compliance with the requirements of this condition. | Compliant |
| | (a) the standards, performance measures and statutory requirements the development is required to comply with; | | Compliant |
| | (b) an assessment of the environmental performance of the development to determine whether it is complying with these standards, performance measures, and statutory requirements; | | Compliant |
| | (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; | | Compliant |
| | (d) indication of what actions were taken to address any issue and/or recommendation raised by the Community Consultative Committee; | | Compliant |
| | (e) provision of the detailed results of all the monitoring required by this consent; and | | Compliant |
| | (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. | | Compliant |

B1. DA 15-1-2002-i

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|--|--|---|---------------|
| 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. | It was reported by AGL that there were no matters identified by the Director-General during the audit period. | Not Triggered |
| 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. | The auditor sighted evidence of submission of the Annual Environmental Performance Report (2014/2015 and 2015/2016) to each of the agencies required by this condition. | Compliant |
| Independent Environmental Audit | | | |
| 37 | 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: | The scope of this 2014-2016 Independent Environmental Audit complies with the requirements of this condition. | Compliant |
| | (a) be conducted by a suitably qualified, experienced, and independent person(s) whose appointment has been approved by the Director-General; | | Compliant |
| | (b) be consistent with <i>ISO 14010 – Guidelines and General Principles for Environmental Auditing</i> , and <i>ISO 14011 – Procedures for Environmental Auditing</i> , or updated versions of these guidelines/manuals; | | Compliant |
| | (c) assess the environmental performance of the development, and its effects on the surrounding environment; | | Compliant |
| | (d) assess whether the development is complying with the relevant standards, performance measures, and statutory requirements; | | Compliant |
| | (e) review the adequacy of the Applicant’s Environmental Management Plan; and | | Compliant |
| | (f) recommend measures or actions to improve the environmental performance of the development, and/or its environmental management and monitoring systems. | | Compliant |
| | 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. | The 2014-2016 Independent Environmental Audit was finalised in a timely manner and it was reported by AGL that the report would be submitted within two months of commissioning (17 December 2016). | Not verified |
| ENVIRONMENTAL PERFORMANCE | | | |

B1. DA 15-1-2002-i

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding | | | | | | | | | | | | | | | | | | | | |
|---|---|---|--------------------------------|----------------------------------|--------------------------------|---------------------|----|----|----|-------------------------------|----|----|----|------------------------------------|----|----|----|--------------------------------|----|----|----|---|---------------|
| | Noise Limits | | | | | | | | | | | | | | | | | | | | | | |
| 38 | <p>The Applicant shall comply with the noise criteria specified in the table below.</p> <p>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_{AEO15min}</th> <th>Evening L_{AEO15min}</th> <th>Night L_{AEO15min}</th> </tr> </thead> <tbody> <tr> <td>Receiver Location A</td> <td>40</td> <td>40</td> <td>40</td> </tr> <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 _{AEO15min} | Evening L _{AEO15min} | Night L _{AEO15min} | Receiver Location A | 40 | 40 | 40 | 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 | <p>The noise monitoring locations identified in this condition are associated with the former Ray Beddoe Treatment Plant site. AGL did not conduct any activity within this area during the audit period.</p> | Not Triggered |
| Location (Identified in Fig. 10.1 of the EIS) | Day L _{AEO15min} | Evening L _{AEO15min} | Night L _{AEO15min} | | | | | | | | | | | | | | | | | | | | |
| Receiver Location A | 40 | 40 | 40 | | | | | | | | | | | | | | | | | | | | |
| 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 | | | | | | | | | | | | | | | | | | | | |
| 39 | <p>For the purposes of assessment of noise levels specified in this consent, noise from the development shall be: more than 30m from the boundary, at the most affected point within 30m of the dwelling to determine compliance with the LAeq15min, LAeq day, LAeq evening and LAeq night noise limits;</p> <p>(a) measured at the most affected point on or within the residential boundary or, where the dwelling is</p> <p>(b) subject to the modification factors provided in Section 4 of the <i>NSW Industrial Noise Policy</i>; and</p> <p>(c) measured using the FAST response on the sound level meter.</p> | Condition closed in a previous audit. | Not Triggered | | | | | | | | | | | | | | | | | | | | |
| 40 | <p>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 <i>NSW Industrial Noise Policy</i>). 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> | Condition closed in a previous audit. | Not Triggered | | | | | | | | | | | | | | | | | | | | |
| 41 | <p>All noise limits specified as part of this consent apply under:</p> <p>(a) wind speeds up to 3m/s at 10 metres above ground level; and</p> <p>(b) temperature inversion conditions of up to 30C/100m.</p> | Condition closed in a previous audit. | Not Triggered | | | | | | | | | | | | | | | | | | | | |
| | Noise – Well Maintenance | | | | | | | | | | | | | | | | | | | | | | |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|---|---|---------------|
| 42 | 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: | The auditor sighted the Noise Management Sub Plan (April 2016) and noted compliance with the requirements of this condition. | Compliant |
| | (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; | Implementation was evidenced by the induction program (construction hours) and notification letters provided to landowners in advance of workover and plug and abandonment works. | Compliant |
| | (b) documenting and implementing any specific work practices the Applicant will employ to limit noise; | There were no reported noise complaints during the audit period. | Compliant |
| | (c) documenting the feasible and reasonable noise mitigation measures that will be undertaken to reduce noise impacts from planned well maintenance activities; and | | Compliant |
| | (d) conducting noise monitoring where appropriate. | | Compliant |
| | Noise – Drilling Impacts | | |
| 43 | 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: | The auditor sighted the Noise Management Sub Plan (April 2016) and noted compliance with the requirements of this condition. AGI reported that no drilling works were undertaken during the audit period. | Not triggered |
| | (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; | | Not triggered |
| | (b) predicting potential noise levels from the proposed well drilling methods where appropriate; | | Not triggered |
| | (c) identifying and implementing all reasonable and feasible noise mitigation measures to reduce any drilling noise impacts; | | Not triggered |
| | (d) documenting and implementing any specific work practices the Applicant will employ to limit noise; conducting noise monitoring where appropriate; and | | Not triggered |
| | (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. | | Not triggered |
| | Hours of Operation | | |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|------|--|---|---------------|
| 44 | The Applicant shall ensure that all construction work, except: | The auditor sighted the Noise Management Sub Plan (April 2016) and induction program and noted compliance with the requirements of this condition. AGL reported that there were no construction activities undertaken during the audit period with respect to DA15-1-2002. | Not triggered |
| | a) for the drilling (including well casing and grouting) of SIS wells; or | | Not triggered |
| | b) where the Applicant has reached an agreement with all potentially affected residences and other noise sensitive receivers to conduct drilling works outside these hours. | | Not triggered |
| | c) Shall only be conducted between 7.00 am and 6.00 pm Monday to Friday and between 8.00am and 1.00pm Saturdays, unless inaudible at any residential receiver. | | Not triggered |
| | Note: Inaudible means that the construction activity cannot be heard by the human ear at the nearest affected residential receiver. | | Not triggered |
| 45 | Notwithstanding condition 44 of this consent, the specified hours of operation also apply to: | Condition not triggered during the audit period. | Not Triggered |
| | (a) planned maintenance activities at any of the wells; | | Not Triggered |
| | (b) planned deliveries to the treatment plant; and | | Not Triggered |
| | (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. | | Not Triggered |
| 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. | Condition closed in a previous audit. | Not Triggered |
| 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. | Condition not triggered during the audit period. | Not Triggered |
| 47A. | Noise from the drilling and construction of AP02 and AP03 shall not exceed the sound pressure (noise) limits in the table below: | Condition not triggered during the audit period. | Not Triggered |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding | | | | | | | | | | |
|-------------------------|---|--|---|--|---------------------------|-------------------------|-------------------------|----|----|----|----|--|---------------|
| | <p>Table 1A – Construction Noise Limits in dB(A) L_{Aeq}</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>Receiver A1, A2, A3, A4</td> <td>45</td> <td>40</td> <td>40</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) | Receiver A1, A2, A3, A4 | 45 | 40 | 40 | 35 | | Not Triggered |
| 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) | | | | | | | | | |
| Receiver A1, A2, A3, A4 | 45 | 40 | 40 | 35 | | | | | | | | | |
| | Ray Beddoe Treatment Plant – Reduction of Noise | | | | | | | | | | | | |
| 48 | 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) | Condition closed in a previous audit. | Not Triggered | | | | | | | | | | |
| | (a) an L _{Aeq} 15min level of 37 dB(A) for the day time period; | | Not Triggered | | | | | | | | | | |
| | (b) an L _{Aeq} 15min level of 37 dB(A) for the evening period; and | | Not Triggered | | | | | | | | | | |
| | (c) an L _{Aeq} 15min level of 35 dB(A) for the night time period. | | Not Triggered | | | | | | | | | | |
| | 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. | | Not Triggered | | | | | | | | | | |
| 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. | Condition closed in a previous audit. | Not Triggered | | | | | | | | | | |
| 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. | Condition closed in a previous audit. | Not Triggered | | | | | | | | | | |
| 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. | Condition closed in a previous audit. | Not Triggered | | | | | | | | | | |
| | Odour | | | | | | | | | | | | |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|---|---|---------------|
| 52 | In accordance with section 129 of the <i>Protection of the Environment Operations Act 1997</i> , 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 <i>Protection of the Environment Operations Act 1997</i> . | Condition closed in a previous audit. | Not Triggered |
| | Water Quality Impacts | | |
| 53 | Except as may be expressly provided for by a licence under the <i>Protection of the Environment Operations Act 1997</i> , the Applicant shall comply with section 120 of the <i>Protection of the Environment Operations Act 1997</i> in carrying out the development. | <p>The auditor sighted the EMP (March 2016) and Soil and Water Management Sub Plan (May 2016). The plans detail a number of controls to prevent the pollution of water.</p> <p>Implementation of the Sub Plan was demonstrated through the Minimum Environmental Controls Form. Commencing in 2015, this process includes the documentation of site specific controls as relevant to workover and plug and abandonment works. Periodic inspections are then undertaken to assess implementation and identify performance improvements.</p> <p>The auditor also sighted a sample of plug and abandonment works completed during the audit period and noted that there was no evidence of erosion.</p> <p>There were no reportable water pollution incidents during the audit period.</p> | Compliant |
| | Waste Water | | |
| 54 | Waste water from the construction, installation and operation of wells and associated infrastructure shall only be applied to the following areas: | The auditor sighted the AGL Environmental Footprint spreadsheet for the financial years 2014/15 and 2015/16 which notes that produced water was primarily reused by external industries. To a lesser extent, produced water was reused during workover activities. The auditor sighted a sample of disposal records generated during the audit period and reconciled against the Environmental Footprint. There were no errors or omissions identified. | Compliant |
| | (a) dust suppression on any unsealed roads within PAL1; | | Compliant |
| | (b) irrigated onto pastures within PAL 1; | | Compliant |
| | (c) evaporation dam; and | | Compliant |
| | (d) reinjection into gas wells. | | Compliant |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|---|--|---------------|
| | 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. Note: Section 120 of the <i>Protection of the Environment Operations Act 1997</i> applies to the disposal of waste water. This section refers to the pollution of waters. | | Compliant |
| 55 | Spray from waste water application shall not drift beyond the boundary of the waste water utilisation area to which it is applied. | Condition closed in a previous audit. | Not Triggered |
| 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. | Condition closed in a previous audit. | Not Triggered |
| 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. | Condition closed in a previous audit. | Not Triggered |
| | Dust | | |
| 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. | <p>The auditor sighted the Air Quality Management Sub Plan (April 2016) and noted the inclusion of adequate dust management controls.</p> <p>The auditor sighted the complaints register for the CGP and noted that there were no dust related complaints during the audit period in relation to this Development Consent.</p> <p>There were no excavation works undertaken during the audit period with respect to DA15-1-2002.</p> | Compliant |
| 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. | <p>The auditor sighted the Air Quality Management Sub Plan (April 2016) and noted the inclusion of adequate dust management controls.</p> <p>The auditor sighted the complaints register for the CGP and noted that there were no dust related complaints during the audit period in relation to this Development Consent.</p> | Compliant |
| 60 | The Applicant shall take all practicable measures to minimise the generation of wind-blown dust from soil stockpiles. | Condition not triggered during the audit period. | Not triggered |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|--|--|---------------|
| | Threatened Species | | |
| 60A | The Applicant shall ensure that, during the drilling and construction of AP02 and AP03, impacts on threatened species are minimized by implementing actions including, but not limited, to the following: | The works referred to in this condition were not undertaken during the audit period. | Not triggered |
| | 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 | | Not triggered |
| | 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. | | Not triggered |
| | Waste | | |
| 61 | 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 <i>Protection of the Environment Operations Act 1997</i> . This condition only applies to the storage, treatment, processing, reprocessing or disposal of waste at the site, if it requires a licence under the <i>Protection of the Environment Operations Act 1997</i> . | <p>The auditor sighted the AGL Environmental Footprint spreadsheet for the financial years 2014/15 and 2015/16 and noted compliance with the requirements of this condition. The Environmental Footprint provides a detailed record of waste streams generated, recycled/reused and disposed, including water, hazardous waste and non-hazardous waste.</p> <p>AGL reported that no wastes are received, or disposed, at the premises.</p> <p>The auditor sighted a sample of disposal records and reconciled against the Environmental Footprint. There were no errors or omissions identified.</p> | Compliant |
| 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. | The auditor sighted the AGL Environmental Footprint spreadsheet for the financial years 2014/15 and 2015/16. The spreadsheets note that produced water was primarily reused by external industries. To a lesser extent, produced water was reused during workover activities. The auditor sighted a sample of disposal records generated during the audit period and reconciled against the Environmental Footprint. There were no errors or omissions identified. | Compliant |
| | Lighting | | |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|--|--|---------------|
| 63 | 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 <i>Australian Standard 4282 – 1997 Control of the Obtrusive Effects of Outdoor Lighting</i> . | Condition closed in a previous audit. | Not Triggered |
| | Gas Flare | | |
| 64 | 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. Note: This condition confirms the existing gas flare structure and specifications. | Condition closed in a previous audit. | Not Triggered |
| | Activated Carbon Filter | | |
| 65 | The activated carbon filter on the odour control system shall be replaced prior to breakthrough occurring. | Condition closed in a previous audit. | Not Triggered |
| | Steel Pipeline | | |
| 66 | The 200 mm steel pipeline shall not be operated above a pressure of 1.05 MPa. | Condition closed in a previous audit. | Not Triggered |
| 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: | Condition closed in a previous audit. | Not Triggered |
| | (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'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 | | Not Triggered |
| | (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's Hazardous Industry Planning Advisory Paper No. 8 Hazard and Operability Studies. | | Not Triggered |
| | Gas Gathering System Pipeline | | |
| 68 | The Applicant shall comply with the following in the construction of the gas gathering system pipeline: | | Not Triggered |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|--|---|---------------|
| | (a) excavated trenches shall not be left uncovered overnight, unless adequate fencing and warning lights are erected; | The auditor sighted the AEPR 2014-2015 (15/10/15) and the AEPR 2015-2016 (31/10/16) and noted that the gas gathering system pipeline was not constructed during the audit period. | Not Triggered |
| | (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; | | Not Triggered |
| | (c) trenches are to be restored and reseeded with local grass seeds on completion of the work; | | Not Triggered |
| | (d) local council traffic guidelines in respect of work carried out on road verges and underneath roads shall be implemented; | | Not Triggered |
| | (e) the pipeline shall be constructed in accordance with the AS 3723-1989; and | | Not Triggered |
| | (f) the Department shall be notified on the completion of any trenching works. | | Not Triggered |
| | LPG Storage | | |
| 69 | The LPG storage and handling system and procedures shall be in accordance with AS 1596-2002 and industry guidelines. | Condition closed in a previous audit. | Not Triggered |
| | Indigenous Heritage | | |
| 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. | Condition closed in a previous audit. | Not Triggered |
| | Cultural Heritage | | |
| 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. Note: a relic is defined under the Heritage Act as any deposit, object or material evidence: | Condition closed in a previous audit. | Not Triggered |
| | (a) which relates to the settlement of the area that comprises NSW, not being Aboriginal settlement; and | | Not Triggered |
| | (b) which are more than 50 years old. | | Not Triggered |
| | Site Rehabilitation | | |

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|---------------------------------|--|---|---------------|
| 72 | 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>The auditor sighted the Rehabilitation and Landscape Management Sub Plan (April 2016) and noted compliance with the requirements of this condition.</p> <p>The auditor sighted a sample of plug and abandonment works completed and/or commenced during the auditor period. Of relevance to this consent were well sites AP01, LB05 and LB07 where rehabilitation works were completed during the audit period. Well sites were adequately rehabilitated in accordance with criteria developed in consultation with the landowner and the DRE (Petroleum Operations Plan, Appendix F, 09/12/15).</p> | Compliant |
| 73 | The Applicant shall carry out rehabilitation of the site in accordance with the requirements of the DMR and the Site Rehabilitation Management Plan. | <p>The auditor sighted the Rehabilitation and Landscape Management Sub Plan (April 2016) and noted compliance with the requirements of this condition.</p> <p>The auditor sighted a sample of plug and abandonment works completed and/or commenced during the auditor period. Of relevance to this consent were well sites AP01, LB05 and LB07 where rehabilitation works were completed during the audit period. Well sites were adequately rehabilitated in accordance with criteria developed in consultation with the landowner and the DRE (Petroleum Operations Plan, Appendix F, 09/12/15).</p> | Compliant |
| ENVIRONMENTAL MONITORING | | | |
| Land Subsidence | | | |
| 74 | 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. | Condition closed in a previous audit. | Not Triggered |
| Vibration Impacts | | | |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding | | | | | | | | | | | | | | | | | | | | |
|--|--|---|---|-------------------|-------------------------|---|--------------------------|------------------|---|---|--------------------------|------------------|---|---|--------------------------|-----|---|---|--------------------------|------------------|---|---|---------------|
| 75 | 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. | It was reported by AGL that there were no drilling activities undertaken during the audit period. | Not verified | | | | | | | | | | | | | | | | | | | | |
| Air Emissions | | | | | | | | | | | | | | | | | | | | | | | |
| 76 | <p>For the purposes of this consent air discharge monitoring points, shall be identified as provided in Table 2 below.</p> <p>Table 2 – Identification of Air Discharge Monitoring Points</p> <table border="1" data-bbox="302 678 976 1241"> <thead> <tr> <th data-bbox="302 678 461 751">Discharge Monitoring Point Identification Number</th> <th data-bbox="461 678 620 751">Type of Monitoring Point</th> <th data-bbox="620 678 779 751">Type of Discharge</th> <th data-bbox="779 678 976 751">Description of Location</th> </tr> </thead> <tbody> <tr> <td data-bbox="302 751 461 869">1</td> <td data-bbox="461 751 620 869">Air emissions monitoring</td> <td data-bbox="620 751 779 869">Discharge to air</td> <td data-bbox="779 751 976 869">TEG reboiler exhaust <i>(located on the dehydrator unit as shown in Fig. 3.9 of the EIS)</i></td> </tr> <tr> <td data-bbox="302 869 461 987">2</td> <td data-bbox="461 869 620 987">Air emissions monitoring</td> <td data-bbox="620 869 779 987">Discharge to air</td> <td data-bbox="779 869 976 987">Flare <i>(located on the southern corner of the Treatment Plant as shown in Fig. 3.9 of the EIS)</i></td> </tr> <tr> <td data-bbox="302 987 461 1123">3</td> <td data-bbox="461 987 620 1123">Air emissions monitoring</td> <td data-bbox="620 987 779 1123">Air</td> <td data-bbox="779 987 976 1123">Coal seam methane gas supply to TEG reboiler <i>(located on the dehydrator unit as shown in Fig 3.9. of the EIS)</i></td> </tr> <tr> <td data-bbox="302 1123 461 1241">4</td> <td data-bbox="461 1123 620 1241">Air emissions monitoring</td> <td data-bbox="620 1123 779 1241">Discharge to air</td> <td data-bbox="779 1123 976 1241">Odour control system exhaust <i>(located between the dehydrator unit and final gas filter as shown in Fig 3.9. of the EIS)</i></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 <i>(located on the dehydrator unit as shown in Fig. 3.9 of the EIS)</i> | 2 | Air emissions monitoring | Discharge to air | Flare <i>(located on the southern corner of the Treatment Plant as shown in Fig. 3.9 of the EIS)</i> | 3 | Air emissions monitoring | Air | Coal seam methane gas supply to TEG reboiler <i>(located on the dehydrator unit as shown in Fig 3.9. of the EIS)</i> | 4 | Air emissions monitoring | Discharge to air | Odour control system exhaust <i>(located between the dehydrator unit and final gas filter as shown in Fig 3.9. of the EIS)</i> | Condition closed in a previous audit. The nominated monitoring locations were at the former Ray Beddoe Treatment Plant. | Not Triggered |
| 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 <i>(located on the dehydrator unit as shown in Fig. 3.9 of the EIS)</i> | | | | | | | | | | | | | | | | | | | | |
| 2 | Air emissions monitoring | Discharge to air | Flare <i>(located on the southern corner of the Treatment Plant as shown in Fig. 3.9 of the EIS)</i> | | | | | | | | | | | | | | | | | | | | |
| 3 | Air emissions monitoring | Air | Coal seam methane gas supply to TEG reboiler <i>(located on the dehydrator unit as shown in Fig 3.9. of the EIS)</i> | | | | | | | | | | | | | | | | | | | | |
| 4 | Air emissions monitoring | Discharge to air | Odour control system exhaust <i>(located between the dehydrator unit and final gas filter as shown in Fig 3.9. of the EIS)</i> | | | | | | | | | | | | | | | | | | | | |
| Load Limits | | | | | | | | | | | | | | | | | | | | | | | |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding | | | | | | | | | | | | | | | | |
|----------------------|---|--|----------------------|---------|---|------------------|---|----------------|---|------------------|---|-----------------|---|---------------|---|-------|---|--|----------------------|
| 77 | <p>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 | <p>Condition closed in a previous audit. The nominated monitoring locations were at the former Ray Beddoe Treatment Plant.</p> | <p>Not Triggered</p> |
| 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 | | | | | | | | | | | | | | | | | | |
| | <p>Note – An assessable pollutant is a pollutant which affects the licence fee payable for the licence. The actual load of an assessable pollutant discharged from the premises during the reporting period must not exceed the load limit specified for the assessable pollutants in Table 3.</p> | <p>Condition closed in a previous audit. The nominated monitoring locations were at the former Ray Beddoe Treatment Plant.</p> | <p>Not Triggered</p> | | | | | | | | | | | | | | | | |
| | <p>Testing Method – Load Limits</p> | | | | | | | | | | | | | | | | | | |
| 78 | <p>Clause 17(1) and (2) of the <i>Protection of the Environment Operations (General) Regulation 1998</i> 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> | <p>Condition closed in a previous audit. The nominated monitoring locations were at the former Ray Beddoe Treatment Plant.</p> | <p>Not Triggered</p> | | | | | | | | | | | | | | | | |
| | <p>Concentration Limits</p> | | | | | | | | | | | | | | | | | | |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding | | | | | | | | | | | | |
|--|---|--|--|----------------------|----------------------|--|------------------|------|--|--|----------------------|-----|-----------------------|--|----------------------|
| 79 | <p>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/m ³ | 0.35 | Dry, 273 K, 101.3 kPa, 7% O ₂ | Sulphuric acid mist and/or sulphur trioxide | g/m ³ | 0.1 | Dry, 273 K, 101.3 kPa | <p>Condition closed in a previous audit. The nominated monitoring locations were at the former Ray Beddoe Treatment Plant.</p> | <p>Not Triggered</p> |
| Pollutant | Units of measure | 100 percentile limit | Reference conditions | | | | | | | | | | | | |
| Nitrogen oxides | g/m ³ | 0.35 | Dry, 273 K, 101.3 kPa, 7% O ₂ | | | | | | | | | | | | |
| Sulphuric acid mist and/or sulphur trioxide | g/m ³ | 0.1 | Dry, 273 K, 101.3 kPa | | | | | | | | | | | | |
| | Destruction Efficiency | | | | | | | | | | | | | | |
| 80 | <p>30. 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 1.</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 | <p>Condition closed in a previous audit. The nominated monitoring locations were at the former Ray Beddoe Treatment Plant.</p> | <p>Not Triggered</p> | | | | |
| Parameter | Units of measure | Lower limit | Reference conditions | | | | | | | | | | | | |
| Volatile organic compound (VOC) destruction efficiency | % | 98 | N/A | | | | | | | | | | | | |
| | Combustion Parameters | | | | | | | | | | | | | | |

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|---|---|--|---|----------------|------------------|---|----|-----------|---------------|----------------|-----|------------|---------------|--|---------------|-----|--|---------------|
| 81 | <p>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 | <p>Condition closed in a previous audit. The nominated monitoring locations were at the former Ray Beddoe Treatment Plant.</p> | Not Triggered | | | |
| Parameter | Units of measure | Lower limit | Averaging period | | | | | | | | | | | | | | | |
| Residence time | s | 0.6 | Instantaneous | | | | | | | | | | | | | | | |
| Temperature | °C | 760 | Instantaneous | | | | | | | | | | | | | | | |
| Site Specific Emission Concentration Limit | | | | | | | | | | | | | | | | | | |
| 82 | <p>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> | <p>Condition closed in a previous audit. The nominated monitoring locations were at the former Ray Beddoe Treatment Plant.</p> | Not Triggered | | | | | | | | | | | | | | | |
| 83 | <p>The emission concentration limits shall be developed in accordance with the <i>Approved Methods and Guidance for the Modelling and Assessment of Air Pollutants in NSW</i> 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>Sulfuric acid mist and/or sulfur trioxide (as SO₃)</td> <td>27</td> <td>3 minutes</td> <td>99.9</td> </tr> <tr> <td rowspan="2">Sulfur dioxide</td> <td>712</td> <td>10 minutes</td> <td>100</td> </tr> <tr> <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 | Sulfur dioxide | 712 | 10 minutes | 100 | 570 | 1 hour | 100 | <p>Condition closed in a previous audit. The nominated monitoring locations were at the former Ray Beddoe Treatment Plant.</p> | Not Triggered |
| 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 | | | | | | | | | | | | | | | |
| Sulfur dioxide | 712 | 10 minutes | 100 | | | | | | | | | | | | | | | |
| | 570 | 1 hour | 100 | | | | | | | | | | | | | | | |
| Monitoring Records | | | | | | | | | | | | | | | | | | |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
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| 84 | 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. | Monitoring requirements were limited to the Leak Detection and Repair Program undertaken to address Conditions R4.1-4.3 of Environment Protection Licence 12003. The auditor sighted the Annual Leak Detection and Repair Summary Report for the following reporting periods and noted compliance with the requirements of this condition: 1. 22 December 2014 - 11 December 2015 (report date 11 December 2015); and 2. 22 December 2013 - 21 December 2014 (report date 16 February 2015). | Compliant |
| 85 | The monitoring required under this consent for the concentration of a pollutant emitted to the air, shall be carried out in accordance with: | Leak detection monitoring was undertaken in accordance with US EPA Method 21 - Determination of Volatile Organic Compound Leaks (40 CFR Part 60, Appendix A, Method 21). | Compliant |
| | (a) any methodology which is required under the POEO Act to be used for the testing of the concentration of the pollutant; or | | Compliant |
| | (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 | | Compliant |
| | (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. 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 . | | Compliant |
| 86 | All records required to be kept by the licence shall be: | Monitoring requirements were limited to the Leak Detection and Repair Program undertaken to address Conditions R4.1-4.3 of Environment Protection Licence 12003. The auditor sighted the Annual Leak | Compliant |
| | (a) in a legible form, or in a form that can readily be reduced to a legible form; | | Compliant |
| | (b) kept for at least four years after the monitoring or event to which they relate took place; and | | Compliant |

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| | (c) produced in a legible form to any authorised officer of the EPA who asks to see them. | Detection and Repair Summary Report for the following reporting periods and noted compliance with the requirements of this condition: 1. 22 December 2014 - 11 December 2015 (report date 11 December 2015); and 2. 22 December 2013 - 21 December 2014 (report date 16 February 2015). | Compliant |
| 87 | The following records shall be kept in respect of any samples required to be collected: | Monitoring requirements were limited to the Leak Detection and Repair Program undertaken to address Conditions R4.1-4.3 of Environment Protection Licence 12003. The auditor sighted the Annual Leak Detection and Repair Summary Report for the following reporting periods and noted compliance with the requirements of this condition: 1. 22 December 2014 - 11 December 2015 (report date 11 December 2015); and 2. 22 December 2013 - 21 December 2014 (report date 16 February 2015). | Compliant |
| | (a) the date(s) on which the sample was taken; | | Compliant |
| | (b) the time(s) at which the sample was taken; | | Compliant |
| | (c) the point at which the sample was taken; and | | Compliant |
| | (d) the name of the person who collected the sample. | | Compliant |
| | Requirement to Monitor Concentrations of Pollutants Discharged | | |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|--|---|----------------------------|-------------------|-----------|-----------------|-------------------------------|---------|---|--------|-------|-----------------|---|-----|--------|------|-----------------|---------|-------------------|--------|-------|---------------------------------|---------|---|--------|-------|---------------------------------|---------|---------|--------|-------|-----------------|---|------------------|--------|-------|-----------------------|---------|---|--------|-------|----------------|---|------------------|--------|------|---|---|------------------|--------|------|-------------|---------|----|--------|------|---|----|------------|------|--------------------------|---|-------------------|-------------------|-------------------|----------|---------|-----|--------|------|----------------------------------|---------|-----|--------|------|----------------------|---------|-------------------|--------|------|---|-------------------|------------|-------|---|----------------------|
| 88 | <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</p> <p>Note: Units of measure, frequency and sampling method to be approved by the EPA in writing.</p> <table border="1" data-bbox="302 619 974 1249"> <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 rowspan="2">temperature</td> <td>1 and 3</td> <td>°C</td> <td>Annual</td> <td>TM-2</td> </tr> <tr> <td>2</td> <td>°C</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 rowspan="2">volumetric flow rate</td> <td>1 and 3</td> <td>m³/s</td> <td>Annual</td> <td>TM-2</td> </tr> <tr> <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/m ³ | 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/m ³ | Annual | TM-11 | oxygen in stack gases | 1 and 3 | % | Annual | TM-25 | sulfur dioxide | 1 | g/m ³ | Annual | TM-4 | sulfuric acid mist and/or sulfur trioxide | 1 | g/m ³ | Annual | TM-3 | temperature | 1 and 3 | °C | Annual | TM-2 | 2 | °C | Continuous | TM-2 | tertiary butyl mercaptan | 4 | Note ¹ | Note ¹ | Note ¹ | 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 | m ³ /s | Annual | TM-2 | 2 | m ³ /s | Continuous | CEM-6 | <p>Condition closed in a previous audit.</p> <p>The nominated monitoring locations were at the former Ray Beddoe Treatment Plant.</p> | <p>Not Triggered</p> |
| 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/m ³ | 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/m ³ | Annual | TM-11 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| oxygen in stack gases | 1 and 3 | % | Annual | TM-25 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| sulfur dioxide | 1 | g/m ³ | Annual | TM-4 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| sulfuric acid mist and/or sulfur trioxide | 1 | g/m ³ | Annual | TM-3 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| temperature | 1 and 3 | °C | Annual | TM-2 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | 2 | °C | Continuous | TM-2 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| tertiary butyl mercaptan | 4 | Note ¹ | Note ¹ | Note ¹ | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 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 | m ³ /s | Annual | TM-2 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | 2 | m ³ /s | Continuous | CEM-6 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 89 | <p>The selection of sampling positions is to be carried out in accordance with test method TM-1.</p> | <p>Condition closed in a previous audit.</p> <p>The nominated monitoring locations were at the former Ray Beddoe Treatment Plant.</p> | <p>Not Triggered</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|---|---|---------------|
| | Community Consultative Committee | | |
| 90 | The Applicant shall establish a Community Consultative Committee to oversee the environmental performance of the development. This Committee shall: | The auditor sighted the minutes of the Community Consultative Committee and noted compliance with the requirements of this condition. | Compliant |
| | (a) be chaired by an independent chairperson approved by the Director-General in consultation with the Applicant, Wollondilly Council and Camden Council; | | Compliant |
| | (b) have four community representatives residing in the PAL 1 area; | It is noted that PAL 1 did not exist during the audit period. | Not Triggered |
| | (c) have one representative from each council; | The auditor sighted the minutes of the Community Consultative Committee and noted compliance with the requirements of this condition. | Compliant |
| | (d) two representatives appointed by the Applicant (including the environmental officer); | | Compliant |
| | (e) two (2) representatives from a recognized environmental group; | | Compliant |
| | (f) meet at least quarterly; | | Compliant |
| | (g) take minutes of the meeting; and | | Compliant |
| | (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. | | Compliant |
| | Representatives from relevant government agencies or other individuals may be invited to attend meetings as required by the Chairperson. | | Compliant |
| 91 | The Applicant shall: | The auditor sighted the minutes of the Community Consultative Committee and presentations to the committee and noted compliance with the requirements of this condition. | Compliant |
| | (a) provide the Committee with regular information on the environmental performance and management of the development; | | Compliant |
| | (b) ensure that the Committee has reasonable access to the necessary plans to carry out its functions; | All documentation relating to the CCC is available on the CGP website and correspondence was sighted from the Chair of CCC (21/10/14) verifying that this arrangement is acceptable to the government agencies. | Compliant |
| | (c) consider the recommendations and comments of the Committee and provide a response to the Committee and Director-General; | | Compliant |
| | (d) provide access for site inspections by the Committee; | | Compliant |
| | (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 | | Compliant |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|---|---|---------------|
| | (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. | | Compliant |
| 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. 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. | Condition not triggered during the audit period. | Not triggered |
| | SCHEDULE 4 | | |
| | MANDATORY CONDITIONS FOR ALL EPA LICENCES | | |
| | ADMINISTRATIVE CONDITIONS | | |
| | Other activities | | |
| | (To be used on licences with ancillary activities) This licence applies to all other activities carried on at the premises, including: i Gas wells and gathering system. | The auditor inspected the RPGP and a sample of well sites and noted the activities undertaken to be consistent with this condition. | Compliant |
| | OPERATING CONDITIONS | | |
| | Activities must be carried out in a competent manner | | |
| | Licensed activities must be carried out in a competent manner. This includes: | Competence is demonstrated through defined roles and responsibilities, training, and assurance, as detailed below: | Compliant |
| | (a) the processing, handling, movement and storage of materials and substances used to carry out the | | Compliant |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|--|--|-----------|
| | (b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity. | <p>1. Roles and responsibilities - Defined in the EMP (March 2016) and position descriptions. The position description of the Gas Plant Operator (16/12/12) was sighted by the auditor and noted to include a requirement to achieve regulatory compliance and adhere to the EMP.</p> <p>2. Training - The auditor sighted the site specific and role-specific induction program that is delivered to all AGL employees and contractors (Rapid Induct). The program includes relevant risks and controls as detailed in the EMP. During the audit period, role-specific training was delivered on Leak Detection and Repair (28/04/16) and the Pollution Incident Response Management Plan (29/04/16).</p> <p>3. Audit and inspection - Sub Plan compliance audits were undertaken monthly to assess implementation of control measures.</p> | Compliant |
| | Maintenance of plant and equipment | | |
| | All plant and equipment installed at the premises or used in connection with the licensed activity: | The auditor sighted the following systems and documents demonstrating compliance with the requirements of this condition: | Compliant |
| | (a) must be maintained in a proper and efficient condition; and | 1. Preventative Maintenance - The preventative maintenance of plant and equipment is managed through the MEX system. The system effectively monitors maintenance requirements based on the use of plant and equipment. | Compliant |
| | (b) must be operated in a proper and efficient manner. | <p>2. Monitoring - Daily and weekly checks are undertaken of vehicles and documented on the 'Vehicle Checklist'.</p> <p>3. Procedures - Standard Operating Procedures have been developed to guide commonly undertaken activities.</p> <p>4. Leak Detection and Repair Program - Refer to EPL 12003.</p> <p>A 'Compliance - Improvement Recommended' finding was reported against this condition in the 2012-2014 Independent Environmental Audit (22/01/15). The auditor noted that 40% of planned maintenance tasks were overdue. This matter has been adequately addressed. During the site inspection it was noted that 3% of planned maintenance tasks were overdue.</p> | Compliant |
| | MONITORING AND RECORDING CONDITIONS | | |
| | Recording of pollution complaints | | |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|---|---|---------------|
| | 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 auditor sighted Consultation Manager, a software program used for managing stakeholder engagement, including complaints. Records retained within Consultation Manager comply with the requirements of this condition. | Compliant |
| | The record must include details of the following: | | Compliant |
| | (a) the date and time of the complaint; | There were no complaints associated with this Development Consent during the audit period. | Compliant |
| | (b) the method by which the complaint was made; | | Compliant |
| | (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; | | Compliant |
| | (d) the nature of the complaint; | | Compliant |
| | (e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and | | Compliant |
| | (f) if no action was taken by the licensee, the reasons why no action was taken. | | Compliant |
| | The record of a complaint must be kept for at least 4 years after the complaint was made. | The auditor sighted complaint records within Consultation Manager (a software program used for managing stakeholder engagement, including complaints). Prior to 2013, a Complaints Register was maintained which was also sighted by the auditor. The Consultation Manager records and the historical Complaints Register demonstrate compliance with the requirements of this condition. | Compliant |
| | The record must be produced to any authorised officer of the EPA who asks to see them. | Condition not triggered during the audit period. | Not Triggered |
| | Telephone complaints line | | |
| | 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. | The auditor sighted the CGP website and noted the inclusion of a telephone line, contact and feedback form. The website notes that the purpose of the telephone line is for complaints and enquiries. The auditor contacted the telephone line during the audit and was satisfied with the handling process. | Compliant |
| | 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. | | Compliant |
| | This condition does not apply until 3 months after this condition takes effect. | | Compliant |
| | REPORTING CONDITIONS | | |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|--|---|-----------|
| | Annual Return documents | | |
| | What documents must an Annual Return contain? | | |
| | The licensee must complete and supply to the EPA an Annual Return in the approved form comprising: | The auditor sighted the December 2014 and December 2015 Annual Returns and noted compliance against the requirements of this condition. | Compliant |
| | (a) a Statement of Compliance; and | | Compliant |
| | (b) a Monitoring and Complaints Summary. | | Compliant |
| | A copy of the form in which the Annual Return must be supplied to the EPA accompanies this licence. Before the end of each reporting period, the EPA will provide to the licensee a copy of the form that must be completed and returned to the EPA. | | Compliant |
| | Period covered by Annual Return | | |
| | An Annual Return must be prepared in respect of each reporting period, except as provided below. 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. | The auditor sighted the December 2014 and December 2015 Annual Returns and noted compliance against the requirements of this condition. | Compliant |
| | Where this licence is transferred from the licensee to a new licensee, | The auditor sighted the public register under section 308 of the <i>Protection of the Environment Operations Act 1997</i> and noted that no licences were surrendered by AGL or revoked by the EPA or the Minister during the audit period. | Compliant |
| | (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 | | Compliant |
| | (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. Note: An application to transfer a licence must be made in the approved form for this purpose. | | Compliant |
| | Where this licence is surrendered by the licensee or revoked by the EPA 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: | The auditor sighted the public register under section 308 of the <i>Protection of the Environment Operations Act 1997</i> and noted that no licences were surrendered by AGL or revoked by the EPA or the Minister during the audit period. | Compliant |
| | (a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or | | Compliant |
| | (b) in relation to the revocation of the licence – the date from which notice revoking the licence operates. | | Compliant |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|--|--|---------------|
| | Deadline for Annual Return | | |
| | The Annual Return for the reporting period must be supplied to the EPA 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'). | A 'Non-Compliance Level 2' was reported against this condition in the 2012-2014 Independent Environmental Audit (22/01/15). The auditor noted that the 2011/2012 Annual Return was submitted after the 60-day period. The auditor sighted the December 2014 and December 2015 Annual Returns and cover letters and noted that the returns were submitted within 60 days of the end of the reporting period. | Compliant |
| | Notification where actual load cannot be calculated | | |
| | (Licences with assessable pollutants) 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 EPA in writing as soon as practicable, and in any event not later than the due date. The notification must specify: | Condition not triggered during the audit period. | Not Triggered |
| | (a) the assessable pollutants for which the actual load could not be calculated; and | | Not Triggered |
| | (b) the relevant circumstances that were beyond the control of the licensee. | | Not Triggered |
| | Licensee must retain copy of Annual Return | | |
| | The licensee must retain a copy of the annual return supplied to the EPA for a period of at least 4 years after the annual return was due to be supplied to the EPA. | The auditor sighted Annual Returns submitted in the previous four years and noted compliance with the requirements of this condition. | Compliant |
| | 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: | The auditor sighted the December 2014 and December 2015 Annual Returns and noted compliance against the relevant requirements of this condition. | Compliant |
| | (a) the licence holder; or | | Compliant |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|--|---|---------------|
| | (b) by a person approved in writing by the EPA to sign on behalf of the licence holder. A person who has been given written approval to certify a Statement of Compliance under a licence issued under the Pollution Control Act 1970 is taken to be approved for the purpose of this condition until the date of first review this licence. | | Compliant |
| | Notification of environmental harm | | |
| | Note: The licensee or its employees must notify the EPA 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 | The auditor sighted the Environmental Incidents Report for the audit period and noted that there were no incidents causing or threatening material harm to the environment. | Compliant |
| | Notifications must be made by telephoning the EPA's Pollution Line service on 131 555. | | Compliant |
| | The licensee must provide written details of the notification to the EPA within 7 days of the date on which the incident occurred. | | Compliant |
| | Written report | | |
| | Where an authorised officer of the EPA suspects on reasonable grounds that: | It was reported by AGL that the EPA did not request any written reports during the audit period with respect to this development consent. | Not Triggered |
| | (a) where this licence applies to premises, an event has occurred at the premises; or | | Not Triggered |
| | (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, 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. | | Not Triggered |
| | The licensee must make all reasonable inquiries in relation to the event and supply the report to the EPA within such time as may be specified in the request. | | Not Triggered |
| | The request may require a report which includes any or all of the following information: | | Not Triggered |
| | (a) the cause, time and duration of the event; | | Not Triggered |
| | (b) the type, volume and concentration of every pollutant discharged as a result of the event; | | Not Triggered |
| | (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 | | Not Triggered |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|---|--|---------------|
| | (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; | | Not Triggered |
| | (e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants; | | Not Triggered |
| | (f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and | | Not Triggered |
| | (g) any other relevant matters. | | Not Triggered |
| | The EPA 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 EPA within the time specified in the request. | | Not Triggered |
| | 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 auditor sighted a copy of the licence at the premises. | Compliant |
| | The licence must be produced to any authorised officer of the EPA who asks to see it. | | Compliant |
| | 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. | | Compliant |

B2. DA 246-8-2002-i

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|---|---|--------------|
| | Schedule 3 | | |
| | Conditions of Consent | | |
| | Obligation to Minimise Harm to the Environment | | |
| 1 | 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>An EMS has been developed and implemented to manage environmental risks and achieve performance improvements. The EMS consists of an EMP, Sub Plans and a compliance management system.</p> <p>A number of controls are in place to monitor and measure implementation of the EMS including Environmental Management Sub Plan Compliance Audits, Daily Workover Reports, Monthly Dam Inspection Reports, air quality monitoring and noise monitoring. The auditor sighted a sample of monitoring controls and noted compliance with the requirements of the EMP.</p> <p>Compliance obligations arising from licences, leases, environmental/ planning approvals and legislation are monitored through a web-based database compliance management system (CMO Compliance). The auditor sighted CMO Compliance and determined that the tool effectively monitors compliance against obligations.</p> <p>A 'Compliance - Improvement Recommended' was reported against this condition in the 2012-2014 Independent Environmental Audit (22/01/15). The auditor recommended that each condition within CMO Compliance be checked to ensure it accurately reflects the documented consent. This matter has been adequately addressed.</p> | Compliant |
| | Terms of Approval | | |
| 2 | The Applicant shall carry out the development generally in accordance with the: | It was reported by AGL that the development is undertaken in accordance with the EMP and Sub Plans which reflect the requirements of the Consent Conditions. On receipt of an approved consent or modification, the EMP is reported to be revised to reflect the new requirements. This was evidenced by the frequent revision history of the document. | Not Verified |
| | (a) DA submitted to the Department on 2 August 2002; and | | Not Verified |
| | (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; | | Not Verified |

B2. DA 246-8-2002-i

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding | |
|-----|---|---|---|--------------|
| | (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; | The DA and subsequent modifications were submitted by Sydney Gas and as such were not available for the purpose of this assessment. | Not Verified | |
| | (d) Conditions of the consent for DA No. 15-1-2002-I dated 23 July 2002; | Refer to DA15-1-2002 for an assessment of compliance. | Note | |
| | (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; and | It was reported by AGL that the development is undertaken in accordance with the EMP and Sub Plans which reflect the requirements of the Consent Conditions. On receipt of an approved consent or modification, the EMP is reported to be revised to reflect the new requirements. This was evidenced by the frequent revision history of the document. | Not Verified | |
| | (f) Modification Application DA246-8-2002-I MOD2 and “Camden Gas Project: Kay Park and Loganbrae Gas Gathering Line Modification Project Statement of Environmental Effects’, dated July 2008; and | | Not Verified | |
| | (g) Modification Application DA 246-8-2002i MOD 3 titled “Camden Gas Project – Modification KP06 SIS to Directional”, dated October 2008; and | | The DA and subsequent modifications were submitted by Sydney Gas and as such were not available for the purpose of this assessment. | Not Verified |
| | (h) Modification Application DA 246-8-2002-I MOD 4 titled “Camden Gas Project: Proposed modification for Development Consent 246-8-2002-i-KP06 SIS well”, dated February 2011 | | Not Verified | |
| | (i) Conditions of this consent. | | Refer to relevant conditions for an assessment of compliance. | Note |
| | 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. | Condition noted. | Note | |
| | Period of Approval | | | |
| 3 | This approval is for a period of twenty one (21) years from the date of granting of the production lease. | Condition not triggered during the audit period. | Not Triggered | |
| | Special Condition of Approval | | | |
| 3A. | 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. | Condition closed in a previous audit. | Not Triggered | |
| | Redrilling and Refracking Management Plan | | | |
| 4 | For the purposes of this consent the redrilling and/or additional fracing of a well does not constitute wellhead maintenance. | Condition not triggered during the audit period. It was reported by AGL (AEPR 2014-2015, 15/10/15 and AEPR 2015-2016, 31/10/16) that there were no re-drilling or fracing activities undertaken during the audit period. | Not Triggered | |

B2. DA 246-8-2002-i

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-------------------|--|--|---------------|
| 5 | The Applicant shall obtain the approval of the Director-General for the redrilling and/or additional fracing of a well. | Condition not triggered during the audit period. It was reported by AGL (AEPR 2014-2015, 15/10/15 and AEPR 2015-2016, 31/10/16) that there were no re-drilling or fracing activities undertaken during the audit period. | Not Triggered |
| 6 | The Applicant shall prepare and submit to the Director-General a Redrilling and Refracing 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 refracing of an existing well. | Condition not triggered during the audit period. It was reported by AGL (AEPR 2014-2015, 15/10/15 and AEPR 2015-2016, 31/10/16) that there were no re-drilling or fracing activities undertaken during the audit period. | Not Triggered |
| 7 | The Applicant shall give written notification of the proposed redrilling/refracing work to potentially affected residences and other noise sensitive receivers at least fourteen days prior to work commencing. | Condition not triggered during the audit period. It was reported by AGL (AEPR 2014-2015, 15/10/15 and AEPR 2015-2016, 31/10/16) that there were no re-drilling or fracing activities undertaken during the audit period. | Not Triggered |
| Compliance | | | |
| 8 | Throughout the life of the development, the Applicant shall secure, renew, maintain, and comply with all the relevant statutory approvals applying to the development. | <p>The auditor sighted the EMP and noted the inclusion of legislative requirements, including reporting requirements, approvals, licences, permits and leases.</p> <p>Compliance obligations arising from licences, leases, environmental/ planning approvals and legislation are monitored through a web-based database compliance management system (CMO Compliance). The auditor sighted CMO Compliance and determined that the tool effectively monitors compliance against obligations.</p> <p>It is noted that there were no reported environmental incidents during the audit period.</p> <p>A 'Compliance - Improvement Recommended' was reported against this condition in the 2012-2014 Independent Environmental Audit (22/01/15). The auditor recommended that each condition within CMO Compliance be checked to ensure it accurately reflects the documented consent. This matter has been adequately addressed.</p> | Compliant |

B2. DA 246-8-2002-i

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|---|---|---------------|
| 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. | The EMP (March 2016) details the training framework including induction programs and role-specific training. The online induction system (Rapid Induct), includes relevant risks and controls as detailed in the EMP. Records and competency assessments are maintained within Rapid Induct and the system includes adequate controls to ensure induction currency is maintained. In addition, job specific training was delivered during the audit period on Leak Detection and Repair (28/04/16) and the Pollution Incident Response Management Plan (29/04/16). The auditor sighted the above training programs and attendance records. | Compliant |
| | Production Operations Plan | | |
| 10 | The Applicant shall prepare a Production Operations Plan (POP) for the approval of the DOPE. 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: | The auditor sighted the POP, Version 9 (09/12/15) and noted compliance with the requirements of this condition. The POP was approved by the Department of Industry, Resources and Energy on 12/01/16 and provided to the DPE on 15/01/16. | Compliant |
| | (a) ongoing operations and environmental management; and | | Compliant |
| | (b) ongoing monitoring of the development. A copy of the POP shall be forwarded to the Department within fourteen days of the DOPE's acceptance. | | Compliant |
| | Environmental Management Plan | | |
| 11 | 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. | Condition closed in a previous audit. | Not Triggered |
| | Condition Report | | |

B2. DA 246-8-2002-i

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|--|---|---------------|
| 12 | The Applicant shall prepare a Condition Report on residences and structures that may be potentially affected by drilling/fracking work, including the redrilling and refracking 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 DOPE after completion of the work. | Condition was not triggered during the audit period. It was reported by AGL (AEPR 2014-2015, 15/10/15 and AEPR 2015-2016, 31/10/16) that there were no drilling or fracking activities undertaken during the audit period. | Not Triggered |
| | Incident Reporting | | |
| 13 | The Applicant shall notify the DECC, DOPE 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 | The auditor sighted the Pollution Incident Response Management Plan (PIRMP) and Emergency Response Plan (20/11/15) for the CGP and noted compliance with the requirements of this condition. | Compliant |
| | Applicant shall provide written details of the incident to the Director-General, the DECC, DOPE, and Wollondilly Council within seven days of the date on which the incident occurred. | There were no externally reported environmental incidents associated with this Development Consent during the audit period. | Compliant |
| 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. | Condition not triggered during the audit period. | Not Triggered |
| | Complaints Register | | |
| 15 | 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: | The auditor sighted Consultation Manager, a software program used for managing stakeholder engagement, including complaints. Records retained within Consultation Manager comply with the requirements of this condition. | Compliant |
| | (a) the date and time, where relevant of the complaint; | | Compliant |
| | (b) the means by which the complaint was made; | | Compliant |
| | (c) any personal details of the complainant that were provided, or if no details were provided, a note to that effect; | There were no complaints associated with this Development Consent during the audit period. | Compliant |
| | (d) the nature of the complaints; | | Compliant |
| | (e) any action(s) taken by the Applicant in relation to the complaint, including any follow-up contact with the complainant; and | | Compliant |
| | (f) if no action was taken by the Applicant in relation to the complaint, the reason(s) why no action was taken. | | Compliant |

B2. DA 246-8-2002-i

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|--|--|---------------|
| | 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. | | Compliant |
| | Annual Environmental Performance Reporting | | |
| 16 | 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. | Condition closed in a previous audit. | Not Triggered |
| | Independent Environmental Audit | | |
| 17 | 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. | The scope of this Independent Environmental Audit satisfies this condition. | Compliant |
| | Noise – Well Maintenance | | |
| 18 | The Applicant shall apply all feasible and reasonable noise mitigation measures to planned well maintenance activities Department of Planning DA No. 246-8-2002-I Page 7 of 11 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: | The auditor sighted the Noise Management Sub Plan (April 2016) and noted compliance with the requirements of this condition. It was reported by AGL that there were no well maintenance activities undertaken during the audit period with respect to DA246-8-2002. | Not Triggered |
| | (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; | | Not Triggered |
| | (b) documenting and implementing any specific work practices the Applicant will employ to limit noise; | | Not Triggered |
| | (c) documenting the feasible and reasonable noise mitigation measures that will be undertaken to reduce noise impacts from planned well maintenance activities; and | | Not Triggered |
| | (d) conducting noise monitoring where appropriate. | | Not Triggered |
| | Noise and Fracture Stimulation Impacts | | |

B2. DA 246-8-2002-i

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|---|--|---------------|
| 19 | The Applicant shall implement management practices as necessary to minimise the potential noise impacts from any drilling and fracture stimulation works. These management practices are to include, but not be limited to: | The auditor sighted the Noise Management Sub Plan (April 2016) and noted compliance with the requirements of this condition. It was reported by AGL that there were no drilling or fracture stimulation works undertaken during the audit period. | Not Triggered |
| | (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; | | Not Triggered |
| | (b) predicting potential noise levels from the proposed well drilling and fracture stimulation methods where appropriate; | | Not Triggered |
| | (a) identifying and implementing all reasonable and feasible noise mitigation measures to reduce any drilling noise impacts; | | Not Triggered |
| | (b) documenting and implementing any specific work practices the Applicant will employ to limit noise; | | Not Triggered |
| | (c) conducting noise monitoring where appropriate; and | | Not Triggered |
| | (d) appropriately informing affected residences and other relevant parties at least two weeks in advance of any drilling and fracture stimulation works with a view to negotiating a mutually beneficial time to schedule fracture stimulation works. | | Not Triggered |
| | Construction Hours | | |
| 19A | 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 8.00am and 1.00pm Saturdays, unless inaudible at any residential receiver. Note: Inaudible means that the construction activity cannot be heard by the human ear at the nearest affected residential receiver. | The auditor sighted the Noise Management Sub Plan (April 2016) and noted compliance with the requirements of this condition. It was reported by AGL that there were no construction works undertaken during the audit period with respect to DA246-8-2002. | Not Triggered |
| | Construction Noise Criteria for SIS and Directional Wells | | |

B2. DA 246-8-2002-i

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding | | | | | | | | | | |
|------------------------------|---|---|---|--|--------------------------|------------------------|------------------|----|----|----|----|---|---------------|
| 19B | <p>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"> <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 | <p>The auditor sighted the Noise Management Sub Plan (April 2016) and noted compliance with the requirements of this condition. It was reported by AGL that there were no drilling or construction works undertaken during the audit period with respect to DA246-8-2002.</p> | Not Triggered |
| 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 | | | | | | | | | |
| Water Quality Impacts | | | | | | | | | | | | | |
| 20 | <p>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> | <p>The auditor sighted the EMP (March 2016) and Soil and Water Management Sub Plan (May 2016). The plans detail a number of controls to prevent the pollution of water.</p> <p>There were no reportable water pollution incidents during the audit period.</p> | Compliant | | | | | | | | | | |
| Waste Water | | | | | | | | | | | | | |
| 21 | <p>Waste water from the construction, installation and operation of wells and associated infrastructure shall only be applied to the following areas:</p> | <p>The auditor sighted the AGL Environmental Footprint spreadsheet for the financial years 2014/15 and 2015/16 which note that produced water was primarily reused by external industries. To a lesser extent, produced water was reused during workover activities. The auditor sighted a sample of disposal records generated during the audit period and reconciled against the Environmental Footprint. There were no errors or omissions identified.</p> | Compliant | | | | | | | | | | |
| | (a) dust suppression on any unsealed roads within the site; | | Compliant | | | | | | | | | | |
| | (b) irrigated onto pastures within the site; | | Compliant | | | | | | | | | | |
| | (c) evaporation dam; and | | Compliant | | | | | | | | | | |
| | (d) reinjection into gas wells. | | Compliant | | | | | | | | | | |
| | <p>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> | Condition not triggered during the audit period. | Not Triggered | | | | | | | | | | |

B2. DA 246-8-2002-i

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|---|--|---------------|
| 22 | Spray from waste water application shall not drift beyond the boundary of the waste water utilisation area to which it is applied. | <p>Condition not triggered during the audit period.</p> <p>The auditor sighted the AGL Environmental Footprint spreadsheet for the financial years 2014/15 and 2015/16 which notes that produced water was primarily reused by external industries. To a lesser extent, produced water was reused during workover activities. The auditor sighted a sample of disposal records generated during the audit period and reconciled against the Environmental Footprint. There were no errors or omissions identified.</p> | Not Triggered |
| 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>Condition not triggered during the audit period.</p> <p>The auditor sighted the AGL Environmental Footprint spreadsheet for the financial years 2014/15 and 2015/16 which notes that produced water was primarily reused by external industries. To a lesser extent, produced water was reused during workover activities. The auditor sighted a sample of disposal records generated during the audit period and reconciled against the Environmental Footprint. There were no errors or omissions identified.</p> | Not Triggered |
| 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 $\mu\text{S}/\text{cm}$. | <p>Condition not triggered during the audit period.</p> <p>The auditor sighted the AGL Environmental Footprint spreadsheet for the financial years 2014/15 and 2015/16 which notes that produced water was primarily reused by external industries. To a lesser extent, produced water was reused during workover activities. The auditor sighted a sample of disposal records generated during the audit period and reconciled against the Environmental Footprint. There were no errors or omissions identified.</p> | Not Triggered |
| | Dust | | |

B2. DA 246-8-2002-i

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|--|---|---------------|
| 25 | 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. | <p>The auditor sighted the Air Quality Management Sub Plan (April 2016) and noted the inclusion of adequate dust management controls.</p> <p>The auditor sighted the complaints register for the CGP and noted that there were no dust related complaints during the audit period in relation to this Development Consent.</p> <p>There were no excavation works undertaken during the audit period that were associated with this Development Consent.</p> | Compliant |
| 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. | <p>The auditor sighted the Air Quality Management Sub Plan (April 2016) and noted compliance with the requirements of this condition.</p> <p>The auditor sighted the complaints register for the CGP and noted that there were no dust related complaints during the audit period in relation to this Development Consent.</p> | Compliant |
| 27 | The Applicant shall take all practicable measures to minimise the generation of wind-blown dust from soil stockpiles. | Condition not triggered during the audit period. | Not triggered |
| | Gas Gathering System Pipeline | | |
| 28 | The Applicant shall comply with the following in the construction of the gas gathering system pipeline: | The auditor sighted the EMP (March 2016) and Flora and Fauna Management Sub Plan (April 2016) and noted compliance with the requirements of this condition. | Not Triggered |
| | (a) excavated trenches shall not be left uncovered overnight, unless adequate fencing and warning lights are erected; | | Not Triggered |
| | (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; | It was reported by AGL (AEPR 2014-2015, 15/10/15 and AEPR 2015-2016, 31/10/16) that there were no gas gathering system construction works undertaken during the audit period with respect to DA246-8-2002. | Not Triggered |
| | (c) trenches are to be restored and reseeded with local grass seeds on completion of the work; | | Not Triggered |
| | (d) local council traffic guidelines in respect of work carried out on road verges and underneath roads shall be implemented; | | Not Triggered |
| | (e) the pipeline shall be constructed in accordance with the AS 3723-1989; and | | Not Triggered |
| | (f) the Department shall be notified on the completion of any trenching works. | | Not Triggered |
| | Threatened Species | | |

B2. DA 246-8-2002-i

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|---|---|---------------|
| 28A | 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: | Condition not triggered during the audit period. | Not Triggered |
| | (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 | | Not Triggered |
| | (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. | | Not Triggered |
| | Heritage | | |
| 28B | 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. | Condition not triggered during the audit period. | Not Triggered |
| | Site Rehabilitation | | |
| 29 | 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 minimize the generation of wind erosion dust. | Condition not triggered during the audit period. | Not Triggered |
| 30 | The Applicant shall carry out rehabilitation of the site in accordance with the requirements of the DOPE and the Site Rehabilitation Management Plan. | Condition not triggered during the audit period. | Not Triggered |
| | Community Consultative Committee | | |
| 31 | 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). | The auditor sighted the minutes of the Community Consultative Committee and noted compliance with the requirements of this condition. | Compliant |
| | Environment Protection Licence | | |
| 32 | 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. | Condition closed in a previous audit. | Not Triggered |

B3. DA 282-6-2003

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|--|---|--------------|
| | Schedule 3 | | |
| | Administrative Conditions | | |
| | Obligation to Minimise Harm to the Environment | | |
| 1 | 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>An EMS has been developed and implemented to manage environmental risks and achieve performance improvements. The EMS consists of an EMP, Sub Plans and a compliance management system.</p> <p>A number of controls are in place to monitor and measure implementation of the EMS including Environmental Management Sub Plan Compliance Audits, Daily Workover Reports, Monthly Dam Inspection Reports, air quality monitoring and noise monitoring. The auditor sighted a sample of monitoring controls and noted compliance with the requirements of the EMP.</p> <p>Compliance obligations arising from licences, leases, environmental/ planning approvals and legislation are monitored through a web-based database compliance management system (CMO Compliance). The auditor sighted CMO Compliance and determined that the tool effectively monitors compliance against obligations.</p> <p>A 'Compliance - Improvement Recommended' was reported against this condition in the 2012-2014 Independent Environmental Audit (22/01/15). The auditor recommended that each condition within CMO Compliance be checked to ensure it accurately reflects the documented consent. This matter has been adequately addressed.</p> | Compliant |
| | Terms of Approval | | |
| 2 | The Applicant shall carry out the development generally in accordance with the: | It was reported by AGL that the development is undertaken in accordance with the EMP and Sub Plans which reflect the requirements of the Consent Conditions. On receipt of an approved consent or modification, the EMP is reported to be revised to reflect the new requirements. This was evidenced by the frequent revision history of the document. | Not Verified |
| | (a) DA submitted to the Department on 20 June 2003; | | Not Verified |
| | (b) <i>Camden Gas Project Stage II– Environmental Impact Statement for the Sydney Gas Company</i> (four volumes), dated 19 June 2003; | | Not Verified |
| | (c) All other documents listed in Appendix C; | | Not Verified |

B3. DA 282-6-2003

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|--|---|--------------|
| | (d) Drawings No. 32339 SK010 Issue 17 and SK014 Issue 1 ; and URS Plan LC-0100 Revision G dated 16 June 2004; | The DA and subsequent modifications were submitted by Sydney Gas and as such were not available for the purpose of this assessment. | Not Verified |
| | (e) 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 II – Modification Application</i> , and the accompanying attachments; | | Not Verified |
| | (f) 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) Pty Ltd and Sydney Gas (Camden) Operations Pty Ltd, dated April 2006; | | Not Verified |
| | (g) 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) Pty Ltd and Sydney Gas (Camden) Operations Pty Ltd, and dated September 2006; | | Not Verified |
| | (h) The modification application submitted to the Department on 16 October 2006 and the accompanying document <i>Camden Gas Project Joint Venture Statement of Environmental Effects Proposed SIS Well Project (GL15)</i> prepared by AGL Gas Production (Camden) Pty Ltd and Sydney Gas (Camden) Operations Pty Ltd, and dated October 2006; | | Not Verified |
| | (i) Modification Application MOD 11-2-2007 and <i>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</i> , dated February 2007; | | Not Verified |
| | (j) Modification Application MOD 26-3-2007 and <i>Camden Gas Project Joint Venture Gas Well and Gathering Line Modification Project Statement of Environmental Effects</i> , dated March 2007; | | Not Verified |
| | (k) Modification Application 282-6-2003 MOD 9, the Statement of Environmental Effects titled <i>Camden Gas Project Joint Venture – EM39 and GL17 Modification Project</i> 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; | | Not Verified |

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| | (l) Modification Application 282-6-2003 MOD 10, the Statement of Environmental Effects titled, <i>Camden Gas Project: Rosalind Park Access Road and Gas Gathering Line Modification</i> dated December 2008 and letter from Cubbitch Barta Native Title Claimants Aboriginal Corporation to Biosis Research Pty Ltd, dated 22 October, 2008; and | | Not Verified |
| | (m) Modification Application 282-6-2003 MOD 11, the letter titled, <i>Camden Gas Project – AGL Modification to Gas Gathering Line</i> dated September 2009 and letter from Biosis Research Pty Ltd, dated 12 June, 2009; | | Not Verified |
| | (n) the modification application DA 282-6-2003i MOD 12 and accompanying letter prepared by AGL Energy Limited, dated 31 May 2010; and | | Not Verified |
| | (o) Conditions of this consent. | Refer to relevant conditions for an assessment of compliance. | Note |
| 3 | If there is any inconsistency between the above documents, the most recent document shall prevail to the extent of the inconsistency. However, the conditions of this consent shall prevail to the extent of any inconsistency. | Condition noted. | Note |
| 4 | The Applicant shall comply with any reasonable requirement/s of the Director-General arising from the Department's assessment of: | Condition not triggered during the audit period. | Not Triggered |
| | (a) Any reports, plans or correspondence that are submitted in accordance with this consent; and | | Not Triggered |
| | (b) The implementation of any actions or measures contained in these reports, plans or correspondence | | Not Triggered |
| | Limits of Approval | | |
| 5 | This approval shall lapse twenty one (21) years from the granting of the production lease. | Condition not triggered during the audit period. | Not Triggered |
| 6 | The Applicant shall not exceed the maximum production capacity of 14.5 petajoules per annum, from the gas treatment plant. | The auditor sighted the Annual Return spreadsheet for the periods ending 21 December 2014 and 21 December 2015 and noted compliance with the requirements of this condition. AGL reported production of 4.78 petajoules for the period ending 21 December 2014 and 4.52 petajoules for the period ending 21 December 2015. | Compliant |
| 6A. | 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. | Condition closed in a previous audit. | Not Triggered |
| | Special Conditions of Approval | | |

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| 7 | The Applicant must in the opinion of the DECCW be a fit and proper person to hold a licence under the <i>Protection of the Environment Operations Act 1997</i> , having regard to the matters in s83 of that Act. | AGL has not had a licence suspended or revoked during the audit period and as such would be considered to be a fit and proper person. | Compliant |
| 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 <i>Protection of the Environment Operations Act 1997</i> , the Applicant must submit, to the DECCW's Manager Sydney Industry PO Box 668 Parramatta 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. | Condition not triggered during the audit period. | Not Triggered |
| 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. | Based on a review of the dates of the consent and modifications, it is noted that no further wells are permitted to be drilled. It was reported that there were no drilling works undertaken during the audit period. Activities were limited to the operation of wells, gas gathering lines and the Rosalind Park Gas Plant. | Compliant |
| 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). | Condition closed in a previous audit. | Not Triggered |

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| 11 | <p>The Applicant shall run verticality logs for new gas wells located within coal exploration titles.</p> <p>Note: The Petroleum Production Lease that may be granted by the DII 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.</p> | Condition not triggered during the audit period. | Not Triggered |
| | Further Approvals | | |
| 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. | <p>As part of the 2010-2012 Independent Environmental Audit, the auditor <u>previously</u> reviewed the list of gas wells provided by AGL against the development consent and modifications and determined that the development was compliant against the requirements of this condition.</p> <p>It was reported by AGL (AEPR 2014-2015, 15/10/15 and AEPR 2015-2016, 31/10/16) that there were no wells drilled during the audit period.</p> | Compliant |
| | Structural Adequacy | | |
| 13 | 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. | Condition not triggered during the audit period. | Not Triggered |
| | (a) Under Part 4A of the EP&A Act, the Applicant is required to obtain construction and occupation certificates for the proposed building works. | | Not Triggered |
| | (b) Part 8 of the EP&A Regulation sets out the detailed requirements for the certification of development. | | Not Triggered |
| | (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. | | Not Triggered |
| | Public Infrastructure | | |
| 14 | The Applicant shall: | AGL reported that there was no damage to public infrastructure as a result of operations during the audit period. | Not Triggered |
| | (a) Repair, or pay the full costs associated with repairing any existing public infrastructure that is damaged by the development; | | Not Triggered |

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| | (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 | The auditor inspected a number of well sites including AP01, LB05, RP03, RP05, RP11, LB07 and MP25 and did not identify any damage to public infrastructure. | Not Triggered |
| | (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. | | Not Triggered |
| | Note: The Applicant may be required to apply to Sydney Water for a Section 73 Compliance Certificate under the <i>Sydney Water Act 1994</i> and to meet Sydney Water's reasonable requirements. | | Not Triggered |
| | Location of Gas Wells and Gas Gathering Systems | | |
| 15 | 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. | Condition closed in a previous audit. | Not Triggered |
| 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. | Condition closed in a previous audit. | Not Triggered |
| 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. | Condition closed in a previous audit. | Not Triggered |
| | Compliance | | |
| 18 | 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: | Condition closed in a previous audit. | Not Triggered |

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| | (a) All commitments and initiatives (environmental, social, economic or project related) that the Applicant has agreed or suggested to implement for this development; | | Not Triggered |
| | (b) Timeframe for implementation of the commitment or initiative; | | Not Triggered |
| | (c) The responsibility for ensuring that the commitment or initiative is implemented in the manner and timeframe provided by the Applicant; and | | Not Triggered |
| | (d) A reference to the document or correspondence that the commitment or initiative was stated by the Applicant. | | Not Triggered |
| 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. | Condition closed in a previous audit. | Not Triggered |
| 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. | Condition closed in a previous audit. | Not Triggered |
| | SCHEDULE 4 | | |
| | SPECIFIC ENVIRONMENTAL CONDITIONS | | |
| | VISUAL AMENITY | | |
| | Visual Performance | | |
| 1 | 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). | The auditor sighted the plan "Camden Gas Project Stage 2: Vegetation and Landscape Management Plan" Drawing No LC-0100 Revision G (16 June 2004) prepared by URS for Sydney Gas. An inspection was conducted of the RGP and it was noted that vegetation is largely being maintained in accordance with the plan. | Compliant |

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| 2 | <p>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.</p> <p>Note: The Applicant where practicable should aim to use darker paint colours on the facilities (such as a 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).</p> | Condition closed in a previous audit. | Not Triggered |
| 3 | <p>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.</p> | Condition closed in a previous audit. | Not Triggered |
| | Lighting Performance | | |
| 4 | <p>The Applicant shall take all practicable measures to minimise any off-site lighting impacts from the development.</p> | Condition closed in a previous audit. | Not Triggered |
| 5 | <p>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 <i>Australian Standard 4282 – 1997 Control of the Obtrusive Effects of Outdoor Lighting</i>.</p> | Condition closed in a previous audit. | Not Triggered |
| 6 | <p>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):</p> | Condition closed in a previous audit. | Not Triggered |
| | <p>(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;</p> | | Not Triggered |

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| | (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; | | Not Triggered |
| | (c) Plan titled Lighting Review to Minimise Obtrusive Light to Mount Gilead Homestead – Drawing No. S5397-E001 prepared by Bassett dated October 2003; | | Not Triggered |
| | (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; | | Not Triggered |
| | (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 | | Not Triggered |
| | (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. | | Not Triggered |
| 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. | Condition closed in a previous audit. | Not Triggered |
| 8 | The Applicant must ensure that wherever possible, any scheduled use of the flare occurs during daylight hours. | The auditor sighted relevant journal entries completed by the Operations Manager and verified that there was no scheduled use of the flare during the audit period. | Compliant |
| 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. | Condition closed in a previous audit. It was reported by AGL that the design of the flare pit remained consistent during the audit period. | Compliant |
| 10 | The Applicant shall report on the effectiveness of the lighting controls in the AEPR. | The auditor sighted the AEPR 2014-2015 (15/10/15) and AEPR 2015-2016 (31/10/16) and noted that the reports comply with the requirements of this condition. | Compliant |

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| 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: | The auditor sighted the AEPR 2014-2015 (15/10/15) and AEPR 2015-2016 (31/10/16) and noted the inclusion of all relevant information on the operation of the flare. This information is derived from the SCADA system which records the inlet pressure. In the event that the inlet pressure exceeds 400KPA during plant shutdown, a flaring event occurs. The auditor sighted the SCADA system records and verified the information publicly reported. | Compliant |
| | (a) date and time of each flare event; | | Compliant |
| | (b) duration of each flare event; | | Compliant |
| | (c) whether the flare operated during daylight or night-time hours; | | Compliant |
| | (d) the cause for the operation of the flare; | | Compliant |
| | (e) the number of compressor engines that have been commissioned and operating during the period; and | | Compliant |
| | (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. | The information required by Condition 11(f) is not currently included in the AEPR. However, it was noted that the use of the flare has decreased since commissioning. | Compliant |
| | Landscaping design | | |
| 12 | The site shall be landscaped as shown on the Landscape Design and this landscaping shall be maintained for the life of the development. | The auditor sighted the plan "Camden Gas Project Stage 2: Vegetation and Landscape Management Plan" Drawing No LC-0100 Revision G (16 June 2004) prepared by URS for Sydney Gas. An inspection was conducted of the RGP and it was noted that vegetation is largely being maintained in accordance with the plan. Following an independent audit in 2014 (Distinctive Living Design) which determined that the RGP landscaping measures were adequate, the DPE confirmed that the 2016 audit is not required (04/08/16). | Compliant |
| | Vegetation and Landscape Management Plan | | |
| 13 | 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: | The auditor sighted the Vegetation and Landscape Management Plan, Proposed Gas Treatment Plant, URS (28 June 2004) and noted that the Plan conforms with the requirements of this condition. Implementation of the Plan occurred prior to the audit period. | Compliant |
| | (a) reasonable measures to protect mature trees as part of the well drilling, gas gathering system and Treatment Plant Site construction activities; | | Compliant |

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| | (b) a landscape strategy detailing the design and proposed planting of trees and shrubs to be undertaken; | Following an independent audit in 2014 (Distinctive Living Design) which determined that the RGP landscaping measures were adequate, the DPE confirmed that the 2016 audit is not required (04/08/16). There were no drilling or construction activities conducted during the audit period. | Compliant |
| | (c) ensuring that tree and shrub species used for landscaping of the site are indigenous to the locality; | | Compliant |
| | (d) details of a program to ensure that all landscaped areas are maintained in a tidy, healthy state; | | Compliant |
| | (e) measures intended to maximise the screening of infrastructure from views from the Mt Gilead property through planting and other measures; | | Compliant |
| | (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; | | Compliant |
| | (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; | | Compliant |
| | (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; | | Compliant |
| | (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; | | Compliant |
| | (j) reasonable measures to ensure that mature trees within the riparian corridor along Menangle Creek are retained and protected; | | Compliant |
| | (k) details of proposed screening works including supplementary planting along the border of the site with Menangle Creek; | | Compliant |
| | (l) reasonable measures to minimise the impacts of the gas wells on the cultural heritage landscape of the EMAI; | | Compliant |
| | (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 | | Compliant |

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| | (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. | | Compliant |
| | 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. | | Compliant |
| 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> <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> | The auditor sighted correspondence from the DPE (04/08/16) confirming that the 2016 independent audit is not required. | <p>Not Triggered</p> <p>Not Triggered</p> <p>Not Triggered</p> <p>Not Triggered</p> <p>Not Triggered</p> <p>Not Triggered</p> <p>Not Triggered</p> |

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| 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. | The auditor sighted the trees adjacent to the southern boundary of the RPGP which screen the premises from the Mt Gilead Homestead and noted that trees have been adequately maintained. | Compliant |
| | (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. | | Compliant |
| 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. | Condition closed in a previous audit. | Not Triggered |
| 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. | The auditor sighted the trees adjacent to the southern boundary of the RPGP which screen the premises from the Mt Gilead Homestead and noted that trees have been adequately maintained. | Compliant |
| | Independent Audit | | |
| 18 | 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: | The auditor sighted correspondence from the DPE (04/08/16) confirming that the 2016 independent audit is not required. | Not Triggered |

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| | (a) Be conducted by an independent landscape expert who is suitably qualified and experienced and whose appointment has been approved by the Director-General; | | Not Triggered |
| | (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; | | Not Triggered |
| | (c) Review the adequacy of the Vegetation and Landscape Management Plan; | | Not Triggered |
| | (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 | | Not Triggered |
| | (e) Be submitted to the Director-General; and | | Not Triggered |
| | (f) Be implemented to the satisfaction of the Director-General. | | Not Triggered |
| 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. | The auditor sighted correspondence from the DPE (04/08/16) confirming that the 2016 independent audit is not required. | Not Triggered |
| | Landscape Planting Plan – Rosalind Park Access Road | | |
| 19A. | 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: | Condition closed in a previous audit. | Not Triggered |
| | (a) details of the landscaping measures along the road and visual bund; | | Not Triggered |
| | (b) measures to manage and maintain the landscaping; and | | Not Triggered |
| | (c) describe the construction rehabilitation measures. | | Not Triggered |
| 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: | The auditor sighted correspondence from the DPE (04/08/16) confirming that the 2016 independent audit is not required. | Not Triggered |

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| | (a) be conducted by a suitably qualified, experienced and independent person(s) whose appointment has been approved by the Director-General; | | Not Triggered |
| | (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; | | Not Triggered |
| | (c) review the adequacy of the Landscape Planting Plan; | | Not Triggered |
| | (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 | | Not Triggered |
| | (e) be submitted and implemented to the satisfaction of to the Director-General. | | Not Triggered |
| | 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. | | Not Triggered |
| | FLORA AND FAUNA | | |
| | Raptor Breeding Zones at EMAI | | |
| 20 | 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 by AGL in the AEPR (31/10/16) that construction and drilling activities were limited to the installation of a new section of gas gathering line between WG04 and WG01. The area of construction was not within 100 metres of the Raptor Breeding Zones. The Raptor Breeding Zones are located on the EMAI property which is approximately 2km from the gas gathering line works. | Compliant |
| 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. | Condition not triggered during the audit period. It was reported by AGL (AEPR 2014-2015, 15/10/15 and AEPR 2015-2016, 31/10/16) that there were no drilling or fracking works undertaken during the audit period. | Not Triggered |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
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| 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. 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. | Condition not triggered during the audit period. | Not Triggered |
| | Flora and Fauna Protection Measures | | |
| 23 | The Applicant shall implement best practice flora and fauna management. | The auditor sighted the Flora and Fauna Management Sub Plan (April 2016) and Rehabilitation and Landscape Management Sub Plan (April 2016). The plans comply with the requirements of this condition. It was noted that no drilling or well construction works were undertaken under this Development Consent during the audit period. | Compliant |
| 24 | The Applicant shall take all practicable measures to minimise potential flora and fauna impacts of the proposed development. | The auditor sighted the Flora and Fauna Management Sub Plan (April 2016) and Rehabilitation and Landscape Management Sub Plan (April 2016). The plans comply with the requirements of this condition. It was noted that no drilling or well construction works were undertaken under this Development Consent during the audit period. | Compliant |
| 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. | It was reported by AGL that the gas gathering line constructed during the audit period (WG04 to WG01) was initiated and completed on the same day. | Not Verified |
| 26 | The Applicant shall not remove mature trees as part of this development unless otherwise agreed by the Director-General. | The auditor sighted the Flora and Fauna Management Sub Plan (April 2016) and noted compliance with the requirements of this condition. | Compliant |
| 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. | Condition not triggered during the audit period. | Not Triggered |
| 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. | Condition closed in a previous audit. | Not Triggered |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|------|--|---|---------------|
| | Threatened Species | | |
| 28A. | 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: | Condition not triggered during the audit period. | Not Triggered |
| | (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 | | Not Triggered |
| | (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. | | Not Triggered |
| 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: | The auditor sighted the AEPR 2014-2015 (15/10/15) and the AEPR 2015-2016 (31/10/16) and noted that there were no drilling or construction works undertaken during the audit period. | Not Triggered |
| | (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 | | Not Triggered |
| | (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. | | Not Triggered |
| | NOISE | | |
| | Noise Impact Assessment Criteria | | |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding | | | | | | | | | | | | | | | | | | | |
|--|---|--|------------------------------|-----------------------------|-------------------|-------------------|------------------------------|------------------------------|------------------------------|--|---------------------------|----|----|----|-------------|----------------------|----|----|----|--|---|-----------|
| 29 | <p>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" data-bbox="315 395 909 533"> <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_{Aeq}(15 minute)</th> <th>L_{Aeq}(15 minute)</th> <th>L_{Aeq}(15 minute)</th> <th>L_{A1}(15 minute)</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 _{Aeq} (15 minute) | L _{Aeq} (15 minute) | L _{Aeq} (15 minute) | L _{A1} (15 minute) | R1 Medhurst Street Gilead | 35 | 35 | 35 | 45 | R7 Mt. Gilead Gilead | 37 | 36 | 36 | 45 | <p>The auditor sighted the following quarterly noise assessment reports prepared by Wilkinson Murray for the Rosalind Park Gas Plant:</p> <ol style="list-style-type: none"> 30 October 2014 31 December 2014 31 March 2015 13 July 2015 23 October 2015 22 December 2015 11 April 2016 30 June 2016 <p>It was noted that the monitoring conducted on 8 September 2015 (report dated 23 October 2015) and 15 June 2016 (report dated 30 June 2016) at location R7 (Mt Gilead) exceeded the relevant noise limit of 36dBA by 1dB. However, Wilkinson Murray reported (in accordance with the NSW Industrial Noise Policy) that compliance with the licence condition was indeterminate on the basis that the result did not exceed the noise limit by more than 2dBA.</p> <p>Flaring events did not coincide with monitoring undertaken by external consultants and as such there were no measurements obtained.</p> | Compliant |
| Receiver Location | Day | | Evening | Night | Flaring (anytime) | | | | | | | | | | | | | | | | | |
| | L _{Aeq} (15 minute) | L _{Aeq} (15 minute) | L _{Aeq} (15 minute) | L _{A1} (15 minute) | | | | | | | | | | | | | | | | | | |
| R1 Medhurst Street Gilead | 35 | 35 | 35 | 45 | | | | | | | | | | | | | | | | | | |
| R7 Mt. Gilead Gilead | 37 | 36 | 36 | 45 | | | | | | | | | | | | | | | | | | |
| 29A. | <p>Noise from the operation of EM39 and GL17 shall not exceed the noise limits in the table below:</p> <table border="1" data-bbox="327 1018 938 1134"> <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_{Aeq}</th> <th>dBA L_{Aeq}</th> <th>dBA L_{Aeq}</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 _{Aeq} | dBA L _{Aeq} | dBA L _{Aeq} | All residential receivers except R22 and R26 | Project-Specific | 40 | 40 | 38 | R22 and R26 | Project-Specific | 43 | 42 | 37 | <p>The auditor sighted the following internal noise monitoring reports completed by AGL during the audit period:</p> <ol style="list-style-type: none"> EM39 (16/09/14) - day EM39 (24/12/15) - evening GL05 (15/09/14) - day (Note that GL05 is located adjacent to GL17) <p>It was reported by AGL that well sites were not audible during the monitoring.</p> <p>A ' Compliance - Opportunity for Improvement' was reported against this condition in the 2012-2014 Independent environmental Audit (22/01/15). The auditor recommended that night-time noise measurements be obtained. This matter has been adequately addressed.</p> | Compliant | |
| Receiver Location | Noise Criteria | | | Day | Evening | Night | | | | | | | | | | | | | | | | |
| | | dBA L _{Aeq} | dBA L _{Aeq} | dBA L _{Aeq} | | | | | | | | | | | | | | | | | | |
| All residential receivers except R22 and R26 | Project-Specific | 40 | 40 | 38 | | | | | | | | | | | | | | | | | | |
| R22 and R26 | Project-Specific | 43 | 42 | 37 | | | | | | | | | | | | | | | | | | |

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|--------------------------------|--|---|-----------------------------------|-----------------------------------|-----------------------------------|-----------------------------------|---------------------------------|--------------------------|-------------|-------------|----|----|----|-----------------|------------|----|----|----|----------------|----------------|------------|----|----|----|--------------------------------|------------------|-------------|-------------|----|----|----|-----------------|------------|----|----|--------|----------------|----------------|------------|----|----|----|--------------------------------|--|--------------|
| 30 | For the purposes of condition 29, 29A and 31: | The monitoring reports sighted by the auditor with respect to conditions 29, 29A and 31 comply with the requirements of this condition. | Compliant | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | (a) Day is defined as the period from 7am to 6pm Monday to Saturday and 8am to 6pm Sundays and Public holidays; | | Compliant | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | (b) Evening is defined as the period 6pm to 10pm; | | Compliant | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | (c) Night is defined as the period from 10pm to 7am Monday to Saturday and 10pm to 8am Sundays and Public Holidays; and | | Compliant | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | (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. | | Compliant | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 31 | Noise from flaring events, must not exceed the noise limits in the table below: <table border="1" data-bbox="315 719 1014 1061"> <thead> <tr> <th>Location</th> <th>Duration of each Event</th> <th>Expected Type Of Event (2)</th> <th>Daytime L_{Aeq,15min}</th> <th>Evening L_{Aeq,15min}</th> <th>Night L_{Aeq,15min}</th> </tr> </thead> <tbody> <tr> <td rowspan="4">R1 Medhurst Street</td> <td>> 2.5 hours</td> <td>Spill Valve</td> <td>35</td> <td>35</td> <td>35</td> </tr> <tr> <td rowspan="2">15 min – 60 min</td> <td>Compressor</td> <td rowspan="2">40</td> <td rowspan="2">40</td> <td rowspan="2">35</td> </tr> <tr> <td>Blowdown (ESD)</td> </tr> <tr> <td rowspan="2">6 min – 15 min</td> <td>Compressor</td> <td rowspan="2">42</td> <td rowspan="2">42</td> <td rowspan="2">37</td> </tr> <tr> <td>Blowdown (shutdown and unload)</td> </tr> <tr> <td rowspan="4">R7 Mt. Gilead</td> <td>> 2.5 hours</td> <td>Spill Valve</td> <td>37</td> <td>36</td> <td>36</td> </tr> <tr> <td rowspan="2">15 min – 60 min</td> <td>Compressor</td> <td rowspan="2">42</td> <td rowspan="2">41</td> <td rowspan="2">40 (1)</td> </tr> <tr> <td>Blowdown (ESD)</td> </tr> <tr> <td rowspan="2">6 min – 15 min</td> <td>Compressor</td> <td rowspan="2">44</td> <td rowspan="2">43</td> <td rowspan="2">37</td> </tr> <tr> <td>Blowdown (shutdown and unload)</td> </tr> </tbody> </table> | Location | Duration of each Event | Expected Type Of Event (2) | Daytime L _{Aeq,15min} | Evening L _{Aeq,15min} | Night L _{Aeq,15min} | R1 Medhurst Street | > 2.5 hours | Spill Valve | 35 | 35 | 35 | 15 min – 60 min | Compressor | 40 | 40 | 35 | Blowdown (ESD) | 6 min – 15 min | Compressor | 42 | 42 | 37 | Blowdown (shutdown and unload) | R7 Mt. Gilead | > 2.5 hours | Spill Valve | 37 | 36 | 36 | 15 min – 60 min | Compressor | 42 | 41 | 40 (1) | Blowdown (ESD) | 6 min – 15 min | Compressor | 44 | 43 | 37 | Blowdown (shutdown and unload) | Flaring events did not coincide with monitoring undertaken by external consultants and as such there were no measurements obtained. It was reported by AGL that noise from flaring events was monitored following commissioning of the plant. The results were reportedly compliant with this condition and as such, no further monitoring was undertaken. It was noted that the use of the flare has decreased since commissioning and there were no noise complaints received during the audit period. | Not Verified |
| Location | Duration of each Event | Expected Type Of Event (2) | Daytime L _{Aeq,15min} | Evening L _{Aeq,15min} | Night L _{Aeq,15min} | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| R1 Medhurst Street | > 2.5 hours | Spill Valve | 35 | 35 | 35 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | 15 min – 60 min | Compressor | 40 | 40 | 35 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Blowdown (ESD) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | 6 min – 15 min | Compressor | 42 | 42 | 37 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Blowdown (shutdown and unload) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| R7 Mt. Gilead | > 2.5 hours | Spill Valve | 37 | 36 | 36 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | 15 min – 60 min | Compressor | 42 | 41 | 40 (1) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Blowdown (ESD) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | 6 min – 15 min | Compressor | 44 | 43 | 37 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Blowdown (shutdown and unload) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| 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 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 levels where applicable. | The monitoring reports sighted by the auditor with respect to conditions 29, 29A and 31 comply with the requirements of this condition. | Compliant |
| 33 | The noise emission limits identified in Conditions 29, 29A and 31 apply under meteorological conditions of: 1. Wind speed up to 3m/s at 10 metres above ground level; or 2. Temperature inversion conditions of up to 3°C/100m and wind speed up to 2m/s at 10 metres above the ground. | The monitoring reports sighted by the auditor with respect to conditions 29, 29A and 31 comply with the requirements of this condition. A 'Compliance - Improvement Recommended' was reported against this condition in the 2012-2014 Independent Environmental Audit (22/01/15). The auditor recommended that additional information on meteorological conditions is provided as part of noise monitoring reports. This matter has been adequately addressed. | Compliant |
| | Noise – Construction and Well Maintenance | | |
| 34 | 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: | The auditor sighted the Noise Management Sub Plan (April 2016) and noted compliance with the requirements of this condition. | Compliant |
| | (a) noise compliance standards; | Implementation was evidenced by the induction program (construction hours) and notification letters. | Compliant |
| | (b) community consultation; | | Compliant |
| | (c) advance notice to affected members of the community for planned well maintenance activities; | There were no noise complaints reported during the audit period in relation to this development consent. | Compliant |
| | (d) complaints handling monitoring/system; | | Compliant |
| | (e) site contact person to follow up complaints; | | Compliant |
| | (f) mitigation measures; | | Compliant |
| | (g) the design/orientation of the proposed mitigation methods demonstrating best practice; | | Compliant |
| | (h) construction times; | | Compliant |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding | | | | | | | | | | | | | | | |
|-------------------------------------|---|--|---|--|-----------------------------|---------------------------|-------------------------------------|--|---------------|----|----|--|---------------|----|----|----|--|---------------|
| | (i) contingency measures where noise complaints are received; and | | Compliant | | | | | | | | | | | | | | | |
| | (j) monitoring methods and program. | | Compliant | | | | | | | | | | | | | | | |
| 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: <table border="1" data-bbox="315 491 900 587"> <thead> <tr> <th>Receiver Location</th> <th>Night Time Noise Limit dB(A) L_{Aeq}</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) L_{Aeq} | Glenlee House | 35 | Menangle Park | 35 | Condition not triggered during the audit period. | Not Triggered | | | | | | | | | |
| Receiver Location | Night Time Noise Limit dB(A) L_{Aeq} | | | | | | | | | | | | | | | | | |
| Glenlee House | 35 | | | | | | | | | | | | | | | | | |
| Menangle Park | 35 | | | | | | | | | | | | | | | | | |
| 34B. | Noise from the drilling and construction of EM38 shall not exceed the sound pressure level (noise) limits in the table below: <table border="1" data-bbox="315 710 947 805"> <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>EM38 – nearest residential receiver</td> <td>54</td> <td>39</td> <td>39</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) | EM38 – nearest residential receiver | 54 | 39 | 39 | 35 | Condition not triggered during the audit period. | Not Triggered | | | | | |
| 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) | | | | | | | | | | | | | | |
| EM38 – nearest residential receiver | 54 | 39 | 39 | 35 | | | | | | | | | | | | | | |
| 34C. | Noise from the drilling and construction of EM39 and GL17 shall not exceed the sound pressure level (noise) limits in the table below: <table border="1" data-bbox="315 922 943 1018"> <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>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 (7.00am-1.00pm) | Saturday (1.00pm-6.00pm) Sunday (7.00am-6.00pm) | Evening (6.00pm-10.00pm) | Night (10.00pm-7.00am) | EM39 – R3 | 40 | 40 | 40 | 38 | GL17 – R3 | 40 | 40 | 40 | 38 | Condition not triggered during the audit period. | Not Triggered |
| 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) | | | | | | | | | | | | | | |
| EM39 – R3 | 40 | 40 | 40 | 38 | | | | | | | | | | | | | | |
| GL17 – R3 | 40 | 40 | 40 | 38 | | | | | | | | | | | | | | |
| | Noise – Drilling Impacts | | | | | | | | | | | | | | | | | |
| 35 | The Applicant shall implement management practices as necessary to minimise the potential noise impacts from drilling work at gas wells located on EMAI. These management practices are to include, but are not limited to: | The auditor sighted the Noise Management Sub Plan (April 2016) and noted compliance with the requirements of this condition. | Not Triggered | | | | | | | | | | | | | | | |
| | (a) identifying all potentially affected noise sensitive receivers (including residences of EMAI staff) that may be affected by drilling work at these wells; | It was reported by AGL (AEPR 2014-2015, 15/10/15 and AEPR 2015-2016, 31/10/16) that there were no re-drilling activities undertaken during the audit period. | Not Triggered | | | | | | | | | | | | | | | |
| | (b) predicting potential noise levels from the proposed well drilling methods where appropriate; | | Not Triggered | | | | | | | | | | | | | | | |

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| | (c) identifying and implementing all reasonable and feasible noise mitigation measures to reduce any drilling noise impacts; | | Not Triggered |
| | (d) documenting and implementing any specific work practices the Applicant will employ to limit noise; conducting noise monitoring where appropriate; and | | Not Triggered |
| | (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. | | Not Triggered |
| | Construction Hours | | |
| 36A. | 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. Note: Inaudible means that the construction activity cannot be heard by the human ear at the nearest affected residential receiver. | The auditor sighted the Noise Management Sub Plan (April 2016) and induction program and noted compliance with the requirements of this condition. AGL reported that there were no construction activities undertaken during the audit period with respect to DA282-6-2003. | Not Triggered |
| | Flare – Measures to Reduce Noise | | |
| 37 | The Applicant must implement the following noise mitigation options to prevent noise impacts from flare operation: | It was reported that there were no changes to flare noise mitigation measures during the audit period. The use of the flare has decreased since commencement of operations and there were no noise complaints associated with the flare during the audit period. | Compliant |
| | 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. | | Compliant |
| | Measures identified in the report Amendment to Statement of Evidence – Compressor Blow Down Systems by Gary Scott dated 11 June 2004. | | Compliant |
| | Operational Noise Management Plan | | |
| 38 | 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: | The auditor sighted the Noise Management Sub Plan (April 2016) and noted compliance with the requirements of this condition. Implementation was evidenced by the induction program (construction hours), quarterly noise monitoring, operational noise monitoring, noise | Compliant |
| | (a) identification of the potential sources of noise during drilling and operation; | | Compliant |

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|-----|--|---|-----------|
| | (b) the noise criteria for these activities; | barriers (RPGP) and low noise fan on compressor 2 (RPGP). | Compliant |
| | (c) details of what actions and measures would be implemented to ensure that these operations would comply with the relevant noise criteria; | A 'Compliance - Improvement Recommended' was reported against this condition in the 2012-2014 Independent Environmental Audit (22/01/15). The auditor recommended that Section 5.4 of the Noise Management Sub-Plan states that the Annual Environmental Performance Report is to be submitted to the Director-General. This matter has been adequately addressed. | Compliant |
| | (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 | | Compliant |
| | (e) describe what procedures would be followed to ensure compliance. | | Compliant |
| | Operating Conditions | | |
| 39 | The Applicant shall undertake the development in a way that minimises the noise generated by the development. | <p>The auditor sighted the Noise Management Sub Plan (April 2016) and noted compliance with the requirements of this condition.</p> <p>Implementation was evidenced by the induction program (construction hours), quarterly noise monitoring, operational noise monitoring, noise barriers (RPGP) and low noise fan on compressor 2 (RPGP).</p> <p>There were no noise complaints reported by AGL during the audit period.</p> | Compliant |
| | Monitoring | | |
| 40 | The Applicant must submit a noise compliance report to the DECCW 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 DECCW'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. | The auditor sighted the December 2014 and December 2015 Annual Returns and noted compliance against the requirements of this condition. | Compliant |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|---|--|-----------|
| 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. | The auditor sighted the following quarterly noise assessment reports prepared by Wilkinson Murray for the RPGP and noted compliance with the requirements of this condition: 1. 30 October 2014; 2. 31 December 2014; 3. 31 March 2015; 4. 13 July 2015; 5. 23 October 2015; 6. 22 December 2015; 7. 11 April 2016; and 8. 30 June 2016. | Compliant |
| 42 | The Applicant shall, by 31 January 2011, submit for the Director-General’s approval an integrated Noise Management Plan for Stage 1 and Stage 2 of the Camden Gas Project, which has been prepared in consultation with DECCW. Following approval, the plan must be implemented to the satisfaction of the Director-General. This Plan must: | The auditor sighted the Noise Management Sub Plan (April 2016) and noted compliance with the requirements of this condition. Following revision of the Noise Management Sub Plan in 2015, AGL requested feedback from the DPE on 17/04/15, 30/06/15 and 04/09/15. | Compliant |
| | (a) fully reflect the requirements of conditions of this consent and all other development consents and project approvals for Stage 1 and Stage 2 of the Camden Gas Project which apply to the management and monitoring of noise emissions; and | Implementation of the Sub Plan was demonstrated through quarterly noise monitoring (RPGP), induction training, and community notification of maintenance works. | Compliant |
| | (b) include a detailed noise monitoring protocol for evaluating compliance with the limits in conditions 29 and 31, which includes consideration of monitoring under meteorological conditions as required by condition 33 and recording of meteorological conditions during monitoring (including wind speed, wind direction and data suitable for quantifying the presence or otherwise of temperature inversions). | | Compliant |
| | Noise Monitoring Report - Flare | | |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|---|--|---------------|
| 43 | The Applicant must submit to the DECCW'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. | Condition closed in a previous audit. | Not Triggered |
| | The report must contain the following information: | | Not Triggered |
| | i A listing of each incident when the flare operated including the duration, gas discharge rate and cause of the incident; | | Not Triggered |
| | i The temperature and volume data for each flare event, as required by Condition 59; | | Not Triggered |
| | i The results of noise measurements for flare operation for each flare type event, as required by Condition 31, | | Not Triggered |
| | i The results of noise measurements for flare operation for each flare event for receivers at location R7; and | | Not Triggered |
| | i An assessment of compliance with noise limits provided in Condition 31. The noise monitoring must be undertaken in accordance with Condition 42. | | Not Triggered |
| | i Where noise levels do not comply with Condition 31, noise mitigation measures to ensure compliance. | | Not Triggered |
| | Modification to the control system to reduce gas flow at the flare is considered a practical noise mitigation measure. | | Not Triggered |
| | Redrilling and Refracting Management Plan | | |
| | Note: For the purposes of this consent the redrilling and/or additional fracing of a well does not constitute wellhead maintenance. | Condition noted. | Not Triggered |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|--|---|---------------|
| 44 | The Applicant shall obtain the prior approval of the Director-General for the redrilling and/or additional fraccing of a gas well. | Condition not triggered during the audit period. It was reported by AGL (AEPR 2014-2015, 15/10/15 and AEPR 2015-2016, 31/10/16) that there were no re-drilling or fraccing activities undertaken during the audit period with respect to DA282-6-2003. | Not Triggered |
| 45 | The Applicant shall prepare a Redrilling and Refraccing Management Plan in consultation with the DII for the redrilling and/or refraccing 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: | Condition not triggered during the audit period. It was reported by AGL (AEPR 2014-2015, 15/10/15 and AEPR 2015-2016, 31/10/16) that there were no re-drilling or fraccing activities undertaken during the audit period with respect to DA282-6-2003. | Not Triggered |
| | (a) a description of all the activities to be undertaken on the well site during the redrilling and/or refraccing work; | | Not Triggered |
| | (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; | | Not Triggered |
| | (c) reference to the relevant parts of the Environmental Management Plan required under conditions 1 and 2 (Schedule 5) of this consent; | | Not Triggered |
| | (d) compliance with all the relevant environmental performance requirements of this consent; and | | Not Triggered |
| | (e) arrangements for complaints handling procedures during the redrilling/refraccing work. | | Not Triggered |
| | The Applicant shall give written notification of the proposed redrilling/refraccing work to potentially affected residences and other noise sensitive receivers at least fourteen days prior to work commencing. | | Not Triggered |
| | VIBRATION | | |
| | Condition Report | | |
| 46 | The Applicant shall prepare a Condition Report for all residences or structures (including structures on EMAI) within 25 metres of a wellhead. | Condition not triggered during the audit period. It was reported by AGL (AEPR 2014-2015, 15/10/15 and AEPR 2015-2016, 31/10/16) that there were no re-drilling or fraccing activities undertaken during the audit period with respect to DA282-6-2003. | Not Triggered |
| | 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. | | Not Triggered |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding | | | | | | | | | | | | | | | | | | | | | |
|---------------------|--|--|------------------|-----------|------------------|--------|-----------------------|------------------|--------|----------------------|-----------------|--------|-----------------------|-----------------|--------|----------------------|---------------------|----------|----------------------|------------------|----------|------------------------|--|-----------|
| | A copy of the Condition Report shall be submitted to the Director-General and the DII after completion of the work. | | Not Triggered | | | | | | | | | | | | | | | | | | | | | |
| | AIR QUALITY | | | | | | | | | | | | | | | | | | | | | | | |
| | Air Emission Criteria | | | | | | | | | | | | | | | | | | | | | | | |
| 47 | <p>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" data-bbox="320 549 893 676"> <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 | <p>The auditor sighted the AGL spreadsheet, 'RPGP Emissions at Residence.xls'. The spreadsheet compares quarterly monitoring results against the EIS predicted emissions rates ((Sydney Gas Air Quality Assessment, June 2003). It was reported by AGL that the EIS predicted emission rates comply with the NSW Impact Assessment Criteria detailed in this condition. The auditor reviewed the calculation methodology and determined that compliance was demonstrated against the requirements of this condition.</p> <p>A 'Compliance - Improvement Recommended' was reported against this condition in the 2012-2014 Independent Environmental Audit (22/01/15). It was recommended that AGL prepare a spreadsheet to compare quarterly emission testing with target emission rates. This matter has been adequately addressed.</p> | Compliant |
| 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 | | | | | | | | | | | | | | | | | | | | | | |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|---|--|--|----------------------|----------------------|------------------|--------------------|-------------------|-----|--|--------------------|----------------|-------------------|---|-----------------------|--------------------|---|-------------------|-----|-----------------------|--------------------|-----------|------------------|----------------------|----------------------|------------------|--------------------|-------------------|-----|--|--------------------|----------------|-------------------|----|-----------------------|--------------------|---|-------------------|-----|-----------------------|--------------------|-----------|------------------|----------------------|----------------------|------------------|--------------------|-------------------|----|--|--------------------|----------------|-------------------|------|-----------------------|--------------------|---|-------------------|----|-----------------------|--------------------|--|-------------|
| 48 | <p>For each discharge point⁶ 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>5.1</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>5.1</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> | 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 | 5.1 | 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 | 5.1 | 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 | 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 | <p>A 'Non-Compliance Level 2' was reported against this condition in the 2012-2014 Independent Environmental Audit (22/01/15) due to an exceedence of nitrogen oxide emissions (Point 1). This matter has been adequately addressed.</p> <p>The auditor sighted the quarterly air monitoring results for the audit period prepared by Ektimo and Emission Testing Consultant. While the reports demonstrate compliance against the requirements of this condition, it is noted that the maximum allowable concentration of nitrogen oxides (sampling point 4) was recorded on a number of occasions during the audit period. It is recommended that operations be reviewed to ensure continued compliance with concentration limits.</p> | Observation |
| 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 | 5.1 | 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 | 5.1 | 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 | 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 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | <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.</p> | Condition not triggered during the audit period. | Not Triggered | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding | | | | | | | | | | | | |
|----------------|---|--|------------------|-------------|------------------|----------------|---|------|---------------|-------------|----|------|---------------|------------------|------|
| | <p>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. <p>This assessment must be undertaken in accordance with the document: <i>Approved Methods and Guidance for the Modelling and Assessment of Air Pollutants in NSW.</i></p> | Condition not triggered during the audit period. | Not Triggered | | | | | | | | | | | | |
| 49 | To avoid any doubt, the above Condition does not authorise the discharge or emission of any other pollutants. | Condition noted. | Not Triggered | | | | | | | | | | | | |
| | Combustion Parameters | | | | | | | | | | | | | | |
| 50 | <p>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> <p>Note: *TBD = To be determined</p> | Parameter | Units of measure | Lower limit | Averaging period | Residence time | S | *TBD | Instantaneous | Temperature | °C | *TBD | Instantaneous | Condition noted. | Note |
| Parameter | Units of measure | Lower limit | Averaging period | | | | | | | | | | | | |
| Residence time | S | *TBD | Instantaneous | | | | | | | | | | | | |
| Temperature | °C | *TBD | Instantaneous | | | | | | | | | | | | |
| | 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. | | Note | | | | | | | | | | | | |
| | Operating Conditions | | | | | | | | | | | | | | |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|--|---|-----------|
| 51 | The Applicant shall undertake the development and maintain the condition of the premises in a way that minimizes or prevents the emission of dust by the development. | <p>An inspection of the Rosalind Park Gas Plant was undertaken by the auditor and a number of dust mitigation controls were observed, including:</p> <ul style="list-style-type: none"> - Car park and access road are constructed with asphalt; - Plant walkways are constructed with asphalt and concrete; - Plant surrounds are sealed with a mix of shale and crushed sandstone (low dust); and - Speed limits on the site and access road are limited to 20km/hr. <p>The auditor sighted the Air Quality Management Sub-Plan (July 2015) and noted the inclusion of dust mitigation measures including the use of water carts where warranted, use of designated roads and access tracks, adherence to project vehicle speed limits and load covering procedures.</p> <p>There were no dust complaints associated with this development consent during the audit period.</p> | Compliant |
| 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 minimize the emissions of dust from the vehicles at all times. | <p>The auditor sighted the Air Quality Management Sub-Plan (July 2015) and noted the inclusion of load covering procedures.</p> <p>There were no dust complaints associated with this development consent during the audit period.</p> | Compliant |
| 53 | The Applicant shall take all practicable measures to minimize the generation of wind-blown dust from soil stockpiles. | <p>The auditor sighted the Air Quality Management Sub-Plan (July 2015) and noted compliance with the requirements of this condition.</p> <p>It was reported by AGL that there were no stockpiles generated during the audit period with respect to DA282-6-2003.</p> | Compliant |
| | Monitoring Locations | | |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|------------------------|---|--|--|-------------------------|-------------------------|---|--------------------------|------------------|---|---|--------------------------|------------------|--|---|--------------------------|------------------|--|---|--------------------------|------------------|--|---|--------------------------|------------------|---|---|--------------------------|------------------|---|---|--------------------------|------------------|---|---|-----------|
| 54 | <p>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.</p> <table border="1" data-bbox="322 416 1117 1123"> <thead> <tr> <th data-bbox="322 416 434 512">EPA Identification no.</th> <th data-bbox="434 416 620 448">Type of Monitoring Point</th> <th data-bbox="620 416 770 480">Type of Discharge Point</th> <th data-bbox="770 416 1117 448">Description of Location</th> </tr> </thead> <tbody> <tr> <td data-bbox="322 512 434 603">1</td> <td data-bbox="434 512 620 544">Air emissions monitoring</td> <td data-bbox="620 512 770 544">Discharge to air</td> <td data-bbox="770 512 1117 603">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 DECCW.</td> </tr> <tr> <td data-bbox="322 603 434 694">2</td> <td data-bbox="434 603 620 635">Air emissions monitoring</td> <td data-bbox="620 603 770 635">Discharge to air</td> <td data-bbox="770 603 1117 694">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 DECCW</td> </tr> <tr> <td data-bbox="322 694 434 785">3</td> <td data-bbox="434 694 620 726">Air emissions monitoring</td> <td data-bbox="620 694 770 726">Discharge to air</td> <td data-bbox="770 694 1117 785">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 DECCW..</td> </tr> <tr> <td data-bbox="322 785 434 876">4</td> <td data-bbox="434 785 620 817">Air emissions monitoring</td> <td data-bbox="620 785 770 817">Discharge to Air</td> <td data-bbox="770 785 1117 876">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 DECCW.</td> </tr> <tr> <td data-bbox="322 876 434 967">5</td> <td data-bbox="434 876 620 908">Air emissions monitoring</td> <td data-bbox="620 876 770 908">Discharge to Air</td> <td data-bbox="770 876 1117 967">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 DECCW.</td> </tr> <tr> <td data-bbox="322 967 434 1058">6</td> <td data-bbox="434 967 620 999">Air emissions monitoring</td> <td data-bbox="620 967 770 999">Discharge to Air</td> <td data-bbox="770 967 1117 1058">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 DECCW.</td> </tr> <tr> <td data-bbox="322 1058 434 1123">7</td> <td data-bbox="434 1058 620 1090">Air emissions monitoring</td> <td data-bbox="620 1058 770 1090">Discharge to Air</td> <td data-bbox="770 1058 1117 1123">Main Flare marked 'Flare' as shown on 'Camden Gas Project Site Plan Location of Emission Points' drawing number 4229DG06 (Rev 2) provided to the DECCW.</td> </tr> </tbody> </table> | EPA Identification no. | Type of 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 DECCW. | 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 DECCW | 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 DECCW.. | 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 DECCW. | 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 DECCW. | 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 DECCW. | 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 DECCW. | <p>The auditor sighted quarterly monitoring reports prepared by Ektimo and Emission Testing Consultant and noted that monitoring points 1 to 6 aligns with this condition. An inspection of the Rosalind Park Gas Plant was undertaken and monitoring points 1 to 7 were directly observed.</p> | Compliant |
| EPA Identification no. | Type of 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 DECCW. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 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 DECCW | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 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 DECCW.. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 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 DECCW. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 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 DECCW. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 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 DECCW. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 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 DECCW. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Testing Method – Concentration Limits | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 55 | <p>The Applicant shall ensure that monitoring for the concentration of a pollutant emitted to the air required to be conducted by the DECCW's General Terms of Approval, or a licence under the <i>Protection of the Environment Operations Act 1997</i>, in relation to the development or in order to comply with a relevant local calculation protocol is done in accordance with:</p> | <p>The auditor sighted quarterly monitoring reports prepared by Ektimo and Emission Testing Consultant and noted compliance with the requirements of this condition.</p> | Compliant | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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|-----|---|--|---------------|
| | (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 | | Compliant |
| | 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; | | Compliant |
| | c) or 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 DECCW for the purposes of that testing prior to the testing taking place. | | Compliant |
| | Note: The <i>Clean Air (Plant and Equipment) Regulation 1997</i> requires testing for certain purposes to be conducted in accordance with test methods contained in the publication <i>Approved Methods for the Sampling and Analysis of Air Pollutants in NSW</i> . | | Compliant |
| | Manufacturers Design Specification | | |
| 56 | At least 1 month prior to the commissioning of the Gas Treatment Plant, the Applicant shall submit to the DECCW's Manager Sydney Industry PO Box 668 Parramatta NSW 2124, a report containing Manufacturers Design Specifications for air emissions from each of the following: | Condition closed in a previous audit. | Not Triggered |
| | i compressor engine; | | Not Triggered |
| | i TEG Fire tube; and | | Not Triggered |
| | i Reboiler still column. | | Not Triggered |
| | The report must compare the Design Specifications with the limits specified in Condition 48 and 50 to demonstrate that compliance can be achieved. | | Not Triggered |
| | 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. | | Not Triggered |
| | Monitoring | | |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|--|--|---------------|
| 57 | 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 DECCW 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 DECCW Guideline Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales: 20 July 2001 or its latest version. | Condition closed in a previous audit. | Not Triggered |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|------------------------------------|--|--|------------------|-----------|-----------------|--------------------|-------------------|------------|-------|-------------|----|------------|------|----------|---|------------|-------|----------------------|-------------------|------------|-------|--------|---|------------|-------|-----------|------------------|-----------|-----------------|----------|-----|-----------|------|----------------------|-------------------|-----------|------|-------------|----|-----------|------|----------|---|-----------|-------|-----------------|-------------------|-----------|-------|---------------------------------|---------|-----------|-------|--------|---|-----------|-------|----------------|---|-----------|-------|--------------------|-------------------|-----------|-------|------------------------------------|-------------------|-----------|------|----------------|-------------------|-----------|------|---------------------------------|---|---|------|---|---------------------------------|
| 58 | <p>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" data-bbox="324 512 1108 655"> <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>PONTS 1, 2, 3, 4, 5</p> <table border="1" data-bbox="324 735 1108 1082"> <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> | 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 | <p>AGL management reported a non-compliance against this condition on 9 July 2012. Due to continuous emissions monitoring equipment failure, AGL remained non-compliant with this condition during the audit period. In response to this non-compliance AGL has entered into a Pollution Reduction Plan (PRP) for a Predictive Emissions System (PEMS) 6-month trial (EPL 12003, Condition U1.1).</p> | <p>Non-Compliant (low risk)</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 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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|---------------------------------|--|--|------------------|-----------|-----------------|----------|-----|-----------|------|----------------------|-------------------|-----------|------|-------------|----|-----------|------|----------|---|-----------|-------|-----------------|-------------------|-----------|-------|---------------------------------|---------|-----------|-------|--------|---|-----------|-------|----------------|---|-----------|-------|-------|----|-----------|------|---------------------------------|---|---|------|--|--|
| | <p>Points 6</p> <table border="1" data-bbox="324 357 1104 635"> <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>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.</p> <p>Note. The requirement for monitoring of emissions at Points 2 and 3 only applies after compressor engines 2 and 3 respectively, commence operations.</p> <p>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.</p> | 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 | | |
| 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 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 59 | Deleted. | Condition deleted. | Note | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Installation of Air Monitoring Points Report | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 60 | The Applicant must submit to the <i>DECCW's Manager Sydney Industry PO Box 668 Parramatta NSW 2124</i> 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: | Condition closed in a previous audit. | Not Triggered | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | (a) the compressor engines; | | Not Triggered | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | (b) TEG Fire Tube; | | Not Triggered | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | (c) Reboiler Still Column; and | | Not Triggered | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | (d) Carbon scrubber vent stack. | | Not Triggered | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | The report must contain the opinion of a qualified air emissions monitoring consultant advising whether the monitoring points comply with TM-1. | | Not Triggered | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|--|--|---------------|
| | Monitoring Program for Air Based Assessable Pollutants | | |
| 61 | The Applicant must submit to the <i>DECCW's Manager Sydney Industry PO Box 668 Parramatta NSW 2124</i> , 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. | Condition closed in a previous audit. | Not Triggered |
| | Requirement to Monitor Concentrations of Pollutants Discharged | | |
| 62 | The Applicant must submit to the <i>DECCW's Manager Sydney Industry PO Box 668 Parramatta NSW 2124</i> , 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 48 and Condition 59. The report must assess compliance with the limit conditions specified in Condition 48 and 50. The report must also include an assessment of flare operations and report on the results of continuous temperature monitoring and flaring incidents. Note: The objective of this condition is to demonstrate that the actual emissions are consistent with the design and the air emission limits specified in Condition 48. | Condition closed in a previous audit. | Not Triggered |
| | Quarterly Reporting of Air Emissions | | |
| 63 | 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 <i>DECCW's Manager Sydney Industry at PO Box 668 Parramatta, NSW, 2124</i> . The results must be received by the <i>DECCW</i> within one month of the date on which the sampling was undertaken for that quarter. | Condition not triggered during the audit period. | Not Triggered |
| | Odour | | |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|---|---|-----------|
| 64 | <p>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> | <p>The auditor sighted quarterly monitoring reports prepared by Ektimo and Emission Testing Consultant and noted that the quarterly monitoring of odour is undertaken from Point 6 (odourised carbon vent). There are no emissions limits set on odour through EPL12003 or this development consent.</p> <p>It is noted that mercaptan is stored in a negative pressure building with three stage charcoal air filtration, closed floor drain systems and self-closing doors. The building is entered daily to assess operations. In the event that the mercaptan bottle is changed, it was reported that the fire control central and local residents are notified of this activity.</p> <p>There were no odours evident on the site and there were no reported odour complaints recorded during the audit period.</p> | Compliant |
| 65 | <p>The Applicant must not cause the emission of detectable mercaptan odour from the premises. Note. Should odour emissions become an issue, the DECCW will consider requiring investigation and implementation of further odour control measures.</p> | <p>The auditor sighted quarterly monitoring reports prepared by Ektimo and Emission Testing Consultant and noted that the quarterly monitoring of odour is undertaken from Point 6 (odourised carbon vent). There are no emissions limits set on odour through EPL12003 or this development consent.</p> <p>It is noted that mercaptan is stored in a negative pressure building with three stage charcoal air filtration, closed floor drain systems and self-closing doors. The building is entered daily to assess operations. In the event that the mercaptan bottle is changed, it was reported that the fire control central and local residents are notified of this activity.</p> <p>There were no odours evident on the site and there were no reported odour complaints recorded during the audit period.</p> | Compliant |
| | SURFACE WATER TREATMENT | | |
| | Pollution of Waters | | |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|--|---|-----------|
| 66 | 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>The auditor sighted the EMP (March 2016) and Soil and Water Management Sub Plan (May 2016). The plans detail a number of controls to prevent the pollution of water.</p> <p>Implementation of the Sub Plan was demonstrated through the Minimum Environmental Controls Form. Commencing in 2015, this process includes the documentation of site specific controls as relevant to workover and plug and abandonment works. Periodic inspections are then undertaken to assess implementation and identify performance improvements.</p> <p>The auditor also sighted a sample of plug and abandonment works completed during the audit period and noted that there was no evidence of erosion.</p> <p>There were no reportable water pollution incidents during the audit period.</p> | Compliant |
| | Management of Waste Water | | |
| | 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. | Condition noted. | Note |
| | Operating Conditions | | |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding | | | | | | | | | | | | | | | | |
|-----------------------------|---|--|--|-------------------------|-------------------------|---|---|--|---|---|---|---|--|----|---|--|---|------------------|------|
| 67 | <p>The Applicant shall undertake the development in a way that minimises the potential surface water impacts of the development.</p> | <p>The auditor sighted the EMP (March 2016) and Soil and Water Management Sub Plan (May 2016). The plans detail a number of controls to prevent the pollution of surface water.</p> <p>Implementation of the Sub Plan was demonstrated through the Minimum Environmental Controls Form. Commencing in 2015, this process includes the documentation of site specific controls as relevant to workover and plug and abandonment works. Periodic inspections are then undertaken to assess implementation and identify performance improvements.</p> <p>The auditor also sighted a sample of plug and abandonment works completed during the audit period and noted that there was no evidence of erosion.</p> <p>Within the Rosalind Park Gas Plant, a diversion drain is in place around the site perimeter. Surface water generated on the site is captured in the stormwater drain.</p> <p>There were no reportable water pollution incidents during the audit period.</p> | Compliant | | | | | | | | | | | | | | | | |
| Monitoring Locations | | | | | | | | | | | | | | | | | | | |
| 68 | <p>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" data-bbox="311 1091 815 1305"> <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 DECCW.</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 DECCW.</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 DECCW.</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 DECCW. | 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 DECCW. | 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 DECCW. | Condition noted. | Note |
| 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 DECCW. | | | | | | | | | | | | | | | | |
| 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 DECCW. | | | | | | | | | | | | | | | | |
| 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 DECCW. | | | | | | | | | | | | | | | | |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--|---|--|--------------------|-----------|-----------------|------------------------|------|---------|----------------|---------------------------|------|---------|----------------|--------------|------|---------|----------------|--|------|---------|----------------|---------|------|---------|----------------|----------------------|------|---------|----------------|------------------------------|------|---------|----------------|-------------------------|-------|---------|----------------|------------------------|----|---------|--------------------|---|-----------|
| | Monitoring of Effluent Parameters | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 69 | <p>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 | The auditor sighted a sample of laboratory reports and AGL field records (measuring level in storage) and noted compliance with the requirements of this condition. | Compliant |
| 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 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 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. | Condition closed in a previous audit. | Not Triggered | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Monitoring Program for Water Based Assessable Pollutants | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 71 | The Applicant must at least one month prior to the completion of construction of the Gas Treatment Plant, submit to the DECCW'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: | Condition closed in a previous audit. | Not Triggered | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | (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 | | Not Triggered | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | (b) sewage waste proposed to be transported to the Bargo Ponds or any other facility which can legally receive such wastes. | | Not Triggered | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Note: Monitoring of non-controlled aqueous wastes is required by Condition 69. | | Not Triggered | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Testing Methods – Concentration Limits | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| 72 | Subject to any express provisions to the contrary in this licence, the Applicant shall undertake monitoring for the concentration of a pollution 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 DECCW in writing before any tests are conducted. | The auditor sighted the December 2014 and December 2015 Annual Returns and noted compliance against the requirements of this condition. | Compliant |
| | Gas Gathering System – Stream Crossings | | |
| 73 | 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. | Condition not triggered during the audit period. It was reported by AGL (AEPR 2014-2015, 15/10/15 and AEPR 2015-2016, 31/10/16) that there were no stream crossings constructed during the audit period with respect to DA282-6-2003. | Not Triggered |
| | 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. | | Not Triggered |
| 74 | The Applicant is permitted to trench stream crossings A, C, D, E, J, J, 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. | Condition not triggered during the audit period. It was reported by AGL (AEPR 2014-2015, 15/10/15 and AEPR 2015-2016, 31/10/16) that there were no stream crossings constructed during the audit period with respect to DA282-6-2003. | Not Triggered |
| 75 | The Applicant shall ensure that stream crossing I is 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. | Condition not triggered during the audit period. It was reported by AGL (AEPR 2014-2015, 15/10/15 and AEPR 2015-2016, 31/10/16) that there were no stream crossings constructed during the audit period with respect to DA282-6-2003. | Not Triggered |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
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| 76 | <p>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 NOW. 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.</p> <p>Note. A Part 3A Permit may be required for a road crossing upgrade.</p> | <p>Condition not triggered during the audit period.</p> <p>It was reported by AGL (AEPR 2014-2015, 15/10/15 and AEPR 2015-2016, 31/10/16) that there were no stream crossings constructed during the audit period with respect to DA282-6-2003.</p> | Not Triggered |
| 77 | <p>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 NOW prior to the issue of the Part 3A Permit.</p> | <p>Condition not triggered during the audit period.</p> <p>It was reported by AGL (AEPR 2014-2015, 15/10/15 and AEPR 2015-2016, 31/10/16) that there were no stream crossings constructed during the audit period with respect to DA282-6-2003.</p> | Not Triggered |
| 78 | <p>The Applicant shall ensure that works within 20 m of watercourses are to be undertaken during dry weather conditions.</p> | <p>Condition not triggered during the audit period.</p> <p>It was reported by AGL (AEPR 2014-2015, 15/10/15 and AEPR 2015-2016, 31/10/16) that there were no works conducted within 20m of a watercourse during the audit period.</p> | Not Triggered |
| 79 | <p>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.</p> | <p>Condition not triggered during the audit period.</p> <p>It was reported by AGL (AEPR 2014-2015, 15/10/15 and AEPR 2015-2016, 31/10/16) that there were no stream crossings constructed during the audit period with respect to DA282-6-2003.</p> | Not Triggered |
| Management of Site Water and Sediment Runoff | | | |

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| 80 | <p>The Applicant shall implement all practicable measures to minimise soil erosion and the discharge of sediments and water pollutants from the site.</p> | <p>The auditor sighted the EMP (March 2016) and Soil and Water Management Sub Plan (May 2016). The plans detail a number of controls to minimise soil erosion and the discharge of sediments and water pollutants from the site.</p> <p>Implementation of the Sub Plan was demonstrated through the Minimum Environmental Controls Form. Commencing in 2015, this process includes the documentation of site specific controls as relevant to workover and plug and abandonment works. Periodic inspections are then undertaken to assess implementation and identify performance improvements.</p> <p>The auditor also sighted a sample of plug and abandonment works completed during the audit period and noted that there was no evidence of erosion.</p> <p>There were no reportable water pollution incidents during the audit period.</p> | Compliant |
| 81 | <p>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.</p> | <p>The auditor sighted the EMP (March 2016) and Soil and Water Management Sub Plan (May 2016). The plans detail a number of controls to minimise soil erosion and the discharge of sediments and water pollutants from the site.</p> <p>Implementation of the Sub Plan was demonstrated through the Minimum Environmental Controls Form. Commencing in 2015, this process includes the documentation of site specific controls as relevant to workover and plug and abandonment works. Periodic inspections are then undertaken to assess implementation and identify performance improvements.</p> <p>The auditor also sighted a sample of plug and abandonment works completed during the audit period and noted that there was no evidence of erosion.</p> <p>There were no reportable water pollution incidents during the audit period.</p> | Compliant |

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| 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. | <p>The auditor sighted the EMP (March 2016) and Soil and Water Management Sub Plan (May 2016). The plans detail a number of controls to minimise soil erosion and the discharge of sediments and water pollutants from the site.</p> <p>Implementation of the Sub Plan was demonstrated through the Minimum Environmental Controls Form. Commencing in 2015, this process includes the documentation of site specific controls as relevant to workover and plug and abandonment works. Periodic inspections are then undertaken to assess implementation and identify performance improvements.</p> <p>The auditor also sighted a sample of plug and abandonment works completed during the audit period and noted that there was no evidence of erosion.</p> <p>There were no reportable water pollution incidents during the audit period.</p> | Compliant |
| 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 (3 rd Edition 1998). | <p>The auditor sighted the Sediment Control and Removal Form which was developed by AGL in 2012 to document the decommissioning of sediment and erosion controls.</p> <p>The auditor sighted the completed Sediment Control and Removal Form for EM23. It was reported by AGL that all other erosion and sediment controls installed during the audit period remain in operation.</p> | Compliant |
| | Soil and Water Management Plan | | |
| 84 | 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: | <p>The auditor sighted the EMP (March 2016) and Soil and Water Management Sub Plan (May 2016). The plans detail a number of controls to minimise soil erosion and the discharge of sediments and water pollutants from the site.</p> <p>Implementation of the Sub Plan was demonstrated through the Minimum Environmental Controls Form. Commencing in 2015, this</p> | Compliant |

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| | (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; | process includes the documentation of site specific controls as relevant to workover and plug and abandonment works. Periodic inspections are then undertaken to assess implementation and identify performance improvements. | Compliant |
| | (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; | The auditor also sighted a sample of plug and abandonment works completed during the audit period and noted that there was no evidence of erosion. There were no reportable water pollution incidents during the audit period. | Compliant |
| | 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 <i>Managing Urban Stormwater: Soils and Construction</i> (3 rd Edition 1998) or its latest version; | | Compliant |
| | (e) consistency with the stormwater management plan for the catchment, should one exist, or with the <i>DECCW's Managing Urban Stormwater: Council Handbook</i> should a stormwater management plan for the catchment not exist; | | Compliant |
| | (f) any DECCW licence requirements; | | Compliant |
| | (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; | | Compliant |
| | (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; | | Compliant |
| | (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; | | Compliant |
| | (i) implement a program of regular testing of waste water quality for compounds, nutrients and metals, as outlined in the EIS; | | Compliant |
| | (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; | It was reported by AGL that wastewater is not applied to land. As such, a sampling program is not warranted. | Not Verified |
| | (k) management procedures for all surface and groundwater collection and storage structures on the site, including a maintenance program for associated infrastructure (e.g. pipes, pumps, dam walls, etc) and a program for desilting of those structures, where relevant; | The auditor sighted the EMP (March 2016) and Soil and Water Management Sub Plan (May 2016). The plans detail a number of controls to minimise soil erosion and the discharge of sediments and water pollutants from the site. | Compliant |

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| | (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 | Implementation of the Sub Plan was demonstrated through the Minimum Environmental Controls Form. Commencing in 2015, this process includes the documentation of site specific controls as relevant to workover and plug and abandonment works. Periodic inspections are then undertaken to assess implementation and identify performance improvements. The auditor also sighted a sample of plug and abandonment works completed during the audit period and noted that there was no evidence of erosion. There were no reportable water pollution incidents during the audit period. | Compliant |
| | (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. | | Compliant |
| | Soil and Water Management Plan – Rosalind Park Access Road | | |
| 84A. | 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: | Condition closed in a previous audit. | Not Triggered |
| | (a) be consistent with the requirements in Management Urban Stormwater: Soils and Construction, Volume 1 4 th Edition, 2004 (Landcom). | | Not Triggered |
| | (b) identify activities that could cause soil erosion and generate sediment; | | Not Triggered |
| | (c) describe measures to minimize soil erosion and the potential for the transport of sediment to downstream waters; | | Not Triggered |
| | (d) describe the location, function, and capacity of erosion and sediment control structures; and | | Not Triggered |
| | (e) describe what measures would be implemented to maintain (and if necessary, decommission) the structures over time. | | Not Triggered |
| | Piping and Filling of Watercourse | | |

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| 84B. | The Applicant shall obtain a Controlled Activity Approval under the <i>Water Management Act 2000</i> from NOW 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 NOW and the Director-General. | Condition not triggered during the audit period. | Not Triggered |
| | Evaporation Pond Liner Integrity Evaluation Program | | |
| 85 | The Applicant must submit at least 1 month prior to completion of construction of the Treatment Plant, to the <i>DECCW's Manager Sydney Industry PO Box 668 Parramatta NSW 2124</i> , 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 on an on-going program for review of the integrity of the liner. | Condition closed in a previous audit. | Not Triggered |
| 86 | Within one month of the report above being provided to the licensee, the licensee must submit, to the <i>DECCW's Manager Sydney Industry PO Box 668 Parramatta NSW 2124</i> , 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 DECCW as required by Condition 85. | Condition closed in a previous audit. | Not Triggered |
| | INDIGENOUS HERITAGE | | |
| | Protection of Indigenous Heritage | | |
| 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. | Condition not triggered during the audit period. | Not Triggered |
| 88 | The Applicant shall provide a report to 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. Note: Under Section 86 of the National Parks and Wildlife Act 1974, 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. | Condition not triggered during the audit period. | Not Triggered |
| | Aboriginal Heritage – EM38 | | |

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| 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 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. | Condition not triggered during the audit period. | Not Triggered |
| | Aboriginal Heritage – EM39 and GL17 | | |
| 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> . | Condition not triggered during the audit period. | Not Triggered |
| | NON-INDIGENOUS HERITAGE | | |
| | Protection of the Heritage Landscape of EMAI | | |
| 89 | 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. | Condition not triggered during the audit period. | Not Triggered |
| 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. | Condition not triggered during the audit period. | Not Triggered |
| | Note: a relic is defined under the Heritage Act as any deposit, object or material evidence: <ul style="list-style-type: none"> - which relates to the settlement of the area that comprises NSW, not being Aboriginal settlement; and - which is more than 50 years old. | | Not Triggered |
| 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> . | Condition not triggered during the audit period. | Not Triggered |

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| | SAFETY AND RISK MANAGEMENT | | |
| | Risk Assessment | | |
| | Pre-Construction Studies | | |
| 91 | 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. | Condition closed in a previous audit. | Not Triggered |
| | (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. | | Not Triggered |
| | (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. | | Not Triggered |
| | (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 for Hazard Analysis. | | Not Triggered |

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| | Pre-commissioning Studies | | |
| 92 | 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). | The Auditor sighted the Emergency Response Plan (20/11/15) and the Health and Safety Management Plan, Camden Project NSW (March 2015) and noted compliance with the requirements of this condition. Following revision of the Emergency Response Plan in 2015, AGL requested feedback from the DPE (17/04/15, 30/06/15 and 04/09/15). | Compliant |
| | (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. | The Auditor sighted the Emergency Response Plan (20/11/15) and noted compliance with the requirements of this condition. | Compliant |
| | (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. | The Auditor sighted the Health and Safety Management Plan, Camden Project NSW (March 2015) and noted compliance with the requirements of this condition. Implementation was demonstrated through the following documents/systems: 1. Induction program (Rapid Induct); 2. Audit program and sample of completed audits; 3. Audit Actions Tracker; and 4. Standard methodologies for common works (e.g. confined space). | Compliant |
| | Compliance Report | | |
| 93 | 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: | Condition closed in a previous audit. | Not Triggered |
| | (a) dates of study submission, approval, commencement of construction and commissioning; | | Not Triggered |

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| | (b) actions taken or proposed, to implement recommendations made in the studies; and | | Not Triggered |
| | (c) responses to any requirement imposed by the Director-General. | | Not Triggered |
| | Incident Report | | |
| 94 | 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 auditor sighted the Pollution Incident Response Management Plan (PIRMP) and Emergency Response Plan (20/11/15) for the CGP and noted compliance with the requirements of this condition. There were no reported environmental incidents associated with this Development Consent during the audit period. | Compliant |
| | The Applicant shall maintain a register of accidents, incidents and potential incidents. The register shall be made available for inspection at any time by the independent hazard auditor and the Director-General. | The auditor sighted the Environmental Incidents Report for the audit period and noted compliance with the requirements of this condition. | Compliant |
| | Hazard Audit | | |
| 95 | 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 auditor sighted the following documents demonstrating compliance with the requirements of this condition: 1. 'Report of the 2016 Hazard Audit of the CGP Operated by AGL Upstream Investments Pty Ltd', Planager, 10/06/16. 2. Correspondence from the DPE noting approval of Ms Karin Nilsson of Planager Pty Ltd to undertake the independent hazard audit. 3. Correspondence from AGL to the DPE enclosing the independent hazard audit (22/06/16). | Compliant |
| | 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. | | Compliant |
| | Note: The Applicant must comply with the requirements of the most recent version of the Schedule of Onshore Exploration and production Safety Requirements' published by the DII in August 1992 where equipment and/or pipeline are on a Production Lease. | | Compliant |

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| | Crime Risk Performance | | |
| 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. | Condition closed in a previous audit. | Not Triggered |
| | Gas Treatment Plant | | |
| | The Applicant is required to: | The auditor inspected the RGP and noted compliance with the requirements of this condition. | Compliant |
| | (a) ensure the Plant is closed to community access; | | Compliant |
| | (b) fully enclose the Plant with a 3-metre metal framed chain mesh fence with a 3-strand barbed wire head; | | Compliant |
| | (c) ensure the Plant is gated and manned 24 hours per day; | | Compliant |
| | (d) keep vehicular and pedestrian gates closed at all times (when not in immediate use); | | Compliant |
| | (e) use self-closing and self-locking pedestrian gates; | | Compliant |
| | (f) use gate locking mechanisms that facilitate emergency egress; and | | Compliant |
| | (g) ensure plant staff are adequately trained in undertaking security functions. | | Compliant |
| | Gas Wellhead Sites | | |
| | The Applicant is required to: | It was noted in the 2012-14 Independent Environmental Audit (22/01/15) that the security fencing and gates are 2.4m high around gas well head sites. Given that the reduced height has not resulted in security issues, the auditor determined that compliance was achieved. | Compliant |
| | (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 | | Compliant |
| | (b) keep gates securely hinged and permanently locked, unless otherwise agreed by NSW Police. | The auditor inspected a sample of wellhead sites and noted compliance with the requirements of this condition. | Compliant |
| | Dangerous Goods | | |
| 97 | The Applicant shall ensure that the storage, handling, and transport of: | The auditor sighted the Health and Safety Management Plan, Camden Project NSW (March 2015) and noted compliance with the requirements of this condition. It was reported that there are no explosives stored on the site and methyl mercaptan is transported via a licenced contractor. | Compliant |
| | (a) Dangerous goods is done in accordance with the relevant Australian Standards, particularly AS1940 and AS1596, and the Dangerous Goods Code; and | | Compliant |
| | (b) Explosives are carried out in accordance with the requirements of DII. | | Compliant |

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| | WASTE | | |
| | Operating Conditions | | |
| | 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. | Condition noted. | Note |
| | Incorporates a DECCW General Term of Approval | | Note |
| 98 | 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. | <p>The auditor sighted the AGL Environmental Footprint spreadsheet for the financial years 2014/15 and 2015/16 and noted compliance with the requirements of this condition. The Environmental Footprint provides a detailed record of waste streams generated, recycled/reused and disposed, including water, hazardous waste and non-hazardous waste.</p> <p>AGL reported that no wastes are received, or disposed, at the premises.</p> <p>The auditor sighted a sample of disposal records and reconciled against the Environmental Footprint. There were no errors or emissions omissions identified.</p> | Compliant |
| 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. | <p>The auditor sighted the AGL Environmental Footprint spreadsheet for the financial years 2014/15 and 2015/16 and noted compliance with the requirements of this condition. The Environmental Footprint provides a detailed record of waste streams generated, recycled/reused and disposed, including water, hazardous waste and non-hazardous waste.</p> <p>The auditor sighted a sample of disposal records and reconciled against the Environmental Footprint. There were no errors or emissions omissions identified.</p> | Compliant |
| 100 | Deleted | Condition noted. | Note |
| 101 | Deleted | Condition noted. | Note |
| 102 | Deleted | Condition noted. | Note |

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| 103 | The Applicant must ensure that any hazardous, industrial or Group A waste at the premises is assessed and classified in accordance with the DECCW's Environmental Guidelines: Assessment Classification and Management of Liquid and Non-Liquid Wastes in force as at 1 July 2003. | <p>The auditor sighted the AGL Environmental Footprint spreadsheet for the financial years 2014/15 and 2015/16 and noted compliance with the requirements of this condition. The Environmental Footprint provides a detailed record of waste streams generated, recycled/reused and disposed, including water, hazardous waste and non-hazardous waste.</p> <p>It was reported that waste classification is undertaken by the waste service provider.</p> <p>The auditor sighted a sample of disposal records and reconciled against the Environmental Footprint. There were no errors or omissions identified.</p> | Compliant |
| 104 | The Applicant must ensure that waste identified for recycling is stored separately from other waste. | <p>The auditor sighted the Waste Management Sub Plan (April 2016) and noted compliance with the requirements of this condition.</p> <p>The auditor observed the separation of waste identified for recycling, including oil filters, batteries, scrap metal, paper, cardboard and plastics.</p> | Compliant |
| 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. | <p>The auditor sighted the Waste Management Sub Plan (April 2016) and noted compliance with the requirements of this condition.</p> <p>The auditor sighted the AGL Environmental Footprint spreadsheet for the financial years 2014/15 and 2015/16. The Environmental Footprint provides a detailed record of waste streams generated, including hazardous waste.</p> <p>The auditor sighted a sample of waste tracking records and reconciled against the Environmental Footprint. There were no errors or omissions identified.</p> | Compliant |
| | Waste Management Plan | | |
| 106 | The Applicant shall prepare and implement a Waste Management Plan for the whole site. This plan shall include, but not necessarily be limited to: | The auditor sighted the Waste Management Sub Plan (April 2016) and noted compliance with the requirements of this condition. | Compliant |
| | a) Measures to minimise the production and impact of waste produced at the site during drilling and operation. | Implementation of the Sub Plan was demonstrated through the recycling program and the induction program. | Compliant |
| | b) Implementation of waste reduction, reuse and recycling principles. | | Compliant |

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| | c) Details of the reuse and recycling of waste water produced/collected on the site, including collection and handling procedures. | | Compliant |
| | d) Details of appropriate disposal methods in the event that reuse and recycling are not available or are not practicable. | | Compliant |
| | 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. | | Compliant |
| | ROADS AND TRAFFIC | | |
| 107 | Roads within EMAI The Applicant shall not bring into the EMAI site, any roadbase 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 of roads). | Condition not triggered during the audit period. | Not Triggered |
| 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. | Condition not triggered during the audit period. | Not Triggered |
| 109 | The Applicant shall ensure that all heavy vehicles only travel along access roads designated for such vehicles. | The auditor sighted the Traffic Management Sub Plan (April 2016) and noted compliance with the requirements of this condition. This condition is also reflected in the induction program. | Compliant |
| 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. | The auditor sighted the Soil and Water Management Sub Plan (May 2016) and noted compliance with the requirements of this condition. This condition is also reflected in the induction program. | Compliant |
| 111 | On completion of drilling and fracking activities, the Applicant shall rehabilitate soils affected by compaction. This rehabilitation shall be conducted in consultation with a representative from EMAI. | Condition not triggered during the audit period. It was reported by AGL (AEPR 2014-2015, 15/10/15 and AEPR 2015-2016, 31/10/16) that there were no drilling or fracking activities undertaken during the audit period with respect to DA282-6-2003. | Not Triggered |
| | Works within the Wollondilly Shire Council Road Reserve | | |

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| 112 | 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: | Condition closed in a previous audit. | Not Triggered |
| 112(a) | Proposed construction methods. | | Not Triggered |
| 112(b) | Soil erosion and sediment control measures for works undertaken during construction and following completion of the works. | | Not Triggered |
| 112(c) | Traffic control plans. | | Not Triggered |
| 112(d) | Techniques for construction of the gas gathering line across Menangle Bridge. | | Not Triggered |
| 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. | Condition closed in a previous audit. | Not Triggered |
| | M5 Underbore – Menangle Park | | |
| 114 | The Applicant shall conduct the underboring of the M5 road to the satisfaction of the RTA. The Applicant shall ensure that the M5 underbore: | Condition closed in a previous audit. | Not Triggered |
| 114(a) | Has a minimum depth of 1.2 metres at the lowest point of the road formation. | | Not Triggered |
| 114(b) | Excavation for the thrust pits are outside the Freeway Reserve. | | Not Triggered |
| 114(c) | Requires no access from within the Freeway for construction or maintenance purposes; unless otherwise agreed by the RTA. | | Not Triggered |
| | BUSHFIRE | | |
| | Bushfire Hazard Measures | | |
| 115 | The Applicant shall implement the following bushfire hazard measures at the site: | Condition closed in a previous audit. | Not Triggered |
| 115(a) | Provision of a two-lane access road to the Treatment Plant area from Menangle Road. | | Not Triggered |

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| 115(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. | | Not Triggered |
| 115(c) | Provision of a dedicated water supply tank of 20,000 Litres for the sole use of fire-fighting. | | Not Triggered |
| 115(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. 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. | | Not Triggered |
| | Measures for the Living Quarters Building | | |
| 116 | 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. | Condition closed in a previous audit. | Not Triggered |
| 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. | Condition closed in a previous audit. | Not Triggered |
| 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. | Condition closed in a previous audit. | Not Triggered |
| | Bushfire Management Plan | | |
| 119 | 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: | Condition closed in a previous audit. | Not Triggered |
| 119(a) | Adequate fire protection works, fire fighting equipment and hazard reduction measures with particular attention to boundaries of adjoining landholdings. | Condition closed in a previous audit. | Not Triggered |

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| 119(b) | An annual report on fire management activities to the Campbelltown Fire Management Committee. | <p>A 'Compliance - Improvement Recommended' was identified in the 2012-2014 Independent Environmental Audit (22/01/15). The auditor recommended that the Campbelltown Fire Management Committee be notified annually of the information in the AEPR.</p> <p>As part of the current audit, correspondence was sighted from AGL to the Campbelltown Fire Management Committee (15/04/15, 09/06/16 and 16/11/16) noting the enclosure of the AEPR. This matter has been adequately addressed.</p> | Compliant |
| 119(c) | The incorporation of relevant bushfire hazard measures and policies of the three Councils. | <p>A 'Compliance - Improvement Recommended' was identified in the 2012-2014 Independent Environmental Audit (22/01/15). The auditor recommended that the Emergency Response Plan state that it incorporates the relevant bushfire hazard measures and policies of the three Councils.</p> <p>As part of the current audit, correspondence was sighted between AGL and the respective Councils requesting feedback on the AGL Bush Fire Management Plan. Feedback was limited to the Wollondilly Shire Council who noted that there were no changes required (28/10/15). This matter has been adequately addressed.</p> | Compliant |
| | REHABILITATION | | |
| | Site Rehabilitation Performance | | |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|--|--|---|---------------|
| 120 | 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>The auditor sighted the Rehabilitation and Landscape Management Sub Plan (April 2016) and noted compliance with the requirements of this condition.</p> <p>The auditor sighted a sample of plug and abandonment works completed and/or commenced during the auditor period. Of relevant to this consent were well sites RP03, RP05 and RP11 where rehabilitation works were commenced during the audit period. In addition, photographs were sighted for well site EM04. Rehabilitation works, where complete, were compliant with the requirements of the Petroleum Operations Plan, Appendix F (09/12/15).</p> <p>There was no evidence of dust generation at the inspected sites.</p> | Compliant |
| 121 | The Applicant shall carry out rehabilitation of the site in accordance with the requirements of the DOPE. | The auditor sighted the Petroleum Operations Plan, Appendix F, (09/12/15) which details rehabilitation criteria developed in consultation with the DRE. | Compliant |
| 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. | Condition not triggered during the audit period. | Not Triggered |
| Rehabilitation of Gas Gathering System\Stream Crossings | | | |
| 123 | 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. | <p>The auditor sighted the Rehabilitation and Landscape Management Sub Plan (April 2016) and noted compliance with the requirements of this condition.</p> <p>It was reported by AGL that no trenched crossings were undertaken during the audit period.</p> | Compliant |
| 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. | <p>The auditor sighted the Rehabilitation and Landscape Management Sub Plan (April 2016) and noted compliance with the requirements of this condition.</p> <p>The auditor sighted photos of the gas gathering line installed during the audit period (WG04 to WG01) and noted that the rehabilitation works were adequate.</p> | Compliant |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|---|---|---|---------------|
| 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. | <p>The auditor sighted the Rehabilitation and Landscape Management Sub Plan (April 2016) and noted compliance with the requirements of this condition.</p> <p>The auditor sighted a sample of plug and abandonment works completed and/or commenced during the auditor period. Of relevance to this consent were well sites RP03, RP05 and RP11 where rehabilitation works commenced during the audit period. In addition, photographs were sighted for well site EM04. Rehabilitation works, where complete, were compliant with the requirements of the Petroleum Operations Plan, Appendix F (09/12/15).</p> | Compliant |
| CONFIRMATION OF PROJECT COMPONENTS | | | |
| Gas Flare Design Report | | | |
| 126 | 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: | Condition closed in a previous audit. | Not Triggered |
| 126(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. | | Not Triggered |
| 126(b) | Benchmark the design of the proposed Stage II flare against best practice as identified in subclause (a). | | Not Triggered |
| 126(c) | Assess the ability of the proposed Stage II flare to meet a destruction efficiency of 98% for VOCs plus methane. | | Not Triggered |
| 126(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. | | Not Triggered |
| 126(e) | Using the results of subclauses (a) to (d), identify the optimum temperature and residence time to achieve maximum destruction efficiency for the proposed flare design. Note: This condition confirms the gas flare structure and specifications. | | Not Triggered |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|--------|---|--|--|
| | Gas Gathering System | | |
| 127 | The Applicant shall comply with the following in the construction of the gas gathering system pipeline: | The auditor sighted the EMP (March 2016) and noted compliance with the requirements of this condition. Construction of the gas gathering system was limited to a new section of line between WG04 and WG01. The auditor sighted photographs of the construction and rehabilitation and noted compliance with the requirements of this condition. | Compliant |
| 127(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. | | Compliant |
| 127(b) | Trenches are to be restored and reseeded with local grass seeds on completion of the work. | | Compliant |
| 127(c) | Local council traffic guidelines in respect of work carried out on road verges and underneath roads shall be implemented. | | Compliant |
| 127(d) | The Applicant shall construct the gas gathering system so as not to impeach lateral water flows. | | Compliant |
| 127(e) | The Applicant shall ensure that no crown or camber remains along the gas gathering systems, following construction. | | Compliant |
| 127(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. | | Compliant |
| 127(g) | The Department shall be notified on the completion of any trenching works. | | The auditor sighted correspondence from AGL to the DPE (21/11/14) noting that a gas gathering line was installed from gas well WG04 to WG01. |
| 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 Campbelltown City Council. | Condition noted. | Note |
| | SCHEDULE 5 | | |
| | ENVIRONMENTAL MANAGEMENT, MONITORING, AUDITING AND REPORTING | | |
| | CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN | | |

B3. DA 282-6-2003

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|------|--|---|---------------|
| 1 | 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. | Condition not triggered during the audit period. | Not Triggered |
| | OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN | | |
| 2 | 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: | The auditor sighted the EMP (March 2016) and noted compliance with the requirements of this condition. A number of controls are in place to monitor and measure implementation of the EMS including Environmental Management Sub Plan Compliance Audits, Daily Workover Reports, Monthly Dam Inspection Reports, air quality monitoring and noise monitoring. The auditor sighted a sample of monitoring controls and noted compliance with the requirements of the EMP. | Compliant |
| 2(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. | | Compliant |
| 2(b) | A description of the roles and responsibilities for all key personnel involved in the drilling and operation of the development. | | Compliant |
| 2(c) | The overall environmental policies and principles to be applied to the operation of the development. | | Compliant |
| 2(d) | Standards and performance measures to be applied to the development, and a means by which environmental performance can be periodically reviewed and improved. | | Compliant |
| 2(e) | Management policies to ensure that environmental performance goals are met and to comply with conditions of this consent. | A 'Compliance - Improvement Recommended' was reported against this condition in the 2012-2014 Independent Environmental Audit (22/01/15). The auditor recommended that linkages between the objectives/targets and performance be clarified in the AEPR. This matter has been adequately addressed. | Compliant |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|---|---|--|-----------|
| 3 | The Applicant shall supply a copy of the CEMP and OEMP to the DECC, DOPE, 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. | <p>It was reported by AGL that the EMP was developed by Sydney Gas in consultation with the nominated agencies in 2002. However, documented evidence of the consultation was not available.</p> <p>Following revision of the EMP and Sub Plans in 2015, AGL requested feedback from the DPE (17/04/15, 30/06/15 and 04/09/15), EPA (26/06/15 and 04/09/15), DPI Water (26/06/15) and the DRE (26/06/15). The auditor sighted all correspondence and noted the inclusion of the EMP and Sub Plans on the AGL website.</p> | Compliant |
| 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. | <p>During the audit period, the EMP and Sub Plans were reviewed annually as evidenced by the revision history recorded within the documents.</p> <p>A 'Non-Compliance - Level 2' was reported against this condition in the 2012-2014 Independent Environmental Audit (22/01/15). The auditor recommended that the EMP and Sub Plans be reviewed annually. This matter has been adequately addressed.</p> | Compliant |
| ANNUAL ENVIRONMENTAL PERFORMANCE REPORTING | | | |
| 5 | 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: | The auditor sighted the AEPR 2014-2015 (15/10/15) and the AEPR 2015-2016 (31/10/16) and noted compliance with the requirements of this condition. | Compliant |
| 5(a) | The standards, performance measures and statutory requirements the development is required to comply with. | | Compliant |
| 5(b) | An assessment of the environmental performance of the development to determine whether it is complying with these standards, performance measures, and statutory requirements. | | Compliant |
| 5(c) | Reporting against the implementation of the Project Commitments Register. | | Compliant |
| 5(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. | | Compliant |
| 5(e) | Indication of what actions were taken to address any issue and/or recommendation raised by the Community Consultative Committee. | | Compliant |
| 5(f) | Provision of the detailed results of all the monitoring required by this consent. | | Compliant |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|---|---|--|---------------|
| 5(g) | Review of the results of this monitoring against: <ul style="list-style-type: none"> - impact assessment criteria; - monitoring results from previous years; and - predictions in the EIS | | Compliant |
| 5(h) | Identify any non-compliance during the year. | | Compliant |
| 5(i) | Identify any significant trends in the data. | | Compliant |
| 5(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. | | Compliant |
| 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. | Condition not triggered during the audit period. | Not Triggered |
| 7 | The Applicant shall also submit a copy of the Annual Environmental Performance Report to the DECC, DOPE, Camden Council, Campbelltown City Council and Wollondilly Shire Council. The Applicant shall make a copy of the Report publicly available. | The auditor sighted evidence of submission of the Annual Environmental Performance Report (2014/2015 and 2015/2016) to each of the nominated agencies. | Compliant |
| INDEPENDENT ENVIRONMENTAL AUDIT – CONSTRUCTION AT EMAI | | | |
| 8 | 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 fracking of gas wells on the EMAI. The objective of the audit is to monitor the performance and effect of construction activities on the EMAI. | Condition closed in a previous audit. | Not Triggered |
| | The Independent Environmental Audit shall: | | Not Triggered |
| | (a) be conducted by a suitably qualified, experienced, and independent person(s) whose appointment has been approved by the Director-General; and | | Not Triggered |
| | (b) be consistent with ISO 19011:2002 - Guidelines for Quality and/ or Environmental Management Systems Auditing, or updated versions of these guidelines/manuals. | | Not Triggered |
| | The Audit shall: | | Not Triggered |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|--|--|---------------|
| | (a) assess the environmental performance of the construction of the development on EMAI, and its effects on the surrounding environment; | | Not Triggered |
| | (b) assess whether the development is complying with the relevant standards, performance measures, and statutory requirements; | | Not Triggered |
| | (c) consider the Applicant's proposed Construction Environmental Management Plan for the EMAI Site; and | | Not Triggered |
| | (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). | | Not Triggered |
| 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. | Condition closed in a previous audit. | Not Triggered |
| | INDEPENDENT ENVIRONMENTAL AUDIT\OPERATION | | |
| 10 | 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: | The scope of this 2014-2016 Independent Environmental Audit complies with the requirements of this conditions. | Compliant |
| | a) Be conducted by a suitably qualified, experienced, and independent person(s) whose appointment has been approved by the Director-General. | | Compliant |
| | b) consistent with ISO 19011:2002 - Guidelines for Quality and/ or Environmental Management Systems Auditing, or updated versions of these guidelines/manuals. | | Compliant |
| | c) Assess the environmental performance of the development, and its effects on the surrounding environment. | | Compliant |
| | d) Assess whether the development is complying with the relevant standards, performance measures, and statutory requirements. | | Compliant |
| | e) Review the adequacy of the Applicant's Environmental Management Plan. | | Compliant |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding | | | | | | | | | | | | | | | | | | | | | | | | | | |
|-----------------------------------|---|---|-----------------|---------------|----|------------------------|------|----------------------|-----|-------------------------|-----|-----------------------|--------|----------------------|------|----------------------------------|-------|--------------------------------|-----|-----------------------------------|-----|------------------------|----|--------------------|------|-------------------------|-----|--|-----------|
| | f) Recommend measures or actions to improve the environmental performance of the development, and/or its environmental management and monitoring systems. | | Compliant | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 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 DOPE. | The 2014-2016 Independent Environmental Audit was finalised in a timely manner and it was reported by AGL that the report would be submitted within two months of commissioning (17 December 2016). | Not Verified | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | ASSESSABLE POLLUTANTS – LOAD LIMITS | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 12 | <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" data-bbox="320 778 757 970"> <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> <p>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. 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.</p> | 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 | <p>The auditor sighted the AGL spreadsheets 'LBL Summary 2013-14 RPGP draft v0' and 'LBL Summary 2014-15 RPGP draft v2' which detail the load calculations based on quarterly or annual monitoring results. It was noted that AGL achieved compliance during the audit period with each specified limit.</p> <p>In all cases, the load calculation method of source monitoring was applied. The auditor sighted quarterly air monitoring reports and tested a sample of values entered into the AGL spreadsheets. There were no errors or omissions noted.</p> <p>The auditor also sighted correspondence from Golder Associates (28 January 2016) who conducted a technical review of the 2014-15 Annual Return and noted compliance with reporting requirements.</p> <p>There was no load based licensing fee required in either the 2013/2014 Annual Return or the 2014/2015 Annual Return.</p> | Compliant |
| 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 | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | MONITORING AND RECORDING CONDITIONS | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
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| 13 | 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>The auditor sighted the AGL spreadsheets 'LBL Summary 2013-14 RPGP draft v0' and 'LBL Summary 2014-15 RPGP draft v2' which details the load calculations based on quarterly or annual monitoring results. It was noted that AGL achieved conformance during the audit period with each specified limit.</p> <p>In all cases, the load calculation method of source monitoring was applied. The sighted quarterly air monitoring reports and tested a sample of values entered into the AGL spreadsheets. There were no errors or omissions noted.</p> | Compliant |
| 14 | The Applicant shall keep all records required to be kept by the licence: | Monitoring records prepared during the audit period were sighted by the auditor and noted to comply with the requirements of this condition. | Compliant |
| | in a legible form, or in a form that can readily be reduced to a legible form; | | Compliant |
| | kept for at least 4 years after the monitoring or event to which they relate took place; and | | Compliant |
| | produced in a legible form to any authorised officer of the DECC who asks to see them. | | Compliant |
| 15 | The Applicant shall keep the following records in respect of any samples required to be collected: | The auditor sighted quarterly noise assessment reports prepared by Wilkinson Murray and monthly/quarterly air quality reports prepared by Emission Testing Consultants and Ektimo. The records were noted to comply with the requirements of this condition. | Compliant |
| | the date(s) on which the sample was taken; | | Compliant |
| | the time(s) at which the sample was collected; | | Compliant |
| | the point at which the sample was taken; and | | Compliant |
| | the name of the person who collected the sample. | | Compliant |
| | REPORTING CONDITIONS | | |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|---|---|---|-----------|
| 16 | 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. | The auditor sighted the December 2014 and December 2015 Annual Returns and noted compliance against the requirements of this condition. | Compliant |
| COMMUNITY CONSULTATIVE COMMITTEE | | | |
| 17 | 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: | The auditor sighted the minutes of the Community Consultative Committee and presentations to the committee and noted compliance with the requirements of this condition. | Compliant |
| (a) | Have four community representatives residing in the PEL 2 area. | | Compliant |
| (b) | Have one representative from each of the following Councils: Camden Council, Campbelltown City Council and Wollondilly Shire Council. | | Compliant |
| (c) | Meet at least quarterly. | | Compliant |
| (d) | Take minutes of the meeting. | | Compliant |
| (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. | | Compliant |
| | Representatives from relevant government agencies or other individuals may be invited to attend meetings as required by the Chairperson. | | Compliant |
| 18 | The Applicant shall: | The auditor sighted the minutes of the Community Consultative Committee and presentations to the committee and noted compliance with the requirements of this condition. All documentation relating to the CCC is available on the CGP website | Compliant |
| (a) | Ensure that two of its representatives attend the Committee's meetings. | | Compliant |
| (b) | Provide the Committee with regular information on the environmental performance and management of the development. | | Compliant |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|--|---|-----------|
| (c) | Ensure that the Committee has reasonable access to the necessary plans to carry out its functions. | and correspondence was sighted from the Chair of CCC (21/10/14) verifying that this arrangement is acceptable to the government agencies. | Compliant |
| (d) | Consider the recommendations and comments of the Committee and provide a response to the Committee and Director-General. | | Compliant |
| (e) | Provide access for site inspections by the Committee. | | Compliant |
| (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. | | Compliant |
| (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 D11 within a month of each Committee meeting. | | Compliant |
| 19 | 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: | The auditor sighted Consultation Manager, a software program used for managing stakeholder engagement, including complaints. Records retained within Consultation Manager comply with the requirements of this condition. | Compliant |
| | a) the date and time, where relevant of the complaint; | | Compliant |
| | b) the means by which the complaint was made; | There were no complaints associated with this Development Consent during the audit period. | Compliant |
| | c) any personal details of the complainant that were provided, or if no details were provided, a note to that effect; | | Compliant |
| | d) the nature of the complaints; | | Compliant |
| | e) any action(s) taken by the Applicant in relation to the complainant, including any follow-up contact with the complainant; and | | Compliant |
| | f) if no action was taken by the Applicant in relation to the complaint, the reason(s) why no action was taken. | | Compliant |
| | The Complaints Register shall be made available for inspection by the DECCW or the Director-General upon request. The Applicant shall also make summaries of the register, without details of the complainants, available for public inspection. | | Compliant |
| | COMMUNITY AWARENESS PROTOCOL | | |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|---|--|---|-----------|
| 20 | 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>The auditor sighted the Pollution Incident Response Management Plan (PIRMP) (21/03/16) and Emergency Response Plan (20/11/15) for the CGP and noted compliance with the requirements of this condition.</p> <p>A 'Compliance - Improvement Recommended' was reported against this condition in the 2012-2014 Independent environmental Audit (22/01/15). The auditor recommended that notification to nearby residents should occur 'as soon as practicable' in the event of a leak. This matter has been adequately addressed.</p> <p>The requirement to submit the Community Awareness Protocol to the Director-General for approval prior to commissioning of the Gas Treatment Plant was closed in a previous audit.</p> | Compliant |
| SCHEDULE 6 | | | |
| MANDATORY CONDITIONS FOR ALL EPA LICENCES | | | |
| | Note: References to "DECCW" in the Consent Conditions have been referenced as "EPA" in this Audit Report. | Condition noted. | Note |
| | The following Mandatory Conditions do not have any numbering. | Condition noted. | Note |
| OPERATING CONDITIONS | | | |
| Activities must be carried out in a competent manner | | | |
| | Licensed activities must be carried out in a competent manner. This includes: | Competence is demonstrated through defined roles and responsibilities, training and assurance, as detailed below: | Compliant |
| | (a) the processing, handling, movement and storage of materials and substances used to carry out the activity. | | Compliant |

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| | (b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity. | <p>1. Roles and responsibilities - Defined in the EMP (March 2016) and position descriptions. The position description of the Gas Plant Operator (16/12/12) was sighted by the auditor and noted to include a requirement to achieve regulatory compliance and adhere to the EMP.</p> <p>2. Training - The auditor sighted the site specific and role-specific induction program that is delivered to all AGL employees and contractors (Rapid Induct). The induction program includes relevant risks and controls as detailed in the EMP. During the audit period, role-specific training was delivered on Leak Detection and Repair (28/04/16) and the Pollution Incident Response Management Plan (29/04/16).</p> <p>3. Audit and inspection - Sub-Plan compliance audits are undertaken monthly to assess implementation of control measures.</p> <p>A Non-Compliance was reported against this condition by AGL in the December 2015 Annual Return. The Annual Return refers to the EPA Final Compliance Audit Report (17/06/14). All non-compliances were addressed prior to the audit period with the exception of the following which relate to the RPGP:</p> <p>1. Underground Storage Tanks - Two underground storage tanks (oily water) were identified as having the potential to pollute water. A specific concern was identified in relation to the adequacy of tank integrity monitoring.</p> <p>2. Transfer of Produced Water - The transfer of produced water from the flare pit to tankers was identified as having the potential to pollute water.</p> <p>The auditor sighted adequate and appropriate evidence demonstrating that corrective actions relating to the above matters were addressed during the audit period.</p> | Compliant |
| | Maintenance of plant and equipment | | |

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| | All plant and equipment installed at the premises or used in connection with the licensed activity. | <p>Due to the previously reported non-compliance against EPL Licence Conditions M2.1 (requirement to monitor pollutants using the specific sample method) and M2.3/DA-282-6-2003-I, Schedule 4, Condition 58 (requirements to undertake continuous monitoring), AGL remains non-compliant with the requirements of this condition. This non-compliance was first reported by AGL management on 9 July 2012.</p> <p>In response to this non-compliance AGL has entered into a Pollution Reduction Plan (PRP) for a Predictive Emissions System (PEMS) 6-month trial (EPL 12003, Condition U1.1).</p> | Non-Compliant (low risk) |
| | MONITORING AND RECORDING CONDITIONS | | |
| | Recording of pollution complaints | | |
| | 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 auditor sighted Consultation Manager, a software program used for managing stakeholder engagement, including complaints. Records retained within Consultation Manager comply with the requirements of this condition. | Compliant |
| | The record must include details of the following: | | Compliant |
| | (a) the date and time of the complaint; | There were no complaints associated with this Development Consent during the audit period. | Compliant |
| | (b) the method by which the complaint was made; | | Compliant |
| | (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; | | Compliant |
| | (d) the nature of the complaint; | | Compliant |
| | (e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and | | Compliant |
| | (f) if no action was taken by the licensee, the reasons why no action was taken. | | Compliant |
| | The record of a complaint must be kept for at least 4 years after the complaint was made. | The auditor sighted complaint records within Consultation Manager (a software program used for managing stakeholder engagement, including complaints). Prior to 2013, a Complaints Register was maintained which was also sighted by the auditor. The Consultation Manager records and the historical Complaints Register demonstrate compliance with the requirements of this condition. | Compliant |

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| | The record must be produced to any authorised officer of the EPA who asks to see them. | Condition not triggered during the audit period. | Not Triggered |
| | Telephone complaints line | | |
| | 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. | The auditor sighted the CGP website and noted the inclusion of a telephone line, contact and feedback form. The website notes that the purpose of the telephone line is for complaints and enquiries. The auditor contacted the telephone line during the audit and was satisfied with the handling process. | Compliant |
| | 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. | | Compliant |
| | This condition does not apply until 3 months after this condition takes effect. | | Compliant |
| | REPORTING CONDITIONS | | |
| | Annual Return documents | | |
| | What documents must an Annual Return contain? | | |
| | The licensee must complete and supply to the EPA an Annual Return in the approved form comprising: | The auditor sighted the December 2014 and December 2015 Annual Returns and noted compliance against the requirements of this condition. | Compliant |
| | (a) a Statement of Compliance; and | | Compliant |
| | (b) a Monitoring and Complaints Summary. | | Compliant |
| | A copy of the form in which the Annual Return must be supplied to the EPA accompanies this licence. Before the end of each reporting period, the EPA will provide to the licensee a copy of the form that must be completed and returned to the EPA. | | Compliant |
| | Period covered by Annual Return | | |
| | An Annual Return must be prepared in respect of each reporting, except as provided below. 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. | The auditor sighted the December 2014 and December 2015 Annual Returns and noted compliance against the requirements of this condition. | Compliant |
| | Where this licence is transferred from the licensee to a new licensee, | Condition not triggered during the audit period. | Not Triggered |

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| | (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 | | Not Triggered |
| | (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. Note: An application to transfer a licence must be made in the approved form for this purpose. | | Not Triggered |
| | Where this licence is surrendered by the licensee or revoked by the EPA 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 | Condition not triggered during the audit period. | Not Triggered |
| | (a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or | | Not Triggered |
| | (b) in relation to the revocation of the licence – the date from which notice revoking the licence operates. | | Not Triggered |
| | Deadline for Annual Return | | |
| | The Annual Return for the reporting period must be supplied to the EPA 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'). | A 'Non-Compliance - Level 2' was reported against this condition in the 2012-2014 Independent environmental Audit (22/01/15). The auditor noted that the 2011/2012 Annual Return was submitted after the 60-day period. The auditor sighted the December 2014 and December 2015 Annual Returns and cover letters and noted that the returns were submitted within 60 days of the end of the reporting period. | Compliant |
| | Notification where actual load cannot 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 EPA in writing as soon as practicable, and in any event not later than the due date. | Condition not triggered during the audit period. | Not Triggered |
| | The notification must specify: | | Not Triggered |

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| | (a) the assessable pollutants for which the actual load could not be calculated; and | | Not Triggered |
| | (b) the relevant circumstances that were beyond the control of the licensee. | | Not Triggered |
| | Licensee must retain copy of Annual Return | | |
| | The licensee must retain a copy of the annual return supplied to the EPA for a period of at least 4 years after the annual return was due to be supplied to the EPA. | The auditor sighted Annual Returns submitted in the previous four years and noted compliance with the requirements of this condition. | Compliant |
| | 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: | The auditor sighted the December 2014 and December 2015 Annual Returns and noted compliance against the requirements of this condition. | Compliant |
| | (a) the licence holder; or | | Compliant |
| | (b) by a person approved in writing by the EPA to sign on behalf of the licence holder. | | Compliant |
| | Notification of environmental harm | | |
| | Note: The licensee or its employees must notify the EPA 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 | AGL reported that the Pollution Incident Response Management Plan was not triggered during the audit period. | Not Triggered |
| | Notifications must be made by telephoning the EPA's Pollution Line service on 131 555. | | Not Triggered |
| | The licensee must provide written details of the notification to the EPA within 7 days of the date on which the incident occurred. | | Not Triggered |
| | Written report | | |
| | Where an authorised officer of the EPA suspects on reasonable grounds that: | It was reported by AGL that the EPA did not request a written report during the audit period with respect to DA282-6-2003. | Not Triggered |
| | (a) where this licence applies to premises, an event has occurred at the premises; or | | Not Triggered |

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| | 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, 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. | | Not Triggered |
| | The licensee must make all reasonable inquiries in relation to the event and supply the report to the EPA within such time as may be specified in the request. The request may require a report which includes any or all of the following information: | | Not Triggered |
| | (a) the cause, time and duration of the event; | | Not Triggered |
| | (b) the type, volume and concentration of every pollutant discharged as a result of the event; | | Not Triggered |
| | (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 | | Not Triggered |
| | (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; | | Not Triggered |
| | (e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants; | | Not Triggered |
| | (f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and | | Not Triggered |
| | (g) any other relevant matters. | | Not Triggered |
| | The EPA 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 EPA within the time specified in the request. | | Not Triggered |
| | 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. | | Compliant |

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| | The licence must be produced to any authorised officer of the EPA who asks to see it. | The auditor sighted a copy of the licence at the premises. It was reported by AGL that the licence was not requested by the EPA during the audit period. | Compliant |
| | 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. | | Compliant |
| | SCHEDULE 7 | | |
| | GENERAL CONDITIONS FOR PART 3A PERMITS | | |
| | DEPARTMENT OF WATER AND ENERGY | | |
| 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 NOW. | Condition not triggered during the audit period. | Not Triggered |
| 2 | Prior to the issue of the Part 3A permit the applicant must provide the NOW with the following: <ul style="list-style-type: none"> - A copy of the development consent including all conditions of approval; - Plans and/or other documentation (3 copies) that satisfy the NOW's General Terms of Approval and recommendations which are included in the consent conditions; and - The appropriate permit fee paid to the NOW | Condition not triggered during the audit period. | Not Triggered |
| 3 | Work is to be carried out in accordance with drawings and any management plans required by these conditions and approved by the NOW that will accompany the 3A permit. | Condition not triggered during the audit period. | Not Triggered |
| 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. | Condition not triggered during the audit period. | Not Triggered |
| 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 NOW with a view to preventing degradation of the stream bed or banks. | Condition not triggered during the audit period. | Not Triggered |
| 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. | Condition not triggered during the audit period. | Not Triggered |

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| 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 | <p>The auditor sighted the Soil and Water Management Sub Plan (May 2016) and noted compliance with the requirements of this condition.</p> <p>Implementation of the Sub Plan was demonstrated through the Minimum Environmental Controls Form. Commencing in 2015, this process includes the documentation of site specific controls as relevant to workover and plug and abandonment works. Periodic inspections are then undertaken to assess implementation and identify performance improvements.</p> | Compliant |
| 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. | Condition not triggered during the audit period. It was reported by AGL (AEPR 2014-2015, 15/10/15 and AEPR 2015-2016, 31/10/16) that there were no works undertaken in a stream or riparian zone. | Not Triggered |
| 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). | <p>The auditor sighted the Soil and Water Management Sub Plan (May 2016) and noted compliance with the requirements of this condition.</p> <p>It was reported by AGL (AEPR 2014-2015, 15/10/15 and AEPR 2015-2016, 31/10/16) that there were no works undertaken in a stream or riparian zone.</p> | Not Triggered |
| 10 | The excavation of soil/spoil and its removal is the responsibility of the permit holder and the owner or occupier of the land. | Condition noted. | Note |
| 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. | Condition not triggered during the audit period. | Not Triggered |
| 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. | Condition not triggered during the audit period. | Not Triggered |
| 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. | Condition not triggered during the audit period. | Not Triggered |
| 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. | Condition not triggered during the audit period. | Not Triggered |

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| 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. | Condition not triggered during the audit period. | Not Triggered |
| 16 | Any Part 3A permit granted is not transferable to any other person or company without the written approval of the NOW and does not authorise works at any other site. | Condition not triggered during the audit period. | Not Triggered |
| 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. | Condition not triggered during the audit period. | Not Triggered |
| 18 | Work as executed survey plans of a professional standard shall be provided to the NOW upon request. | Condition not triggered during the audit period. | Not Triggered |
| 19 | If, in the opinion of a the NOW 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. | Condition not triggered during the audit period. | Not Triggered |
| 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 NOW. If any breach of the permit conditions requires a special site inspection by the NOW, then the permit holder shall pay a fee prescribed by the NOW for this inspection and all subsequent breach inspections. | Condition not triggered during the audit period. | Not Triggered |
| 21 | If works are to cease prior to completion the NOW must be notified in writing one month in advance of the cessation of the operation. | Condition not triggered during the audit period. | Not Triggered |
| | SCHEDULE 8 | | |
| | DECC WASTE TRACKING REQUIREMENTS | | |
| O5 | Monitoring of waste movements within NSW | | |
| O5.1 | 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. | Condition noted. | Note |
| | Prerequisites for waste movements | | |
| O5.2 | If the waste is transported from the premises, the licensee must ensure that the waste is transported: | The auditor sighted the Waste Management Sub Plan (April 2016) and noted compliance with the requirements of this condition. | Compliant |

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| O5.2 (a) | To a place which has been licensed by the DECC to issue consignment authorisation numbers. | The auditor sighted the AGL Environmental Footprint spreadsheet for the financial years 2014/15 and 2015/16. The Environmental Footprint provides a detailed record of waste streams generated, including hazardous waste. The auditor sighted a sample of waste tracking records and reconciled against the Environmental Footprint. There were no errors or omissions identified. | Compliant |
| O5.2 (a) | To a place that can otherwise lawfully accept that class of waste. | | Compliant |
| O5.3 | If the waste is transported from the premises, the licensee must; | The auditor sighted the Waste Management Sub Plan (April 2016) and noted compliance with the requirements of this condition. The auditor sighted the AGL Environmental Footprint spreadsheet for the financial years 2014/15 and 2015/16. The Environmental Footprint provides a detailed record of waste streams generated, including hazardous waste. The auditor sighted a sample of waste tracking records and reconciled against the Environmental Footprint. There were no errors or omissions identified. | Compliant |
| O5.3 (a) | Obtain a consignment authorisation number from the consignee. | | Compliant |
| O5.3 (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. | | Compliant |
| O5.3 (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 | | Compliant |
| O5.3 (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. | | Compliant |
| | Application for a consignment authorisation number | | |
| O5.4 | 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: | It was reported by AGL that applications for consignment authorisation numbers are prepared by waste contractors. The Auditor sighted a sample of consignment authorisation numbers on waste tracking documentation and noted compliance with the requirements of this condition. | Compliant |
| O5.4 (a) | A statement identifying the classification of the waste in accordance with the requirements of condition 04.1. | | Compliant |
| O5.4 (b) | Copies of all information used to classify the waste. | | Compliant |
| O5.4 (c) | An estimate of the amount of waste to which the application applies. | | Compliant |
| O5.4 (d) | Whether the consignment will consist a single load or multiple loads. | | Compliant |

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| O5.4 (e) | An estimate of the total period required for transportation of the consignment. | | Compliant |
| O5.4(f) | The date of dispatch of at least the first load in the consignment. | | Compliant |
| | 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). 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 the formal provision of the above information that need only be supplied in the formal application. | Condition noted. | Note |
| O5.5 | 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. | Condition noted. | Note |
| | Notification of dates of dispatch of the second and subsequent loads in a consignment | | |
| O5.6 | The licensee must provide the consignee with written notification of the date of dispatch of each load of waste. | The auditor sighted a sample of waste tracking records and noted compliance against the requirements of this condition. | Compliant |
| O5.7 | 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. | The auditor sighted a sample of waste tracking records and noted compliance against the requirements of this condition. | Compliant |
| | Notification of a final load in a consignment | | |
| O5.8 | 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. | The auditor sighted a sample of waste tracking records and noted compliance against the requirements of this condition. | Compliant |
| | Note: The notifications referred to in conditions 05.6 and 05.8 may be attached to the waste data form of the preceding load. | | Compliant |
| | Amendments to the nominated date(s) of dispatch | | |

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| 05.9 | 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. | The auditor sighted a sample of waste tracking records and noted compliance against the requirements of this condition. | Compliant |
| 05.10 | A notification referred to in 05.9 must occur on or before the date of delivery as previously nominated. Note: More than one amendment to dates of dispatch may occur. | The auditor sighted a sample of waste tracking records and noted compliance against the requirements of this condition. | Compliant |
| | Cancellation of consignment authorisations | | |
| 05.11 | 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 expected load. | The auditor sighted a sample of waste tracking records and noted compliance against the requirements of this condition. | Compliant |
| | Notification of delayed delivery by transporter | | |
| 05.12 | 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. | Condition not triggered during the audit period. | Not Triggered |
| | Record keeping | | |
| 05.13 | The licensee must record and retain all information related to each consignment of waste. Note: This includes waste data forms and copies of other documents such as notifications of revised delivery dates, regular and other reports, etc. | The auditor sighted the AGL Environmental Footprint spreadsheet for the financial years 2014/15 and 2015/16. The Environmental Footprint provides a detailed record of waste streams generated, including hazardous waste. The auditor sighted a sample of waste tracking records and reconciled against the Environmental Footprint. There were no errors or omissions identified. | Compliant |
| 05.14 | The records referred to in 05.13 must be kept so that: | The auditor sighted the AGL Environmental Footprint spreadsheet for the financial years 2014/15 and 2015/16. The Environmental Footprint provides a detailed record of waste streams generated, including hazardous waste. The auditor sighted a sample of waste tracking records and reconciled against the Environmental Footprint. There were no errors or omissions identified. | Compliant |
| 05.14 (a) | All records relating to individual consignment authorisation numbers are kept physically together. | | Compliant |
| 05.14 (b) | Consignments transported by each transporter can be readily identified and accessed. | | Compliant |
| 05.14 (c) | Consignments sent to each destination can readily be identified and accessed. Note: The licensee must keep all information for at least 4 years. | | Compliant |

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| | Exception reporting | | |
| 05.15 | 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. | Condition not triggered during the audit period. | Not Triggered |
| 05.16 | The licensee must notify the DECC in writing within 48 hours of becoming aware of any of the following: | Condition not triggered during the audit period. | Not Triggered |
| 05.16 (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. | | Not Triggered |
| 05.16 (b) | The refusal of a transporter to transport waste after arriving at the licensee's premises for the purposes of transporting that waste. | | Not Triggered |
| 05.16 (c) | A transporter who transports, or attempts to transport, waste without a waste data form completed to the extent required. | | Not Triggered |
| 05.16 (d) | The refusal of a consignee to accept waste from the licensee. | | Not Triggered |
| 05.16 (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. | | Not Triggered |
| 05.16 (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. | | Not Triggered |
| | Note: The DECC should be notified of exception reports by sending a facsimile to: Manager, Hazardous Waste Regulation, NSW Environment Protection Authority. | | |
| 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. Note: The requirements of the NEPM apply to the interstate movement of any of the wastes listed in Appendix 1 of this licence. | Condition not triggered during the audit period. It was reported by AGL that there were no interstate movements of controlled waste from the CGP during the audit period. | Not Triggered |
| | Classification of controlled waste | | |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
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| O6.2 | 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. 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. | Condition not triggered during the audit period. It was reported by AGL that there were no interstate movements of controlled waste from the CGP during the audit period. | Not Triggered |
| | Application for a consignment authorisation | | |
| O6.3 | 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. 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. | Condition not triggered during the audit period. It was reported by AGL that there were no interstate movements of controlled waste from the CGP during the audit period. | Not Triggered |
| | Waste movements | | |
| O6.4 | 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. | Condition not triggered during the audit period. It was reported by AGL that there were no interstate movements of controlled waste from the CGP during the audit period. | Not Triggered |
| O6.5 | 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. | Condition not triggered during the audit period. It was reported by AGL that there were no interstate movements of controlled waste from the CGP during the audit period. | Not Triggered |
| O6.6 | The licensee must: | Condition not triggered during the audit period. | Not Triggered |
| O6.6 (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. | It was reported by AGL that there were no interstate movements of controlled waste from the CGP during the audit period. | Not Triggered |
| O6.6 (b) | Make the copy of the waste transport certificate available for inspection by an authorised officer on request. | | Not Triggered |

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| | 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. | | Not Triggered |
| | Notification of delayed delivery by transporter | | |
| O6.7 | 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. | Condition not triggered during the audit period. It was reported by AGL that there were no interstate movements of controlled waste from the CGP during the audit period. | Not Triggered |
| | Record keeping | | |
| O6.8 | The licensee must record and retain all information related to each consignment of waste. 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. | Condition not triggered during the audit period. It was reported by AGL that there were no interstate movements of controlled waste from the CGP during the audit period. | Not Triggered |
| O6.9 | The records referred to in O6.8 must be kept so that: | Condition not triggered during the audit period. | Not Triggered |
| O6.9 (a) | All records relating to each consignment authorisation are kept physically together. | It was reported by AGL that there were no interstate movements of controlled waste from the CGP during the audit period. | Not Triggered |
| O6.9 (b) | Consignments transported by each transporter can be readily identified and accessed. | | Not Triggered |
| O6.9(c) | Consignments sent to each destination can readily be identified and accessed. | | Not Triggered |
| | Note: The licensee must keep all information for at least 4 years. | | Not Triggered |
| | Exception Reporting | | |
| O6.10 | 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. | Condition not triggered during the audit period. It was reported by AGL that there were no interstate movements of controlled waste from the CGP during the audit period. | Not Triggered |
| O6.11 | The licensee must notify the DECC in writing within 48 hours of becoming aware of any of the following: | Condition not triggered during the audit period. | Not Triggered |

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| O6.11 (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. | It was reported by AGL that there were no interstate movements of controlled waste from the CGP during the audit period. | Not Triggered |
| O6.11 (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. | | Not Triggered |
| O6.11 (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. | | Not Triggered |
| O6.11 (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. | | Not Triggered |
| O6.11 (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. Note: The DECC should be notified of exception reports by sending a facsimile to: Manager, Hazardous Waste Regulation, NSW Environment Protection Authority. | | Not Triggered |
| R4 | Regular reporting of transportation of certain wastes within NSW | | |
| R4.1 | Conditions R4.2 to R4.5 apply to the transport of hazardous and/or industrial and/or Group A waste within NSW. | Condition noted. | Note |
| | Regular reporting | | |
| R4.2 | 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. | It is noted that Appendix 2, Table 1 is not attached to the Development Consent. This condition is no longer reflected in the Environment Protection Licence for the CGP. | Not Triggered |
| 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. | It is noted that Appendix 2, Table 2 is not attached to the Development Consent. This condition is no longer reflected in the Environment Protection Licence for the CGP. | Not Triggered |
| | Reporting periods | | |
| R4.4 | Reports to the DECC in accordance with R4.2 and R4.3 shall be supplied on or before: | It is noted that Appendix 2, Tables 1 and 2 are not attached to the Development Consent. This condition is no longer reflected in the Environment Protection Licence for the CGP. | Not Triggered |
| R4.4(a) | 30 April for the reporting of information relating to wastes transported from the premises between 1 January and 31 March of that year. | | Not Triggered |

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| R4.4(b) | 31 July for the reporting of information relating to wastes transported from the premises between 1 April and 30 June of that year. | | Not Triggered |
| R4.4(c) | 31 October for the reporting of information relating to wastes transported from the premises between 1 July and 30 September of that year. | | Not Triggered |
| R4.4(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. 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. | | Not Triggered |
| | Nil reports | | |
| R4.5 | 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. | Condition not triggered during the audit period. | Not Triggered |
| R5 | Regular reporting of interstate movements of controlled wastes | | |
| 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. Note: The requirements of the NEP apply to the interstate movement of any of the wastes listed in Appendix 1 of this licence. | Condition not triggered during the audit period. It was reported by AGL that there were no interstate movements of controlled waste from the CGP during the audit period. | Not Triggered |
| | Regular reporting | | |
| R5.2 | 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 3. | Condition not triggered during the audit period. It was reported by AGL that there were no interstate movements of controlled waste from the CGP during the audit period. | Not Triggered |
| | Reporting periods | | |
| R5.3 | Reports to the DECC in accordance with R5.2 shall be supplied on or before: | Condition not triggered during the audit period. | Not Triggered |
| R5.3(a) | 30 April for the reporting of information relating to wastes transported from the premises between 1 January and 31 March of that year. | It was reported by AGL that there were no interstate movements of controlled waste from the CGP during the audit period. | Not Triggered |
| R5.3(b) | 31 July for the reporting of information relating to wastes transported from premises between 1 April and 30 June of that year. | | Not Triggered |
| R5.3(c) | 31 October for the reporting of information relating to wastes transported from the premises between 1 July and 30 September of that year. | | Not Triggered |

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| R5.3(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. | | Not Triggered |
| | Nil reports | | |
| R5.4 | 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. | Condition not triggered during the audit period. It was reported by AGL that there were no interstate movements of controlled waste from the CGP during the audit period. | Not Triggered |
| | Interstate transport of controlled wastes | | |
| R5.5 | The licensee must comply with the requirements of the NEPM. | Condition not triggered during the audit period. It was reported by AGL that there were no interstate movements of controlled waste from the CGP during the audit period. | Not Triggered |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
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| | SCHEDULE 2 | | |
| | Obligation to Minimise Harm to the Environment | | |
| 1 | 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>An EMS has been developed and implemented to manage environmental risks and achieve performance improvements. The EMS consists of an EMP, Sub Plans and a compliance management system.</p> <p>A number of controls are in place to monitor and measure implementation of the EMS including Environmental Management Sub Plan Compliance Audits, Daily Workover Reports, Monthly Dam Inspection Reports, air quality monitoring and noise monitoring. The auditor sighted a sample of monitoring controls and noted compliance with the requirements of the EMP.</p> <p>Compliance obligations arising from licences, leases, environmental/ planning approvals and legislation are monitored through a web-based database compliance management system (CMO Compliance). The auditor sighted CMO Compliance and determined that the tool effectively monitors compliance against obligations.</p> <p>A 'Compliance - Improvement Recommended' was reported against this condition in the 2012-2014 Independent Environmental Audit (22/01/15). The auditor recommended that each condition within CMO Compliance be checked to ensure it accurately reflects the documented consent. This matter has been adequately addressed.</p> | Compliant |
| | Terms of Approval | | |
| 2 | The Applicant shall carry out the development generally in accordance with the: | It was reported by AGL that the development is undertaken in accordance with the EMP and Sub Plans which reflect the requirements of the Consent Conditions. On receipt of an approved consent or modification, the EMP is reported to be revised to reflect the new requirements. This was evidenced by the frequent revision history of the document. | Not Verified |
| | (a) DA submitted to the Department on 28 July 2004; | | Not Verified |
| | (b) Statement of Environmental Effects - Harness Racing Drilling Program Sydney Gas Company dated 24 June 2003; | | Not Verified |
| | (c) Review of Environmental Effects - Mt Taurus Drilling Program Sydney Gas Company dated March 2004; | | Not Verified |

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| | (d) Modification Application MOD 27-3-2007 and Camden Gas Project Joint Venture Gas Well and Gathering Line Modification Project Statement of Environmental Effects, dated March 2007; and | The DA and subsequent modifications were submitted by Sydney Gas and as such were not available for the purpose of this assessment. | Not Verified |
| | (e) Modification Application MOD 13-10-2011, Camden Gas Project: MP25 Environmental Assessment dated October 2011, Response to Submissions dated 17 February 2012 and associated Statement of Commitments dated April 2012 (see Appendix 1); and | | Not Verified |
| | (f) Conditions of this consent. | Refer to relevant conditions for an assessment of compliance. | Note |
| | 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. | Condition is noted | Note |
| 3 | The Applicant shall comply with any reasonable requirement/s of the Director-General arising from the Department's assessment of: | Condition is noted | Note |
| | (a) Any reports, plans or correspondence that are submitted in accordance with this consent; and | | Note |
| | (b) The implementation of any actions or measures contained in these reports, plans or correspondence. | | Note |
| 4 | This approval is for a period of twenty one (21) years from the granting of the production lease. | Condition not triggered during the audit period. | Not Triggered |
| 5 | Nothing in this consent permits the drilling and operation of any additional wells (beyond the approved 17 wells for gas production) or gas gathering lines. | As part of the 2010-2012 Independent Environmental Audit, the auditor reviewed the list of gas wells provided by AGL against the development consent and modifications and determined that the development was compliant against the requirements of this condition. It was reported by AGL (Annual Environmental Performance Reports) that one additional well (MP25) has been drilled since that time. As such, AGL remains in compliance. | Compliant |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
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| 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. | <p>A 'Non-Compliance - Level 2' was reported against this condition in the 2012-2014 Independent Environmental Audit (22/01/15). The auditor determined that the GPS coordinates and survey data was not provided to the Councils within the specified timeframes.</p> <p>Given that there were no gas wells or gas gathering lines completed during the audit period with respect to DA183-8-2004, this condition was not triggered.</p> | Not Triggered |
| 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. | <p>A 'Non-Compliance - Level 2' was reported against this condition in the 2012-2014 Independent Environmental Audit (22/01/15). The auditor determined that the wellhead configurations were not provided to the Councils within the specified timeframes.</p> <p>Given that there were no gas wells completed during the audit period, this condition was not triggered.</p> | Not Triggered |
| 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. | Condition not triggered during the audit period. | Not Triggered |
| Environmental Management | | | |
| 9 | <p>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.</p> <p>Note: Section 120 of the Protection of the Environment Operations Act 1997 applies to the disposal of wastewater.</p> | <p>The auditor sighted the EMP (March 2016) and Soil and Water Management Sub Plan (May 2016). The plans detail a number of controls to prevent the pollution of water.</p> <p>There were no reportable water pollution incidents during the audit period.</p> | Compliant |
| 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. | Condition closed in a previous audit. | Not Triggered |
| 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. | Condition closed in a previous audit. | Not Triggered |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding | | | | | | | | | | |
|-------------------|---|---|---|--|---------------------------|-------------------------|------------------|----|----|----|----|---|-----------|
| 12 | The Applicant is required to store and manage the use and disposal of water in accordance with the current version of the Office of Environment and Heritage's <i>Environmental Guidelines: Assessment, Classification and Management of Liquid and Non-Liquid Wastes</i> | The auditor sighted the AGL Environmental Footprint spreadsheet for the financial years 2014/15 and 2015/16 which notes that produced water was primarily reused by external industries. To a lesser extent, produced water was reused during workover activities. The auditor sighted a sample of disposal records generated during the audit period and reconciled against the Environmental Footprint. There were no errors or omissions identified. | Compliant | | | | | | | | | | |
| 13 | The Applicant shall undertake the development in a way that minimises the noise generated by the development. | The auditor sighted the Noise Management Sub Plan (April 2016) and noted compliance with the requirements of this condition. Implementation was evidenced by the induction program (construction hours) and letters of notification to residents. | Compliant | | | | | | | | | | |
| | Construction Hours | | | | | | | | | | | | |
| 13A. | The Applicant shall ensure that all construction work (except for the 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 and 1.00pm Saturdays, unless inaudible at any residential receiver. Note: Inaudible means that the construction activity cannot be heard by the human ear at the nearest affected residential receiver. | The auditor sighted the Noise Management Sub Plan (April 2016) and induction program noted compliance with the requirements of this condition. AGL reported that there were no construction activities undertaken during the audit period with respect to DA183-8-2004. | Not Triggered | | | | | | | | | | |
| | Construction Noise Criteria for Surface to in-seam Wells | | | | | | | | | | | | |
| 13B. | Noise from the drilling and construction of MP30 shall not exceed the sound pressure level (noise) limits in the table below: | Condition not triggered during the audit period. | Not Triggered | | | | | | | | | | |
| 13C. | Noise from the drilling and construction of MP25 shall not exceed the sound pressure level (noise) limits in the table below: <table border="1" data-bbox="302 1109 1008 1268"> <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>47</td> <td>42</td> <td>42</td> <td>40</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 | 47 | 42 | 42 | 40 | Condition not triggered during the audit period. It was reported by AGL (AEPR 2014-2015, 15/10/15 and AEPR 2015-2016, 31/10/16) that there were no re-drilling or construction activities undertaken during the audit period with respect to DA183-8-2004. | 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 | 47 | 42 | 42 | 40 | | | | | | | | | |

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| 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. | Condition closed in a previous audit. | Not Triggered |
| 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. | A major flood event occurred on 5 June 2016 at the Nepean River, Menangle Park ('Menangle Park Flood Event'). As a result of the overland flow, produced water tanks associated with MP15, MP16/MP25 and EM21 were adversely effected. The tank contents (produced water) discharged into flood waters. The EPA subsequently issued a Notice to Provide Information and/or Records. As part of the audit, an assessment was conducted of the adequacy of the Emergency Response Plan (20/11/15) and the Field Production Flood Management Procedure (Version 5 and Version 6). The audit determined that the documents were largely implemented during the Menangle Park Flood Event. Isolated issues of concern are detailed in Section 3.4.1. | Observation |
| 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. | Condition closed in a previous audit. | Not Triggered |
| | Soil and Water Management Plan at MP25 | | |
| 16A. | Prior to the commencement of construction of the gas well at MP25, the management plans submitted under conditions 15 and 16 must: | Condition closed in a previous audit. | Not Triggered |
| | a) be updated by a suitably qualified expert; | | Not Triggered |
| | b) be re-submitted to the Director-General for approval prior to the commencement of construction activities at the MP25 gas well site; | | Not Triggered |
| | c) include measures to minimise impacts on surface water and groundwater quality at the MP25 gas well site, including but not limited to: | | Not Triggered |
| | i. using above-ground baffle tanks to contain all drilling fluids during drilling operations; | | Not Triggered |

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| | ii. disposing of all drilling fluids and groundwater collected in the baffle tanks at an authorised wastewater treatment facility; | | Not Triggered |
| | iii. ensuring that adequate spill control equipment and materials will be available at drill sites; | | Not Triggered |
| | iv. a contingency plan to address any groundwater brought to the surface that exceeds the capacity of onsite detention structure, and would avoid discharges from the site (otherwise than in accordance with an environment protection licence); and | | Not Triggered |
| | v. ensuring that no hydraulic fracturing occurs and that no fracking fluids containing Benzene, Toluene, Ethylbenzene and Xylene (BTEXO chemicals are used. | | Not Triggered |
| | Bore Construction at MP25 | | |
| 16B | The Applicant must ensure that the gas well at MP25: | Condition not triggered during the audit period. | Not Triggered |
| | (a) is designed in consultation with, and in accordance with the specifications required by, the Division of Resources and Energy (DRE), under the Department of Trade, Investment, Regional Infrastructure and Services (DTIRIS); | | Not Triggered |
| | (b) is cased with steel across the uppermost beneficial-use aquifer layer; | | Not Triggered |
| | (c) has all casing fully cemented from casing shoe to surface, leaving no open annuluses; and | | Not Triggered |
| | (d) has a blow-out prevention device on the wellhead secured to the steel casing. | | Not Triggered |
| | In order to protect the integrity of any underground aquifers, prevent gas escape and maintain groundwater quality. | | Not Triggered |
| | Gas Gathering Line – MP16 to MP30 | | |
| 16C. | For the gas gathering line between MP30 and MP15, the Applicant shall, to the satisfaction of the Director-General ensure that: | Condition closed in a previous audit. | Not Triggered |
| | (a) pipelines are designed, constructed and operated in accordance with the Australian Standard for Installation and Maintenance of Plastic Pipe Systems for Gas AS3723-1989 (or its latest version); | | Not Triggered |
| | (b) the route of the gas gathering and water transport systems and access roads follow previously or currently disturbed areas wherever practicable; | | Not Triggered |
| | (c) trenches are not left open overnight, unless adequately covered; | | Not Triggered |

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| | (d) open trenching works within 20 metres of watercourses are only undertaken during dry weather conditions; | | Not Triggered |
| | (e) construction activities do not impede lateral water flows; | | Not Triggered |
| | (f) no crown or camber remains along any gas gathering system line, following rehabilitation; | | Not Triggered |
| | (g) signs are erected at intervals along all gas gathering system lines indicating the presence of a buried gas pipeline; and | | Not Triggered |
| | (h) impacts to riparian vegetation and engendered ecological communities are minimised. | | Not Triggered |
| | Heritage | | |
| 16D. | 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. | Condition not triggered during the audit period. | Not Triggered |
| | Threatened Species | | |
| 16E. | 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: | Condition not triggered during the audit period. | Not Triggered |
| | (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 | | Not Triggered |
| | (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. | | Not Triggered |
| 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. | The auditor sighted the Rehabilitation and Landscape Management Sub Plan (April 2016) and noted compliance with the requirements of this condition. | Compliant |
| 17A. | Prior to the commencement of construction of the gas well at MP25, the management plan under condition 17 must: | Condition closed in a previous audit. | Not Triggered |
| | (a) be updated by a suitably qualified expert to include gas well MP25; and | | Not Triggered |

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| | (b) be re-submitted to the Director-General for approval. | | Not Triggered |
| | Redrilling and Refracting Management Plan | | |
| | <i>Note: For the purposes of this consent the redrilling and/or additional fraccing of a well does not constitute wellhead maintenance.</i> | Condition noted. | Note |
| 18 | The Applicant shall obtain the prior approval of the Director-General for the redrilling and/or additional fraccing of a gas well. | Condition was not triggered during the audit period. It was reported by AGL (AEPR 2014-2015, 15/10/15 and AEPR 2015-2016, 31/10/16) that there were no re-drilling or fraccing activities conducted during the audit period. | Not Triggered |
| 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. | Condition was not triggered during the audit period. It was reported by AGL (AEPR 2014-2015, 15/10/15 and AEPR 2015-2016, 31/10/16) that there were no re-drilling or fraccing activities conducted during the audit period. | Not Triggered |
| | The Plan shall include, but not necessarily be limited to: | | Not Triggered |
| | (a) a description of all the activities to be undertaken on the well site during the redrilling and/or refracting work; | | Not Triggered |
| | (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; | | Not Triggered |
| | (c) reference to the relevant parts of the Environmental Management Plan required under condition 21 of this consent; | | Not Triggered |
| | (d) compliance with all the relevant environmental performance requirements of this consent; and | | Not Triggered |
| | (e) arrangements for complaints handling procedures during the redrilling/refracting work. | | Not Triggered |
| 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. | Condition was not triggered during the audit period. It was reported by AGL (AEPR 2014-2015, 15/10/15 and AEPR 2015-2016, 31/10/16) that there were no re-drilling or fraccing activities conducted during the audit period. | Not Triggered |
| | Operational Environmental Management Plan (OEMP) | | |

B4. DA 183-8-2004

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|------|---|---|---------------|
| 21 | 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: | The auditor sighted the EMP (March 2016) and noted compliance with the requirements of this condition. Following the most recent revision (March 2016), the EMP was submitted to the DPE for approval (6/04/16). | Compliant |
| | (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; | A number of controls are in place to monitor and measure implementation of the EMS including Environmental Management Sub Plan Compliance Audits, Daily Workover Reports, Monthly Dam Inspection Reports, air quality monitoring and noise monitoring. The auditor sighted a sample of monitoring controls and noted compliance with the requirements of the EMP. Compliance obligations arising from licences, leases, environmental/ planning approvals and legislation are monitored through a web-based database compliance management system (CMO Compliance). The auditor sighted CMO Compliance and determined that the tool effectively monitors compliance against obligations. | Compliant |
| | (b) a description of the roles and responsibilities for all key personnel involved in the operation of the development; | | Compliant |
| | (c) the overall environmental policies and principles to be applied to the operation of the development; | | Compliant |
| | (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 | | Compliant |
| | (e) management policies to ensure that environmental performance goals are met and to comply with conditions of this consent. | | Compliant |
| 21A. | Prior to the commencement of construction of the gas well at MP25, the OEMP submitted under condition 22 must: | Condition closed in a previous audit. | Not Triggered |
| | (a) be updated by a suitably qualified expert to include gas well MP25; and | | Not Triggered |
| | (b) be re-submitted to the Director-General for approval. | | Not Triggered |
| 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. | Condition closed in a previous audit. | Not Triggered |
| 23 | The Applicant shall review and update the OEMP annually, or as directed by the Director-General | During the audit period, the EMP and Sub Plans were reviewed annually as evidenced by the revision history recorded within the documents. A 'Non-Compliance - Level 2' was reported against this condition in the 2012-2014 Independent Environmental Audit (22/01/15). The auditor recommended that the EMP and Sub Plans be reviewed annually. This matter has been adequately addressed. | Compliant |

B4. DA 183-8-2004

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|--|---|-----------|
| | Annual Environmental Performance Reporting | | |
| 24 | The Applicant shall include the operation of MT1 - MT10 inclusive, MP13 – MP17 inclusive, and MP30, 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. | The auditor sighted the 2014-2015 AEPR (15/10/15) and the 2015-2016 AEPR (31/10/16) and noted compliance with the requirements of this condition. | Compliant |
| | Independent Environmental Audit | | |
| 25 | The Applicant shall include the operation of MT1 - MT10 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. | The scope of this independent audit satisfies this condition. | Compliant |

B5. DA 9-1-2005

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|--|---|--------------|
| | Obligation to Minimise Harm to the Environment | | |
| 1 | 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>An EMS has been developed and implemented to manage environmental risks and achieve performance improvements. The EMS consists of an EMP, Sub Plans and a compliance management system.</p> <p>A number of controls are in place to monitor and measure implementation of the EMS including Environmental Management Sub Plan Compliance Audits, Daily Workover Reports, Monthly Dam Inspection Reports, air quality monitoring and noise monitoring. The auditor sighted a sample of monitoring controls and noted compliance with the requirements of the EMP.</p> <p>Compliance obligations arising from licences, leases, environmental/ planning approvals and legislation are monitored through a web-based database compliance management system (CMO Compliance). The auditor sighted CMO Compliance and determined that the tool effectively monitors compliance against obligations.</p> <p>A 'Compliance - Improvement Recommended' was reported against this condition in the 2012-2014 Independent Environmental Audit (22/01/15). The auditor recommended that each condition within CMO Compliance be checked to ensure it accurately reflects the documented consent. This matter has been adequately addressed.</p> | Compliant |
| | Terms of Approval | | |
| 2 | The Applicant shall carry out the development generally in accordance with the: | <p>It was reported by AGL that the development is undertaken in accordance with the EMP and Sub Plans which reflect the requirements of the Consent Conditions. On receipt of an approved consent or modification, the EMP is reported to be revised to reflect the new requirements. This was evidenced by the frequent revision history of the document.</p> <p>The DA and subsequent modifications were submitted by Sydney Gas and as such were not available for the purpose of this assessment.</p> | Not Verified |
| | (a) DA submitted to the Department on 4 January 2005; | | Not Verified |
| | (b) <i>Statement of Environmental Effects – Elizabeth Macarthur Agricultural Institute Horizontal Drilling Project Sydney Gas Company</i> dated July 2002; | | Not Verified |
| | (c) <i>Statement of Environmental Effects – Glenlee Drilling Project Drilling Operations Sydney Gas Company</i> dated September 2002 | | Not Verified |
| | (d) Letter from Sydney Gas Operations Pty Ltd to the Department dated 13 May 2005, modifying the application to relocate well GL3; | | Not Verified |

B5. DA 9-1-2005

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|--|--|---------------|
| | (e) 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) Pty Ltd and Sydney Gas (Camden) Operations Pty Ltd, dated April 2006; | | Not Verified |
| | (f) Modification Application MOD 28-3-2007 and <i>Camden Gas Project Joint Venture Gas Well and Gathering Line Modification Project Statement of Environmental Effects</i> , dated March 2007; | | Not Verified |
| | (g) letter from AGL Energy Limited to the Department dated 28th May 2010, modifying the application to revise condition 26 of schedule 2; and | | Not Verified |
| | (h) Conditions of this consent. | Refer to relevant conditions for an assessment of compliance. | Note |
| | 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. | Condition not triggered during the audit period. | Not Verified |
| 3 | This approval is for a period of twenty one (21) years from the granting of the production lease. | Condition not triggered during the audit period. | Not Triggered |
| 4 | The Applicant shall not commence the construction of well GL11 until the Director-General has approved the Drilling and Fraccing Management Plan required under condition 37. | Condition closed in a previous audit. | Not Triggered |
| 5 | The Applicant shall comply with any reasonable requirement/s of the Director-General arising from the Department's assessment of: | Condition noted. | Note |
| | (a) Any reports, plans or correspondence that are submitted in accordance with this consent; and | | Note |
| | (b) The implementation of any actions or measures contained in these reports, plans or correspondence. | | Note |
| 6 | Nothing in this consent permits the drilling and operation of any additional wells (beyond the approved 8 wells for gas production). | The auditor reviewed the gas wells reported in the AEPR against the development consents and confirmed that no additional wells have been drilled or operated. | Compliant |

B5. DA 9-1-2005

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|---|--|---------------|
| 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. | Condition not triggered during the audit period. It was reported by AGL (AEPR 2014-2015, 15/10/15 and AEPR 2015-2016, 31/10/16) that there were gas wells or gas gathering system constructed during the audit period with respect to DA9-1-2005. | Not Triggered |
| 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. | Condition not triggered during the audit period. It was reported by AGL (AEPR 2014-2015, 15/10/15 and AEPR 2015-2016, 31/10/16) that there were no gas wells constructed during the audit period. | Not Triggered |
| 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. | Condition not triggered during the audit period. | Not Triggered |
| 10 | The Applicant shall comply with the following in the construction of the gas gathering system pipeline: | Condition not triggered during the audit period. It was reported by AGL (AEPR 2014-2015, 15/10/15 and AEPR 2015-2016, 31/10/16) that the gas gathering system pipeline was constructed prior to the audit period. | Not Triggered |
| | (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; | | Not Triggered |
| | (b) trenches are to be restored and reseeded with local grass seeds on completion of the work; | | Not Triggered |
| | (c) local council traffic guidelines in respect of work carried out on road verges and underneath roads shall be implemented; | | Not Triggered |
| | (d) the Applicant shall construct the gas gathering system so as not to impeach lateral water flows; | | Not Triggered |
| | (e) the Applicant shall ensure that no crown or camber remains along the gas gathering systems, following construction; | | Not Triggered |
| | (f) the pipeline shall be designed, constructed and operated in accordance with the Australian | | Not Triggered |
| | (g) Standard for the installation and maintenance of Plastic Pipe Systems for Gas AS 3723-1989 (or its latest version); and | | Not Triggered |
| | (h) the Department shall be notified on the completion of any trenching works. | Not Triggered | |

B5. DA 9-1-2005

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|--|---|---------------|
| 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. | Condition not triggered during the audit period. | Not Triggered |
| | Hours of Operation | | |
| 12 | The Applicant may conduct construction activities on land owned by Waste Service NSW, during the following hours: | Condition not triggered during the audit period. | Not Triggered |
| | Monday to Friday 7.00 am to 6.00 pm; | | Not Triggered |
| | Saturday and Sunday 7.00 am to 6.00 pm. (Excluding Public Holidays) | | Not Triggered |
| 13 | For development carried out on land not owned by Waste Service NSW, the Applicant is restricted to the following hours of construction: | Condition not triggered during the audit period. | Not Triggered |
| | Monday to Friday 7.00 am to 6.00 pm; | | Not Triggered |
| | Saturday 8.00 am to 1.00 pm. (Excluding Public Holidays) | | Not Triggered |
| | Environmental Management | | |
| 14 | 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. | Condition not triggered during the audit period. | Not Triggered |
| | Note: The <i>Rivers and Foreshore Improvement Act 1948</i> 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. | | Not Triggered |
| 15 | Except as may be expressly provided for by a licence under the <i>Protection of the Environment Operations Act 1997</i> in relation to the development, the Applicant shall comply with section 120 of the <i>Protection of the Environment Operations Act 1997</i> , in carrying out this development. Note: Section 120 of the <i>Protection of the Environment Operations Act 1997</i> applies to the disposal of wastewater. | The auditor sighted the EMP (March 2016) and Soil and Water Management Sub Plan (May 2016). The plans detail a number of controls to prevent the pollution of water. There were no reportable water pollution incidents during the audit period. | Compliant |

B5. DA 9-1-2005

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|--|--|---------------|
| 16 | The Applicant shall implement all practicable measures to minimise soil erosion and the discharge of sediments and water pollutants from the site. | The auditor sighted the Soil and Water Management Sub Plan (May 2016) and noted compliance with the requirements of this condition. There were no excavation works undertaken during the audit period with respect to this development consent. | Compliant |
| 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. | Condition not triggered during the audit period. | Not Triggered |
| 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. | Condition not triggered during the audit period. | Not Triggered |
| 19 | The Applicant shall undertake the development in a way that minimises the noise generated by the development. | The auditor sighted the Noise Management Sub Plan (April 2016) and noted compliance with the requirements of this condition. There were no reported noise complaints during the audit period and no noise monitoring warranted. | Not Triggered |
| 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. | A major flood event occurred on 5 June 2016 at the Nepean River, Menangle Park ('Menangle Park Flood Event'). As a result of the overland flow, produced water tanks associated with MP15, MP16/MP25 and EM21 were adversely effected. The tank contents (produced water) discharged into flood waters. The EPA subsequently issued a Notice to Provide Information and/or Records. As part of the audit, an assessment was conducted of the adequacy of the Emergency Response Plan (20/11/15) and the Field Production Flood Management Procedure (Version 5 and Version 6). The audit determined that the documents were largely implemented during the Menangle Park Flood Event. Isolated issues of concern are detailed in Section 3.4.1. | Observation |
| 21 | The Applicant shall ensure that the route of the gas gathering system follows previously or currently disturbed areas wherever possible. | Condition not triggered during the audit period. | Not Triggered |
| 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. | Condition not triggered during the audit period. | Not Triggered |

B5. DA 9-1-2005

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|------|--|--|---------------|
| | Threatened Species | | |
| 22A. | 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: | Condition not triggered during the audit period. | Not Triggered |
| | (a) The recommendations outlined in Sections 6 and 7 of the Ecosearch Environmental Consultants Pty Ltd report titled <i>Flora and Fauna Assessment, AGL –Gas Well and Gathering Line Project Modifications</i> ; and | | Not Triggered |
| | (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. | | Not Triggered |
| 23 | The Applicant shall not remove mature trees as part of this development unless otherwise agreed by the Director-General. | The auditor sighted the Flora and Fauna Management Sub Plan (April 2016) and Rehabilitation and Landscape Management Sub Plan (April 2016). The plans comply with the requirements of this condition. It was reported by AGL that there were no mature trees removed during the audit period. | Compliant |
| 24 | The Applicant shall implement best practice flora and fauna management. | The auditor sighted the Flora and Fauna Management Sub Plan (April 2016) and noted compliance with the requirements of this condition. | Compliant |
| 25 | The Applicant shall take all practicable measures to minimise potential flora and fauna impacts of the proposed development. | The auditor sighted the Flora and Fauna Management Sub Plan (April 2016) and noted compliance with the requirements of this condition. | Compliant |
| 26 | The Applicant shall provide landscaping around the well heads using appropriate species in consultation with the land owner. | The auditor sighted the Rehabilitation and Landscape Management Sub Plan (April 2016) and noted compliance with the requirements of this condition. It was reported by AGL that there were no landscaping works undertaken during the audit period with respect to this development consent. | Compliant |
| 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. | Condition not triggered during the audit period. | Not Triggered |

B5. DA 9-1-2005

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|---|---|---------------|
| 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. | Condition closed in a previous audit. | Not Triggered |
| 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. | The auditor sighted the Rehabilitation and Landscape Management Sub Plan (April 2016) and noted compliance with the requirements of this condition. Following revision of the Sub Plan in 2015, AGL requested feedback from the DPE (17/04/15, 30/06/15 and 04/09/15). | Compliant |
| 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. | Condition not triggered during the audit period. | Not Triggered |
| 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. | Condition not triggered during the audit period. | Not Triggered |
| | Safety and Risk | | |
| 32 | 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. | The Auditor sighted the Emergency Response Plan (20/11/15) and the Health and Safety Management Plan, Camden Project NSW (March 2015) and noted compliance with the requirements of this condition. | Compliant |
| | (a) <u>Emergency Plan</u> 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. | The Auditor sighted the Emergency Response Plan (20/11/15) and noted compliance with the requirements of this condition. | Compliant |

B5. DA 9-1-2005

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|---|---|---------------|
| | <p>(b) <u>Safety Management System</u> 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>The Auditor sighted the Health and Safety Management Plan, Camden Project NSW (March 2015) and noted compliance with the requirements of this condition.</p> <p>Implementation was demonstrated through the following documents/systems: 1. Induction program (Rapid Induct); 2. Audit program and sample of completed audits; 3. Audit Actions Tracker; and 4. Standard methodologies for common works (e.g. confined space).</p> | Compliant |
| | <p>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.</p> | Condition noted. | Note |
| | Compliance Report | | |
| 33 | <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>Condition closed in a previous audit.</p> | Not Triggered |
| | <p>(a) dates of study/plan/system completion/submission and commencement of construction and commissioning;</p> | <p>A 'Non-Compliance - Level 2' was reported against this condition in the 2012-2014 Independent environmental Audit (22/01/15) due to the date of submission. There was no recommended action identified by the auditor.</p> | Not Triggered |
| | <p>(b) actions taken or proposed, to implement recommendations made in the studies/plans/systems; and</p> | | Not Triggered |
| | <p>(c) responses to any requirement imposed by the Director-General under Condition 35.</p> | | Not Triggered |
| | <p>This report shall verify that:</p> | | Not Triggered |
| | <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> | | Not Triggered |
| | <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> | | Not Triggered |

B5. DA 9-1-2005

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|---|---|---------------|
| | 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: | | Not Triggered |
| | (a) The required study/plan/system has been undertaken or prepared to the relevant Hazardous Industry Planning Advisory Panel; | | Not Triggered |
| | (b) All recommendations of each study/plan/system have been implemented; and | | Not Triggered |
| | (c) All safety management system and their associated risk controls have been implemented and are being maintained. | | Not Triggered |
| | Hazard Audit | | |
| 34 | 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 auditor sighted the following documents demonstrating compliance with the requirements of this condition: 1. 'Report of the 2016 Hazard Audit of the CGP Operated by AGL Upstream Investments Pty Ltd', Planager, 10/06/16. 2. Correspondence from the DPE noting approval of Ms Karin Nilsson of Planager Pty Ltd to undertake the independent hazard audit. 3. Correspondence from AGL to the DPE enclosing the independent hazard audit (22/06/16). | Compliant |
| | 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. | | Compliant |
| | Note: The Applicant may include the three yearly hazard audit of the development with the Hazard Audit required under Schedule 4 Condition 95 of development consent DA-282-6-2003-i, dated 16 June 2004. | | Compliant |
| 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. | Condition not triggered during the audit period. | Not Triggered |
| | Drilling and Fracing Management Plan | | |
| | Note: For the purposes of this consent the re-drilling and/or additional fracing of a well does not constitute wellhead maintenance. | Condition not triggered during the audit period. It was reported by AGL (AEPR 2014-2015, 15/10/15 and AEPR 2015-2016, 31/10/16) that there were no re-drilling or fracing activities undertaken during the audit period. | Not Triggered |

B5. DA 9-1-2005

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|--|--|---------------|
| 36 | The Applicant shall obtain the prior approval of the Director-General for the drilling, redrilling and/or additional fracing of a gas well. | Condition not triggered during the audit period. It was reported by AGL (AEPR 2014-2015, 15/10/15 and AEPR 2015-2016, 31/10/16) that there were no re-drilling or fracing activities undertaken during the audit period. | Not Triggered |
| 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: | Condition not triggered during the audit period. It was reported by AGL (AEPR 2014-2015, 15/10/15 and AEPR 2015-2016, 31/10/16) that there were no re-drilling or fracing activities undertaken during the audit period. | Not Triggered |
| | (a) a description of all the activities to be undertaken on the well site during the drilling, redrilling and/or refracing work; | | Not Triggered |
| | (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; | | Not Triggered |
| | (c) reference to the relevant parts of the Environmental Management Plan required under condition 41; | | Not Triggered |
| | (d) compliance with all the relevant environmental performance requirements of this consent; and | | Not Triggered |
| | (e) arrangements for complaints handling procedures during the drilling, redrilling and/or refracing work. | | Not Triggered |
| 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. | Condition not triggered during the audit period. It was reported by AGL (AEPR 2014-2015, 15/10/15 and AEPR 2015-2016, 31/10/16) that there were no re-drilling or fracing activities undertaken during the audit period. | Not Triggered |
| | Construction Environmental Management Plan (CEMP) | | |
| 39 | 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. | Condition not triggered during the audit period. It was reported by AGL (AEPR 2014-2015, 15/10/15 and AEPR 2015-2016, 31/10/16) that there were no construction activities undertaken during the audit period with respect to DA9-1-2005. | Not Triggered |

B5. DA 9-1-2005

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|---|--|--|---------------|
| 40 | <p>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.</p> <p>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.</p> | <p>Condition not triggered during the audit period.</p> <p>It was reported by AGL (AEPR 2014-2015, 15/10/15 and AEPR 2015-2016, 31/10/16) that there were no construction activities during the audit period with respect to DA9-1-2005.</p> | Not Triggered |
| Operational Environmental Management Plan (OEMP) | | | |
| 41 | <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> | <p>The auditor sighted the EMP (March 2016) and noted compliance with the requirements of this condition.</p> | Compliant |
| | (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; | <p>A number of controls are in place to monitor and measure implementation of the EMS including Environmental Management Sub Plan Compliance Audits, Daily Workover Reports, Monthly Dam Inspection Reports, air quality monitoring and noise monitoring. The auditor sighted a sample of monitoring controls and noted compliance with the requirements of the EMP.</p> | Compliant |
| | (b) a description of the roles and responsibilities for all key personnel involved in the operation of the development; | | Compliant |
| | (c) the overall environmental policies and principles to be applied to the operation of the development; | | Compliant |
| | (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 | | Compliant |
| | (e) management policies to ensure that environmental performance goals are met and to comply with conditions of this consent. | | Compliant |
| | <p>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.</p> | | Compliant |
| Annual Environmental Performance Reporting | | | |

B5. DA 9-1-2005

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|---|--|---|---------------|
| 42 | 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. | The auditor sighted the AEPR 2014-2015 (15/10/15) and the AEPR 2015-2016 (31/10/16) and noted compliance with the requirements of this condition. | Compliant |
| Independent Environmental Audit – Construction at EMAI | | | |
| 43 | 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. | Condition closed in a previous audit. | Not Triggered |
| The Independent Environmental Audit shall: | | | Not Triggered |
| (a) be conducted by a suitably qualified, experienced, and independent person(s) whose appointment has been approved by the Director-General; and | | | Not Triggered |
| (b) be consistent with ISO 19011:2002 - Guidelines for Quality and/ or Environmental Management Systems Auditing, or updated versions of these guidelines/manuals. | | | Not Triggered |
| The Audit shall: | | | Not Triggered |
| a) assess the environmental performance of the construction of the development on EMAI, and its effects on the surrounding environment; | | | Not Triggered |
| b) assess whether the development is complying with the relevant standards, performance measures, and statutory requirements; | | | Not Triggered |
| c) consider the Applicant’s proposed Construction Environmental Management Plan for the EMAI Site; and | | | Not Triggered |
| 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). | | | Not Triggered |

B5. DA 9-1-2005

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|--|---|---------------|
| | 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. | | Not Triggered |
| | Note: The Applicant may include the construction of the development on the EMAI in the audit prepared to comply with Schedule 5 Condition 8 of development consent DA-282-6-2003-i, dated 16 June 2004. | | Not Triggered |
| | Independent Environmental Audit – Operation | | |
| 44 | 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-282-6-2003- i, dated 16 June 2004. | The scope of this 2014-2016 Independent Environmental Audit complies with the requirements of this condition. | Compliant |

B6. DA 75-4-2005

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|--|---|--------------|
| | SCHEDULE 2 | | |
| | Obligation to Minimise Harm to the Environment | | |
| 1 | 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>An EMS has been developed and implemented to manage environmental risks and achieve performance improvements. The EMS consists of an EMP, Sub Plans and a compliance management system.</p> <p>A number of controls are in place to monitor and measure implementation of the EMS including Environmental Management Sub Plan Compliance Audits, Daily Workover Reports, Monthly Dam Inspection Reports, air quality monitoring and noise monitoring. The auditor sighted a sample of monitoring controls and noted compliance with the requirements of the EMP.</p> <p>Compliance obligations arising from licences, leases, environmental/ planning approvals and legislation are monitored through a web-based database compliance management system (CMO Compliance). The auditor sighted CMO Compliance and determined that the tool effectively monitors compliance against obligations.</p> <p>A 'Compliance - Improvement Recommended' was reported against this condition in the 2012-2014 Independent Environmental Audit (22/01/15). The auditor recommended that each condition within CMO Compliance be checked to ensure it accurately reflects the documented consent. This matter has been adequately addressed.</p> | Compliant |
| | Terms of Approval | | |
| 2 | The Applicant shall carry out the development generally in accordance with the: | It was reported by AGL that the development is undertaken in accordance with the EMP and Sub Plans which reflect the requirements of the Consent Conditions. On receipt of an approved consent or modification, the EMP is reported to be revised to reflect the new requirements. This was evidenced by the frequent revision history of the document. | Not Verified |
| | (a) Development Application submitted to the Department on 18 April 2005; | | Not Verified |
| | (b) <i>Statement of Environmental Effects – Camden Gas Project, Sugarloaf Farm Drilling Program, PPL4</i> Sydney Gas (Camden) Operations Pty Ltd, dated March 2005; | | Not Verified |
| | (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; | | Not Verified |

B6. DA 75-4-2005

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|---|---|---|
| | (d) Letter from Sydney Gas (Camden) Operations Pty Ltd to the Department, dated 20 May 2005, amending the application to relocate SL5; | The DA and subsequent modifications were submitted by Sydney Gas and as such were not available for the purpose of this assessment. | Not Verified |
| | (e) Letter from Sydney Gas (Camden) Operations Pty Ltd to the Department, dated 30 May 2005, providing a response to general public submissions; | | Not Verified |
| | (f) Letter from Sydney Gas (Camden) Operations Pty Ltd to the Department, dated 17 June 2005, about the access roads; | | Not Verified |
| | (g) Letter from Sydney Gas (Camden) Operations Pty Ltd to the Department of Environment and Conservation, dated 10 June 2005, about Aboriginal heritage issues; | | Not Verified |
| | (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; | | Not Verified |
| | (i) Modification Application MOD 29-3-2007 and Camden Gas Project Joint Venture Gas Well and Gathering Line Modification Project Statement of Environmental Effects , dated March 2007; | | Not Verified |
| | (j) Modification Application DA 75-4-2005 MOD 2 and letter dated 18 December 2009; | | Not Verified |
| | (k) EA titled Spring Farm and Menangle Park Gas Gathering System Modifications – Gas gathering line MP22 to SL02 prepared by AGL Gas Production (Camden) Pty Ltd, and dated 7 December 2010; and | | Not Verified |
| | (l) conditions of this approval. | | Refer to relevant conditions for an assessment of compliance. |
| | 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. | Condition noted. | Note |
| 3 | The Applicant shall comply with any reasonable requirement/s of the Director-General arising from the Department’s assessment of: | Condition not triggered during the audit period. | Not Triggered |
| | (a) Any reports, plans or correspondence that are submitted in accordance with this consent; and | | Not Triggered |
| | (b) The implementation of any actions or measures contained in these reports, plans or correspondence. | | Not Triggered |

B6. DA 75-4-2005

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|---|---|---------------|
| | Limits on Approval | | |
| 4 | 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. | Condition not triggered during the audit period. | Not Triggered |
| 5 | Nothing in this consent permits the drilling and operation of any additional wells (beyond the approved 9 wells for gas production). | The auditor reviewed the gas wells reported in the AEPR against the development consents and confirmed that no additional wells have been drilled or operated. | Compliant |
| 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. | Condition closed in a previous audit. | Not Triggered |
| 7 | The access road near SL7 shall only be used in an emergency. | Condition closed in a previous audit. | Not Triggered |
| | Administration | | |
| 8 | Construction shall not commence until the Applicant has obtained a Part 3A Permit under the <i>Rivers and Foreshores Improvement Act 1948</i> , a Licence from the OEH under the <i>Protection of the Environment Operations Act 1997</i> , and an approval under section 60 of the <i>Heritage Act 1977</i> from the NSW Heritage Council. 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. | Condition not triggered during the audit period. It was reported by AGL (AEPR 2014-2015, 15/10/15 and AEPR 2015-2016, 31/10/16) that there were no construction works during the audit period with respect to DA75-4-2005. | Not Triggered |
| 9 | An application must be made to the OEH under section 90 of the <i>National Parks and Wildlife Act 1974</i> for approval to destroy the known objects at Sugarloaf Farm Site 1 (Locale 5) and Sugarloaf Farm Site 5. | Condition not triggered during the audit period. | Not Triggered |
| 10 | The Applicant must, in the opinion of the OEH be a fit and proper person to hold a Licence under the <i>Protection of the Environment Operations Act 1997</i> , having regard to the matters in section 83 of that Act. | AGL has not had a licence suspended or revoked during the audit period and as such would be considered to be a fit and proper person. | Compliant |
| 11 | The premises for the purposes of the Licence under the <i>Protection of the Environment Operations Act 1997</i> , 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. | Condition noted. | Note |

B6. DA 75-4-2005

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|---|---|---|---------------|
| 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. | Condition not triggered during the audit period. It was reported by AGL (AEPR 2014-2015, 15/10/15 and AEPR 2015-2016, 31/10/16) that there were no drilling or workover maintenance works undertaken during the audit period. | Not Triggered |
| 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. | Condition not triggered during the audit period. It was reported by AGL (AEPR 2014-2015, 15/10/15 and AEPR 2015-2016, 31/10/16) that there were gas wells or gas gathering system constructed during the audit period with respect to DA75-4-2005. | Not Triggered |
| 14 | 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. | Condition not triggered during the audit period. It was reported by AGL (AEPR 2014-2015, 15/10/15 and AEPR 2015-2016, 31/10/16) that there were gas wells or gas gathering system constructed during the audit period with respect to DA75-4-2005. | Not Triggered |
| 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. | Condition not triggered during the audit period. | Not Triggered |
| ENVIRONMENTAL PERFORMANCE CONDITIONS | | | |
| Activities Must be Carried out in a competent Manner | | | |

B6. DA 75-4-2005

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|---|---|--|-----------|
| 16 | <p>The development must be carried out in a competent manner. This includes:</p> <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. | <p>Competence is demonstrated through defined roles and responsibilities, training, and assurance, as detailed below:</p> <ol style="list-style-type: none"> 1. Roles and responsibilities - Defined in the EMP (March 2016) and position descriptions. The position description of the Gas Plant Operator (16/12/12) was sighted by the auditor and noted to include a requirement to achieve regulatory compliance and adhere to the EMP and AGL operating procedures. 2. Training - The auditor sighted the site specific and role-specific induction program that is delivered to all AGL employees and contractors (Rapid Induct). The induction program includes relevant risks and controls as detailed in the EMP. During the audit period, role-specific training was delivered on Leak Detection and Repair (28/04/16) and the Pollution Incident Response Management Plan (29/04/16). 3. Audit and inspection - Sub Plan compliance audits are undertaken monthly to assess implementation of control measures. | Compliant |
| Maintenance of Plant and Equipment | | | |
| 17 | <p>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.</p> | <p>The auditor sighted the following systems and documents demonstrating compliance with the requirements of this condition:</p> <ol style="list-style-type: none"> 1. Preventative Maintenance - The preventative maintenance of plant and equipment is managed through the MEX system. The system effectively monitors maintenance requirements based on the use of plant and equipment. 2. Monitoring - Daily and weekly checks are undertaken of vehicles and documented on the 'Vehicle Checklist' 3. Procedures - Standard Operating Procedures have been developed to guide commonly undertaken activities. 4. Leak Detection and Repair Program - Refer to EPL 12003. <p>A 'Compliance - Improvement Recommended' finding was reported against this condition in the 2012-2014 Independent Environmental Audit (22/01/15). The auditor noted that 40% of planned maintenance tasks were overdue. This matter has been adequately addressed. During the site inspection it was noted that 3% of planned maintenance tasks were overdue.</p> | Compliant |

B6. DA 75-4-2005

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding | | | | | | | | | | | | | | |
|-------------------------|--|--|------------------------------|----------------|-------|--|------------------------------|------------------------------|------------------------------|----------------|-------------------------|----|----|----|----|---|---------------|
| | Noise Limits | | | | | | | | | | | | | | | | |
| 18 | <p>Noise from the operation of the development shall not exceed the sound pressure level (noise) limits presented in the Table below:</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>LA1 (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) | LA1 (1 minute) | Any residential premise | 35 | 35 | 35 | 45 | <p>The auditor sighted the Noise Management Sub Plan (April 2016) and noted compliance with the requirements of this condition.</p> <p>There were no reported noise complaints during the audit period and no noise monitoring warranted.</p> | Not Triggered |
| Location | Day | | Evening | Night | | | | | | | | | | | | | |
| | L _{Aeq} (15 minute) | L _{Aeq} (15 minute) | L _{Aeq} (15 minute) | LA1 (1 minute) | | | | | | | | | | | | | |
| Any residential premise | 35 | 35 | 35 | 45 | | | | | | | | | | | | | |
| | <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 OEH 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. | | Not Triggered | | | | | | | | | | | | | | |
| | Construction Noise Criteria for SIS Wells | | | | | | | | | | | | | | | | |

B6. DA 75-4-2005

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding | | | | | | | | | | |
|-------------------|--|--|--------------------------|--|--------------------------|------------------------|------------------|----|----|----|----|--|---------------|
| 18A. | <p>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)</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 (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 | <p>Condition not triggered during the audit period. It was reported by AGL (AEPR 2014-2015, 15/10/15 and AEPR 2015-2016, 31/10/16) that there were no drilling or construction works undertaken during the audit period with respect to DA75-4-2005.</p> | Not Triggered |
| Receiver Location | Weekday (7.00am-6.00pm) | 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 | | | | | | | | | |
| 19 | <p>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 OEH 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> | Condition closed in a previous audit. | Not Triggered | | | | | | | | | | |
| 20 | <p>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 18;</p> | <p>The auditor sighted the Noise Management Sub Plan (April 2016) and noted compliance with the requirements of this condition.</p> <p>Following revision of the Noise Management Sub Plan in 2015, AGL requested feedback from the DPE (17/04/15, 30/06/15 and 04/09/15).</p> | Compliant | | | | | | | | | | |
| | | | Compliant | | | | | | | | | | |

B6. DA 75-4-2005

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|---|--|---------------|
| | (b) Community consultation; | There were no reported noise complaints during the audit period. | Compliant |
| | (c) Advance notice to affected members of the community for planned well maintenance activities; | | Compliant |
| | (d) Complaints handling monitoring system; | | Compliant |
| | (e) Mitigation measures; | | Compliant |
| | (f) The design/orientation of the proposed mitigation methods demonstrating best practice; | | Compliant |
| | (g) Construction times; | | Compliant |
| | (h) Contingency measures where noise complaints are received; and | | Compliant |
| | (i) Monitoring methods and programs. | | Compliant |
| | Hours of Operation | | |
| 21 | 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 8.00am and 1.00pm Saturdays, unless inaudible at any residential receiver. Note: Inaudible means that the construction activity cannot be heard by the human ear at the nearest affected residential receiver. | Condition not triggered during the audit period. It was reported by AGL (AEPR 2014-2015, 15/10/15 and AEPR 2015-2016, 31/10/16) that there were no construction works undertaken during the audit period with respect to DA75-4-2005. | Not Triggered |
| 22 | Planned maintenance activities at any of the wells must only be conducted between: | Condition not triggered during the audit period. It was reported by AGL (AEPR 2014-2015, 15/10/15 and AEPR 2015-2016, 31/10/16) that there were no maintenance activities undertaken during the audit period with respect to DA75-4-2005. | Not Triggered |
| | (a) 7.00 am to 6.00 pm on weekdays; and | | Not Triggered |
| | (b) 8.00am and 1.00pm on Saturdays (excluding Public Holidays) | | Not Triggered |
| | Note: This condition does not apply to the delivery of material outside the hours of operation under condition 21 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 OEH and affected residents as soon as possible, or within a reasonable period in the case of an emergency. | | Not Triggered |
| | Air Quality | | |

B6. DA 75-4-2005

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|--|--|---------------|
| 23 | <p>The Applicant shall carry out the development in a manner that will minimise emissions of dust from the site.</p> <p>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.</p> | <p>The auditor sighted the Air Quality Management Sub Plan (April 2016) and noted the inclusion of adequate dust management controls.</p> <p>The auditor sighted the complaints register for the CGP and noted that there were no dust related complaints during the audit period in relation to this Development Consent.</p> <p>There were no excavation works undertaken during the audit period with respect to DA75-4-2005.</p> | Compliant |
| | Water | | |
| 24 | <p>Except as may be expressly provided by a Licence, the Applicant shall comply with section 120 of the <i>Protection of the Environment Operations Act 1997</i> during the carrying out of the development.</p> <p>Note: Section 120 of the Protection of the Environment Operations Act 1997 applies to the disposal of wastewater.</p> | <p>The auditor sighted the EMP (March 2016) and Soil and Water Management Sub Plan (May 2016). The plans detail a number of controls to prevent the pollution of water.</p> <p>There were no reportable water pollution incidents during the audit period.</p> | Compliant |
| | Stormwater/Sediment Control | | |
| 25 | <p>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 Landcom's <i>Managing Urban Stormwater: Soils and Construction</i>.</p> | Condition closed in a previous audit. | Not Triggered |
| | Waste | | |

B6. DA 75-4-2005

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----------------------------------|--|--|---------------|
| 26 | <p>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 <i>Protection of the Environment Operations Act 1997</i>.</p> <p>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.</p> | <p>The auditor sighted the AGL Environmental Footprint spreadsheet for the financial years 2014/15 and 2015/16 and noted compliance with the requirements of this condition. The Environmental Footprint provides a detailed record of waste streams generated, recycled/reused and disposed, including water, hazardous waste and non-hazardous waste.</p> <p>AGL reported that no wastes are received, or disposed, at the premises.</p> <p>The auditor sighted a sample of disposal records and reconciled against the Environmental Footprint. There were no errors or omissions identified.</p> | Compliant |
| 27 | <p>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.</p> | <p>The auditor sighted the AGL Environmental Footprint spreadsheet for the financial years 2014/15 and 2015/16 and noted compliance with the requirements of this condition. The Environmental Footprint provides a detailed record of waste streams generated, recycled/reused and disposed, including water, hazardous waste and non-hazardous waste. The auditor sighted a sample of disposal records and reconciled against the Environmental Footprint. There were no errors or omissions identified.</p> | Compliant |
| Safety and Risk Management | | | |
| 28 | <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 <i>Locational Guidelines - Development in the Vicinity of Operating Coal Seam Methane Wells</i> (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> | <p>Condition closed in a previous audit.</p> <p>A 'Non-Compliance - Level 2' was reported against this condition in the 2012-2014 Independent Environmental Audit (22/01/15) due to the timing of the report. Further action was not required.</p> | Not Triggered |
| 29 | <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>The Auditor sighted the Emergency Response Plan (20/11/15) and the Health and Safety Management Plan, Camden Project NSW (March 2015) and noted compliance with the requirements of this condition.</p> | Compliant |

B6. DA 75-4-2005

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|---|--|---------------|
| | (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. | The Auditor sighted the Emergency Response Plan (20/11/15) and noted compliance with the requirements of this condition. | Compliant |
| | (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. | The Auditor sighted the Health and Safety Management Plan, Camden Project NSW (March 2015) and noted compliance with the requirements of this condition. Implementation was demonstrated through the following documents/systems: 1. Induction program (Rapid Induct); 2. Audit program and sample of completed audits; 3. Audit Actions Tracker; and 4. Standard methodologies for common works (e.g. confined space). | Compliant |
| | 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. | | Compliance |
| | Compliance Report | | |
| 30 | 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: | Condition closed in a previous audit. A 'Non-Compliance - Level 2' was reported against this condition in the 2012-2014 Independent Environmental Audit (22/01/15) due to the timing of the report. Further action was not required. | Not Triggered |
| | (a) Dates of study/plan/system completion/submission and commencement of construction and commissioning; | | Not Triggered |
| | (b) Actions taken or proposed, to implement recommendations made in the studies/plans/systems; and | | Not Triggered |
| | (c) Responses to any requirement imposed by the Director-General under Condition 32. | | Not Triggered |

B6. DA 75-4-2005

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|---|---|---------------|
| | This report shall verify that: | | Not Triggered |
| | (a) The Emergency Plan required under Condition 29(a) is effectively in place and that at least one emergency exercise has been conducted; and | | Not Triggered |
| | (b) The Safety Management System required under Condition 29(b) has been fully implemented and that records required by the system are being kept. | | Not Triggered |
| | 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: | | Not Triggered |
| | (a) The required study/plan/system has been undertaken or prepared to the relevant Hazardous Industry Planning Advisory Paper; | | Not Triggered |
| | (b) All recommendations of each study/plan/system have been implemented; and | | Not Triggered |
| | (c) All safety management system and their associated risk controls have been implemented and are being maintained. | | Not Triggered |
| | Hazard Audit | | |
| 31 | 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 auditor sighted the following documents demonstrating compliance with the requirements of this condition: 1. 'Report of the 2016 Hazard Audit of the CGP Operated by AGL Upstream Investments Pty Ltd', Planager, 10/06/16. 2. Correspondence from the DPE noting approval of Ms Karin Nilsson of Planager Pty Ltd to undertake the independent hazard audit. 3. Correspondence from AGL to the DPE enclosing the independent hazard audit (22/06/16). | Compliant |
| | 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. | | Compliant |
| | Note: The Applicant may include the three yearly hazard audit of the development with the Hazard Audit required under Schedule 4 Condition 95 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. | | Compliant |

B6. DA 75-4-2005

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|---|---|---------------|
| 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. | Condition not triggered during the audit period. | Not Triggered |
| | Redrilling and Fracing Management Plan | | |
| | Note: For the purposes of this consent the redrilling and/or additional fracing of a well does not constitute wellhead maintenance. | Condition noted. | Note |
| 33 | The Applicant shall obtain the prior approval of the Director-General for the redrilling and/or additional fracing of a gas well. | Condition not triggered during the audit period. It was reported by AGL (AEPR 2014-2015, 15/10/15 and AEPR 2015-2016, 31/10/16) that there were no redrilling or fracing activities undertaken during the audit period. | Not Triggered |
| 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: | Condition not triggered during the audit period. It was reported by AGL (AEPR 2014-2015, 15/10/15 and AEPR 2015-2016, 31/10/16) that there were no redrilling or fracing activities undertaken during the audit period. | Not Triggered |
| | (a) A description of all the activities to be undertaken on the well site during the redrilling and/or refracing work; | | Not Triggered |
| | (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; | | Not Triggered |
| | (c) Reference to the relevant parts of the Environmental Management Plan required under condition 52; | | Not Triggered |
| | (d) Compliance with all the relevant environmental performance requirements of this consent; and | | Not Triggered |
| | (e) Arrangements for complaints handling procedures during the redrilling and/or refracing work. | | Not Triggered |
| 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. | Condition not triggered during the audit period. It was reported by AGL (AEPR 2014-2015, 15/10/15 and AEPR 2015-2016, 31/10/16) that there were no redrilling or fracing activities undertaken during the audit period. | Not Triggered |

B6. DA 75-4-2005

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|---|---|---------------|
| | Gas Gathering System | | |
| 36 | The Applicant shall ensure that the route of the gas gathering system follows previously or currently disturbed areas wherever possible. | Condition closed in a previous audit. | Not Triggered |
| 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. | Condition not triggered during the audit period. It was reported by AGL (AEPR 2014-2015, 15/10/15 and AEPR 2015-2016, 31/10/16) that there were no gas gathering lines constructed during the audit period with respect to DA75-4-2005. | Not Triggered |
| 38 | The Applicant shall comply with the following in the construction of the gas gathering system pipeline: | Condition not triggered during the audit period. It was reported by AGL (AEPR 2014-2015, 15/10/15 and AEPR 2015-2016, 31/10/16) that there were no gas gathering lines constructed during the audit period with respect to DA75-4-2005. | Not Triggered |
| | (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; | | Not Triggered |
| | (b) Trenches are to be restored and reseeded with local grass seeds on completion of the work; | | Not Triggered |
| | (c) Construct the gas gathering system so as not to impeach lateral water flows; | | Not Triggered |
| | (d) Ensure that no crown or camber remains along the gas gathering systems, following construction; | | Not Triggered |
| | (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 | | Not Triggered |
| | (f) Notify the Department on the completion of any trenching works. | | Not Triggered |
| | Flora and Fauna | | |
| 39 | The Applicant shall take all practicable measures to minimise potential flora and fauna impacts of the development. | The auditor sighted the Flora and Fauna Management Sub-Plan (August 2008) which details a number of controls to minimise the impacts to flora and fauna during construction, operation and rehabilitation. | Compliant |
| 40 | The Applicant shall not remove mature trees as part of this development unless otherwise agreed by the Director-General of DoPE, or delegate. | It was reported by AGL that there were no mature trees removed during the audit period. | Not Verified |
| 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. | Condition closed in a previous audit. | Not Triggered |

B6. DA 75-4-2005

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|------|--|--|---------------|
| 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. | The auditor sighted the Rehabilitation and Landscape Management Sub Plan (April 2016) and noted compliance with the requirements of this condition. | Compliant |
| | Threatened Species | | |
| 42A. | The Applicant shall ensure that, during the drilling and construction of SLO8 and SLO9, impacts on threatened species are minimised by implementing actions including, but not limited, to the following: | Condition not triggered during the audit period. It was reported by AGL (AEPR 2014-2015, 15/10/15 and AEPR 2015-2016, 31/10/16) that there were no drilling or construction works undertaken during the audit period with respect to DA75-4-2005. | Not Triggered |
| | (a) The recommendations outlined in Sections 6 and 7 of the Ecosearch Environmental Consultants Pty Ltd report titled <i>Flora and Fauna Assessment, AGL –Gas Well and Gathering Line Project Modifications ; and</i> | | Not Triggered |
| | (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. | | Not Triggered |
| | Bushfire Management | | |
| 43 | The Applicant shall: | The auditor sighted the Emergency Response Plan (20/11/15) for the CGP and noted compliance with the requirements of this condition. | Compliant |
| | (a) Ensure that the development is suitably equipped to respond to any fires on the site; and | | Compliant |
| | (b) Assist the Rural Fire Service and emergency services as much as possible if there is a fire on the site. | | Compliant |
| 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. 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. | A 'Non-Compliance - Level 2' was reported against this condition in the 2012-2014 Independent Environmental Audit (22/01/15). The auditor noted that consultation had not been undertaken with Council or the Rural Fire Service. As part of the current audit, correspondence was sighted between AGL and the respective Councils and the Rural Fire Service requesting feedback on the AGL Bush Fire Management Plan. Feedback was limited to the Wollondilly Shire Council who noted that there were no changes required (28/10/15). This matter has been adequately addressed. | Compliant |
| | Heritage | | |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|---|--|---------------|
| 45 | 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. | Condition not triggered during the audit period. | Not Triggered |
| 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. | Condition not triggered during the audit period. | Not Triggered |
| | Aboriginal Relics | | |
| 47 | The Applicant must ensure that should any Aboriginal objects be uncovered, excavation or disturbance of the area is to stop immediately and the OEH is to be informed in accordance with section 91 of the <i>National Parks and Wildlife Act 1974</i> . | Condition not triggered during the audit period. | Not Triggered |
| 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. | Condition not triggered during the audit period. | Not Triggered |
| | Sydney Water Supply Canal | | |
| 49 | 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. | Condition closed in a previous audit. | Not Triggered |
| 50 | The Applicant shall comply with the requirements in Sydney Water's <i>Guidelines on Precautions to be taken when Building Over or Adjacent to Sydney Water's Assets</i> . | Condition closed in a previous audit. | Not Triggered |
| | ENVIRONMENTAL MANAGEMENT AND MONITORING | | |
| | Construction Environmental Management Plan (CEMP) | | |

B6. DA 75-4-2005

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|---|---|--|---------------|
| 51 | <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 of the Department of Planning and Infrastructure, or delegate prior to the commencement of construction.</p> <p>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 approved by the Director-General prior to the commencement of construction.</p> | <p>Condition not triggered during the audit period. It was reported by AGL (AEPR 2014-2015, 15/10/15 and AEPR 2015-2016, 31/10/16) that there were no drilling or construction works undertaken during the audit period with respect to DA75-4-2005.</p> | Not Triggered |
| Operational Environmental Management Plan (OEMP) | | | |
| 52 | <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> | <p>The auditor sighted the EMP (March 2016) and noted compliance with the requirements of this condition.</p> | Compliant |
| | (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; | <p>A number of controls are in place to monitor and measure implementation of the EMS including Environmental Management Sub Plan Compliance Audits, Daily Workover Reports, Monthly Dam Inspection Reports, air quality monitoring and noise monitoring. The auditor sighted a sample of monitoring controls and noted compliance with the requirements of the EMP.</p> | Compliant |
| | (b) A description of the roles and responsibilities for all key personnel involved in the operation of the development; | | Compliant |
| | (c) The overall environmental policies and principles to be applied to the operation of the development; | | Compliant |
| | (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 | | Compliant |
| | (e) Management policies to ensure that environmental performance goals are met and to comply with conditions of this consent. | | Compliant |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|--|---|-----------|
| | 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. | | Compliant |
| | Annual Return | | |
| 53 | The Applicant shall provide an annual return to the OEH in relation to the development as required by any Licence under the <i>Protection of the Environment Operations Act 1997</i> 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. | The auditor sighted the December 2014 and December 2015 Annual Returns and noted compliance against the requirements of this condition. | Compliant |
| | Annual Environmental Performance Reporting | | |
| 54 | 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: | The auditor sighted the AEPR 2014-2015 (15/10/15) and the AEPR 2015-2016 (31/10/16) and noted compliance with the requirements of this condition. | Compliant |
| | (a) The standards, performance measures and statutory requirements the development is required to comply with; | | Compliant |
| | (b) An assessment of the environmental performance of the development to determine whether it is complying with these standards, performance measures, and statutory requirements; | | Compliant |
| | (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; | | Compliant |
| | (d) Indication of what actions were taken to address any issue and/or recommendation raised by the Camden Gas Project's Community Consultative Committee; | | Compliant |
| | (e) Provision of the detailed results of all the monitoring required by this consent; | | Compliant |
| | (f) Identify any non-compliance during the year; | | Compliant |
| | (g) Identify any significant trends in the data; and | | Compliant |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|--|---|---------------|
| | (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. | | Compliant |
| | Note: The Applicant may include the operation of wells SL1 – 9 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. | | Compliant |
| 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. | Condition not triggered during the audit period. | Not Triggered |
| 56 | The Applicant shall also submit a copy of the Annual Environmental Performance Report to the OEH, Department of Primary Industries and Campbelltown City Council. The Applicant shall make a copy of the Report publicly available. | The auditor sighted evidence of submission of the Annual Environmental Performance Report (2014/2015 and 2015/2016) to each of the agencies required by this condition. | Compliant |
| | Independent Environmental Audit – Construction at Sugarloaf Farm | | |
| 57 | On completion of all construction works, the Applicant shall commission and pay the full costs of an Independent Environmental Audit of the drilling and fracking 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: | Condition closed in a previous audit. | Not Triggered |
| | (a) Be conducted by a suitably qualified, experienced, and independent person(s) whose appointment has been approved by the Director-General; and | | Not Triggered |
| | (b) Be consistent with ISO 19011:2002 - Guidelines for Quality and/ or Environmental Management Systems Auditing, or updated versions of these guidelines/manuals. | | Not Triggered |
| | The Audit shall: | | Not Triggered |
| | a) Assess the environmental performance of the construction of the development on the site, and its effects on the surrounding environment; | | Not Triggered |
| | b) Assess whether the development is complying with the relevant standards, performance measures, and statutory requirements; | | Not Triggered |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|---|---|---------------|
| | c) Consider the Applicant’s proposed Construction Environmental Management Plan; and | | Not Triggered |
| | 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). | | Not Triggered |
| | 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. | | Not Triggered |
| | Independent Environmental Audit – Operation | | |
| 58 | 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: | The scope of this 2014-2016 Independent Environmental Audit complies with the requirements of this condition. | Compliant |
| | (a) Be conducted by a suitably qualified, experienced, and independent person(s) whose appointment has been approved by the Director-General; | | Compliant |
| | (b) Be consistent with ISO 19011:2002 - Guidelines for Quality and/ or Environmental Management Systems Auditing, or updated versions of these guidelines/manuals; | | Compliant |
| | (c) Assess the environmental performance of the development, and its effects on the surrounding environment; | | Compliant |
| | (d) Assess whether the development is complying with the relevant standards, performance measures, and statutory requirements; | | Compliant |
| | (e) Review the adequacy of the Applicant’s Environmental Management Plan; and | | Compliant |
| | (f) Recommend measures or actions to improve the environmental performance of the development, and/or its environmental management and monitoring systems. | | Compliant |

B6. DA 75-4-2005

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|--|---|-----------|
| | Note: The Applicant may include the operation of wells SL1 – 9 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. | | Compliant |
| | Complaints Register | | |
| 59 | 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: | The auditor sighted Consultation Manager, a software program used for managing stakeholder engagement, including complaints. Records retained within Consultation Manager comply with the requirements of this condition. | Compliant |
| | (a) Record the date and time of the complaint; | | Compliant |
| | (b) Record the method by which the complaint was made; | There were no complaints associated with this Development Consent during the audit period. | Compliant |
| | (c) Note any personal details of the complainant or, if no such details were provided, a note to that effect; | | Compliant |
| | (d) The nature of the complaint; | | Compliant |
| | (e) The action taken by the applicant in relation to the complaint, including any follow-up contact with the complainant; and | | Compliant |
| | (f) State, if no action was taken by the Applicant, the reasons why no action was taken. | | Compliant |
| | 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 OEH or the Department who asks to see them. | The auditor sighted complaint records within Consultation Manager (a software program used for managing stakeholder engagement, including complaints). Prior to 2013, a Complaints Register was maintained which was also sighted by the auditor. The Consultation Manager records and the historical Complaints Register demonstrate compliance with the requirements of this condition. | Compliant |
| 60 | The Applicant must: | | |
| | (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 | The auditor sighted the CGP website and noted the inclusion of a telephone line, contact and feedback form. The website notes that the purpose of the telephone line is for complaints and enquiries. The auditor contacted the telephone line during the audit and was satisfied with the handling process. | Compliant |
| | (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. | | Compliant |
| | Community Liaison | | |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
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| 61 | 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 auditor sighted the minutes of the Community Consultative Committee and noted compliance with the requirements of this condition. | Compliant |

Appendix C Licences

C1. EPL 12003

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding | | | | | | |
|--|--|---|--------------------|-------|--|--|--|--|-----------|
| | What the licence authorises and regulates | | | | | | | | |
| A1.1 | <p>This licence authorises the carrying out of the scheduled activities listed below at the premises specified in A2. The activities are listed according to their scheduled activity classification, fee-based activity classification and the scale of the operation.</p> <p>Unless otherwise further restricted by a condition of this licence, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition.</p> <table border="1"> <thead> <tr> <th>Scheduled Activity</th> <th>Fee Based Activity</th> <th>Scale</th> </tr> </thead> <tbody> <tr> <td>Petroleum exploration, assessment and production</td> <td>Petroleum exploration, assessment and production</td> <td>> 0.50 - 6 PJ annual production capacity</td> </tr> </tbody> </table> | Scheduled Activity | Fee Based Activity | Scale | Petroleum exploration, assessment and production | Petroleum exploration, assessment and production | > 0.50 - 6 PJ annual production capacity | The auditor sighted the Annual Return spreadsheets for the periods ending 21 December 2014 and 21 December 2015 and noted conformance with the requirements of this condition. | Compliant |
| Scheduled Activity | Fee Based Activity | Scale | | | | | | | |
| Petroleum exploration, assessment and production | Petroleum exploration, assessment and production | > 0.50 - 6 PJ annual production capacity | | | | | | | |
| A1.2 | This licence does not authorise the above scheduled activities where approval for these activities is also required under the Environmental Planning and Assessment Act or the Petroleum (Onshore) Act, and approval has not been granted. | Condition noted. It was reported by AGL (AEPR 2014-2015, 15/10/15 and Draft AEPR 2015-2016, 21/10/16) that there were no drilling or construction activities during the audit period. | Compliant | | | | | | |
| A2 | Premises or plant to which this licence applies | | | | | | | | |
| A2.1 | The licence applies to the following premises: Rosalind Park Gas Plant, Medhurst Road, Gilead, NSW 2560, Park Lot DP 230946 | Condition noted. | Note | | | | | | |
| A2.2 | The premises also includes the gas gathering reticulation system owned and operated by the licensee that is associated with the gas treatment plant(s) identified in condition A2.1. | Condition noted. | Note | | | | | | |
| A2.3 | The gas gathering reticulation system identified in condition A2.2 includes all gas wells, trunk lines, and any associated effluent storages, temporary work areas and infrastructure associated with the gathering systems, gas wells and trunk lines. | Condition noted. | Note | | | | | | |
| A2.4 | The licensee must maintain a current register of the gas gathering reticulation system documenting each gas well location, well head configuration and all trunk lines associated with the gas treatment plant identified in condition A2.1. | The auditor sighted the following documents and noted compliance with the requirements of this condition: 1. CGP POP (09/12/15) provides details of all gas gathering lines. 2. AGL spreadsheet, 'CGP well details LGA details 111116.xls' provides a register of gas wells including location and well head configuration. | Compliant | | | | | | |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----------|---|---|--------------|
| A2.5 | For the purposes of this licence, the premises also includes immediate areas in a 10 metre radius of all infrastructure in connection to the operation of the gas wells. During well establishment, the premises have a nominal area of 100m x 70m and is surrounded by fencing. At various times during well head maintenance, the premises at the gas well head comprises an area of approximate dimensions 50m x 40m. | <p>The auditor inspected the following well sites during the audit: AP01, LB05, RP03, RP05, RP11, LB07, MP25. Each of the sites were compliant with the requirements of this condition.</p> <p>The auditor sighted aerial photographs of the workovers completed during the audit period (EM40 and GL17) and noted that both occupied an area of less than 2000m². The sites were therefore compliant with the requirements of this condition.</p> | Compliant |
| A2.6 | Any maps referred to in this section and included as part of this licence indicate the activity that is authorised by this licence to be undertaken at each well site. | Condition noted. | Note |
| A3 | Information supplied to the EPA | | |
| A3.1 | <p>Works and activities must be carried out in accordance with the proposal contained in the licence application, except as expressly provided by a condition of this licence.</p> <p>In this condition the reference to "the licence application" includes a reference to:</p> <ul style="list-style-type: none"> a) the applications for any licences (including former pollution control approvals) which this licence replaces under the Protection of the Environment Operations (Savings and Transitional) Regulation 1998; and b) the licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this licence. | The licence application was prepared by Sydney Gas and it was reported that records are no longer available. There was insufficient evidence provided to form an opinion in relation to this condition. | Not Verified |
| 2 | Discharges to Air and Water and Applications to Land | | |
| P1 | Location of monitoring/discharge points and areas | | |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding | | | | | | | | | | | | | | | | | | | | | | | | |
|------------------------|---|--|--|--|--|------------------------|--------------------------|-------------------------|----------------------|---|--|--|--|---|--|--|--|---|--|--|--|---|--|--|---|------------------|------|
| P1.1 | <p>The following points referred to in the table below are identified in this licence for the purposes of monitoring and/or the setting of limits for the emission of pollutants to the air from the point.</p> <table border="1" data-bbox="315 443 945 799"> <thead> <tr> <th colspan="4" style="text-align: center;"><i>Air</i></th> </tr> <tr> <th>EPA identification no.</th> <th>Type of Monitoring Point</th> <th>Type of Discharge Point</th> <th>Location Description</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Discharge to air Air emissions monitoring</td> <td>Discharge to air Air emissions monitoring</td> <td>Compressor Engine 1 labelled 'Engine Exhaust Stack 1' on drawing titled 'Camden Gas Project Site Plan Location of Emission Points' drawing number 4229DG06 submitted to the EPA with letter dated 29 October 2004.</td> </tr> <tr> <td>2</td> <td>Discharge to air Air emissions monitoring</td> <td>Discharge to air Air emissions monitoring</td> <td>Compressor Engine 2 labelled 'Engine Exhaust Stack 2' on drawing titled 'Camden Gas Project Site Plan Location of Emission Points' drawing number 4229DG06 submitted to the EPA with letter dated 29 October 2004.</td> </tr> <tr> <td>3</td> <td>Discharge to air Air emissions monitoring</td> <td>Discharge to air Air emissions monitoring</td> <td>Compressor Engine 3 marked 'Engine Exhaust Stack 3' on drawing titled 'Camden Gas Project Site Plan Location of Emission Points' drawing number 4229DG06 submitted to the EPA with letter dated 29 October 2004.</td> </tr> <tr> <td>4</td> <td>Discharge to air Air emissions monitoring</td> <td>Discharge to air Air emissions monitoring</td> <td>TEG Fire Tube marked 'Reboiler Flue 4' on drawing titled 'Camden Gas Project Site Plan Location of Emission Points' drawing number 4229DG06 submitted to the EPA with letter dated 29 October 2004.</td> </tr> </tbody> </table> | <i>Air</i> | | | | EPA identification no. | Type of Monitoring Point | Type of Discharge Point | Location Description | 1 | Discharge to air Air emissions monitoring | Discharge to air Air emissions monitoring | Compressor Engine 1 labelled 'Engine Exhaust Stack 1' on drawing titled 'Camden Gas Project Site Plan Location of Emission Points' drawing number 4229DG06 submitted to the EPA with letter dated 29 October 2004. | 2 | Discharge to air Air emissions monitoring | Discharge to air Air emissions monitoring | Compressor Engine 2 labelled 'Engine Exhaust Stack 2' on drawing titled 'Camden Gas Project Site Plan Location of Emission Points' drawing number 4229DG06 submitted to the EPA with letter dated 29 October 2004. | 3 | Discharge to air Air emissions monitoring | Discharge to air Air emissions monitoring | Compressor Engine 3 marked 'Engine Exhaust Stack 3' on drawing titled 'Camden Gas Project Site Plan Location of Emission Points' drawing number 4229DG06 submitted to the EPA with letter dated 29 October 2004. | 4 | Discharge to air Air emissions monitoring | Discharge to air Air emissions monitoring | TEG Fire Tube marked 'Reboiler Flue 4' on drawing titled 'Camden Gas Project Site Plan Location of Emission Points' drawing number 4229DG06 submitted to the EPA with letter dated 29 October 2004. | Condition noted. | Note |
| <i>Air</i> | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| EPA identification no. | Type of Monitoring Point | Type of Discharge Point | Location Description | | | | | | | | | | | | | | | | | | | | | | | | |
| 1 | Discharge to air Air emissions monitoring | Discharge to air Air emissions monitoring | Compressor Engine 1 labelled 'Engine Exhaust Stack 1' on drawing titled 'Camden Gas Project Site Plan Location of Emission Points' drawing number 4229DG06 submitted to the EPA with letter dated 29 October 2004. | | | | | | | | | | | | | | | | | | | | | | | | |
| 2 | Discharge to air Air emissions monitoring | Discharge to air Air emissions monitoring | Compressor Engine 2 labelled 'Engine Exhaust Stack 2' on drawing titled 'Camden Gas Project Site Plan Location of Emission Points' drawing number 4229DG06 submitted to the EPA with letter dated 29 October 2004. | | | | | | | | | | | | | | | | | | | | | | | | |
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| 4 | Discharge to air Air emissions monitoring | Discharge to air Air emissions monitoring | TEG Fire Tube marked 'Reboiler Flue 4' on drawing titled 'Camden Gas Project Site Plan Location of Emission Points' drawing number 4229DG06 submitted to the EPA with letter dated 29 October 2004. | | | | | | | | | | | | | | | | | | | | | | | | |
| P1.2 | <p>The following utilisation areas referred to in the table below are identified in this licence for the purposes of the monitoring and/or the setting of limits for any application of solids or liquids to the utilisation area.</p> | Condition noted. | Note | | | | | | | | | | | | | | | | | | | | | | | | |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|------------------------|--|--|---|--|--|------------------------|--------------------------|-------------------------|----------------------|---|--------------------------------------|--|---|---|--------------------------------------|--|--|----|--------------------------------------|--|---|----|--------------------------------------|--|---|----|--------------------------------------|--|---|----|--------------------------------------|--|---|----|--------------------------------------|--|---|----|--------------------------------------|--|---|----|--------------------------------|--|------------------------------------|---|------------------|
| <p>P1.3</p> | <p>The following points referred to in the table are identified in this licence for the purposes of the monitoring and/or the setting of limits for discharges of pollutants to water from the point.</p> <table border="1" data-bbox="315 432 875 1353"> <thead> <tr> <th colspan="4" data-bbox="524 432 613 448"><i>Water and land</i></th> </tr> <tr> <th data-bbox="315 448 383 480">EPA Identification no.</th> <th data-bbox="383 448 524 480">Type of Monitoring Point</th> <th data-bbox="524 448 674 480">Type of Discharge Point</th> <th data-bbox="674 448 875 480">Location Description</th> </tr> </thead> <tbody> <tr> <td data-bbox="315 480 383 592">8</td> <td data-bbox="383 480 524 592">Groundwater Quality Monitoring Point</td> <td data-bbox="524 480 674 592"></td> <td data-bbox="674 480 875 592">Groundwater monitoring point labelled "SF07" on map entitled "Camden Gas Project Groundwater Monitoring Network" dated 18/06/2012 (DOC16/106041). Prior to February 2016 this was groundwater monitoring point labelled "EM40".</td> </tr> <tr> <td data-bbox="315 592 383 671">9</td> <td data-bbox="383 592 524 671">Groundwater Quality Monitoring Point</td> <td data-bbox="524 592 674 671"></td> <td data-bbox="674 592 875 671">Groundwater monitoring point labelled "SF08" as shown on the map entitled "Camden Gas Project Groundwater Monitoring Network" dated 18/06/2012 (Trim DOC16/106041)</td> </tr> <tr> <td data-bbox="315 671 383 767">10</td> <td data-bbox="383 671 524 767">Groundwater Quality Monitoring Point</td> <td data-bbox="524 671 674 767"></td> <td data-bbox="674 671 875 767">Groundwater monitoring point labelled "RB10" as shown on the map entitled "Camden Gas Project Groundwater Monitoring Network" dated 18/06/2012 (Trim DOC16/106041).</td> </tr> <tr> <td data-bbox="315 767 383 879">11</td> <td data-bbox="383 767 524 879">Groundwater Quality Monitoring Point</td> <td data-bbox="524 767 674 879"></td> <td data-bbox="674 767 875 879">Groundwater monitoring point labelled "SL02" on map entitled "Camden Gas Project Groundwater Monitoring Network" dated 18/06/2012 (DOC16/106041). Prior to February 2016 this was groundwater monitoring point labelled "MT05".</td> </tr> <tr> <td data-bbox="315 879 383 991">12</td> <td data-bbox="383 879 524 991">Groundwater Quality Monitoring Point</td> <td data-bbox="524 879 674 991"></td> <td data-bbox="674 879 875 991">Groundwater monitoring point labelled "MP22" on map entitled "Camden Gas Project Groundwater Monitoring Network" dated 18/06/2012 (DOC16/106041). Prior to February 2016 this was groundwater monitoring point labelled "MP12".</td> </tr> <tr> <td data-bbox="315 991 383 1102">13</td> <td data-bbox="383 991 524 1102">Groundwater Quality Monitoring Point</td> <td data-bbox="524 991 674 1102"></td> <td data-bbox="674 991 875 1102">Groundwater monitoring point labelled "MP07" on map entitled "Camden Gas Project Groundwater Monitoring Network" dated 18/06/2012 (DOC16/106041). Prior to February 2016 this was groundwater monitoring point labelled "MP30".</td> </tr> <tr> <td data-bbox="315 1102 383 1214">14</td> <td data-bbox="383 1102 524 1214">Groundwater Quality Monitoring Point</td> <td data-bbox="524 1102 674 1214"></td> <td data-bbox="674 1102 875 1214">Groundwater monitoring point labelled "MP02" on map entitled "Camden Gas Project Groundwater Monitoring Network" dated 18/06/2012 (DOC16/106041). Prior to February 2016 this was groundwater monitoring point labelled "RP12".</td> </tr> <tr> <td data-bbox="315 1214 383 1326">15</td> <td data-bbox="383 1214 524 1326">Groundwater Quality Monitoring Point</td> <td data-bbox="524 1214 674 1326"></td> <td data-bbox="674 1214 875 1326">Groundwater monitoring point labelled "MP09" on map entitled "Camden Gas Project Groundwater Monitoring Network" dated 18/06/2012 (DOC16/106041). Prior to February 2016 this was groundwater monitoring point labelled "SL03".</td> </tr> <tr> <td data-bbox="315 1326 383 1353">16</td> <td data-bbox="383 1326 524 1353">Water Quality Monitoring Point</td> <td data-bbox="524 1326 674 1353"></td> <td data-bbox="674 1326 875 1353">Rosalind Park Gas Plant Flare Pit.</td> </tr> </tbody> </table> | <i>Water and land</i> | | | | EPA Identification no. | Type of Monitoring Point | Type of Discharge Point | Location Description | 8 | Groundwater Quality Monitoring Point | | Groundwater monitoring point labelled "SF07" on map entitled "Camden Gas Project Groundwater Monitoring Network" dated 18/06/2012 (DOC16/106041). Prior to February 2016 this was groundwater monitoring point labelled "EM40". | 9 | Groundwater Quality Monitoring Point | | Groundwater monitoring point labelled "SF08" as shown on the map entitled "Camden Gas Project Groundwater Monitoring Network" dated 18/06/2012 (Trim DOC16/106041) | 10 | Groundwater Quality Monitoring Point | | Groundwater monitoring point labelled "RB10" as shown on the map entitled "Camden Gas Project Groundwater Monitoring Network" dated 18/06/2012 (Trim DOC16/106041). | 11 | Groundwater Quality Monitoring Point | | Groundwater monitoring point labelled "SL02" on map entitled "Camden Gas Project Groundwater Monitoring Network" dated 18/06/2012 (DOC16/106041). Prior to February 2016 this was groundwater monitoring point labelled "MT05". | 12 | Groundwater Quality Monitoring Point | | Groundwater monitoring point labelled "MP22" on map entitled "Camden Gas Project Groundwater Monitoring Network" dated 18/06/2012 (DOC16/106041). Prior to February 2016 this was groundwater monitoring point labelled "MP12". | 13 | Groundwater Quality Monitoring Point | | Groundwater monitoring point labelled "MP07" on map entitled "Camden Gas Project Groundwater Monitoring Network" dated 18/06/2012 (DOC16/106041). Prior to February 2016 this was groundwater monitoring point labelled "MP30". | 14 | Groundwater Quality Monitoring Point | | Groundwater monitoring point labelled "MP02" on map entitled "Camden Gas Project Groundwater Monitoring Network" dated 18/06/2012 (DOC16/106041). Prior to February 2016 this was groundwater monitoring point labelled "RP12". | 15 | Groundwater Quality Monitoring Point | | Groundwater monitoring point labelled "MP09" on map entitled "Camden Gas Project Groundwater Monitoring Network" dated 18/06/2012 (DOC16/106041). Prior to February 2016 this was groundwater monitoring point labelled "SL03". | 16 | Water Quality Monitoring Point | | Rosalind Park Gas Plant Flare Pit. | <p>The auditor sighted the CGP Ground Water Monitoring Network' map (18/6/12) and noted compliance with the requirements of this condition.</p> | <p>Compliant</p> |
| <i>Water and land</i> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| EPA Identification no. | Type of Monitoring Point | Type of Discharge Point | Location Description | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| 9 | Groundwater Quality Monitoring Point | | Groundwater monitoring point labelled "SF08" as shown on the map entitled "Camden Gas Project Groundwater Monitoring Network" dated 18/06/2012 (Trim DOC16/106041) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 10 | Groundwater Quality Monitoring Point | | Groundwater monitoring point labelled "RB10" as shown on the map entitled "Camden Gas Project Groundwater Monitoring Network" dated 18/06/2012 (Trim DOC16/106041). | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 11 | Groundwater Quality Monitoring Point | | Groundwater monitoring point labelled "SL02" on map entitled "Camden Gas Project Groundwater Monitoring Network" dated 18/06/2012 (DOC16/106041). Prior to February 2016 this was groundwater monitoring point labelled "MT05". | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 12 | Groundwater Quality Monitoring Point | | Groundwater monitoring point labelled "MP22" on map entitled "Camden Gas Project Groundwater Monitoring Network" dated 18/06/2012 (DOC16/106041). Prior to February 2016 this was groundwater monitoring point labelled "MP12". | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 13 | Groundwater Quality Monitoring Point | | Groundwater monitoring point labelled "MP07" on map entitled "Camden Gas Project Groundwater Monitoring Network" dated 18/06/2012 (DOC16/106041). Prior to February 2016 this was groundwater monitoring point labelled "MP30". | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 14 | Groundwater Quality Monitoring Point | | Groundwater monitoring point labelled "MP02" on map entitled "Camden Gas Project Groundwater Monitoring Network" dated 18/06/2012 (DOC16/106041). Prior to February 2016 this was groundwater monitoring point labelled "RP12". | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 15 | Groundwater Quality Monitoring Point | | Groundwater monitoring point labelled "MP09" on map entitled "Camden Gas Project Groundwater Monitoring Network" dated 18/06/2012 (DOC16/106041). Prior to February 2016 this was groundwater monitoring point labelled "SL03". | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 16 | Water Quality Monitoring Point | | Rosalind Park Gas Plant Flare Pit. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>3</p> | <p>Limit Conditions</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

C1. EPL 12003

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----------|--|---|-----------|
| L1 | Pollution of Waters | | |
| L1.1 | Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997. | <p>The auditor sighted the EMP (March 2016) and Soil and Water Management Sub Plan (May 2016). The plans detail a number of controls to prevent the pollution of water.</p> <p>Implementation of the Sub Plan was demonstrated through the Minimum Environmental Controls Form. Commencing in 2015, this process includes the documentation of site specific controls as relevant to workover and plug and abandonment works. Periodic inspections are then undertaken to assessment implementation and identify performance improvements.</p> <p>The auditor also sighted a sample of plug and abandonment works completed during the audit period and noted that there was no evidence of erosion.</p> <p>There were no reportable water pollution incidents during the audit period.</p> | Compliant |
| L2 | Load Limits | | |
| L2.1 | The actual load of an assessable pollutant discharged from the premises during the reporting period must not exceed the load limit specified for the assessable pollutant in the table below. Note: An assessable pollutant is a pollutant which affects the licence fee payable for the licence. | The auditor sighted the AGL spreadsheets 'LBL Summary 2013-14 RPGP draft v0' and 'LBL Summary 2014-15 RPGP draft v2' which details the load calculations based on quarterly or annual monitoring results. It was noted that AGL achieved conformance during the audit period with each specified limit. | Compliant |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|--|---|-----------------|---------------|-------|-----------------------------------|------|----------------------|--|-------------------------|--------|------------------------|------|--------------------------------|--|-----------------------|-----------|---------------------------------|--|-----------------------|--|---------------------|---------|-----------------------------|--|----------------------------------|--|---|--|---|--|----------------------------------|----------|--|-----------|
| L2.2 | <p>The actual load of an assessable pollutant must be calculated in accordance with the relevant load calculation protocol. Note: There are no discharges to waters for purposes of the Condition L2.2.</p> <table border="1" data-bbox="324 438 891 1011"> <thead> <tr> <th>Assessable Pollutant</th> <th>Load limit (kg)</th> </tr> </thead> <tbody> <tr> <td>Benzene (Air)</td> <td>47.00</td> </tr> <tr> <td>Benzo(a)pyrene (equivalent) (Air)</td> <td>0.27</td> </tr> <tr> <td>BOD (Enclosed Water)</td> <td></td> </tr> <tr> <td>Fine Particulates (Air)</td> <td>460.00</td> </tr> <tr> <td>Hydrogen Sulfide (Air)</td> <td>1.60</td> </tr> <tr> <td>Nitrogen Oxides - Summer (Air)</td> <td></td> </tr> <tr> <td>Nitrogen Oxides (Air)</td> <td>103000.00</td> </tr> <tr> <td>Oil and Grease (Enclosed Water)</td> <td></td> </tr> <tr> <td>Salt (Enclosed Water)</td> <td></td> </tr> <tr> <td>Sulfur Oxides (Air)</td> <td>3000.00</td> </tr> <tr> <td>Total PAHs (Enclosed Water)</td> <td></td> </tr> <tr> <td>Total Phenolics (Enclosed Water)</td> <td></td> </tr> <tr> <td>Total suspended solids (Enclosed Water)</td> <td></td> </tr> <tr> <td>Volatile organic compounds - Summer (Air)</td> <td></td> </tr> <tr> <td>Volatile organic compounds (Air)</td> <td>33000.00</td> </tr> </tbody> </table> | Assessable Pollutant | Load limit (kg) | Benzene (Air) | 47.00 | Benzo(a)pyrene (equivalent) (Air) | 0.27 | BOD (Enclosed Water) | | Fine Particulates (Air) | 460.00 | Hydrogen Sulfide (Air) | 1.60 | Nitrogen Oxides - Summer (Air) | | Nitrogen Oxides (Air) | 103000.00 | Oil and Grease (Enclosed Water) | | Salt (Enclosed Water) | | Sulfur Oxides (Air) | 3000.00 | Total PAHs (Enclosed Water) | | Total Phenolics (Enclosed Water) | | Total suspended solids (Enclosed Water) | | Volatile organic compounds - Summer (Air) | | Volatile organic compounds (Air) | 33000.00 | <p>The auditor sighted the AGL spreadsheets 'LBL Summary 2013-14 RPGP draft v0' and 'LBL Summary 2014-15 RPGP draft v2' which details the load calculations based on quarterly or annual monitoring results. It was noted that AGL achieved conformance during the audit period with each specified limit.</p> <p>In all cases, the load calculation method of source monitoring was applied. The auditor sighted quarterly air monitoring reports and tested a sample of values entered into the AGL spreadsheets. There were no errors or omissions noted.</p> <p>The auditor also sighted correspondence from Golder Associates (28 January 2016) who conducted a technical review of the 2014-15 Annual Return and noted compliance with reporting requirements.</p> | Compliant |
| Assessable Pollutant | Load limit (kg) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Benzene (Air) | 47.00 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Benzo(a)pyrene (equivalent) (Air) | 0.27 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| BOD (Enclosed Water) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Fine Particulates (Air) | 460.00 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Hydrogen Sulfide (Air) | 1.60 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Nitrogen Oxides - Summer (Air) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Nitrogen Oxides (Air) | 103000.00 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Oil and Grease (Enclosed Water) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Salt (Enclosed Water) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Sulfur Oxides (Air) | 3000.00 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Total PAHs (Enclosed Water) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Total Phenolics (Enclosed Water) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Total suspended solids (Enclosed Water) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Volatile organic compounds - Summer (Air) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Volatile organic compounds (Air) | 33000.00 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| L3 | Concentration limits | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| L3.1 | <p>For each monitoring/discharge point or utilisation area specified in the table\ below (by a point number), the concentration of a pollutant discharged at that point, or applied to that area, must not exceed the concentration limits specified for that pollutant in the table.</p> | <p>The auditor sighted the quarterly air monitoring results for the audit period prepared by Ektimo and Emission Testing Consultant and noted compliance with concentration limits.</p> <p>It was noted that the licence concentration limit for nitrogen oxides (sampling point 4) was met on a number of occasions during the audit period. It is recommended that operations be reviewed to ensure continued compliance with concentration limits.</p> | Observation | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| L3.2 | <p>To avoid any doubt, this condition does not authorise the pollution of waters by any pollutant other than those specified in the table\.</p> | Condition noted. | Note | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

C1. EPL 12003

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--|--|--|----------------------|------------------------------------|----------------------|-------------------|------------------|-----------------|----------------------------|-----|---------------------|------------------|--------------------|--|----------------------------|-----|---------------------|--|--------------------|-----------------|----------------------------|---|---------------------|--|--------------------|-----------|------------------|------------------------------------|----------------------|-------------------|------------------|-----------------|----------------------------|----|---------------------|--|--------------------|-----------------|----------------------------|-----|---------------------|------------------|--------------------|--|----------------------------|-----|---------------------|--|--------------------|-----------|------------------|------------------------------------|----------------------|-------------------|------------------|-----------------|----------------------------|----|---------------------|------------------|--------------------|--|----------------------------|----|---------------------|--|--------------------|-----------------|----------------------------|------|---------------------|--|--------------------|------------------|------|
| L3.3 | <p>Air Concentration Limits</p> <p>POINT 1,2,3</p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Units of measure</th> <th>100 percentile concentration limit</th> <th>Reference conditions</th> <th>Oxygen correction</th> <th>Averaging period</th> </tr> </thead> <tbody> <tr> <td>Nitrogen Oxides</td> <td>milligrams per cubic metre</td> <td>461</td> <td>Dry, 273K, 101.3kPa</td> <td>7 percent oxygen</td> <td>As per test method</td> </tr> <tr> <td>Sulfuric acid mist and sulfur trioxide (as SO₃)</td> <td>milligrams per cubic metre</td> <td>5.0</td> <td>Dry, 273K, 101.3kPa</td> <td></td> <td>As per test method</td> </tr> <tr> <td>Sulphur dioxide</td> <td>milligrams per cubic metre</td> <td>7</td> <td>Dry, 273K, 101.3kPa</td> <td></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 concentration limit</th> <th>Reference conditions</th> <th>Oxygen correction</th> <th>Averaging period</th> </tr> </thead> <tbody> <tr> <td>Sulphur dioxide</td> <td>milligrams per cubic metre</td> <td>35</td> <td>Dry, 273K, 101.3kPa</td> <td></td> <td>As per test method</td> </tr> <tr> <td>Nitrogen Oxides</td> <td>milligrams per cubic metre</td> <td>110</td> <td>Dry, 273K, 101.3kPa</td> <td>7 percent oxygen</td> <td>As per test method</td> </tr> <tr> <td>Sulfuric acid mist and sulfur trioxide (as SO₃)</td> <td>milligrams per cubic metre</td> <td>3.5</td> <td>Dry, 273K, 101.3kPa</td> <td></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 concentration limit</th> <th>Reference conditions</th> <th>Oxygen correction</th> <th>Averaging period</th> </tr> </thead> <tbody> <tr> <td>Nitrogen Oxides</td> <td>milligrams per cubic metre</td> <td>13</td> <td>Dry, 273K, 101.3kPa</td> <td>7 percent oxygen</td> <td>As per test method</td> </tr> <tr> <td>Sulfuric acid mist and sulfur trioxide (as SO₃)</td> <td>milligrams per cubic metre</td> <td>35</td> <td>Dry, 273K, 101.3kPa</td> <td></td> <td>As per test method</td> </tr> <tr> <td>Sulphur dioxide</td> <td>milligrams per cubic metre</td> <td>1042</td> <td>Dry, 273K, 101.3kPa</td> <td></td> <td>As per test method</td> </tr> </tbody> </table> | Pollutant | Units of measure | 100 percentile concentration limit | Reference conditions | Oxygen correction | Averaging period | Nitrogen Oxides | milligrams per cubic metre | 461 | Dry, 273K, 101.3kPa | 7 percent oxygen | As per test method | Sulfuric acid mist and sulfur trioxide (as SO ₃) | milligrams per cubic metre | 5.0 | Dry, 273K, 101.3kPa | | As per test method | Sulphur dioxide | milligrams per cubic metre | 7 | Dry, 273K, 101.3kPa | | As per test method | Pollutant | Units of measure | 100 percentile concentration limit | Reference conditions | Oxygen correction | Averaging period | Sulphur dioxide | milligrams per cubic metre | 35 | Dry, 273K, 101.3kPa | | As per test method | Nitrogen Oxides | milligrams per cubic metre | 110 | Dry, 273K, 101.3kPa | 7 percent oxygen | As per test method | Sulfuric acid mist and sulfur trioxide (as SO ₃) | milligrams per cubic metre | 3.5 | Dry, 273K, 101.3kPa | | As per test method | Pollutant | Units of measure | 100 percentile concentration limit | Reference conditions | Oxygen correction | Averaging period | Nitrogen Oxides | milligrams per cubic metre | 13 | Dry, 273K, 101.3kPa | 7 percent oxygen | As per test method | Sulfuric acid mist and sulfur trioxide (as SO ₃) | milligrams per cubic metre | 35 | Dry, 273K, 101.3kPa | | As per test method | Sulphur dioxide | milligrams per cubic metre | 1042 | Dry, 273K, 101.3kPa | | As per test method | Condition noted. | Note |
| Pollutant | Units of measure | 100 percentile concentration limit | Reference conditions | Oxygen correction | Averaging period | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Nitrogen Oxides | milligrams per cubic metre | 461 | Dry, 273K, 101.3kPa | 7 percent oxygen | As per test method | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Sulfuric acid mist and sulfur trioxide (as SO ₃) | milligrams per cubic metre | 5.0 | Dry, 273K, 101.3kPa | | As per test method | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Sulphur dioxide | milligrams per cubic metre | 7 | Dry, 273K, 101.3kPa | | As per test method | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Pollutant | Units of measure | 100 percentile concentration limit | Reference conditions | Oxygen correction | Averaging period | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Sulphur dioxide | milligrams per cubic metre | 35 | Dry, 273K, 101.3kPa | | As per test method | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Nitrogen Oxides | milligrams per cubic metre | 110 | Dry, 273K, 101.3kPa | 7 percent oxygen | As per test method | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Sulfuric acid mist and sulfur trioxide (as SO ₃) | milligrams per cubic metre | 3.5 | Dry, 273K, 101.3kPa | | As per test method | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Pollutant | Units of measure | 100 percentile concentration limit | Reference conditions | Oxygen correction | Averaging period | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Nitrogen Oxides | milligrams per cubic metre | 13 | Dry, 273K, 101.3kPa | 7 percent oxygen | As per test method | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Sulfuric acid mist and sulfur trioxide (as SO ₃) | milligrams per cubic metre | 35 | Dry, 273K, 101.3kPa | | As per test method | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Sulphur dioxide | milligrams per cubic metre | 1042 | Dry, 273K, 101.3kPa | | As per test method | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding | | | | | | | | | | | | | | | |
|-----------|--|---|---|--------------|----------|--------------|----|------------------------------------|---|---|----|----|-------|--|---|----|--|-----------|
| L3.4 | <p>Note: Should the licensee seek to revise the concentration limits as specified in Condition L3.1 for nitrogen oxides, the licensee must demonstrate that:</p> <p>a) The revised emission limit is representative of the proper and efficient maintenance and operation of the equipment;</p> <p>b) The equipment is designed to minimise emissions as far as is practicable and consistent with best practice considering the type of equipment and application;</p> <p>c) The revised emission limit is supported by Manufacturers Design Specification; and</p> <p>d) 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.</p> | Condition not triggered during the audit period. | Not Triggered | | | | | | | | | | | | | | | |
| L4 | Waste | | | | | | | | | | | | | | | | | |
| L4.1 | <p>The licensee must not cause, permit or allow any waste to be received at the premises, except the wastes expressly referred to in the column titled “Waste” and meeting the definition, if any, in the column titled “Description” in the table below.</p> <p>Any waste received at the premises must only be used for the activities referred to in relation to that waste in the column titled “Activity” in the table below.</p> <p>Any waste received at the premises is subject to those limits or conditions, if any, referred to in relation to that waste contained in the column titled “Other Limits” in the table below.</p> <p>This condition does not limit any other conditions in this licence.</p> <table border="1" data-bbox="320 1042 927 1278"> <thead> <tr> <th>Code</th> <th>Waste</th> <th>Description</th> <th>Activity</th> <th>Other Limits</th> </tr> </thead> <tbody> <tr> <td>NA</td> <td>General or Specific exempted waste</td> <td>Waste that meets all the conditions of a resource recovery exemption under Clause 51A of the Protection of the Environment Operations (Waste) Regulation 2005</td> <td>As specified in each particular resource recovery exemption</td> <td>NA</td> </tr> <tr> <td>NA</td> <td>Waste</td> <td>Any waste received on site that is below licensing thresholds in Schedule 1 of the POEO Act, as in force from time to time</td> <td>-</td> <td>NA</td> </tr> </tbody> </table> | Code | Waste | Description | Activity | Other Limits | NA | General or Specific exempted waste | Waste that meets all the conditions of a resource recovery exemption under Clause 51A of the Protection of the Environment Operations (Waste) Regulation 2005 | As specified in each particular resource recovery exemption | NA | NA | Waste | Any waste received on site that is below licensing thresholds in Schedule 1 of the POEO Act, as in force from time to time | - | NA | <p>The auditor sighted the AGL Environmental Footprint spreadsheet for the financial years 2014/15 and 2015/16 and noted compliance with the requirements of this condition. The Environmental Footprint provides a detailed record of waste streams generated, recycled/reused and disposed, including water, hazardous waste and non-hazardous waste.</p> <p>AGL reported that no wastes are received, or disposed, at the premises.</p> <p>The auditor sighted a sample of disposal records and reconciled against the Environmental Footprint. There were no errors or omissions identified.</p> | Compliant |
| Code | Waste | Description | Activity | Other Limits | | | | | | | | | | | | | | |
| NA | General or Specific exempted waste | Waste that meets all the conditions of a resource recovery exemption under Clause 51A of the Protection of the Environment Operations (Waste) Regulation 2005 | As specified in each particular resource recovery exemption | NA | | | | | | | | | | | | | | |
| NA | Waste | Any waste received on site that is below licensing thresholds in Schedule 1 of the POEO Act, as in force from time to time | - | NA | | | | | | | | | | | | | | |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding | | | | | | | | | | | | | | | | | | | | |
|--------------------------|---|--|------------------------------|------------------------------|-------|-----------------|--|------------------------------|------------------------------|------------------------------|------------------------------|--------------------------|----|----|----|----|-----------------------|----|----|----|----|---|-----------|
| L4.2 | <p>Asbestos</p> <p>Note: The licensee must comply with the conditions as specified in this licence or where no specific conditions are outlined in this licence, the licensee must comply with the Protection of the Environment Operations (Waste) Regulation 2005.</p> | Condition not activated during the audit period. | Not Triggered | | | | | | | | | | | | | | | | | | | | |
| L5 | Noise Limits | | | | | | | | | | | | | | | | | | | | | | |
| L5.1 | <p>Noise from the premises must not exceed the noise limits in the table below:</p> <p>Note: Pressure safety valve (discharge) and pressure safety valve (suction) flaring events are exempted from the limits in condition L5.1.</p> <table border="1" data-bbox="322 600 904 711"> <thead> <tr> <th>Receiver Location</th> <th>Day</th> <th>Evening</th> <th>Night</th> <th>Flaring (night)</th> </tr> <tr> <td></td> <td>L_{Aeq}(15 minute)</td> <td>L_{Aeq}(15 minute)</td> <td>L_{Aeq}(15 minute)</td> <td>L_{Aeq}(15 minute)</td> </tr> </thead> <tbody> <tr> <td>R1 Medhurst Road, 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 (night) | | L _{Aeq} (15 minute) | L _{Aeq} (15 minute) | L _{Aeq} (15 minute) | L _{Aeq} (15 minute) | R1 Medhurst Road, Gilead | 35 | 35 | 35 | 45 | R7 Mt. Gilead, Gilead | 37 | 36 | 36 | 45 | <p>The auditor sighted the following quarterly noise assessment reports prepared by Wilkinson Murray for the Rosalind Park Gas Plant:</p> <ol style="list-style-type: none"> 30 October 2014; 31 December 2014; 31 March 2015; 13 July 2015; 23 October 2015; 22 December 2015; 11 April 2016; and 30 June 2016. <p>It was noted that the monitoring conducted on 8 September 2015 (report dated 23 October 2015) and 15 June 2016 (report dated 30 June 2016) at location R7 (Mt Gilead) exceeded the relevant noise limit of 36dBA by 1dB. However, Wilkinson Murray reported (in accordance with the NSW Industrial Noise Policy) that compliance with the licence condition was indeterminate on the basis that the result did not exceed the noise limit by more than 2dBA.</p> <p>Flaring events did not coincide with monitoring undertaken by external consultants and as such there were no measurements obtained.</p> | Compliant |
| Receiver Location | Day | Evening | Night | Flaring (night) | | | | | | | | | | | | | | | | | | | |
| | L _{Aeq} (15 minute) | L _{Aeq} (15 minute) | L _{Aeq} (15 minute) | L _{Aeq} (15 minute) | | | | | | | | | | | | | | | | | | | |
| R1 Medhurst Road, Gilead | 35 | 35 | 35 | 45 | | | | | | | | | | | | | | | | | | | |
| R7 Mt. Gilead, Gilead | 37 | 36 | 36 | 45 | | | | | | | | | | | | | | | | | | | |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-------------|--|--|---------|
| L5.2 | <p>For the purposes of condition L5.1:</p> <ul style="list-style-type: none"> 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. | Condition noted. | Note |
| L5.3 | Incidence of flaring events | | |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--------------------------|--|--|--------------------------------|-----------------|---------|-------|--|--|-----------------|-----------------|-----------------|--------------------------|------------------------|----|----|----|--|---|----|----|----|--|---|----|----|----|-----------------------|------------------------|----|----|----|--|---|----|----|-----|--|---|----|----|----|--|--------------|
| L5.4 | <p>Noise for flaring event, must not exceed the noise limits in the table below:</p> <table border="1" data-bbox="309 379 1055 772"> <thead> <tr> <th data-bbox="309 379 443 419">Receiver Location</th> <th data-bbox="443 379 577 419">Type & Duration of Flare event</th> <th data-bbox="577 379 734 419">Day</th> <th data-bbox="734 379 913 419">Evening</th> <th data-bbox="913 379 1055 419">Night</th> </tr> <tr> <td></td> <td></td> <td data-bbox="577 419 734 451">LAeq(15 minute)</td> <td data-bbox="734 419 913 451">LAeq(15 minute)</td> <td data-bbox="913 419 1055 451">LAeq(15 minute)</td> </tr> </thead> <tbody> <tr> <td data-bbox="309 451 443 483">R1 Medhurst Road, Gilead</td> <td data-bbox="443 451 577 483">Spill valve >2.5 hours</td> <td data-bbox="577 451 734 483">35</td> <td data-bbox="734 451 913 483">35</td> <td data-bbox="913 451 1055 483">35</td> </tr> <tr> <td></td> <td data-bbox="443 483 577 539">Compressor blowdown (ESD) 15-60 minutes</td> <td data-bbox="577 483 734 539">40</td> <td data-bbox="734 483 913 539">40</td> <td data-bbox="913 483 1055 539">35</td> </tr> <tr> <td></td> <td data-bbox="443 539 577 611">Compressor blowdown (shut down and unload) 6-15 minutes</td> <td data-bbox="577 539 734 611">42</td> <td data-bbox="734 539 913 611">42</td> <td data-bbox="913 539 1055 611">37</td> </tr> <tr> <td data-bbox="309 611 443 643">R7 Mt. Gilead, Gilead</td> <td data-bbox="443 611 577 643">Spill valve >2.5 hours</td> <td data-bbox="577 611 734 643">37</td> <td data-bbox="734 611 913 643">36</td> <td data-bbox="913 611 1055 643">36</td> </tr> <tr> <td></td> <td data-bbox="443 643 577 699">Compressor blowdown (ESD) 15-60 minutes</td> <td data-bbox="577 643 734 699">42</td> <td data-bbox="734 643 913 699">41</td> <td data-bbox="913 643 1055 699">40*</td> </tr> <tr> <td></td> <td data-bbox="443 699 577 772">Compressor blowdown (shut down and unload) 6-15 minutes</td> <td data-bbox="577 699 734 772">44</td> <td data-bbox="734 699 913 772">43</td> <td data-bbox="913 699 1055 772">37</td> </tr> </tbody> </table> | Receiver Location | Type & Duration of Flare event | Day | Evening | Night | | | LAeq(15 minute) | LAeq(15 minute) | LAeq(15 minute) | R1 Medhurst Road, Gilead | Spill valve >2.5 hours | 35 | 35 | 35 | | Compressor blowdown (ESD) 15-60 minutes | 40 | 40 | 35 | | Compressor blowdown (shut down and unload) 6-15 minutes | 42 | 42 | 37 | R7 Mt. Gilead, Gilead | Spill valve >2.5 hours | 37 | 36 | 36 | | Compressor blowdown (ESD) 15-60 minutes | 42 | 41 | 40* | | Compressor blowdown (shut down and unload) 6-15 minutes | 44 | 43 | 37 | <p>Flaring events did not coincide with monitoring undertaken by external consultants and as such there were no measurements obtained.</p> <p>It was reported by AGL that noise from flaring events was monitored following commissioning of the plant. The results were reportedly compliant with this condition and as such, no further monitoring was undertaken.</p> <p>It was noted that the use of the flare has decreased since commissioning and there have been no noise complaints received during the audit period.</p> | Not Verified |
| Receiver Location | Type & Duration of Flare event | Day | Evening | Night | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | LAeq(15 minute) | LAeq(15 minute) | LAeq(15 minute) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| R1 Medhurst Road, Gilead | Spill valve >2.5 hours | 35 | 35 | 35 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Compressor blowdown (ESD) 15-60 minutes | 40 | 40 | 35 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Compressor blowdown (shut down and unload) 6-15 minutes | 42 | 42 | 37 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| R7 Mt. Gilead, Gilead | Spill valve >2.5 hours | 37 | 36 | 36 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Compressor blowdown (ESD) 15-60 minutes | 42 | 41 | 40* | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Compressor blowdown (shut down and unload) 6-15 minutes | 44 | 43 | 37 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-------------|---|--|-----------|
| | <p>Note: 1. For the purposes of the table above, a is where ESD (Emergency Shut Down) flare events exceed a frequency of occurrence of 1 per 21 days or a duration higher than 15 minutes per event to a reduced flow rate of less the 0.5 mmscf/d for each event, a lower limit of 36dB(A) LAeq (15 Minutes) applies at night.</p> <p>Note: 2. For the purposes of the table above, a flare event is defined as the period of time when the gas flow to the flare is greater than the gas flow necessary to maintain the pilot flare.</p> <p>Note: 3. Pressure safety valve (discharge) and pressure safety valve (suction) flaring events are exempted from the limits in condition L5.4.</p> | | |
| L5.5 | Noise measurements | | |
| L5.6 | <p>Noise from the premises is to be measured at any point on or within the residential boundary or at any 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) noise limits in condition L5.1.</p> <p>Where it can be demonstrated that direct measurement of noise from the premises is impractical, the EPA may accept alternative means of determining compliance. See Chapter 11 of the NSW Industrial Noise Policy January 2000 for general guidance for determining compliance.</p> <p>The modification factors presented in Section 4 of the NSW Industrial Noise Policy January 2000 shall also be applied to the measured noise levels where applicable.</p> | <p>The auditor sighted all noise assessment reports prepared during the audit period and noted conformance with the requirements of this condition.</p> | Compliant |
| L5.7 | <p>Noise from the premises is to be measured at 1m from the dwelling façade to determine compliance with the LA1 (1 minute) noise level in L5.1.</p> | <p>The auditor sighted all noise assessment reports prepared during the audit period. It was noted that all attended noise measurements were conducted at a location representative of the most affected point within the 30m-perimeter surrounding the house for both identified noise sensitive receivers.</p> <p>Although noise was not measured at 1m from the dwelling facade, the monitoring results are compliant with emission limits at 30m. As such, it is assumed that compliance would be achieved at the dwelling facade.</p> | Compliant |
| L5.8 | <p>The noise emission limits identified in this licence apply under all meteorological conditions except:</p> | <p>The auditor sighted all noise assessment reports completed during the audit period and noted compliance with the requirements of this condition. The estimated LAeq(15minute) noise levels were based on</p> | Compliant |
| L5.8a) | <p>a) during rain and wind speeds (at 10m height) greater than 3m/s; and</p> | | Compliant |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-------------|--|---|-----------|
| L5.8b) | b) under "non-significant weather conditions". Note: Field meteorological indicators for non-significant weather conditions are described in the NSW Industrial Noise Policy, Chapter 5 and Appendix E in relation to wind and temperature inversions. | Industrial Noise Policy assessable weather conditions (e.g. data under the weather condition of wind speed less than or equal to 3m/s (at 10-m height) or rain fall less than 0.3mm). | Compliant |
| L5.9 | Well, Gathering System and Trunk Line Maintenance noise management protocol | | |
| L5.10 | The licensee must have in place a Well, Gathering System and Trunk Line Maintenance Noise Management Protocol to be used for the premises as defined in Condition A2 of this licence for the duration of the licence. The Protocol must include, but not limited to: | The auditor sighted the Noise Management Sub Plan (April 2016) and noted compliance with the requirements of this condition. | Compliant |
| L5.10 a) | noise compliance standards; | | Compliant |
| L5.10 b) | community consultation; | | Compliant |
| L5.10 c) | advance notice to affected members of the community for planned well maintenance activities; | | Compliant |
| L5.10 d) | complaints handling monitoring/system; | | Compliant |
| L5.10 e) | site contact person to follow up complaints; | | Compliant |
| L5.10 f) | mitigation measures; | | Compliant |
| L5.10 g) | the design/orientation of the proposed mitigation methods demonstrating best practice; | | Compliant |
| L5.10 h) | construction times; | | Compliant |
| L5.10 i) | contingency measures where noise complaints are received; and | | Compliant |
| L5.10 j) | monitoring methods and program. | | Compliant |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----------|---|--|---------------|
| L6 | Hours of Operation | | |
| L6.1 | Planned maintenance activities at any of the wells must only be conducted between: | The auditor sighted the Noise Management Sub Plan (April 2016) and noted compliance with the requirements of this condition. Implementation was demonstrated by the following documents sighted by the auditor: 1. Induction program (includes planned maintenance hours); 2. Notification letters to potentially impacted residents; and 3. Minimum Environmental Controls Form. Commencing in 2015, this process includes the documentation of site specific controls as relevant to workover and plug and abandonment works. Periodic inspections are then undertaken to assess implementation and identify performance improvements. Sample documents sighted by the auditor include the hours of operation as specified in this condition. | Compliant |
| L6.1a) | 7am and 6pm on weekdays; and | | Compliant |
| L6.1b) | 8am and 1pm on Saturdays (excluding Public Holidays). | | Compliant |
| L6.2 | This condition does not apply to the delivery of material outside the hours of operation permitted by condition L6.1, 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 must be provided to the EPA and affected residents as soon as possible or within a reasonable period in the case of emergency. | Condition not triggered during the audit period. | Not Triggered |
| L7 | Potentially offensive odour | | |
| L7.1 | No condition of this licence identifies a potentially offensive odour for the purposes of section 129 of the Protection of the Environment Operations Act 1997. Note: Section 129 of the Protection of the Environment Operations Act 1997, provides that the licensee must not cause or permit the emission of any offensive odour from the premises but provides a defence if the emission is identified in the relevant environment protection licence as a potentially offensive odour and the odour was emitted in accordance with the conditions of a licence directed at minimising odour. Note: Should odour emissions become an issue, the EPA will consider requiring investigation and implementation of further odour control measures. | Condition noted. | Note |
| L8 | Other limit conditions | | |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-------------|---|---|---------------|
| L8.1 | Polychlorinated Biphenyls (PCBs) Note: The licensee must comply with the conditions as specified in this licence or where no specific conditions are outlined in this licence, the licensee must comply with the "Chemical Control Order in Relation to Materials and Wastes Containing Polychlorinated Biphenyl, 1997". | Condition not triggered during the audit period. | Not Triggered |
| L8.2 | Hydraulic Fracturing | | |
| L8.3 | The licensee must not use chemicals that contain BTEX compounds (Benzene, Toluene, Ethyl Benzene and Xylene) in the fracturing fluid additives. | The auditor sighted the EMP (March 2016) and the Soil and Water Management Sub Plan (May 2016) which note that wells are to be constructed and operated in accordance with the Code of Practice for Coal Seam Gas – Fracture Stimulation Activities. The Code of Practice notes that the use of additives containing BTEX compounds is banned in NSW. It was reported that there were no fraccing activities undertaken during the audit period. | Not Triggered |
| 4 | Operating Conditions | | |
| O1 | Activities must be carried out in a competent manner | | |
| O1.1 | Licensed activities must be carried out in a competent manner. This includes: | Competence is demonstrated through defined roles and responsibilities, training and assurance, as detailed below: | Compliant |
| O1.1a) | the processing, handling, movement and storage of materials and substances used to carry out the activity; and | | Compliant |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
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| O1.1b) | the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity. | <p>1. Roles and responsibilities - Defined in the EMP (March 2016) and position descriptions. The position description of the Gas Plant Operator (16/12/12) was sighted by the auditor and noted to include a requirement to achieve regulatory compliance and adhere to the EMP.</p> <p>2. Training - The auditor sighted the site specific and role-specific induction program that is delivered to all AGL employees and contractors (Rapid Induct). The induction program includes relevant risks and controls as detailed in the EMP. During the audit period, role-specific training was delivered on Leak Detection and Repair (28/04/16) and the Pollution Incident Response Management Plan (29/04/16).</p> <p>3. Audit and inspection - Sub Plan compliance audits are undertaken monthly to assess implementation of control measures.</p> <p>A Non-Compliance was reported against this condition by AGL in the December 2015 Annual Return. The Annual Return refers to the EPA Final Compliance Audit Report (17/06/14). All non-compliances were addressed prior to the audit period with the exception of the following which relate to the RPGP:</p> <p>1. Underground Storage Tanks - Two underground storage tanks (oily water) were identified as having the potential to pollute water. A specific concern was identified in relation to the adequacy of tank integrity monitoring.</p> <p>2. Transfer of Produced Water - The transfer of produced water from the flare pit to tankers was identified as having the potential to pollute water.</p> <p>The auditor sighted adequate evidence demonstrating that corrective actions relating to the above matters were addressed during the audit period.</p> | Compliant |
| O2 | Maintenance of plant and equipment | | |
| O2.1 | All plant and equipment installed at the premises or used in connection with the licensed activity: | Condition noted. | Note |
| O2.1a) | must be maintained in a proper and efficient condition; and | Due to the previously reported non-compliance against EPL Licence Conditions M2.1 (requirement to monitor pollutants using the specific | Non-Compliant (low risk) |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----------|---|--|--------------------------|
| O2.2b) | must be operated in a proper and efficient manner. | sample method) and M2.3/DA-282-6-2003-I, Schedule 4, Condition 58 (requirements to undertake continuous monitoring), AGL remains non-compliant with the requirements of this condition. This non-compliance was first reported by AGL management on 9 July 2012. | Non-Compliant (low risk) |
| O3 | Dust | | |
| O3.1 | The premises must be maintained in a condition which minimises or prevents the emission of dust from the premises. | The auditor sighted the Air Quality Management Sub Plan (April 2016) and noted the inclusion of adequate dust management controls. The auditor sighted the complaints register for the CGP and noted that there were no dust related complaints recorded during the audit period. | Compliant |
| O4 | Emergency Response | | |
| O4.1 | The licensee must maintain, and implement as necessary, a current emergency response plan for the premises. The licensee must keep the emergency response plan on the premises at all times. The emergency response plan must document systems and procedures to deal with all types of incidents (e.g. spills, explosions or fire) that may occur at the premises or that may be associated with activities that occur at the premises and which are likely to cause harm to the environment. If a current emergency response plan does not exist at the date on which this condition is attached to the licence, the licensee must develop an emergency response plan within three months of that date. | The auditor sighted the Pollution Incident Response Management Plan (PIRMP) and Emergency Response Plan (20/11/15) for the CGP and noted compliance with the requirements of this condition. | Compliant |
| O5 | Process and management | | |
| O5.1 | The licensee must ensure that any liquid and/or non-liquid waste generated and/or stored at the premises is assessed and classified in accordance with the DECC Waste Classification Guidelines as in force from time to time. | The auditor sighted the Waste Management Sub Plan (April 2016) and noted compliance with the requirements of this condition. Implementation of the Sub Plan was demonstrated through the AGL Environmental Footprint spreadsheet for the financial years 2014/15 and 2015/16. The spreadsheets detail waste generated during the audit period. The auditor sighted a sample of disposal records and reconciled against the Environmental Footprint. There were no errors or omissions identified. | Compliant |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----------|---|--|-----------|
| O5.2 | The licensee must ensure that waste identified for recycling is stored separately from other waste. | The auditor sighted the Waste Management Sub Plan (April 2016) and noted compliance with the requirements of this condition. The auditor inspected the RPGP and observed the separation of waste for recycling, including oil filters, batteries, scrap metal, paper, cardboard and plastics. | Compliant |
| 5 | Monitoring and Recording Conditions | | |
| M1 | Monitoring Records | | |
| M1.1 | The results of any monitoring required to be conducted by this licence or a load calculation protocol must be recorded and retained as set out in this condition. | Monitoring records prepared during the audit period were sighted by the auditor and noted to comply with the requirements of this condition. | Compliant |
| M1.2 | All records required to be kept by this licence must be: | Monitoring records prepared during the audit period were sighted by the auditor and noted to comply with the requirements of this condition. | Compliant |
| M1.2 a) | in a legible form, or in a form that can readily be reduced to a legible form; | | Compliant |
| M1.2 b) | kept for at least 4 years after the monitoring or event to which they relate took place; and | | Compliant |
| M1.2 c) | produced in a legible form to any authorised officer of the EPA who asks to see them. | | Compliant |
| M1.3 | The following records must be kept in respect of any samples required to be collected for the purposes of this licence: | The auditor sighted quarterly noise assessment reports prepared by Wilkinson Murray and monthly/quarterly air quality reports prepared by Emission Testing Consultants and Ektimo. The records were noted to comply with the requirements of this condition. | Compliant |
| M1.3 a) | the date(s) on which the sample was taken; | | Compliant |
| M1.3 b) | the time(s) at which the sample was collected; | | Compliant |
| M1.3 c) | the point at which the sample was taken; and | | Compliant |
| M1.3 d) | the name of the person who collected the sample. | | Compliant |
| M2 | Requirement to monitor concentration of pollutants discharged | | |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|--|--|--------------------------|-----------|-----------------|----------------|---------|-----------|-------|-----------------|---------------------------|-----------|-------|----------|---------|-----------|-------|---------------------------------|---------------------|-----------|-------|-----------------|----------------------------|-----------|-------|-------------|---------|-----------|-------|---|----------------------------|-----------|------|-----------------|----------------------------|-----------|------|-------------|-----------------|-----------|------|----------|-------------------|-----------|------|---------------------|-------------------------|-----------|------|-----------|------------------|-----------|-----------------|----------------|---------|-----------|-------|-----------------|---------------------------|-----------|-------|----------|---------|-----------|-------|---------------------------------|---------------------|-----------|-------|-------|-------------|-----------|------|-------------|---------|-----------|-------|-------------|-----------------|-----------|------|----------|-------------------|-----------|------|---------------------|-------------------------|-----------|------|--|-----------|
| M2.1 | For each monitoring/discharge point or utilisation area specified below (by a point number), the licensee must monitor (by sampling and obtaining results by analysis) the concentration of each pollutant specified in Column 1. The licensee must use the sampling method, units of measure, and sample at the frequency, specified opposite in the other columns: | As noted in condition O2.1, AGL management reported a non-compliance against condition M2.1 on 9 July 2012. Due to continuous emissions monitoring equipment failure, AGL remained non-compliant with this condition during the audit period. AGL has entered into a Pollution Reduction Plan (PRP) for a Predictive Emissions System (PEMS) 6 month trial (Condition U1.1). | Non-Compliant (low risk) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| M2.2 | <p>Air Monitoring Requirements</p> <p>POINT 1,2,3,4,5</p> <table border="1" data-bbox="338 608 831 855"> <thead> <tr> <th>Pollutant</th> <th>Units of measure</th> <th>Frequency</th> <th>Sampling Method</th> </tr> </thead> <tbody> <tr><td>Carbon dioxide</td><td>percent</td><td>Quarterly</td><td>TM-24</td></tr> <tr><td>Dry gas density</td><td>kilograms per cubic metre</td><td>Quarterly</td><td>TM-23</td></tr> <tr><td>Moisture</td><td>percent</td><td>Quarterly</td><td>TM-22</td></tr> <tr><td>Molecular weight of stack gases</td><td>grams per gram mole</td><td>Quarterly</td><td>TM-23</td></tr> <tr><td>Nitrogen Oxides</td><td>milligrams per cubic metre</td><td>Quarterly</td><td>TM-11</td></tr> <tr><td>Oxygen (O2)</td><td>percent</td><td>Quarterly</td><td>TM-25</td></tr> <tr><td>Sulfuric acid mist and sulfur trioxide (as SO3)</td><td>milligrams per cubic metre</td><td>Quarterly</td><td>TM-3</td></tr> <tr><td>Sulphur dioxide</td><td>milligrams per cubic metre</td><td>Quarterly</td><td>TM-4</td></tr> <tr><td>Temperature</td><td>degrees Celsius</td><td>Quarterly</td><td>TM-2</td></tr> <tr><td>Velocity</td><td>metres per second</td><td>Quarterly</td><td>TM-2</td></tr> <tr><td>Volumetric flowrate</td><td>cubic metres per second</td><td>Quarterly</td><td>TM-2</td></tr> </tbody> </table> <p>POINT 6</p> <table border="1" data-bbox="338 898 831 1177"> <thead> <tr> <th>Pollutant</th> <th>Units of measure</th> <th>Frequency</th> <th>Sampling Method</th> </tr> </thead> <tbody> <tr><td>Carbon dioxide</td><td>percent</td><td>Quarterly</td><td>TM-24</td></tr> <tr><td>Dry gas density</td><td>kilograms per cubic metre</td><td>Quarterly</td><td>TM-23</td></tr> <tr><td>Moisture</td><td>percent</td><td>Quarterly</td><td>TM-22</td></tr> <tr><td>Molecular weight of stack gases</td><td>grams per gram mole</td><td>Quarterly</td><td>TM-23</td></tr> <tr><td>Odour</td><td>odour units</td><td>Quarterly</td><td>OM-7</td></tr> <tr><td>Oxygen (O2)</td><td>percent</td><td>Quarterly</td><td>TM-25</td></tr> <tr><td>Temperature</td><td>degrees Celsius</td><td>Quarterly</td><td>TM-2</td></tr> <tr><td>Velocity</td><td>metres per second</td><td>Quarterly</td><td>TM-2</td></tr> <tr><td>Volumetric flowrate</td><td>cubic metres per second</td><td>Quarterly</td><td>TM-2</td></tr> </tbody> </table> | Pollutant | Units of measure | Frequency | Sampling Method | Carbon dioxide | percent | Quarterly | TM-24 | Dry gas density | kilograms per cubic metre | Quarterly | TM-23 | Moisture | percent | Quarterly | TM-22 | Molecular weight of stack gases | grams per gram mole | Quarterly | TM-23 | Nitrogen Oxides | milligrams per cubic metre | Quarterly | TM-11 | Oxygen (O2) | percent | Quarterly | TM-25 | Sulfuric acid mist and sulfur trioxide (as SO3) | milligrams per cubic metre | Quarterly | TM-3 | Sulphur dioxide | milligrams per cubic metre | Quarterly | TM-4 | Temperature | degrees Celsius | Quarterly | TM-2 | Velocity | metres per second | Quarterly | TM-2 | Volumetric flowrate | cubic metres per second | Quarterly | TM-2 | Pollutant | Units of measure | Frequency | Sampling Method | Carbon dioxide | percent | Quarterly | TM-24 | Dry gas density | kilograms per cubic metre | Quarterly | TM-23 | Moisture | percent | Quarterly | TM-22 | Molecular weight of stack gases | grams per gram mole | Quarterly | TM-23 | Odour | odour units | Quarterly | OM-7 | Oxygen (O2) | percent | Quarterly | TM-25 | Temperature | degrees Celsius | Quarterly | TM-2 | Velocity | metres per second | Quarterly | TM-2 | Volumetric flowrate | cubic metres per second | Quarterly | TM-2 | The auditor sighted quarterly air quality monitoring reports for the RGP and noted compliance with the requirements of this condition. | Compliant |
| Pollutant | Units of measure | Frequency | Sampling Method | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Carbon dioxide | percent | Quarterly | TM-24 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Dry gas density | kilograms per cubic metre | Quarterly | TM-23 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Moisture | percent | Quarterly | TM-22 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Molecular weight of stack gases | grams per gram mole | Quarterly | TM-23 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Nitrogen Oxides | milligrams per cubic metre | Quarterly | TM-11 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Oxygen (O2) | percent | Quarterly | TM-25 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Sulfuric acid mist and sulfur trioxide (as SO3) | milligrams per cubic metre | Quarterly | TM-3 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Sulphur dioxide | milligrams per cubic metre | Quarterly | TM-4 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Temperature | degrees Celsius | Quarterly | TM-2 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Velocity | metres per second | Quarterly | TM-2 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Volumetric flowrate | cubic metres per second | Quarterly | TM-2 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Pollutant | Units of measure | Frequency | Sampling Method | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Carbon dioxide | percent | Quarterly | TM-24 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Dry gas density | kilograms per cubic metre | Quarterly | TM-23 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Moisture | percent | Quarterly | TM-22 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Molecular weight of stack gases | grams per gram mole | Quarterly | TM-23 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Odour | odour units | Quarterly | OM-7 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Oxygen (O2) | percent | Quarterly | TM-25 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Temperature | degrees Celsius | Quarterly | TM-2 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Velocity | metres per second | Quarterly | TM-2 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Volumetric flowrate | cubic metres per second | Quarterly | TM-2 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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|----------------------|---|--|-----------------------------------|-----------|-----------------|-----------------|----------------------------|------------|-------|-------------|-----------------|------------|------|----------|---------|------------|-----------------------------------|----------------------|-------------------------|------------|-------|--------|---------|------------|-------|--|--------------------------|
| M2.3 | <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>Nitrogen Oxides</td> <td>milligrams per cubic metre</td> <td>Continuous</td> <td>CEM-2</td> </tr> <tr> <td>Temperature</td> <td>degrees Celsius</td> <td>Continuous</td> <td>TM-2</td> </tr> <tr> <td>Moisture</td> <td>percent</td> <td>Continuous</td> <td>Method approved by EPA in writing</td> </tr> <tr> <td>Volumetric flow rate</td> <td>cubic metres per second</td> <td>Continuous</td> <td>CEM-6</td> </tr> <tr> <td>Oxygen</td> <td>percent</td> <td>Continuous</td> <td>CEM-3</td> </tr> </tbody> </table> | Pollutant | Units of measure | Frequency | Sampling Method | Nitrogen Oxides | milligrams per cubic metre | Continuous | CEM-2 | Temperature | degrees Celsius | Continuous | TM-2 | Moisture | percent | Continuous | Method approved by EPA in writing | Volumetric flow rate | cubic metres per second | Continuous | CEM-6 | Oxygen | percent | Continuous | CEM-3 | As noted in condition O2.1, AGL management reported a non-compliance against condition M2.1 on 9 July 2012. Due to continuous emissions monitoring equipment failure, AGL remained non-compliant with this condition during the audit period. AGL has entered into a Pollution Reduction Plan (PRP) for a Predictive Emissions System (PEMS) 6 month trial (Condition U1.1). | Non-Compliant (low risk) |
| Pollutant | Units of measure | Frequency | Sampling Method | | | | | | | | | | | | | | | | | | | | | | | | |
| Nitrogen Oxides | milligrams per cubic metre | Continuous | CEM-2 | | | | | | | | | | | | | | | | | | | | | | | | |
| Temperature | degrees Celsius | Continuous | TM-2 | | | | | | | | | | | | | | | | | | | | | | | | |
| Moisture | percent | Continuous | Method approved by EPA in writing | | | | | | | | | | | | | | | | | | | | | | | | |
| Volumetric flow rate | cubic metres per second | Continuous | CEM-6 | | | | | | | | | | | | | | | | | | | | | | | | |
| Oxygen | percent | Continuous | CEM-3 | | | | | | | | | | | | | | | | | | | | | | | | |
| M2.4 | <p>Continuous emissions monitoring results for moisture, as required by Condition M2.3, must be calibrated by reference to sampling method TM-22 as specified in EPA Approved Methods for the Sampling and Analysis of Air Pollutants in NSW, as in force from time to time.</p> <p>Note: The requirement for quarterly monitoring at point 6 may be reviewed based on odour emission performance after 12 months from commissioning of the treatment plant.</p> | As noted in condition O2.1, AGL management reported a non-compliance against condition M2.1 on 9 July 2012. Due to continuous emissions monitoring equipment failure, AGL remained non-compliant with this condition during the audit period. AGL has entered into a Pollution Reduction Plan (PRP) for a Predictive Emissions System (PEMS) 6 month trial (Condition U1.1). | Non-Compliant (low risk) | | | | | | | | | | | | | | | | | | | | | | | | |
| M2.5 | For the purposes of Condition M2.2, the selection of sampling positions for quarterly monitoring at points 1, 2, 3, 4 and 6 must be carried out in accordance with test method TM-1 as specified in Approved Methods for the Sampling and Analysis of Air Pollutants in NSW, as in force from time to time. | The auditor sighted quarterly air quality monitoring reports and noted compliance with the requirements of this condition. | Compliant | | | | | | | | | | | | | | | | | | | | | | | | |
| M2.6 | For the purposes of Condition M2.2, the selection of sampling positions for quarterly monitoring (excluding velocity) at point 5 must be carried out in accordance with test method TM-1 as specified in Approved Methods for the Sampling and Analysis of Air Pollutants in NSW, as in force from time to time. | The auditor sighted quarterly air quality monitoring reports and noted compliance with the requirements of this condition. | Compliant | | | | | | | | | | | | | | | | | | | | | | | | |
| M2.7 | <p>Point 8, 9, 10, 11, 12, 13, 14, 15</p> <p>Water and/ or Land Monitoring Requirements (<i>refer to page 19/20 of EPL 12003 for details on pollutants, units of measure, frequency and sampling method</i>).</p> | Condition noted. | Note | | | | | | | | | | | | | | | | | | | | | | | | |

C1. EPL 12003

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----------|---|---|---|
| M2.8 | For the purposes of the table above for points 8, 9, 10, 11, 12, 13, 14, and 15 the monitoring results are required to be submitted annually as a Groundwater Monitoring Report with the Annual Return. | The auditor sighted a sample of laboratory reports and the 'CGP Annual Groundwater Report, Produced Water Quality Report' for the following reporting periods: 22 December 2013 - 21 December 2014 (15/02/15); and 22 December 2014 - 21 December 2015 (11/01/16). The reports comply with the requirements of this condition. | Compliant |
| M2.9 | For the purposes of Condition M2.7 EPA has approved the following method of analysis for the following pollutants only: • Methane - ALS "Static Headspace GC/FID technique" • Phenols - USEPA method 8270D. • Polycyclic aromatic hydrocarbons - USEPA method 8270D All other monitoring must be undertaken in accordance with Condition M3.2. | The auditor sighted correspondence from ALS Environmental Sydney (05/06/14) confirming that the test methods performed by ALS comply with the requirements of this condition. | Compliant |
| M3 | Testing methods - concentration limits | | |
| M3.1 | Monitoring for the concentration of a pollutant emitted to the air required to be conducted by this licence must be done in accordance with: | The auditor sighted air monitoring reports prepared during the audit period and noted compliance with the requirements of this condition. | Compliant |
| M3.1 a) | any methodology which is required by or under the Act to be used for the testing of the concentration of the pollutant; or | | Compliant |
| M3.1 b) | if no such requirement is imposed by or under the Act, any methodology which a condition of this licence requires to be used for that testing; or | | Compliant |
| M3.1 c) | if no such requirement is imposed by or under the Act or by a condition of this licence, any methodology approved in writing by the EPA for the purposes of that testing prior to the testing taking place. Note: The Protection of the Environment Operations (Clean Air) Regulation 2010 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". | | Compliant |
| M3.2 | Subject to any express provision to the contrary in this licence, monitoring for the concentration of a water pollutant must be done in accordance with the EPA Approved Methods Publication "Approved Methods for the Sampling and Analysis of Water Pollutants in New South Wales" unless another method has been approved by the EPA in writing before any tests are conducted. | | The auditor sighted correspondence from ALS Environmental Sydney (05/06/14) confirming that the test methods performed by ALS comply with the requirements of this condition. |

C1. EPL 12003

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----------|---|--|-----------|
| M3.3 | Subject to any express provision to the contrary in this licence, monitoring for the concentration of a pollutant discharged to waters or applied to a utilisation area must be done in accordance with the Approved Methods Publication unless another method has been approved by the EPA in writing before any tests are conducted. | Condition noted. | Note |
| M4 | Testing methods - load limits Note: Division 3 of the Protection of the Environment Operations (General) Regulation 2009 requires that monitoring of actual loads of assessable pollutants listed in L2.2 must be carried out in accordance with the relevant load calculation protocol set out for the fee-based activity classification listed in the Administrative Conditions of this licence. | The auditor sighted the AGL spreadsheets 'LBL Summary 2013-14 RPGP draft v0' and 'LBL Summary 2014-15 RPGP draft v2' which detail the load calculations based on quarterly or annual monitoring results. It was noted that AGL achieved conformance during the audit period with each specified limit. In all cases, the load calculation method of source monitoring was applied. The auditor sighted quarterly air monitoring reports and tested a sample of values entered into the AGL spreadsheets. There were no errors or omissions noted. The auditor also sighted correspondence from Golder Associates (28 January 2016) who conducted a technical review of the 2014-15 Annual Return and noted compliance with reporting requirements. | Compliant |
| M5 | Recording of pollution complaints | | |
| M5.1 | 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 auditor sighted Consultation Manager, a software program used for managing stakeholder engagement, including complaints. Records retained within Consultation Manager comply with the requirements of this condition. | Compliant |
| M5.2 | The record must include details of the following: | The auditor sighted Consultation Manager, a software program used for managing stakeholder engagement, including complaints. Records retained within Consultation Manager comply with the requirements of this condition. | Compliant |
| M5.2 a) | the date and time of the complaint; | | Compliant |
| M5.2 b) | the method by which the complaint was made; | | Compliant |
| M5.2 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; | | Compliant |
| M5.2 d) | the nature of the complaint; | | Compliant |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-------------|---|---|---------------|
| M5.2 e) | the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and | | Compliant |
| M5.2f) | if no action was taken by the licensee, the reasons why no action was taken. | | Compliant |
| M5.3 | The record of a complaint must be kept for at least 4 years after the complaint was made. | The auditor sighted complaint records within Consultation Manager (a software program used for managing stakeholder engagement, including complaints). Prior to 2013, a Complaints Register was maintained which was also sighted by the auditor. The Consultation Manager records and the historical Complaints Register demonstrate compliance with the requirements of this condition. | Compliant |
| M5.4 | The record must be produced to any authorised officer of the EPA who asks to see them. | Condition not triggered during the audit period. | Not Triggered |
| M6 | Telephone complaints line | | |
| M6.1 | 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. | The auditor sighted the CGP website and noted the inclusion of a telephone line, contact and feedback form. The website notes that the purpose of the telephone line is for complaints and enquiries. The auditor contacted the telephone line during the audit and was satisfied with the handling process. | Compliant |
| M6.2 | 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. | | Compliant |
| M6.3 | The preceding two conditions do not apply until 3 months after: the date of the issue of this licence. | | Compliant |
| M7 | Other monitoring and recording conditions | | |
| M7.1 | Leak Detection and Repair Program | | |
| M7.2 | The licensee must operate a Leak Detection And Repair Program for all relevant components of plant and equipment. | The auditor sighted the Annual Leak Detection and Repair Reports (AGL, 16/02/15 and 11/12/15) prepared during the audit period and noted compliance with the requirements of this condition. | Compliant |
| 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 Leaks (40 CFR Part 60, Appendix A, Method 21). | The auditor sighted the Annual Leak Detection and Repair Reports (AGL, 16/02/15 and 11/12/15) prepared during the audit period and noted compliance with the requirements of this condition. | Compliant |
| 6 | Reporting Conditions | | |
| R1 | Annual return documents | | |

C1. EPL 12003

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|--------|---|--|---------------|
| R1.1 | The licensee must complete and supply to the EPA an Annual Return in the approved form comprising: 1. a Statement of Compliance, 2. a Monitoring and Complaints Summary, 3. a Statement of Compliance - Licence Conditions, 4. a Statement of Compliance - Load based Fee, 5. a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan, 6. a Statement of Compliance - Requirement to Publish Pollution Monitoring Data, 7. a Statement of Compliance - Environmental Management Systems and Practices; and 8. a Statement of Compliance - Environmental Improvement Works. At the end of each reporting period, the EPA will provide to the licensee a copy of the form that must be completed and returned to the EPA. | The auditor sighted the December 2014 and December 2015 Annual Returns and noted compliance against the requirements of this condition. | Compliant |
| R1.2 | An Annual Return must be prepared in respect of each reporting period, except as provided below. 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. | The auditor sighted the December 2014 and December 2015 Annual Returns and noted compliance against the relevant requirements of this condition. | Compliant |
| R1.3 | Where this licence is transferred from the licensee to a new licensee: | Condition not triggered during the audit period. | Not Triggered |
| R1.3a) | 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 | | Not Triggered |
| R1.3b) | 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. Note: An application to transfer a licence must be made in the approved form for this purpose. | | Not Triggered |
| R1.4 | Where this licence is surrendered by the licensee or revoked by the EPA 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: | Condition not triggered during the audit period. | Not Triggered |

C1. EPL 12003

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----------|---|---|---------------|
| R1.4a) | in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or | | Not Triggered |
| R1.4b) | in relation to the revocation of the licence - the date from which notice revoking the licence operates. | | Not Triggered |
| R1.5 | The Annual Return for the reporting period must be supplied to the EPA 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'). | The auditor sighted the December 2014 and December 2015 Annual Returns and cover letters and noted that the returns were submitted within 60 days of the end of the reporting period. | Compliant |
| R1.6 | 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 EPA in writing as soon as practicable, and in any event not later than the due date. The notification must specify: | Condition not triggered during the audit period. | Not Triggered |
| R1.6a) | the assessable pollutants for which the actual load could not be calculated; and | | Not Triggered |
| R1.6b) | the relevant circumstances that were beyond the control of the licensee. | | Not Triggered |
| R1.7 | The licensee must retain a copy of the Annual Return supplied to the EPA for a period of at least 4 years after the Annual Return was due to be supplied to the EPA. | The auditor sighted Annual Returns submitted in the previous four years and noted compliance with the requirements of this condition. | Compliant |
| R1.8 | Within the Annual Return, the Statements of Compliance must be certified and the Monitoring and Complaints Summary must be signed by: | The auditor sighted the December 2014 and December 2015 Annual Returns and noted compliance against the relevant requirements of this condition. | Compliant |
| R1.8a) | the licence holder; or | | Compliant |
| R1.b) | by a person approved in writing by the EPA to sign on behalf of the licence holder. | | Compliant |
| R1.9 | The licensee must submit a noise compliance monitoring report on 16 April 2004 and on an annual basis with the annual return required in condition R1.1 thereafter, to assess compliance with the noise limits provided in condition L5.1. The noise monitoring must be undertaken in accordance with the NSW Industrial Noise Policy August 2000. | The auditor sighted the December 2014 and December 2015 Annual Returns and noted compliance against the requirements of this condition. | Compliant |
| R2 | Notification of environmental harm | | |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----------|--|--|---------------|
| R2.1 | Notifications must be made by telephoning the Environment Line service on 131 555. | Condition not triggered during the audit period. | Not Triggered |
| R2.2 | The licensee must provide written details of the notification to the EPA within 7 days of the date on which the incident occurred. Note: The licensee or its employees must notify all relevant authorities of incidents causing or threatening material harm to the environment immediately after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act. | Condition not triggered during the audit period. | Not Triggered |
| R3 | Written report | | |
| R3.1 | Where an authorised officer of the EPA suspects on reasonable grounds that: | It is noted that the EPA issued a Notice to Provide Information on 29/08/16 in relation to a flood event that occurred on 5 June 2016 at the Nepean River, Menangle Park. | Note |
| R3.1a) | where this licence applies to premises, an event has occurred at the premises; or | | Note |
| R3.1b) | 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, 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. | | Note |
| R3.2 | The licensee must make all reasonable inquiries in relation to the event and supply the report to the EPA within such time as may be specified in the request. | The EPA issued a Notice to Provide Information on 29/08/16 in relation to a flood event that occurred on 5 June 2016 at the Nepean River, Menangle Park. The auditor sighted the AGL response (27/09/16) and noted compliance with the requirements of the Notice. | Compliant |
| R3.3 | The request may require a report which includes any or all of the following information: | The EPA issued a Notice to Provide Information on 29/08/16 in relation to a flood event that occurred on 5 June 2016 at the Nepean River, Menangle Park. The auditor sighted the AGL response (27/09/16) and noted compliance with the requirements of the Notice. | Compliant |
| R3.3a) | the cause, time and duration of the event; | | Compliant |
| R3.3b) | the type, volume and concentration of every pollutant discharged as a result of the event; | | Compliant |
| R3.3c) | 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; | | Compliant |
| R3.3d) | 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; | | Compliant |

C1. EPL 12003

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding | | | | | | | | | | | |
|----------------------------|---|--|----------------------|-------------------------------------|--------------------|--------------------------|--|--|----------------------------|--|--|------------------------|--|--|
| R3.3e) | action taken by the licensee in relation to the event, including any follow-up contact with any complainants; | | Compliant | | | | | | | | | | | |
| R3.3f) | details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and | | Compliant | | | | | | | | | | | |
| R3.3g) | any other relevant matters. | | Compliant | | | | | | | | | | | |
| R3.4 | The EPA 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 EPA within the time specified in the request. | Condition not triggered during the audit period. | Not Triggered | | | | | | | | | | | |
| R4 | Other reporting conditions | | | | | | | | | | | | | |
| R4.1 | Leak Detection and Repair Program Summary Report | | | | | | | | | | | | | |
| 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 auditor sighted the Annual Leak Detection and Repair Reports for reporting periods 22 December 2013 to 21 December 2014 (16/02/15) and 22 December 2014 - 11 December 2015 (11/12/15). The reports comply with the requirements of this condition. | Compliant | | | | | | | | | | | |
| R4.2a) | The total number of components inspected, as well as the number and percentage of minor, major and significant leaking components found by component types; | | Compliant | | | | | | | | | | | |
| R4.2b) | The type of components and the scale of the leak for any equipment where leaks are found; | | Compliant | | | | | | | | | | | |
| R4.2c) | The emission level of leaking equipment and emission level of re-check after leak was repaired; | | Compliant | | | | | | | | | | | |
| R4.2d) | The repair responses and times as listed in the table below. <table border="1"> <caption>Table: Repair Responses and Times</caption> <thead> <tr> <th>Scale of leak (ppmv)</th> <th>Initial remedial repair in response</th> <th>Actual repair time</th> </tr> </thead> <tbody> <tr> <td>1,000 - < 10,000 (Minor)</td> <td></td> <td></td> </tr> <tr> <td>>=10,000 - <50,000 (Major)</td> <td></td> <td></td> </tr> <tr> <td>>=50,000 (Significant)</td> <td></td> <td></td> </tr> </tbody> </table> | | Scale of leak (ppmv) | Initial remedial repair in response | Actual repair time | 1,000 - < 10,000 (Minor) | | | >=10,000 - <50,000 (Major) | | | >=50,000 (Significant) | | |
| Scale of leak (ppmv) | Initial remedial repair in response | Actual repair time | | | | | | | | | | | | |
| 1,000 - < 10,000 (Minor) | | | | | | | | | | | | | | |
| >=10,000 - <50,000 (Major) | | | | | | | | | | | | | | |
| >=50,000 (Significant) | | | | | | | | | | | | | | |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-------------|---|---|---------------|
| R4.3 | <p>Where a leak is identified, AGL should aim to have the component repaired as follows:</p> <ul style="list-style-type: none"> • 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. | <p>The auditor sighted the Annual Leak Detection and Repair Reports prepared by AGL for reporting periods 22 December 2013 to 21 December 2014 (16/02/15) and 22 December 2014 - 11 December 2015 (11/12/15) and noted compliance with the requirements of this condition.</p> <p>The following inputs to the Annual Leak Detection and Repair Reports were sighted by the auditor:</p> <ol style="list-style-type: none"> 1. Gas Leakage Audit, 2015 (Health Pipeline Services Pty Ltd, 09/12/15). The findings of the audit were reconciled against the relevant Annual Leak Detection and Repair Reports. There were no errors or omissions identified. 2. AGL field records ('Gas Leak Detection and Repair Response Form'). A sample of records was reconciled against the collated list of gas leaks ('160520_LDAR Data Analysis Rev 9'). There were no errors or omissions identified. | Compliant |
| R4.4 | Groundwater Monitoring Report | | |
| R4.5 | The licensee must supply with the Annual Return a Groundwater Monitoring Report for points 8, 9, 10, 11, 12, 13, 14, and 15 which provides: | <p>The auditor sighted the 'CGP Annual Groundwater Report, Produced Water Quality Report' for the following reporting periods: 22 December 2013 - 21 December 2014 (15/02/15); and 22 December 2014 - 21 December 2015 (11/01/16).</p> <p>The reports comply with the requirements of this condition.</p> | Compliant |
| R4.5a) | an analysis and interpretation of monitoring results and | | Compliant |
| R4.5b) | actions to correct identified adverse trends. | | Compliant |
| R4.6 | Spatial information | | |
| R4.7 | The licensee must submit to the EPA updated spatial information with the Annual Return when there have been infrastructure changes to the licence as identified in condition A2.1. The information must be provided in an ESRI geodatabase or shapefile format or any ESRI compatible dataset in GDA94. | Condition not triggered during the audit period. | Not Triggered |
| 7 | General Conditions | | |
| G1 | Copy of licence kept at the premises or plant | | |
| G1.1 | A copy of this licence must be kept at the premises to which the licence applies. | The auditor sighted a copy of the licence at the premises and noted compliance with the requirements of this condition. | Compliant |

C1. EPL 12003

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----------|--|---|---------------|
| G1.2 | The licence must be produced to any authorised officer of the EPA who asks to see it. | Condition not triggered during the audit period. | Not Triggered |
| G1.3 | The licence must be available for inspection by any employee or agent of the licensee working at the premises. | | Not Triggered |
| G2 | Signage | | |
| G2.1 | The location of EPA point number(s) 1,2,3,4,5,6 and 7 must be clearly marked by signs that indicate the point identification number used in this licence and be located as close as practical to the point. | The auditor inspected the RGP and noted compliance with the requirements of this condition. | Compliant |
| G3 | Other general conditions | | |
| G3.1 | Completed Programs Refer to the table for completed programs. Note that PRP 6 - Predictive Emissions Monitoring System Trial a Predictive Emissions Monitoring System for Compressor Engines 2 and 3 for a six month period. Upon completion of the trial the EPA may approve PEMS as the monitoring system for Compressor Engines 2 and 3 subject to conditions of the (EPL). 31 August 2014 | Condition noted. | Note |
| 8 | Pollution Studies and Reduction Programs | | |
| U1 | PRP 7 - Predictive Emissions Monitoring System (Stage 2) | | |

C1. EPL 12003

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|------|--|--|-----------|
| U1.1 | <p>The aim of this Pollution Reduction Program (PRP) is for the licensee to refine the Predictive Emissions Monitoring System (PEMS) on its Compressor Engine 2 and 3 (Licensed Discharge Points 2 and 3 respectively on EPL 12003).</p> <p>Background</p> <p>The Trial PEMS Program (PRP 6) was undertaken in accordance with Clause 2.2 of the Enforceable Undertaking signed by the Environment Protection Authority (EPA) and AGL on 8 August 2013. The PEMS is proposed as a suitable alternative to continuous emissions monitoring to predict Nitrogen Oxides (NOx) in-stack concentrations specifically for Compressor Engines 2 and 3.</p> <p>The Licensee provided its report 'PRP 6 – Predictive Emissions Monitoring System Post Trial Report' to EPA on 29 August 2014. The report identified that while the Trial generally provided information consistent with the proposal it identified that additional and more sensitive monitoring of deviations from normal compressor engine operations and catalyst performance is required. The Licensee has therefore proposed a Stage 2 PRP to investigate PEMS improvements.</p> | Condition noted. | Note |
| U1.2 | <p>The Stage 2 PEMS Program is outlined in the document Environment Protection Licence 12003 PRP 6 – Predictive Emissions Monitoring System Post Trial Report (AGL, 29 August 2014). The Stage 2 Program will be undertaken for a period of six (6) months.</p> <p>Refer to clause U1.2 for additional details.</p> | <p>The auditor sighted the AGL report, 'Environment Protection Licence 12-3 Predictive Emissions Monitoring System Post Trial Report' (14/04/16). The report notes that the Stage 2 PEMS Program was undertaken from 14 September 2015 to 15 March 2016. As such, compliance is demonstrated against the requirements of this condition.</p> | Compliant |

C1. EPL 12003

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding | | | | | | | | |
|-----------------------|--|---|-----------|-----------------------|--|-----------------|--|---------------------|-----------------------------|--|--------------|
| U1.3 | <p>STAGE 2 REPORT Within 30 days of completion of the Stage 2 Program, the licensee must submit a written report to the EPA. The report must include, but not be limited to, the following information:</p> <ol style="list-style-type: none"> 1. Operating conditions during the Trial period, including compressor engine operational hours. 2. The results of all stack emissions testing conducted for each compressor engine during the Trial. 3. The results of all reference method tests. 4. All test reports and raw data. 5. How ongoing operations will be managed to ensure compliance with EPL NOx concentration limits. 6. Any conclusions reached by AGL as a result of the Trial. <p>Note:</p> <ol style="list-style-type: none"> 1. Upon completion of the Stage 2 Program, the EPA may approve PEMS as the monitoring system for Compressor Engines 2 and 3 subject to conditions of the EPL. <p>COMPLETION DATE: 14 APRIL 2016</p> | <p>The auditor sighted the following documents demonstrating compliance with the requirements of this condition:</p> <ol style="list-style-type: none"> 1. 'Environment Protection Licence 12003 Predictive Emissions Monitoring System Post Trial Report' (AGL, 14/04/16). The report notes that the Stage 2 Program was completed on 15/03/16. 2. Correspondence from AGL to EPA noting enclosure of the above report (14/04/16). | Compliant | | | | | | | | |
| U2 | EIP 8 - Gas Well Instrumentation Improvement Program | | | | | | | | | | |
| U2.1 | <p><i>Refer to clause U2.1 for background.</i></p> <p>Program AGL proposes to install 12 volt air compressors according to the following schedule:</p> <table border="1" data-bbox="322 1058 927 1169"> <thead> <tr> <th>Installation Period</th> <th>Gas Wells</th> </tr> </thead> <tbody> <tr> <td>February - April 2016</td> <td>SL02, GL02, GL05, GL12, GL16, EM17, EM19, MP02, MP03, MP09, MP10, MP12, MP23, JD11, LB09, LB10</td> </tr> <tr> <td>May - June 2016</td> <td>SF05, SF07, SF08, SF09, MT01, MT02, MT03, MT04, MT06, MT07, GL07, GL14, GL15</td> </tr> <tr> <td>July - October 2016</td> <td>Remaining production wells.</td> </tr> </tbody> </table> | Installation Period | Gas Wells | February - April 2016 | SL02, GL02, GL05, GL12, GL16, EM17, EM19, MP02, MP03, MP09, MP10, MP12, MP23, JD11, LB09, LB10 | May - June 2016 | SF05, SF07, SF08, SF09, MT01, MT02, MT03, MT04, MT06, MT07, GL07, GL14, GL15 | July - October 2016 | Remaining production wells. | <p>The air compressors were installed by AGL. The auditor sighted handwritten notes recording the installation dates of a number of the 12 volt air compressors.</p> <p>It was report by AGL that the following wells are shut in and as such air compressors were not installed: GL17, WG03, RP02, RP09, RP10, RP12, EM06, EM21, EM22, EM28, EM31, EM33, KP03, RB06, RB08 and RB09.</p> | Not Verified |
| Installation Period | Gas Wells | | | | | | | | | | |
| February - April 2016 | SL02, GL02, GL05, GL12, GL16, EM17, EM19, MP02, MP03, MP09, MP10, MP12, MP23, JD11, LB09, LB10 | | | | | | | | | | |
| May - June 2016 | SF05, SF07, SF08, SF09, MT01, MT02, MT03, MT04, MT06, MT07, GL07, GL14, GL15 | | | | | | | | | | |
| July - October 2016 | Remaining production wells. | | | | | | | | | | |
| U2.2 | <p>Whilst this schedule is implemented AGL will continue to operate its internal Leak Detection and Repair Program Survey for all operational and suspended wells. Completion Date: 31 December 2016</p> | <p>The auditor sighted the Annual Leak Detection and Repair Reports prepared by AGL for reporting periods 22 December 2013 to 21 December 2014 (16/02/15) and 22 December 2014 - 11 December 2015 (11/12/15) and noted compliance with the requirements of this condition.</p> | Compliant | | | | | | | | |

C1. EPL 12003

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----------|---|--|-----------|
| U3 | EIP 9 - Water Storage Improvement Program | | |
| U3.1 | <p>AGL has proposed a project to improve the water storage facilities at the Rosalind Park Gas Plant (RPGP). The aim of the project will result in an environmental improvement and a reduction in pollution consistent with the objects of the Protection of the Environment Operations Act 1997.</p> <p>Refer to clause U3.1 for additional details.</p> <p>Timeframes April/May 2016 – Finalise engineering design, order tanks, clean and line 15KL in-ground tank, plant alterations or tank plumbing and electrical May 2016 – Continue plant alterations for tank plumbing, electrical, communications and civils June 2016 – Receive and install tanks October 2016 – Complete project commissioning COMPLETION DATE: 31 October 2016</p> | <p>The auditor inspected the RPGP (31/10/16) and noted the following installations and upgrades:</p> <ol style="list-style-type: none"> 1. 70kL above ground double walled tanks (4) and associated pipework, tank level indicators and controls; 2. 4.5kL pump tank and associated pipework, tank level indicators and controls; 3. Upgrade to the SCADA system, including high water alarms and auto shut-down of pumps; and 4. Upgrade of the existing 15kL underground storage tank (additional liner). <p>The above tanks were in use at the time of the inspection.</p> <p>During commissioning of the water storage facilities, a carbon build-up was identified within transfer pumps P704 (on Tank T704) and P702 (on Tank T702) which were subsequently removed from service and returned to the supplier. The pumps were subsequently re-installed on 01/11/16 and 02/11/16.</p> <p>Given that the storage facilities were commissioned prior to 31 October 2016, the auditor determined that AGL demonstrated substantial compliance against the requirements of this condition.</p> | Compliant |
| 9 | Special Conditions | | |
| E1 | Temporary 'Start-up Period - Stage 1 and Stage 2' for Compressor Engine 1 | | |
| E1.1 | <p>Background: Compressor Engine 1 at the Rosalind Park Gas Plant has been off line and undergoing repair since early November 2013. Compressor Engine 1 has now been rebuilt and the Licensee plans to re-start the compressor. The 'Start-up period' will involve 'Stage 1' commissioning and 'Stage 2' mechanical conditioning. The 'Start-up period - Stage 1 and Stage 2', is expected to take approximately five (5) weeks.</p> | <p>The auditor sighted the AGL report, 'Compressor 1 Start-Up Stage 1 and Stage 2' (16/08/16) which notes that the 'start-up period' (inclusive of Stage 1 and Stage 2) occurred between 25 May 2016 and 28 June 2016.</p> | Compliant |

C1. EPL 12003

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|------|---|---|-----------|
| E1.1 | <p>Notification Protocol: Two weeks prior to commencing the Compressor Engine 1 'Start-up period - Stage 1 and Stage 2', AGL must provide notification of the 'Start-up period - Stage 1 and Stage 2' to the following stakeholders: • Camden Gas Project Community Consultative Committee</p> <ul style="list-style-type: none"> • Neighbouring landowners • Camden Council • Wollondilly Shire Council • Campbelltown City Council • State and Federal Members of Parliament within the Camden Gas Project area; and • Relevant government agencies including the Office of Coal Seam Gas, the Department of Planning and Environment and the EPA. | <p>The auditor sighted correspondence from AGL to the nominated stakeholders (18/04/16) demonstrating compliance with the requirements of this condition.</p> <p>Neighbouring landowners were informed of the start-up period via the AGL website (https://www.agl.com.au/about-agl/how-we-source-energy/natural-gas/natural-gas-projects/camden-gas-project/macarthur-community, accessed 06/11/16).</p> | Compliant |
| E1.2 | <p>The notification protocol must include (but not necessarily be limited to): The scope of the 'Start-up period - Stage 1 and Stage 2' including duration</p> <ul style="list-style-type: none"> • A description of potential environmental impacts (in particular, Nitrogen Oxides emissions) • A description of mitigation measures that will be undertaken to prevent and/or minimise impacts during the 'Start-up period - Stage 1 and Stage 2'; and • The AGL contact details for any further enquiries. | | Compliant |
| E1.3 | <p>A copy of the notification will also be made publicly available on the Camden Gas Project website for the duration of the 'Start-up period - Stage 1 and Stage 2'.</p> | <p>The auditor sighted the AGL website (https://www.agl.com.au/about-agl/how-we-source-energy/natural-gas/natural-gas-projects/camden-gas-project/macarthur-community, accessed 06/11/16) and noted the inclusion of a start-up period notification on 18/04/16.</p> | Compliant |
| E1.4 | <p>Prior to the 'Start-up period Stage 1', (refer to condition E1.4 for additional details) the Licensee must calibrate the existing Compressor 1 Ecotech CEMS unit. The CEMS unit will resume operation at the commencement of the 'Start-up period Stage 1'.</p> | <p>The auditor sighted the following documents demonstrating compliance with the requirements of this condition:</p> <ol style="list-style-type: none"> 1. AGL report, 'Compressor 1 Start-Up Stage 1 and Stage 2' (16/08/16) which notes that the 'start-up period' (inclusive of stage 1 and stage 2) occurred between 25 May 2016 and 28 June 2016. 2. Ecotech Maintenance Report (21/03/16) noting completion of calibration checks on Opsis. | Compliant |

C1. EPL 12003

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|------|---|---|--------------|
| E1.5 | <p>Once Compressor 1 'Start-up period Stage 1' is complete and the compressor engine is operating, AGL must engage suitably qualified stack testing consultants to perform a RATA test on the CEMS unit.</p> <p>'Start-up period Stage 2' Mechanical conditioning is required to:</p> <ul style="list-style-type: none"> • Assess the adequacy of engine repair; • Monitor and adjust operating parameters; and • Enhance engine performance (including reducing Nitrogen Oxides emissions where possible, and providing ongoing reliable and stable engine operations during 'normal operations'). <p>As a consequence of 'Start-up period Stage 2' mechanical conditioning being operated across a range of speeds and loads it is expected that Compressor 1 Nitrogen Oxides emission concentrations will vary.</p> | <p>The auditor sighted the Ektimo report, 'RATA Testing, AGL Upstream Investments Pty Ltd, Rosalind Park Gas Plant' (28/07/16) and noted compliance with the requirements of this condition.</p> | Compliant |
| E1.6 | <p>The mechanical conditioning must be completed within a period of 500 hours (21 days) after the initial start-up. At the completion of the 'Start-up period Stage 2' mechanical conditioning, the Licensee will resume normal operation of Compressor 1.</p> | <p>It was reported by AGL that normal operation of Compressor 1 resumed on completion of the 'Start-up period Stage 2'.</p> | Not Verified |
| E1.7 | <p>Nitrogen Oxides Concentration Limit for Compressor 1: Despite condition L3.1, the concentration limit for Nitrogen Oxides with respect to Discharge Point 1 specified in the table in condition L3.3 does not apply for the duration of the 'Start-up period – Stage 1 and Stage 2'.</p> | <p>Condition noted.</p> | Note |
| E1.8 | <p>Minimise Air Emissions/Temporary Load Limit: Despite condition E1.7, in accordance with Section 128 of the Protection of the Environment Operations Act 1997, the Licensee must ensure it minimises air emissions for the Rosalind Park Gas Plant during the 'Start-up period - Stage 1 and Stage 2'.</p> | <p>The auditor sighted the AGL report, 'Compressor 1 Start-Up Stage 1 and Stage 2' (16/08/16) and noted that nitrogen oxide load of the RPGP was 2,007.68 kg during the five week period. The nominated load limit (condition E1.10) was 6,600kg.</p> | Compliant |
| E1.9 | <p>To ensure overall Nitrogen Oxides loads from the premises are minimised during the 'Start-up period - Stage 1 and Stage 2' the Licensee must not operate three compressors concurrently. To be perfectly clear, while operating compressor Engine 1 is fully operational and discharging gas, only one other compressor engine at RPGP, either compressor engine 2 or compressor engine 3, may also be operated.</p> | <p>The auditor sighted the AGL report, 'Compressor 1 Start-Up Stage 1 and Stage 2' (16/08/16). The report notes that all three compressors were operating on a number of days. The auditor sighted SCADA records for the nominated days and confirmed that the three compressors were not operated concurrently. The SCADA records indicate that idle compressors were only restarted when compressor 1 was in the shutting down phase.</p> | Compliant |

C1. EPL 12003

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-------|---|---|-----------|
| E1.10 | <p>EPL 12003 has a Nitrogen Oxides annual load of 103,000kg per annum for the RPGP or approximately 293 kg/day. During 'Start-up period - Stage 1 and Stage 2' the Licensee must ensure that Nitrogen Oxides loads from RPGP do not exceed 6,600 kg over the 5 week start up period (average 189 kg/day).</p> <p>Note: Should compressor engine 1 be required to be shut down the remaining idle compressor engine at RPGP may be restarted during the period compressor engine 1 is shutting down to continue plant operations.</p> | <p>The auditor sighted the AGL report, 'Compressor 1 Start-Up Stage 1 and Stage 2' (16/08/16) and noted that nitrogen oxide load of the RPGP was 2,007.68 kg during the five week period. The calculation was based on the volumetric flowrate provided in the most recent Ektimo monthly stack testing report.</p> | Compliant |
| E1.11 | <p>Reporting: The Licensee must provide a written report to the EPA within 8 weeks of the completion of 'Start-up period - Stage 1 and Stage 2'.</p> <p>The written report must provide information on the 'Start-up period - Stage 1 and Stage 2' including but not limited to:</p> <ul style="list-style-type: none"> • Nitrogen Oxides Emissions data (concentration) from Compressor engine 1 • Nitrogen Oxides Emissions data (load) from Compressor engine 1 • Nitrogen Oxides Emissions data (load) from RPGP • Description of works completed under 'Start-up period - Stage 1 and Stage 2' • Timetable of works completed under 'Start-up period - Stage 1 and Stage 2' | <p>The auditor sighted the AGL report, 'Compressor 1 Start-Up Stage 1 and Stage 2' (16/08/16) and correspondence to the EPA (16/08/16) and noted compliance with the requirements of this condition.</p> | Compliant |

C2. WAL

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----------------|--|---|---------------|
| MW0029-00001 | Take of Water From 1 July 2018, if the water supply work nominated on this access licence is located at or less than 40m from the top of the high bank of a river then: | The auditor sighted maps of the CGP noting the location of gas wells. An aerial photograph was sighted of the wells in close proximity to the Nepean River (MP15 and MP16/MP25) and the auditor verified that the wells are located more than 40m from the river. | Not Triggered |
| MW0029-00001, A | This restriction will only apply when the system that confirms when water can be taken is available on DPI Water website. | | Not Triggered |
| MW0029-00001, A | DPI Water will inform the licence holder in writing of the applicable restrictions and how to access the information on its website when this system becomes operative. | | Not Triggered |
| MW0919-00001 | A maximum water allocation of 0.1 ML/unit share may be carried over in the account for this access licence from one water year to the next water year if a water meter is installed on each water supply work nominated on this licence and each meter is maintained in working order. | Condition not triggered. It was reported by AGL (2014/15 Annual DPI Water Compliance Report and 2015/16 Annual DPI Water Compliance Report) that there is no water allocation carried forward. | Not Triggered |
| MW0605-00001 | Water must be taken in compliance with the conditions of the approval for the nominated work on this access licence through which water is to be taken. | Condition noted. Refer to the Works and Use Approval compliance assessment. | Note |
| MW0547-00001 | The total volume of water taken under this licence in any water year must not exceed a volume equal to: | The water entitlement is 15ML for each WAL. It was reported by AGL (2014/15 Annual DPI Water Compliance Report and 2015/16 Annual DPI Water Compliance Report) that the following volumes of produced water were extracted: 1. 2014/15 - 2.2ML; and 2. 2015/16 - 2.6ML. Produced water is contained at individual well sites within agricultural tanks and transported by AGLs haulage tanker to the RGP storage | Compliant |
| MW0547-00001, A | The sum of water in the account from the available water determination for the current year, plus | | Compliant |
| MW0547-00001, B | The water carried over in the account from the previous water year, plus | | Compliant |
| MW0547-00001, C | The net amount of water assigned to or from the account under a water allocation assignment, plus | | Compliant |

C2. WAL

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----------------|---|---|---------------|
| MW0547-00001, D | Any water re-credited by the Minister to the account. | tanks as required. Water volumes are measured on collection by the haulage contractor. To verify the volumes of produced water reported, the auditor sighted a sample of haulage contractor docketts and reconciled against the logbook maintained by AGL ('Field Water'). There were no errors or omissions identified. The auditor sighted the ERM Report 'Response to EPA: DA-282-6-2003 Proposed Sydney Gas Stage II Coal Bed Methane Proposal' (18/11/03) which predicts an average of 25KL of water produced by each well site per annum. Applying this estimate to currently producing wells (92) results in 2.3ML per annum. The prediction is determined to be comparable to the actual volumes detailed above. | Compliant |
| MW2338-00001 | Monitoring and Recording The completed logbook must be retained for five (5) years from the last date recorded in the logbook. | Produced water is contained at individual well sites within agricultural tanks and transported by AGLs haulage tanker to the RPGP storage tanks as required. Water volumes are measured on collection by the haulage contractor. The auditor sighted a sample of haulage contractor docketts and reconciled against the logbook maintained by AGL ('Field Water'). There were no errors or omissions identified. | Compliant |
| MW2336-00001 | The purpose or purposes for which water is taken, as well as details of the type of crop, area cropped, and dates of planting and harvesting, must be recorded in the logbook each time water is taken. | It was reported by AGL that water associated with the licence is only obtained for the purpose of coal seam production. | Not Verified |
| MW2337-00001 | The following information must be recorded in the logbook for each period of time that water is taken: | The auditor sighted the AGL logbook ('Field Water') and noted compliance with the requirements of this condition. | Compliant |
| MW2337-00001, A | Date, volume of water, start and end time when water was taken as well as the pump capacity per unit of time, and | | Compliant |
| MW2337-00001, B | The access licence number under which the water is taken, and | The auditor sighted the AGL logbook ('Field Water') and the Annual DPI Water Compliance Reports (2014/15 and 2015/16) and noted compliance with the requirements of this condition. | Compliant |
| MW2337-00001, C | The approval number under which the water is taken, and | | Compliant |
| MW2337-00001, D | The volume of water taken for domestic consumption and/or stock watering. | Condition not triggered during the audit period. | Not Triggered |

C2. WAL

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----------------|---|--|-----------|
| MW2339-00001 | A logbook must be kept, unless the work is metered and fitted with a data logger. The logbook must be produced for inspection when requested by DPI Water. | The auditor sighted the AGL logbook ('Field Water') and noted compliance with the requirements of this condition. | Compliant |
| MW0051-00001 | Reporting Once the licence holder becomes aware of a breach of any condition on this access licence, the licence holder must notify the Minister as soon as practicable. The Minister must be notified by: | Condition noted. It was reported by AGL (2014/15 Annual DPI Water Compliance Report and 2015/16 Annual DPI Water Compliance Report) that there were no breach of conditions during the reporting period. | Compliant |
| MW0051-00001, A | email: water.enquiries@ dpi.nsw.gov.au, or | | Compliant |
| MW0051-00001, B | telephone: 1800 353 104. Any notification by telephone must also be confirmed in writing within seven (7) business days of the telephone call. | | Compliant |

C3. WUA

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|------------------|--|--|---------------|
| MW0655-00001 | Take of Water Any water supply work authorised by this approval must take water in compliance with the conditions of the access licence under which water is being taken. | Condition noted. Refer to the Water Access Licence compliance assessment. | Note |
| MW0097-00001 | Water Management Works If contaminated water is found above the production aquifer during the construction of the water supply work authorised by this approval, the licensed driller must: | Condition not triggered during the audit period. It was reported by AGL (AEPR 2014-2015, 15/10/15 and AEPR 2015-2016, 31/10/16) that there were no wells drilled during the audit period. | Not Triggered |
| MW0097-00001, A | A. notify DPI Water in writing within 48 hours of becoming aware of the contaminated water, and | | Not Triggered |
| MW0097-00001, B | B. adhere to the Minimum Construction Requirements for Water Bores in Australia (2012), as amended or replaced from time to time. | | Not Triggered |
| MW0487-00001 | The water supply work authorised by this approval must be constructed within three (3) years from the date this approval is granted. | It was reported by AGL (AEPR 2014-2015, 15/10/15 and AEPR 2015-2016, 31/10/16) that there were no wells drilled during the audit period. As such, compliance was demonstrated against the requirements of this condition. | Compliant |
| MW00044-00001 | When a water supply work authorised by this approval is to be abandoned or replaced, the approval holder must contact DPI Water in writing to verify whether the work must be decommissioned. The work is to be decommissioned, unless the approval holder receives notice from the Minister not to do so. When decommissioning the work the approval holder must: | The auditor sighted the minutes of a meeting between AGL and DPI Water (03/11/16) confirming that notification of decommissioned works may be provided through the Annual DPI Water Compliance Report. The auditor sighted well sites and/or records verifying that plug and abandonment works were commenced or completed during the audit period for the following well sites: AP01, JD07a, JD05, MH01, LB07, LB05 RP03, RP04, RP05, RP11, EM02, EM03 and EM04. The Annual DPI Water Compliance Reports (2014/15 and 2015/16) detail all wells plugged and abandoned during the audit period. | Compliant |
| MW00044-00001, A | Comply with the minimum requirements for decommissioning bores prescribed in the Minimum Construction Requirements for Water Bores in Australia (2012), as amended or replaced from time to time, and | The auditor sighted the EMP (March 2016) which notes that sealing/plugging and abandonment of wells occurs in accordance with the NSW Code of Practice for Coal Seam Gas Well Integrity and PPL conditions. It was reported by AGL that the NSW Code of Practice for Coal Seam Gas Well Integrity exceeds the requirements of the Minimum Construction Requirements for Water Bores in Australia (2012). | Not Verified |

C3. WUA

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|------------------|---|--|---------------|
| MW00044-00001, B | Notify DPI Water in writing within sixty (60) days of decommissioning that the work has been decommissioned. | The auditor sighted the minutes of a meeting between AGL and DPI Water (03/11/16) confirming that notification of decommissioned works may be provided through the Annual DPI Water Compliance Report. | Compliant |
| MW0481-00001 | Monitoring and Recording A logbook must be kept and maintained at the authorised work site or on the property for each water supply work authorised by this approval, unless the work is metered and fitted with a data logger. | The auditor sighted a sample of haulage contractor docketts and reconciled against the logbook maintained by AGL ('Field Water'). There were no errors or omissions identified. | Compliant |
| MW0482-00001 | Where a water meter is installed on a water supply work authorised by this approval, the meter reading must be recorded in the logbook before taking water. This reading must be recorded every time water is to be taken. | Condition not triggered during the audit period. | Not Triggered |
| MW0051-00001 | Once the approval holder becomes aware of a breach of any condition on this approval, the approval holder must notify the Minister as soon as practicable. The Minister must be notified by: | Condition noted. It was reported by AGL (2014/15 Annual DPI Water Compliance Report and 2015/16 Annual DPI Water Compliance Report) that there were no breach of conditions during the reporting period. | Compliant |
| MW0051-00001, A | Email: water.enquiries@dpi.nsw.gov.au | | Compliant |
| MW0051-00001, B | Telephone: 1800 353 104. Any notification by telephone must also be confirmed in writing within seven (7) business days of the telephone call. | | Compliant |
| MW0485-00001 | Within sixty (60) days of completing construction of the water supply work authorised by this approval, the approval holder must provide a completed Form A for that work to DPI Water. | It was reported by AGL (AEPR 2014-2015, 15/10/15 and AEPR 2015-2016, 31/10/16) that there were no wells drilled during the audit period. | Compliant |
| | Other Conditions (10WA112288 only) | | |
| DK1363-00001 | Water Management Works The approval holder must not construct or install works used for the purpose of conveying, distributing or storing water from the works authorised by this approval, that obstruct the reasonable passage of floodwaters flowing in, to, or from a river or lake. | It was reported by AGL (AEPR 2014-2015, 15/10/15 and AEPR 2015-2016, 31/10/16) that there were no water management works conducted during the audit period. | Compliant |

C4. Industrial Bore Licences

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|---|---|--------------|
| 1 | Water must not be pumped, otherwise extracted or injected from the works authorised by this license for any other purpose other than coal seam gas production. | Condition not triggered during the audit period. It was reported by AGL (2014/15 Annual DPI Water Compliance Report and 2015/16 Annual DPI Water Compliance Report) that water was only pumped, extracted or injected from authorised works for the purpose of coal seam gas production. | Not Verified |
| 2 | Subject to appropriate occupational health and safety provisions the licensee shall allow the NSW Office of Water, or any other person authorised by it, full and free access to the works, either during or after construction, for the purpose of undertaking inspection or test of works and its fittings, and shall carry out any work or alterations deemed necessary by the NSW Office of Water to ensure the protection and maintenance of the works, or the control of the water extracted and for the protection of the quality and the prevention from pollution/contamination of surface and subsurface water. | Condition noted. | Note |
| 3 | If a work is abandoned at any time the licensee must notify the NSW Office of Water that the work has been abandoned and seal off the aquifer by: (a) backfilling the work with clay or cement to ground level after withdrawing the casing (lining) or (b) such methods as agreed to or directed by the NSW Office of Water. | The auditor sighted the minutes of a meeting between AGL and DPI Water (03/11/16) confirming that notification of decommissioned works may be provided through the Annual DPI Water Compliance Report. The auditor sighted well sites and/or records verifying that plug and abandonment works were commenced or completed during the audit period for the following well sites: AP01, JD07a, JD05, MH01, LB07, LB05 RP03, RP04, RP05, RP11, EM02, EM03 and EM04. The Annual DPI Water Compliance Reports (2014/15 and 2015/16) details all wells plugged and abandoned during the audit period. | Compliant |

C4. Industrial Bore Licences

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|--|---|---------------|
| 4 | <p>The licensee must not allow any tailwater/drainage to discharge from the licensee's property into or onto: any adjoining public or crown road; any other persons land; any crown land; any river, creek or watercourse, any groundwater aquifer; any native vegetation as described under the Native Vegetation Conservation Act 1997; any wetlands of environmental significance</p> | <p>Adequate and appropriate evidence, detailed below, was provided to demonstrate compliance with the requirements of this condition.</p> <p>1. Well Sites - The auditor inspected a number of well sites and noted that produced water is stored within designated tanks at respective well sites. It was reported by AGL that wells with dewatering pumps have high level alarms installed on the storage tank. The EMP (March 2016) notes that tank volumes are inspected weekly and collected by road tanker as required.</p> <p>2. RPGP - The auditor inspected the RPGP and noted that produced water is now stored within 70kL above ground double walled tanks. The transfer of produced water to the above ground tanks occurs within a bunded loading bay.</p> <p>3. Disposal Records - The auditor sighted the AGL Environmental Footprint spreadsheet for the financial years 2014/15 and 2015/16 which notes that produced water was primarily reused by external industries. To a lesser extent, produced water was reused during workover activities. The auditor sighted a sample of disposal records generated during the audit period and reconciled against the Environmental Footprint. There were no errors or omissions identified.</p> <p>4. Environmental Incidents – The auditor sighted the Environmental Incidents Report for the audit period and noted that there were no incidents causing or threatening material harm to the environment.</p> | Compliant |
| 5 | <p>Works used for the purpose of conveying, distributing or storing water taken by means of the licensed work must not be constructed or installed so as to obstruct the reasonable passage of flood waters flowing into or from a river.</p> | <p>The auditor inspected the RPGP and a sample of well sites and noted that there are no works used for the purpose of conveying, distributing or storing water that would obstruct the passage of flood waters.</p> | Compliant |
| 6 | <p>The works authorised by this license shall be constructed with annular seals to isolate aquifers overlying the producing aquifer and prevent the loss or mixing of water from different groundwater sources.</p> | <p>Condition not triggered during the audit period. It was reported by AGL (AEPR 2014-2015, 15/10/15 and AEPR 2015-2016, 31/10/16) that there were drilling activities undertaken during the audit period.</p> | Not Triggered |

C4. Industrial Bore Licences

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|---|---|--------------------------|
| 7 | All groundwater extracted must be distributed via dedicated transfer pipelines that are to be monitored to ensure pipeline failure does not occur. | The auditor inspected a number of well sites and noted that produced water is transferred via a short transfer pipeline to designated tanks at each well site. It was reported by AGL that inspections are undertaken weekly to ensure the integrity of the pipeline. | Compliant |
| 8 | The licensee must install to the satisfaction of the NSW Office of Water in respect of type and construction an appliance(s) to measure the quantity of water extracted from the works where extraction exceeds 50 KL in any 12 month period. | <p>It was reported by AGL that there are no water flow meters installed at any well site.</p> <p>AGL previously reported to DPI Water (2012/2013 Technical Report, 30/09/13) that flow meters were unsuccessfully trialled in 2012.</p> <p>There are currently nine gas wells producing more than 50KL of water. Produced water is contained at individual well sites within agricultural tanks and volumes are measured on collection by the haulage contractor.</p> <p>It is recommended that AGL seek approval from DPI Water of the current method of measuring water volumes (measurement on collection by the haulage contractor) or install appropriate flow meters.</p> | Non-Compliant (low risk) |
| 9 | The licensee must maintain records of the actual volume of groundwater pumped (in kilolitres or megalitres) as measured by the installed appliance(s) as well as volumes of water transported from individual well sites for disposal or use and provide this information to the NSW Office of Water on an agreed basis, at the completion of the project, or upon request from the NSW Office of Water. | Produced water is contained at individual well sites within agricultural tanks and transported by AGL's haulage tanker to the RGP storage tanks as required. Water volumes are measured on collection by the haulage contractor. The auditor sighted a sample of haulage contractor dockets and reconciled against the logbook maintained by AGL ('Field Water'). There were no errors or omissions identified. | Compliant |
| 10 | The license holder shall engage a qualified groundwater consultant to produce or independent peer review, a groundwater management plan for the Camden Gas Project. The groundwater management plan shall be prepared in consultation with and to the satisfaction of NSW Office of Water. The groundwater management plan shall be prepared and implemented within 12 months of the issue of this licence. | The auditor sighted the Groundwater Management Plan for the CGP (30/10/15). The document revision history notes that the plan was first prepared by AGL on 25/10/11. The plan was independently peer reviewed by Parsons Brinckerhoff (06/03/12). Correspondence was sighted from AGL's Manager Hydrogeology noting that the plan was provided to the NSW Office of Water in April 2012. | Compliant |

C4. Industrial Bore Licences

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|---|--|---------------|
| 11 | The licensee must maintain records of the results of water quality testing of samples from any extraction or monitoring locations and provide this information to the NSW Office of Water on an agreed basis, at the completion of the project, or upon request from the NSW Office of Water. | The auditor sighted a sample of laboratory reports and the CGP Annual Groundwater Report, Produced Water Quality Report for the following reporting periods: 1. 22 December 2013 - 21 December 2014 (15/02/15); and 2. 22 December 2014 - 21 December 2015 (11/01/16). The reports comply with the requirements of this condition. | Compliant |
| 12 | The license holder must install, if and when called upon to do so, monitoring bores to the satisfaction of the NSW Office of Water in respect to location and depth. | It was reported by AGL (2015/16 Annual DPI Water Compliance Report) that six shallow seepage monitoring bores were installed at the RPGP during the audit period. | Not Verified |
| | A) The installation of monitoring bores is to be carried out within three years of the commencement of this license. | Condition not triggered during the audit period. | Not Triggered |
| | B) The license holder must maintain records of the groundwater levels as measured in the monitoring bores. | The auditor sighted the following reports demonstrating compliance with the requirements of this condition: | Compliant |
| | C) Measurements of groundwater levels are to be taken and recorded as a minimum throughout the duration of the project and quarterly for a five year period thereafter as required by the NSW Office of Water. | 1. CGP - FY16 Six-monthly Monitoring Update - April 2016 (Parsons Brinckerhoff, 02/05/16); 2. CGP - FY16 Six-monthly Monitoring Update - October 2015 (Parsons Brinckerhoff, 27/11/15); | Compliant |
| | D) groundwater level records are to be maintained for all aquifer(s) and any additional water bearing zones(s) or stratigraphic horizon(s) if required by the NSW Office of Water overlying the coal seam(s) from which gas is to be extracted. | 3. CGP - FY15 Q4 Monitoring Update - June 2015 (Parsons Brinckerhoff, 09/07/15); 4. CGP - FY15 Q3 Monitoring Update - April 2015 (18/05/15, Parsons Brinckerhoff); 5. CGP - FY15 Q2 Monitoring Update - January 2015 (20/03/15, Parsons Brinckerhoff); and 6. 2014-2015 Groundwater and Surface Water Monitoring Status Report, CGP (Parsons Brinckerhoff, 08/10/15). | Compliant |
| | E) Records of groundwater levels from the monitoring bores are to be provided to the NSW Office of Water on an annual basis after the monitoring period has expired, or upon request from the NSW Office of Water. | The auditor sighted the 2014/15 Annual DPI Water Compliance Report (AGL, 28/09/15) and 2015/16 Annual DPI Water Compliance Report (22/09/16) and noted compliance with the requirements of this condition. | Compliant |
| 13 | The licensee must provide all raw monitoring data to the NSW Office of Water in an electronic format that is compatible with Microsoft Office and Adobe Acrobat software. | The auditor sighted the 2014/15 Annual DPI Water Compliance Report (AGL, 28/09/15) and 2015/16 Annual DPI Water Compliance Report (22/09/16) and noted compliance with the requirements of this condition. | Compliant |

C4. Industrial Bore Licences

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|---|---|-----------|
| 14 | The licensee shall provide to the NSW Office of Water for every operating period (herein adopted as 12 months) an interpreted technical groundwater report in hard copy format that documents the following: | The auditor sighted the 2014/15 Annual DPI Water Compliance Report (AGL, 28/09/15) and 2015/16 Annual DPI Water Compliance Report (22/09/16) and noted that an interpreted groundwater report was provided each year. The reports comply with the requirements of this condition. | Compliant |
| | A) Activities associated with the project for the preceding operating period, including the installation of new wells, the refurbishment of existing wells, the maintenance of disused wells and the decommissioning of abandoned wells. | | Compliant |
| | B) Volumes of groundwater extracted during the preceding operating period from individual wells and in total from the project wellfield, together with volumes of water transported for disposal or use from individual wells. | | Compliant |
| | C) Reconciliations of the extracted flow measurements with volumes of water transported for disposal or use for individual wells for the preceding operating period and identification of causes of any inconsistencies and rectification measures that will be undertaken. | | Compliant |
| | D) The impacts of the wellfield operation and individual wells on the monitored groundwater systems for the preceding operating period. | | Compliant |
| | E) Predictions of groundwater extraction, potential adverse effects of pumping and proposed mitigation measures for the next operating period. | | Compliant |
| 15 | The NSW Office of Water shall have the right during the currency of this license to request an audit of all groundwater monitoring data collection, archiving and quality assurance/quality control (QA/QC) procedures subject to constraints imposed by the regulation of the operation, the licensee shall take any actions deemed necessary by the NSW Office of Water as a consequence of the audit findings. | Condition noted. | Note |
| 16 | The volume of groundwater extracted from the works authorised by this license and by license(s) listed in the attached schedule shall not exceed 30 megalitres in any 12 month period commencing 1st July. | The auditor sighted the AGL logbook ('Field Water') and noted compliance with the requirements of this condition. | Compliant |

C5. PPL

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|---|--|-----------|
| | SCHEDULE OF CONDITIONS OF PRODUCTION LEASE | | |
| | Operations | | |
| 1 | The lease holder must restrict operations to the lease area and must not adopt any other method of operations without the prior written approval of the Minister and subject to any conditions he may stipulate. | The auditor sighted the POP, Version 9, Appendix A (09/12/15) and noted compliance with the requirements of this condition. | Compliant |
| | Management and Rehabilitation of Lands (General) | | |
| 2 | a) The lease holder must maintain the subject area in a clean and tidy condition at all times. | The auditor inspected the RPGP and a sample of well sites (AP01, LB05, RP03, RP05, RP11 and LB07) and noted compliance with the requirements of this condition. | Compliant |
| | b) The lease holder must stabilise and rehabilitate to the satisfaction of the Minister and within such time as may be allowed by the Minister any lands within the subject area which may have been disturbed by the lease holder. | The auditor sighted the Rehabilitation and Landscape Management Sub Plan (April 2016) and noted compliance with the requirements of this condition. The auditor inspected a sample of well sites rehabilitated during the audit period (AP01, LB05 and LB07). Rehabilitation works were in compliance with the above plans and the criteria developed in consultation with the landowner and the DRE (Petroleum Operations Plan, Appendix F, 09/12/15). | Compliant |
| | c) Operations must be carried out in a manner that interferes as little as possible with flora and fauna. | The auditor sighted the Flora and Fauna Management Sub Plan (April 2016) and Rehabilitation and Landscape Management Sub Plan (April 2016). The plans comply with the requirements of this condition. | Compliant |
| | d) The lease holder must take all reasonable precautions against causing outbreak of fire on the subject area. | The auditor sighted the Emergency Response Plan (20/11/15) and noted compliance with the requirements of this condition. | Compliant |
| | e) The lease holder must conduct operations in such a manner as not to cause or aggravate soil erosion and the lease holder must observe and perform any written instructions given or which may be given by the Minister with a view to minimising or preventing soil erosion. | The auditor sighted the Soil and Water Management Sub Plan (May 2016) and noted compliance with the requirements of this condition. Implementation of the Sub Plan was demonstrated through the Minimum Environmental Controls Form. Commencing in 2015, this process includes the documentation of site specific controls as relevant to workover and plug and abandonment works. Periodic inspections are then undertaken to assess implementation and identify performance improvements. | Compliant |

C5. PPL

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|---|---|----------------------|
| | <p>f) The lease holder must provide and maintain to the satisfaction of the Minister efficient means to prevent contamination, pollution, erosion and siltation of any river, stream, creek, tributary, lake, dam, reservoir, watercourse or catchment area or any undue interference to fish or their environment and must observe any written instruction given or which may be given by the Minister with a view to preventing or minimising the contamination, pollution, erosion or siltation of any river, stream, creek, tributary, lake, dam, reservoir, watercourse or catchment area, or any undue interference to fish or their environment.</p> | <p>The auditor sighted the EMP (March 2016) and Soil and Water Management Sub Plan (May 2016). The plans detail a number of controls to prevent the pollution of water.</p> <p>Implementation of the Sub Plan was demonstrated through the Minimum Environmental Controls Form. Commencing in 2015, this process includes the documentation of site specific controls as relevant to workover and plug and abandonment works. Periodic inspections are then undertaken to assessment implementation and identify performance improvements.</p> <p>The auditor also sighted a sample of plug and abandonment works completed during the audit period and noted that there was no evidence of erosion.</p> <p>There were no reportable water pollution incidents during the audit period.</p> | <p>Compliant</p> |
| 3 | <p>Production Operations plan</p> | | |
| | <p>(1) Operations must be conducted in accordance with a Production Operations Plan (the Plan) satisfactory to the Director-General. The Plan together with environmental conditions of development consent and other approvals win. form the basis for:-</p> | <p>The auditor sighted the POP, Version 9 (09/12/15) and noted compliance with the requirements of this condition. The POP was approved by the Department of Industry, Resources and Energy on 12/01/16.</p> | <p>Compliant</p> |
| | <p>(a) ongoing operations and environmental management; and</p> | | <p>Compliant</p> |
| | <p>(b) ongoing monitoring of the project.</p> | | <p>Compliant</p> |
| | <p>(2) The Plan must be prepared in accordance with the Director-General's guidelines current at the time of lodgement.</p> | | <p>Compliant</p> |
| | <p>(3) The Plan must be lodged with the Director-General:-</p> | <p>Condition not triggered during the audit period.</p> | <p>Not Triggered</p> |
| | <p>(a) within six (6) months from the date of grant of the production lease. The management plan current for Petroleum Assessment Lease No. 1 (PAL 1) will remain as the governing document for environmental management for the interim period;</p> | | <p>Not Triggered</p> |
| | <p>(b) prior to the expiry of current Plan; and</p> | | <p>Compliant</p> |

C5. PPL

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|--|---|-----------|
| | (c) in accordance with any direction issued by the Director-General. | The auditor sighted the POP, Version 9 (09/12/15) and noted that the plan was reviewed annually during the audit period. | Compliant |
| | (4) The Plan must present a schedule of proposed operations for a period of up to seven (7) years and contain diagrams and documentation which identify:- | | Compliant |
| | a) area(s) proposed to be disturbed under the Plan; | | Compliant |
| | b) production and rehabilitation methods to be used and their sequence; | | Compliant |
| | c) existing and proposed surface infrastructure; | | Compliant |
| | d) progressive rehabilitation schedules; | | Compliant |
| | e) areas of particular environmental, ecological and cultural sensitivity; and | | Compliant |
| | f) proposed resource recovery. | | Compliant |
| | (5) The Plan when lodged will be reviewed by the Department of Mineral Resources. | Condition noted. | Note |
| | (6) The Director-General may within two (2) months of the lodgement of the Plan, require modification and re-lodgement. | Condition noted. | Note |
| | (7) If a requirement in accordance with sub-paragraph (6) is not issued within two (2) months of the lodgement of the Plan, the lease holder may proceed with implementation of the Plan submitted subject to the lodgement of the required security deposit within the specified time. | Condition noted. | Note |
| | (8) During the life of the Production Operations Plan, proposed modifications to the Plan must be lodged with the Director-General and will be subject to the review process outlined in sub-paragraphs (5), (6) and (7). Where the leaseholder and/or the Director-General is of the opinion that the Plan should be amended, the leaseholder shall submit an amended Plan for acceptance. | The POP was revised in December 2015 (Version 9). The auditor sighted correspondence from the DRE (12/01/16) noting approval of the revised plan. | Compliant |
| 4 | Annual Environmental Management Report (AEMR) | | |
| | (1) Within 12 months of the commencement of production operations and thereafter annually or, at such other times as may be allowed by the Director-General, the lease holder must lodge an Annual Environmental Management Report (AEMR) with the Director-General. | The auditor sighted the AEPR 2014-2015 (15/10/15) and AEPR 2015-2016 (31/10/16) and noted compliance with the requirements of this condition. | Compliant |

C5. PPL

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|---|--|-----------|
| | (2) The AEMR must be prepared in accordance with the Director-General's guidelines current at the time of reporting and contain a review and forecast of performance for the preceding and ensuing months in terms of: | | Compliant |
| | (a) the accepted Production Operations Plan; | | Compliant |
| | (b) development consent requirements and conditions; | | Compliant |
| | (c) Environment Protection Authority and Department of Land and Water Conservation licences and approvals; | | Compliant |
| | (d) any other statutory environmental requirements; and | | Compliant |
| | (e) details of any variations to environmental approvals applicable to the lease area, | | Compliant |
| | (3) After considering an AEMR the Director-General may, by notice in writing, direct the lease holder to undertake operations, remedial actions or supplementary studies in such manner and within such period as may be specified in the notice to ensure that operations on the lease area are conducted in accordance with sound environmental practice. | Condition noted. | Note |
| | (4) The leaseholder shall, as and when directed by the Minister, co-operate with the Director-General to conduct and facilitate review of the AEMR involving other government agencies. | Condition noted. | Note |
| 5 | Catchment Areas | | |
| | (a) Operations must be carried out in such a way as not to cause any pollution of any Catchment Area. | The auditor sighted the EMP (March 2016) and Soil and Water Management Sub Plan (May 2016). The plans detail a number of controls to protect catchment areas. | Compliant |
| | (b) If the lease holder is using or about to use any process which in the opinion of the Minister is likely to cause contamination of the waters of any Catchment Area the lease holder must refrain from using or cease using as the case may require such process within twenty four (24) hours of the receipt by the lease holder of a notice in writing under the hand of the Minister requiring the lease holder to do so. | Implementation of the Sub Plan was demonstrated through the Minimum Environmental Controls Form. Commencing in 2015, this process includes the documentation of site specific controls as relevant | Compliant |

C5. PPL

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|--|---|-----------|
| | (c) The lease holder must comply with any regulations now in force or hereafter to be in force for the protection from pollution of any Catchment Area. | <p>to workover and plug and abandonment works. Periodic inspections are then undertaken to assess implementation and identify performance improvements.</p> <p>The auditor also sighted a sample of plug and abandonment works completed during the audit period and noted that there was no evidence of erosion.</p> <p>There were no reportable water pollution incidents during the audit period.</p> | Compliant |
| 6 | Water | | |
| | (a) The lease holder must make such provisions for sanitation as may be directed by the Director-General and must at all times observe and perform any requirements of the Director-General respecting sanitation. | <p>It was reported by AGL (AEPR 2014-2015, 15/10/15 and AEPR 2015-2016, 31/10/16) that sewage is generated from the RPGP site and workover rig facilities. The waste is stored within tanks at the RPGP and disposed to an appropriately licenced facility.</p> <p>The auditor sighted the AGL Environmental Footprint spreadsheet for the financial years 2014/15 and 2015/16. The Environmental Footprint provides a detailed record of waste streams generated, including septic waste. The auditor sighted a sample of disposal records and reconciled against the Environmental Footprint. There were no errors or omissions identified.</p> | Compliant |

C5. PPL

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|--|---|---------------|
| | (b) Operations must be carried out in a manner that avoids the pollution or siltation of any watercourse or waterbody. | <p>The auditor sighted the EMP (March 2016) and Soil and Water Management Sub Plan (May 2016). The plans detail a number of controls to protect catchment areas.</p> <p>Implementation of the Sub Plan was demonstrated through the Minimum Environmental Controls Form. Commencing in 2015, this process includes the documentation of site specific controls as relevant to workover and plug and abandonment works. Periodic inspections are then undertaken to assess implementation and identify performance improvements.</p> <p>The auditor also sighted a sample of plug and abandonment works completed during the audit period and noted that there was no evidence of erosion.</p> <p>There were no reportable water pollution incidents during the audit period.</p> | Compliant |
| | (c) The lease holder must not interfere with the flow of water in any stream or watercourse. | Condition not triggered during the audit period. | Not Triggered |
| | Dust | | |
| 7 | The lease holder must take such reasonable precautions as are necessary to abate any dust nuisance. | <p>An inspection of the RGP was undertaken by the auditor and a number of dust mitigation controls were observed, including:</p> <ul style="list-style-type: none"> -Car park and access road are constructed with asphalt; -Plant walkways are constructed with asphalt and concrete; -Plant surrounds are sealed with a mix of shale and crushed sandstone (low dust); and -Speed limits on the site and access road are limited to 20km/hr. <p>The auditor sighted the Air Quality Management Sub-Plan (July 2015) and noted the inclusion of dust mitigation measures including the use of water carts where warranted, use of designated roads and access tracks, adherence to project vehicle speed limits and load covering procedures.</p> <p>There were no dust complaints reported during the audit period.</p> | Compliant |

C5. PPL

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|----------|--|--|---------------|
| 8 | Fences | | |
| | (a) Fences on or adjacent to the subject area must not be interfered with without the prior written approval of the owner thereof or the Director- General and subject to any conditions the Director-General may stipulate. | Condition not triggered during the audit period. | Not Triggered |
| | (b) Any gates within the subject area or any other gates used by the lease holder must be closed or left open in accordance with the requirements of the owner or occupier. | The auditor sighted a sample of gates during the site inspection and noted compliance with the requirements of this condition. | Compliant |
| 9 | Vegetation | | |
| | (a) The lease holder must not cut, destroy, ringbark or remove any timber or other vegetative cover on any other land subject of this lease except such as directly obstructs or prevents the carrying on of the operations. | The auditor sighted the Flora and Fauna Management Sub Plan (April 2016) and noted compliance with the requirements of this condition. It was reported by AGL that there was no vegetation cut, destroyed or removed except as directly obstructs operations. | Compliant |
| | (b) All trees, shrubs and undergrowth which the lease holder cuts down, removes or damages for the purpose of the operations must be as directed by and to the satisfaction of the Director-General. | Condition not triggered during the audit period. | Not Triggered |
| | (c) The lease holder must observe any instructions given by any responsible authority with a view to the eradication of noxious weeds. The lease holder must make all reasonable efforts to prevent the introduction and establishment of noxious weeds. | The auditor sighted the Rehabilitation and Landscape Management Sub Plan (April 2016) and noted compliance with the requirements of this condition. It was reported by AGL that there were no instructions provided by responsible authorities during the audit period with respect to weed management. | Compliant |
| | Roads | | |

C5. PPL

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|---|--|---------------|
| 10 | <p>In the event of the operations being conducted on the surface of any road, track or fire trail traversing the subject area or in the event of such operations causing damage to or interference with any such road, track or fire trail the lease holder must if directed in writing by the Minister provide to the satisfaction of the Minister an alternative road track or fire trail in a position as required by the Minister and must allow free and uninterrupted access along such alternate road, track or fire trail and, if required by the Minister, the lease holder must upon completion of operations rehabilitate the surface of the original road, track or fire trail to a condition satisfactory to the Minister.</p> <p>The lease holder must consult with prior to and implement local Council and Roads and Traffic Authority guidelines as applicable in respect of works carried out on road verges and underneath shire roadways.</p> | Condition not triggered during the audit period. | Not Triggered |
| | Transmission Lines, Communication Lines and Other Utilities | | |
| 11 | <p>The lease holder must as far as is practicable so conduct operations as not to interfere with or impair the stability or efficiency of any transmission line, communication line or pipeline or any other utility traversing the surface or below the surface of the subject area and must comply with any written direction which may be given by the Minister in this regard.</p> | Condition not triggered during the audit period. | Not Triggered |
| | Aboriginal Place or Relic | | |
| 12 | <p>The lease holder must not destroy, deface or damage any place or relic within the subject area except in accordance with an authority issued under the National Parks and Wildlife Act, 1974, and must take every precaution in drilling, excavating or disturbing the land against any such destruction, defacement or damage.</p> | Condition not triggered during the audit period. | Not Triggered |
| 13 | Safety | | |

C5. PPL

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|------------------|---|---|---------------|
| | (a) All production activity must be carried out in conformity with the "Schedule of Onshore Petroleum Exploration and Production Safety Requirements" published by the Department of Mineral Resources in August 1992, as may be amended from time to time. The lease holder will prepare a Safety Management Plan in accordance with the Schedule. | <p>The Auditor sighted the Health and Safety Management Plan, Camden Project NSW (March 2015) and noted compliance with the requirements of this condition.</p> <p>Implementation was demonstrated through the following documents/systems:</p> <ol style="list-style-type: none"> 1. Induction program (Rapid Induct); 2. Audit program and sample of completed audits ; 3. Audit Actions Tracker; and 4. Standard methodologies for common works (e.g. confined space). | Compliant |
| | (b) Operations must be carried out in a manner that ensures the safety of people and livestock in the vicinity of the operations. All drill holes, pipelines, installations, facilities and unattended worksites must be appropriately protected to ensure that access to them by members of the public and livestock is restricted. | The auditor inspected a sample of well sites and the RPGP and noted facilities to be adequately fenced and secured. | Compliant |
| | (c) The lease holder shall undertake all activities with due regard to identifying and managing the risk of the activities so as to not adversely affect the potential mineability, and the safe and efficient recovery of any mineable coal seams. | Condition not triggered during the audit period. It was reported by AGL (AEPR 2014-2015, 15/10/15 and AEPR 2015-2016, 31/10/16) that there were no wells drilled during the audit period. | Not Triggered |
| | (d) The lease holder shall work co-operatively and in good faith with the applicant or holder of any Mining Lease within the lease area, including with regard to identifying and managing the risk of the activities so as to not adversely affect the potential mineability, and the safe and efficient recovery of any mineable coal seams, and so as not to unreasonably impede rights to coal exploration and assessment activities provided under an Act. | Condition not triggered during the audit period. It was reported by AGL (AEPR 2014-2015, 15/10/15 and AEPR 2015-2016, 31/10/16) that there were no wells drilled during the audit period. | Not Triggered |
| Indemnity | | | |

C5. PPL

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|---|---|---------------|
| 14 | The lease holder must identify and keep indemnified the Crown from and against all and any accident or injury to any person or property which may arise out of the construction actions suits and claims and demands of whatsoever nature and all costs charges and expenses which may be brought against the lease holder or which the lease holder may incur in respect of maintenance or working of any workings now existing or to be made by the lease holder within the boundaries of the subject area or in connection with any of the operations notwithstanding that all other conditions of this lease must in all respects have been observed by the lease holder or that any such accident or injury must arise from any act or thing which the lease holder may be licensed or compelled to do herein. | The auditor sighted the following documents demonstrating compliance against the requirements of this condition: 1. Certificate of Currency (25/11/15) - Public and Products Liability and Industrial Special Risks; 2. Certificate of Currency (25/11/15) - Motor Vehicle Insurance; and 3. Certificate of Currency (25/11/15) - Combined Public and Products Liability and Professional Indemnity. | Compliant |
| 15 | Security Deposit | | |
| | (a) A security in the sum of [amount varies for each PPL] must be lodged with the Minister by the lease holder for the purpose of ensuring the fulfilment by the lease holder of its obligations under this lease. If the lease holder fails to fulfil any one or more of such obligations the said sum may be applied at the discretion of the Minister towards the cost of fulfilling such obligations. For the purpose of this clause the lease holder must be deemed to have failed to fulfil the obligations of this lease if it fails to comply with any condition or provision hereof, any provision of the Act or regulations made thereunder or any condition or direction imposed or given pursuant to a condition or provision hereof or of any provision of the Act or regulations made thereunder. | Condition closed prior to the audit period. | Not Triggered |
| | (b) The lease holder must provide the security required by sub-clause (a) hereof in one of the following forms:- (i) cash; or (ii) a security certificate or bond in such form and given by such surety may from time to time be approved by the Minister. | Condition closed prior to the audit period. | Not Triggered |
| | Well Sealing | | |
| 16 | All wells drilled by the lease holder within the lease area will be subject to the following condition:- | Condition not triggered during the audit period. | Not Triggered |
| | The location and height (AHD) of each borehole collar must be determined to an accuracy of 1 metre and the position of the hole within potentially mineable coal seams must also be determined, using a gyroscopic downhole tool, to an accuracy of 1-2 metres. | | Not Triggered |

C5. PPL

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|---|---|---------------|
| | This information must be supplied to the Department of Mineral Resources. Reasonable access must be provided to SHP Billiton field staff to carry out additional surveys as necessary. | | Not Triggered |
| | Plugging and abandonment must be undertaken in a manner acceptable to the Director-General. | <p>The auditor sighted the Rehabilitation and Landscape Management Sub Plan (April 2016) and noted compliance with the requirements of this condition.</p> <p>The auditor inspected a sample of well sites rehabilitated during the audit period (AP01, LB05 and LB07). Rehabilitation works were in compliance with the above plans and the criteria developed in consultation with the landowner and the DRE (Petroleum Operations Plan, Appendix F, 09/12/15).</p> | Compliant |
| 17 | Restriction to Area | | |
| | (i) The area over which well maintenance/drilling activities are undertaken must be kept to the minimum practical size commensurate with best practice and safe operations. The working area must be clearly delineated by fencing and other barriers as appropriate. | The auditor inspected a sample of well sites and noted compliance with the requirements of this condition. | Compliant |
| | (ii) If so directed by the Director-General the lease holder must enclose the subject area with a secure stock proof fence and such fencing 'must -be erected and maintained in a manner satisfactory to the Director-General. | Condition not triggered during the audit period. | Not Triggered |
| | (iii) The lease holder must observe any instructions given by the Director- General with a view of minimising or preventing public inconvenience or damage to public or private property. | Condition not triggered during the audit period. | Not Triggered |
| 18 | Reporting | | |
| | A) Well Drilling | | |
| | i) The standard requirements for reporting in the Petroleum (Onshore) Act 1991, shall apply. | Condition not triggered during the audit period. It was reported by AGL (AEPR 2014-2015, 15/10/15 and AEPR 2015-2016, 31/10/16) that there were no wells drilled during the audit period. | Not Triggered |
| | ii) While an activity is taking place, the lease holder must submit a weekly progress report containing a summary of any test results and problems encountered. | | Not Triggered |

C5. PPL

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|---|---|---------------|
| | iii) The lease holder must submit a copy of all reports undertaken relating to the interpretation of the results of work carried out in the area including geological and geophysical reports as well as engineering reports. These reports must be submitted within six (6) months of the completion of the assessment. | | Not Triggered |
| | B) Well Assessment | | |
| | The lease holder shall submit the following reports within seven (7) days of the completion of each month's activity:- | The auditor sighted a sample of monthly Gas Production Reports prepared by AGL and submitted to the DRE and noted compliance with the requirements of this condition. | Compliant |
| | (i) Gas flow rates for each well connected to the gas gathering system; and | | Compliant |
| | (ii) Total gas flow into the treatment facility. | | Compliant |
| | General | | |
| 19 | The lease holder must submit a copy of all reports undertaken relating to the interpretation of the results of work carried out in the area including geological and geophysical reports as well as engineering reports. These reports must be submitted within six (6) months of the completion of the assessment. | Condition not triggered during the audit period. It was reported by AGL (AEPR 2014-2015, 15/10/15 and AEPR 2015-2016, 31/10/16) that there were no wells drilled during the audit period. | Not Triggered |
| 20 | Control of Operations | | |
| | (a) If an Inspector appointed under the Petroleum (Onshore) Act 1991, believes that the lease holder is not complying with any provision of the Act 1991 or Regulation or any condition of this lease relating to the working of the subject area, he may direct the lease holder to cease working the subject area and to rectify the situation. | Condition not triggered during the audit period. | Not Triggered |
| | (b) The lease holder must comply with any lawful direction given. | | Not Triggered |
| 21 | Minister May Make Stop Work Order | | |
| | (1) If the Minister is of the opinion that any action is being, or is about to be, carried out that is, or is likely to result in, a breach of any lease condition or of the Petroleum (Onshore) Act or the regulations under the Act, the Minister may order that the action is to cease and that no action, other than such action as may be specified in the order, is to be carried out in or in the vicinity of the lease area, or a portion of the lease area nominated by the order, within a period of 40 days after the date of the order. | Condition not triggered during the audit period. | Not Triggered |

C5. PPL

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|--|--|---------------|
| | (2) An order takes effect on and from the date on which: (a) a copy of the order is provided to the leaseholder, or (b) the person performing or about to perform the action is notified that the order has been made, whichever is the sooner. | Condition not triggered during the audit period. | Not Triggered |
| | (3) In this clause, a reference to action being, or about to be, carried out includes a reference to action that should be, but is not being, carried out and the Minister may make an order, in accordance with this clause, that any such action is to be carried out. | Condition not triggered during the audit period. | Not Triggered |
| | (4) The Minister is not required, before making an order under this clause, to notify the leaseholder or any other affected by the order. | Condition not triggered during the audit period. | Not Triggered |
| | (5) The Minister may extend an order under this clause for such further period or periods of 40 days as the Minister thinks fit. | Condition not triggered during the audit period. | Not Triggered |
| | (6) After making an order under this clause, the Minister must immediately consult with the leaseholder to determine whether any modification of the action may be sufficient to avoid a breach of a lease condition or of the Act or the regulations. | Condition not triggered during the audit period. | Not Triggered |
| | SCHEDULE OF SPECIAL CONDITIONS OF APPROVAL | | |
| 1 | The lease holder shall lodge an application for Development Consent for the Stage 2 production area within three (3) years of the granting of this lease. Should Development Consent not be granted within five (5) years of the grant of the Petroleum Production Lease, the Minister may cancel the lease. | Condition not triggered during the audit period. | Not Triggered |
| 2 | The lease holder shall relinquish areas where no wells have been drilled within ten (10) years of the granting of this lease, except with the written consent of the Minister. | Condition not triggered during the audit period. It was reported by AGL (AEPR 2014-2015, 15/10/15 and AEPR 2015-2016, 31/10/16) that there were no wells drilled during the audit period. | Not Triggered |
| | SCHEDULE A CONDITIONS - ENVIRONMENTAL MANAGEMENT CONDITIONS | | |
| | Environmental Harm | | |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|----------|--|---|-----------|
| 1 | The lease Holder must implement all practicable measures to prevent and/or minimise any harm to the environment that may result from the construction, operation or rehabilitation of the development. | <p>An Environmental Management System (EMS) has been developed and implemented to manage environmental risks and achieve performance improvements. The EMS consists of an Environmental Management Plan (EMP), Sub Plans and a compliance management system.</p> <p>A number of measures are in place to monitor and measure implementation of the EMS including Environmental Management Sub Plan Compliance Audits, Daily Workover Reports, Monthly Dam Inspection Reports, air quality monitoring and noise monitoring. The auditor sighted a sample of monitoring controls and noted compliance with the requirements of the EMP.</p> <p>Compliance obligations arising from licences, leases, environmental/ planning approvals and legislation are monitored through a web-based database compliance management system (CMO Compliance). The auditor sighted CMO Compliance and determined that the tool effectively monitors compliance against obligations.</p> | Compliant |
| 2 | Petroleum Operations Plan | | |
| | a) Production operations must not be carried out otherwise than in accordance with a Petroleum Operations Plan (POP) which has been approved by the Director-General of the Department of Industry and investment. | The auditor sighted the POP, Version 9 (09/12/15) and noted compliance with the requirements of this condition. The POP was approved by the DRE on 12/01/16 and provided to the DPE on 15/01/16. | Compliant |
| | b) The POP must: | | Compliant |
| | i) identify areas that will be disturbed by operations; | | Compliant |
| | ii) detail the staging of specific operations; | | Compliant |
| | iii) identify how operations will be managed to allow closure of the site; | | Compliant |
| | iv) identify how operations will be carried out on site in order to prevent and or minimise harm to environment, including groundwater; | | Compliant |
| | v) reflect conditions of approval under: | | Compliant |
| | (1) the Environmental Planning and Assessment Act 1979; | | Compliant |
| | (2) the Protection of the Environment Operations Act 1997; and | | Compliant |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|----------|--|--|-----------|
| | (3) any other approvals relevant to the development including the conditions of the lease; and | | Compliant |
| | vi) have regard to any relevant guidelines adopted by the Director-General. | | Compliant |
| | c) The Lease Holder may apply to the Director-general to amend an approved POP at any time. | Condition noted | Note |
| | d) It is not a breach of this condition if: | Condition noted | Note |
| | i) the operations constituting the breach were necessary to comply with a lawful order or direction given under the Petroleum (Onshore) Act 1999 , the Environmental Planning and Assessment Act 1979, Protection of the Environment Operations Act 1997 or the Occupational Health and Safety Act 2000; and | Condition noted | Note |
| | ii) the Director-General had been notified of the terms of the order of direction prior to the operations constituting the breach being carried out. | Condition noted | Note |
| | Note: The Director-General is deemed to be notified of the terms of and order of directions if the order of direction was issued by the Department. | Condition noted | Note |
| | e) A POP ceases to have affect 7 years after the date of approval of other such period as specified by the Director-General is deemed to be notified of the terms of and order of direction if the order of direction was issued by the Director-General. | The auditor sighted the POP, Version 9 (09/12/15) and noted compliance with the requirements of this condition. The POP was approved by the DRE on 12/01/16 and provided to the DPE on 15/01/16. | Compliant |
| 3 | Environment Management Reporting | | |
| | a) The Lease Holder must lodge Environmental Management Reports (EMR) with the Director-General. | The auditor sighted the AEPR 2014-2015 (15/10/15) and AEPR 2015-2016 (31/10/16) and noted compliance with the requirements of this condition. | Compliant |
| | b) The EMR must | | Compliant |
| | i) report against compliance with the POP; | | Compliant |
| | ii) report on progress in respect of rehabilitation completion criteria; | | Compliant |
| | iii) report on the extent of compliance with regulatory requirements; and | | Compliant |
| | iv) have regard to any relevant guidelines adopted by the Director-General. | | Compliant |
| | c) Additional environmental reports may be required on specific surface disturbing operations or environmental incidents from time to time as directed in writing by the Director-General and must be lodged as instructed. | Condition noted | Note |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|---|--|--------------|
| 4 | Incident reporting | | |
| | a) The Licence Holder must report any incidents causing or threatening material harm to the environment in accordance with Departmental guidelines. | The auditor sighted the Pollution Incident Response Management Plan (PIRMP) and Emergency Response Plan (20/11/15) for the CGP and noted compliance with the requirements of this condition. There were no reportable environmental incidents during the audit period. | Compliant |
| | For the purposes of the condition, harm to the environment is material if: | | Compliant |
| | i) it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or | | Compliant |
| | ii) it results in actual or potential loss of property damage of an amount, or amounts in aggregate, exceeding \$10,000. | | Compliant |
| | Loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment. | | Compliant |
| | Rehabilitation | | |
| 5 | Disturbed land must be rehabilitated to a sustainable/agreed end land use to the satisfaction of the Director-General. | The auditor sighted the Rehabilitation and Landscape Management Sub Plan (April 2016) and noted compliance with the requirements of this condition. The auditor inspected a sample of well sites rehabilitated during the audit period (AP01, LB05 and LB07). Rehabilitation works were in compliance with the above plans and the criteria developed in consultation with the landowner and the DRE (Petroleum Operations Plan, Appendix F, 09/12/15). | Compliant |
| | SAFETY | | |
| 6 | Industry Codes and Standards | | |
| | a) All operations must be carried out in conformity with the "Schedule of Onshore Petroleum Exploration and Production Safety Requirements" published by the Department of Industry and Investment as amended for time to time. The Lease Holder must prepare a Safety Management Plan in accordance with the Schedule. | The auditor sighted the AGL Energy Limited Upstream Gas Health and Safety Management Plan CGP (March 2015). The Plan notes that it was developed in accordance with the Schedule of Onshore Petroleum Exploration and Production Safety Requirements (NSW) 1992. The scope of the audit did not include an assessment against the requirements of the Schedule of Onshore Petroleum Exploration and Production Safety Requirements (NSW) 1992. | Not Verified |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|---|--|----------------------------------|
| | <p>b) The design, fabrication, installation, inspection, testing, operation and maintenance of all gas gathering pipelines shall conform to the appropriate Australian Standards. Technical records, inspection reports and the results of any tests must be made available to an inspector on request.</p> | <p>The auditor sighted the EMP (March 2016) which notes that the gas gathering system route is designed, constructed and operated in accordance with the requirements of Australian Standard AS 4645.3:2008 Gas Distribution Networks – Plastic pipe systems.</p> <p>The scope of the audit did not include an assessment of compliance against the relevant Australian Standards.</p> | <p>Not Verified</p> |
| 7 | <p>Gathering Pipelines</p> | | |
| | <p>a) Notice must be given to the Director-General prior to commencement of the gas gathering pipeline installation program and while trenches are open to allow inspection prior to backfilling.</p> | <p>During the audit period, gas gathering line was installed between WG04 and WG01 (374m). Notice was not provided to the Director-General to allow inspection prior to backfilling. It is noted that the works were initiated and completed over one day.</p> <p>In the event of further gas gathering installation works, it is recommended that notice be provided to the Director-General.</p> | <p>Non-Compliance (Low Risk)</p> |
| | <p>b) All gas gathering pipelines must be buried with an electronically conductive wire or other approved means provided for locating the pipe.</p> | <p>The auditor sighted the EMP (March 2016) which notes that tracer lines are installed within gas gathering pipelines.</p> | <p>Not Verified</p> |
| | <p>c) All gas gathering pipelines must be surveyed and prominent markers must be installed at appropriate intervals to show the location of these pipelines.</p> | <p>The auditor sighted the following evidence demonstrating compliance of the WG04 gas gathering line with the requirements of this condition:</p> <ol style="list-style-type: none"> 1. Survey map (SMEC Urban, Drawing No. 76442.15.D86); and 2. Photos of the markers installed on the line. | <p>Compliant</p> |
| | <p>d) A progress report must be submitted to the Director General on or before the 15th day of each month during construction and installation of gas gathering pipeline.</p> | <p>It was reported by AGL that a progress report was not submitted to the Director General during the construction and installation of the WG04 gas gathering line (374m). It is noted that the works were initiated and completed over one day.</p> <p>In the event of further gas gathering installation works, it is recommended that a progress report be provided to the Director-General on or before the 15th day of each month.</p> | <p>Non-Compliance (Low Risk)</p> |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|---|---|---------------|
| | e) The gas gathering pipelines must be maintained free of leaks while in operation and a program implemented to confirm this. Records to be maintained and made available to an inspector on request. | The auditor sighted the following demonstrating compliance with the requirements of this condition: 1. MEX preventative maintenance system for plant and equipment; and 2. Gas Leakage Audit 2014 - Final Report for Camden (NSW) (Health Pipeline Services Pty Ltd, 13/10/14). | Compliant |
| | f) Gas gathering pipelines must not be abandoned except in a manner approved by the Director General. | Condition noted | Note |
| | WELLS | | |
| | Notification of Activities | | |
| 8 | The Lease Holder must provide reasonable notice of disturbing activities to potentially affected parties prior to the commencement of activities on each site. The Lease Holder must accommodate reasonable requests for limited rescheduling of activities. | The auditor sighted a sample of resident notification letters and noted compliance with the requirements of this condition. | Compliant |
| 9 | Well Surveying and Logging | | |
| | a) The locations and height (AHD) of the collar of all wells drilled by the Lease Holder within the lease area must be determined to an accuracy of 1 metre, and the position of the hole within any potentially mineable coal seam must also be determined to an accuracy of 1 metre. This information must be supplied to the Director-General. | Condition not triggered during the audit period. It was reported by AGL (AEPR 2014-2015, 15/10/15 and AEPR 2015-2016, 31/10/16) that there were no wells drilled during the audit period. | Not Triggered |
| | b) All vertical wells must be downhole geophysically logged prior to the installation of production casing with logging suite which can accurately determine the location and properties of all production zones, and conventional gas reservoirs. In addition a cement bond log must be run to confirm the integrity of the cement annulus between the wall of the well and the entire length of the casing. All other suites must be run for the entire length of the hole. | | Not Triggered |
| | c) In the event of horizontal wells being drilled, the Lease Holder must supply 3 dimensional co-ordinates determining the path and track of the hole, to the satisfaction of the Director-General. | | Not Triggered |
| | d) The Lease Holder must provide a copy of all geophysical logs to the Director-General within 14 days of completion. | | Not Triggered |
| 10 | Well Abandonment | | |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|--|---|---------------------------------|
| | <p>a) At the completion of production, steel casing must be removed from the vertical interval of any potentially mineable coal seam as determined by the Executive Director, Mineral Resources. Downhole geophysical surveys and/or cameras must be used to confirm the removal of all casing throughout the prescribed interval.</p> | <p>The auditor sighted the Plug and Abandonment Record prepared by AGL and submitted to the DRE for nominated well sites plugged and abandoned during the audit period. The records note that the production casing did not extend into the mineable coal seam for a number of well sites. In the event that the casing extended into the coal seam, open hole completion occurred or the DRE approved an alternative method (correspondence sighted).</p> <p>An exception was noted with respect to well sites EM04 and GL10 which extend into the mineable coal seam. Evidence was not available to demonstrate DRE approval of the decommissioning process.</p> <p>It is recommended that AGL obtain approval from DRE where steel casing is not removed from the vertical interval of any potentially mineable coal seam.</p> | <p>Non-Compliant (Low Risk)</p> |
| | <p>b) A well must not be plugged and abandoned except in accordance with the schedule of Onshore Exploration and Production Safety Requirements, and any other guidelines in force from time to time.</p> | <p>The auditor sighted the EMP (March 2016) which notes that sealing/plugging and abandonment of wells occurs in accordance with the NSW Code of Practice for Coal Seam Gas Well Integrity and PPL conditions.</p> | <p>Non-Compliant (Low Risk)</p> |
| | <p>c) All wells must be fully sealed in accordance with the Department's guidelines.</p> | <p>Correspondence was sighted from the DRE to AGL noting approval of the plug and abandonment program for nominated well sites. An exception was noted with respect to EM04 and GL10.</p> <p>It is recommended that AGL obtain approval from the DRE prior to commencing plug and abandonment programs that deviate from guidelines and requirements.</p> | <p>Non-Compliant (Low Risk)</p> |
| | <p>d) The Lease Holder must, within 2 weeks of the abandonment of any well, submit to the Director-General a report providing details on the following items:</p> | <p>With respect to well sites abandoned during the audit period, the following matters of non-compliance were identified:</p> | <p>Non-Compliant (Low Risk)</p> |
| | <p>i) Location of abandoned well</p> | <p>1. Plug and Abandonment Records prepared by AGL largely address reporting requirements with the exception of gas and water makes and composition.</p> | <p>Non-Compliant (Low Risk)</p> |
| | <p>ii) Termination depth of drillhole and depth to worked seam.</p> | | <p>Non-Compliant (Low Risk)</p> |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|---|---|--------------------------|
| | iii) details of drillhole diameter and casing used. | 2. Evidence was not consistently available to demonstrate that Plug and Abandonment Records were submitted to the DRE within 14 days of abandonment. Specifically, Records were not submitted within the specified time for LB05, LB07 and GL10. | Non-Compliant (Low Risk) |
| | iv) Gas and water makes and composition during the drilling and production test phases. The commencement and completion date of each phase of the operation and the date of any other significant events. | 3. Evidence was not available to demonstrate DRE approval of the decommissioning process of well sites EM04 and GL10 which extend into the mineable coal seam. | Non-Compliant (Low Risk) |
| | v) The estimated and actual quantities of grout used to seal the drillhole. | It is recommended that Plug and Abandonment Records, including data on gas and water makes and composition, be submitted to the DRE within two weeks of abandonment. Further, it is recommended that AGL obtain approval from DRE where steel casing is not removed from the vertical interval of any potentially mineable coal seam. | Non-Compliant (Low Risk) |
| | vi) Evidence of removal of steel casing from the interval encompassing any potentially mineable coal seam. | | Non-Compliant (Low Risk) |
| | IMPACT ON COAL SEAMS | | |
| 11 | Operations not to affect mineability of coal seams | | |
| | a) The Lease Holder must undertake all activities with due regard to identifying, managing and minimising the impact of the activities on the potential mineability of coal seams at the expiration of the lease. | <p>It was reported by AGL (AEPR 2014-2015, 15/10/15 and AEPR 2015-2016, 31/10/16) that there were no wells drilled during the audit period.</p> <p>The auditor sighted the Plug and Abandonment Record prepared by AGL and submitted to the DRE for nominated well sites plugged and abandoned during the audit period. The records note that the production casing did not extend into the mineable coal seam for a number of well sites. In the event that the casing extended into the coal seam, open hole completion occurred or the DRE approved an alternative method (correspondence sighted).</p> <p>An exception was noted with respect to well sites EM04 and GL10 which extend into the mineable coal seam. Evidence was not available to demonstrate DRE approval of the decommissioning process.</p> <p>It is recommended that AGL obtain approval from DRE where steel casing is not removed from the vertical interval of any potentially mineable coal seam.</p> | Non-Compliant (Low Risk) |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|--|---|---------------|
| | b) The Director-General may request the Lease Holder to provide to the Department all geological information pertinent to the drilling of any well in the lease area. The Director-General may request additional tests and data if required. The Lease Holder must comply with any such requests. | Condition not triggered during the audit period. It was reported by AGL (AEPR 2014-2015, 15/10/15 and AEPR 2015-2016, 31/10/16) that there were no wells drilled during the audit period. | Not Triggered |
| | Well Casing | | |
| 12 | As an alternative to steel casing, glass reinforced epoxy liners may be used across the Bulli coal seam subject to separate approval of the Director-General. | It was reported by AGL that glass reinforced epoxy liners are not used within CGP gas wells. | Not Verified |
| | OPERATIONS GENERALLY | | |
| 13 | Commercial Production | | |
| | The Lease Holder must notify the Director-General when commercial production commences. The notification must be provided to the Director General within 7 days of the commercial production. | Condition not triggered during the audit period. | Not Triggered |
| | Commercial production in the condition means the use by of supply to any person (including the Lease Holder) of any petroleum extracted from the lease area for any purpose other than well assessment, flaring of equipment testing (not resulting in the generation of energy or supply of petroleum for commercial purposes). | Condition not triggered during the audit period. | Not Triggered |
| 14 | Disruption to utilities | | |
| | a) If the activities carried out pursuant to the Lease will in any way impact on any utility, the Lease Holder must inform the authority in control of the utility and provide sufficient information for the authority to assess the proposal of its impacts. | Condition not triggered during the audit period. | Not Triggered |
| | b) The Lease Holder must pay costs for remediation or repair of damage to utilities caused by the Lease Holder's operations and associated activities. | | Not Triggered |
| | GEOLOGICAL & PRODUCTION REPORTING | | |
| 15 | Well Drilling | | |
| | a) While a drilling activity is taking place, the Lease Holder must submit a daily drilling report to the Director-General. | Condition not triggered during the audit period. | Not Triggered |
| | b) The Lease Holder must submit a weekly progress report containing a summary of any results and problems encountered. The weekly progress report must be submitted to the Director-General. | | Not Triggered |

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| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|---|---|---------------|
| | Note: These reports are in addition to the reporting requirements under s.131 of the Petroleum (Onshore) Act and the Petroleum (Onshore) Regulation 2007. | | Not Triggered |
| | Well Assessment | | |
| 16 | The lease holder must submit to the Director-General, a copy of all reports undertaken relating to the interpretation of the results of work carried out in the area, including geological and geophysical reports as well as engineering reports. These reports must be submitted within six (6) months of the completion of the assessment. | Condition not triggered during the audit period. It was reported by AGL (AEPR 2014-2015, 15/10/15 and AEPR 2015-2016, 31/10/16) that there were no wells drilled during the audit period. | Not Triggered |
| | SECURITY | | |
| 18 | Security | | |
| | a) The Lease Holder must lodge a security with the Minister in the sum set out in Appendix 2 for the purpose of ensuring the fulfilment of the Lease Holder's obligations under this licence. | Condition not triggered during the audit period. | Not Triggered |
| | b) The security may be lodged in one of the following forms: | | Not Triggered |
| | i) cash; | | Not Triggered |
| | ii) a security certificate in a form approved by the Minister and issued by an authorised deposit-taking institution. | | Not Triggered |
| | c) The Lease Holder must not carry out any activities under the authority conferred by this Lease unless the Security required by this condition has been lodged with the Director-General and the Lease Holder has received receipt of the lodgement. | | Not Triggered |
| | Note: This condition is imposed pursuant to section 16 of the Petroleum (Onshore) Act 1991. The amount of the security by this condition can be varied by written notice served on the Lease Holder. | | Not Triggered |
| | COOPERATION | | |
| 19 | Cooperation Agreement | | |

C5. PPL

| No. | Consent Condition | Compliance Assessment and Recommendation | Finding |
|-----|--|---|----------------------|
| | <p>The lease holder must make every reasonable attempt, and be able to demonstrate their attempts, to enter into a cooperation agreement with the holder(s) of any overlapping coal title(s). The cooperation agreement should address but not be limited to issues such as:</p> <ul style="list-style-type: none"> -access arrangements -operational interaction procedures -dispute resolution -information exchange -well location -timing of drilling -potential resource conflicts and -rehabilitation issues | <p>Condition not triggered during the audit period.</p> | <p>Not Triggered</p> |

Appendix D Water Licence Review (Audit Period)

| Well No. | Well Configuration | WAL | Tenure | WUA | Tenure | Industrial Bore Licence | Tenure | Exemption | Comments |
|----------|-----------------------|-------|-------------------------|--------------|----------|-------------------------|--------|-----------|----------|
| EM02 | Plugged and abandoned | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| EM03 | Plugged and abandoned | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| EM04 | Plugged and abandoned | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| EM05 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| EM06 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| EM07 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| EM08 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| EM09 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| EM10 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| EM11 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| EM12 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| EM13 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| EM14 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| EM15 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| EM16 | Suspended | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| EM17 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| EM18 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| EM19 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| EM20 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| EM21 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| EM22 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| EM23 | Plugged and abandoned | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| EM24 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| EM25 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |

| Well No. | Well Configuration | WAL | Tenure | WUA | Tenure | Industrial Bore Licence | Tenure | Exemption | Comments |
|----------|-----------------------|-------|-------------------------|--------------|----------|-------------------------|--------|-----------|----------|
| EM27 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| EM28 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| EM30 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| EM31 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| EM32 | Suspended | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| EM33 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| EM34 | Suspended | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| EM37 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| EM38 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| EM39 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| EM40 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| GL02 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| GL04 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| GL05 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| GL06 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| GL07 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| GL08 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| GL09 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| GL10 | Plugged and abandoned | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| GL11 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| GL12 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| GL13 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| GL14 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| GL15 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| GL16 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| GL17 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |

| Well No. | Well Configuration | WAL | Tenure | WUA | Tenure | Industrial Bore Licence | Tenure | Exemption | Comments |
|----------|-----------------------|-------|-------------------------|--------------|----------|-------------------------|--------|-----------|--|
| JD01 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| JD04 | Plugged and abandoned | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| JD05 | Plugged and abandoned | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| JD06 | Plugged and abandoned | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| JD07A | Plugged and abandoned | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| JD11 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| JS01 | Suspended | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| JS03 | Suspended | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| JS04 | Suspended | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| KP01 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| KP02 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| KP03 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| KP05 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| KP06 | Operational | 24736 | Continuing (perpetuity) | Not verified | 03/04/16 | N/A | N/A | N/A | |
| LB05 | Plugged and abandoned | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| LB06 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| LB07 | Plugged and abandoned | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| LB09 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| LB10 | Operational | | | | | N/A | N/A | N/A | Application submitted to DPI Water on 08/02/13 to amend WUA. |
| LB11 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| MH01 | Plugged and abandoned | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| MP01 | Suspended | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| MP02 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| MP03 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |

| Well No. | Well Configuration | WAL | Tenure | WUA | Tenure | Industrial Bore Licence | Tenure | Exemption | Comments |
|----------|--------------------|-------|-------------------------|--------------|----------|-------------------------|----------|-----------|---|
| MP05 | Suspended | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| MP05a | Operational | | | | | 10BL604878 | 12/07/16 | N/A | Well was not transitioned to the Water Management Act 2000. |
| MP07 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| MP08 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| MP09 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| MP10 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| MP11 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| MP12 | Operational | | | | | 10BL604879 | 12/07/16 | N/A | Well was not transitioned to the Water Management Act 2000. |
| MP14 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| MP15 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| MP16 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| MP17 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| MP22 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| MP23 | Operational | | | | | 10BL604880 | 12/07/16 | N/A | Well was not transitioned to the Water Management Act 2000. |
| MP25 | Operational | | | | | 10BL604888 | 12/7/16 | N/A | Well was not transitioned to the Water Management Act 2000. |
| MP30 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| MT01 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| MT02 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |

| Well No. | Well Configuration | WAL | Tenure | WUA | Tenure | Industrial Bore Licence | Tenure | Exemption | Comments |
|----------|-----------------------|-------|-------------------------|--------------|----------|-------------------------|--------|-----------|--|
| MT03 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| MT04 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| MT05 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| MT06 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| MT07 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| MT08 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| MT09 | Suspended | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| MT10 | Suspended | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| RB06 | Suspended | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| RB07 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| RB08 | Suspended | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| RB09 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| RB10 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| RB11 | Suspended | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| RB12 | Suspended | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| RP02 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| RP03 | Plugged and abandoned | | | | | | | N/A | Application submitted to DPI Water on 08/02/13 to amend WUA. |
| RP04 | Plugged and abandoned | | | | | | | N/A | Application submitted to DPI Water on 08/02/13 to amend WUA. |
| RP05 | Plugged and abandoned | | | | | | | N/A | Application submitted to DPI Water on 08/02/13 to amend WUA. |

| Well No. | Well Configuration | WAL | Tenure | WUA | Tenure | Industrial Bore Licence | Tenure | Exemption | Comments |
|----------|-----------------------|-------|-------------------------|--------------|----------|-------------------------|---------|-----------|--|
| RP06 | Suspended | | | | | | | N/A | Application submitted to DPI Water on 08/02/13 to amend WUA. |
| RP07 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| RP08 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| RP09 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| RP10 | Suspended | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| RP11 | Plugged and abandoned | | | | | | | N/A | Application submitted to DPI Water on 08/02/13 to amend WUA. |
| RP12 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| SF01 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| SF02 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| SF03 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| SF05 | Operational | | | | | 10BL604884 | 12/7/16 | N/A | Well was not transitioned to the Water Management Act 2000. |
| SF07 | Operational | | | | | 10BL604885 | 12/7/16 | N/A | Well was not transitioned to the Water Management Act 2000. |
| SF08 | Operational | | | | | 10BL604886 | 12/7/16 | N/A | Well was not transitioned to the Water Management Act 2000. |
| SF09 | Operational | | | | | 10BL604887 | 12/7/16 | N/A | Well was not transitioned to the |

| Well No. | Well Configuration | WAL | Tenure | WUA | Tenure | Industrial Bore Licence | Tenure | Exemption | Comments |
|----------|--------------------|-------|-------------------------|--------------|----------|-------------------------|--------|-----------|----------------------------|
| | | | | | | | | | Water Management Act 2000. |
| SF17 | Pad location only | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| SL02 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| SL03 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| SL09 | Suspended | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| WG01 | Suspended | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| WG02 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| WG03 | Operational | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| WG04 | Suspended | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| WG05 | Suspended | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |
| WG06 | Suspended | 24856 | Continuing (perpetuity) | Not verified | 22/05/16 | N/A | N/A | N/A | |

**Appendix E Addendum to the Camden Gas Project Independent
Environmental Audit 2014-2016**



Treo Environment

78 Denison Street
Bondi Junction
NSW, 2022

Phone: 02 9389 7699
info@treoenvironment.com
www.treoenvironment.com

ABN: 42 158 013 944
ACN: 158 013 944

Mr Aaron Clifton
Environment Business Partner NSW, Gas Operations
AGL Upstream Investments Pty Ltd
PO Box 67
Menangle NSW 2568

8/02/2017

Dear Mr Clifton

Re: Addendum to the Camden Gas Project Independent Environmental Audit 2014-2016

In October 2016, Treo Environment was engaged by AGL Upstream Investments Pty Ltd (AGL) to conduct an independent environmental audit (IEA) of the Camden Gas Project for the period 2014-2016. The findings of the IEA reflected conditions and documentation presented during the period 17 October 2016 to 12 December 2016 (Treo Environment, 14/12/16).

Subsequent to completion of the IEA, additional evidence was provided by AGL with respect to several matters of non-compliance. The records were generated during the audit period and as such have been assessed by the auditor and reflected in this addendum report.

Background

The requirement to conduct an IEA is reflected in the conditions of a number of development approvals. The key requirements of the conditions are detailed below and provided the basis for the audit:

“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 measures or actions to improve the environmental performance of the development and/or its environmental management and monitoring systems.”*

Scope and Criteria

The scope of the IEA was limited to an assessment of construction and operational activities of the Camden Gas Project undertaken between 1 July 2014 and 30 June 2016. The following development approvals (and modifications), licences and leases formed the reference point against which performance was measured:

- DA 15-1-2002-I (Apap, Joe Stanley, Johndilo, Loganbrae, Lipscombe and Mahon);
- DA 246-8-2002-I (Kay Park);
- DA 282-6-2003-I (RPGP, Rosalind Park, Wandinong, EMAI (EM01-20, 40));
- DA 183-8-2004-I (Mt Taurus and Menangle Park);
- DA 9-1-2005 (Glenlee Wells);
- DA 75-4-2005 (Sugarloaf Farm);
- Environment Protection Licence (EPL) 12003;
- Water Access Licences (WAL) (2);
- Works and Usage Approvals (WUA) (2);
- Industrial bore licences (8); and
- Petroleum Production Leases (PPL) (5).

Addendum

With respect to the compliance assessment undertaken against the conditions of the Petroleum Production Leases, the IEA identified seven matters of non-compliance, all of which were assessed as low risk. Subsequent to the audit, additional evidence was provided by AGL with respect to five matters. The auditor verified that the additional records were generated during the audit period and as such amended the compliance status (**Table 1.1**)

Table 1.1 Petroleum Production Lease Matters of Non-Compliance and

| Requirement | Independent Environmental Audit 2014-2016 Assessment | Addendum and Compliance Status |
|---|--|---|
| <p>Schedule A, Condition 10a</p> <p>At the completion of production, steel casing must be removed from the vertical interval of any potentially mineable coal seam as determined by the Executive Director, Mineral Resources. Downhole geophysical surveys and/or cameras must be used to confirm the removal of all casing throughout the prescribed interval.</p> | <p>The auditor sighted the Plug and Abandonment Record prepared by AGL and submitted to the Department of Industry – Division of Resources and Energy (DRE) for nominated well sites plugged and abandoned during the audit period. The records note that the production casing did not extend into the mineable coal seam for a number of well sites. In the event that the casing extended into the coal seam, open hole completion occurred or the DRE approved an alternative method (correspondence sighted).</p> <p>An exception was noted with respect to well sites EM04 and GL10 which extend into the mineable coal seam. Evidence was not available to demonstrate DRE approval of the decommissioning process.</p> | <p>Compliant</p> <p>Adequate and appropriate evidence was provided to demonstrate that the decommissioning process developed for well sites EM04 and GL10 was approved by the DRE.</p> |

| Requirement | Independent Environmental Audit 2014-2016 Assessment | Addendum and Compliance Status |
|--|---|--|
| <p>Schedule A, Condition 10b</p> <p>A well must not be plugged and abandoned except in accordance with the schedule of Onshore Exploration and Production Safety Requirements, and any other guidelines in force from time to time.</p> | <p>The auditor sighted the EMP (March 2016) which notes that sealing/plugging and abandonment of wells occurs in accordance with the NSW Code of Practice for Coal Seam Gas Well Integrity and PPL conditions.</p> | <p>Compliant</p> <p>Adequate and appropriate evidence was provided to demonstrate that the plug and abandonment program of well sites EM04 and GL10 was approved by the DRE.</p> |
| <p>Schedule A, Condition 10c</p> <p>All wells must be fully sealed in accordance with the Department's guidelines.</p> | <p>Correspondence was sighted from the DRE to AGL noting approval of the plug and abandonment program for nominated well sites. An exception was noted with respect to EM04 and GL10.</p> | |
| <p>Schedule A, Condition 10d</p> <p>The Lease Holder must, within 2 weeks of the abandonment of any well, submit to the Director-General a report providing details on the following items:</p> <ul style="list-style-type: none"> - Location of abandoned well. - Termination depth of drill hole and depth to worked seam. - details of drill hole diameter and casing used. - Gas and water makes and composition during the drilling and production test phases. The commencement and completion date of each phase of the operation and the date of any other significant events. - The estimated and actual quantities of grout used to seal the drill hole. <p>Evidence of removal of steel casing from the interval encompassing any potentially mineable coal seam.</p> | <p>With respect to well sites abandoned during the audit period, the following matters of non-compliance were identified:</p> <ol style="list-style-type: none"> 1. Plug and Abandonment Records prepared by AGL largely address reporting requirements with the exception of gas and water makes and composition. 2. Evidence was not consistently available to demonstrate that Plug and Abandonment Records were submitted to the DRE within 14 days of abandonment. Specifically, records were not submitted within the specified time for LB05, LB07 and GL10. 3. Evidence was not available to demonstrate DRE approval of the decommissioning process of well sites EM04 and GL10 which extend into the mineable coal seam. | <p>Non-Compliant (reduction in matters of non-compliance)</p> <p>With respect to well sites abandoned during the audit period, the following matters of non-compliance were identified:</p> <ol style="list-style-type: none"> 1. Plug and Abandonment Records prepared by AGL largely address reporting requirements with the exception of gas and water makes and composition. 2. Evidence was not consistently available to demonstrate that Plug and Abandonment Records were submitted to the DRE within 14 days of abandonment. Specifically, records were not submitted within the specified time for LB05, LB07 and GL10. |

| Requirement | Independent Environmental Audit 2014-2016 Assessment | Addendum and Compliance Status |
|---|--|---|
| <p>Schedule A, Condition 11a</p> <p>The Lease Holder must undertake all activities with due regard to identifying, managing and minimising the impact of the activities on the potential mineability of coal seams at the expiration of the lease.</p> | <p>The auditor sighted the Plug and Abandonment Record prepared by AGL and submitted to the DRE for nominated well sites plugged and abandoned during the audit period. The records note that the production casing did not extend into the mineable coal seam for a number of well sites. In the event that the casing extended into the coal seam, open hole completion occurred or the DRE approved an alternative method (correspondence sighted).</p> <p>An exception was noted with respect to well sites EM04 and GL10 which extend into the mineable coal seam. Evidence was not available to demonstrate DRE approval of the decommissioning process.</p> | <p>Compliant</p> <p>Adequate and appropriate evidence was provided to demonstrate that the decommissioning process developed for well sites EM04 and GL10 was approved by the DRE.</p> |

Yours faithfully,



Denise Corish
Director


Appendix F Independent Audit Submission Form

| Independent Audit Certification Form | |
|---|---|
| <i>Development Name:</i> | Camden Gas Project |
| <i>Development Consent No.:</i> | <ul style="list-style-type: none"> • DA 15-1-2002-I (Apap, Joe Stanley, Johndilo, Loganbrae, Lipscombe and Mahon); • DA 246-8-2002-I (Kay Park); • DA 282-6-2003-I [RPGP, Rosalind Park, Wandinong, EMAI (EM01-20, 40)]; • DA 183-8-2004-I (Mt Taurus and Menangle Park); • DA 9-1-2005 (Glenlee Wells); and • DA 75-4-2005 (Sugarloaf Farm). |
| <i>Description of Development:</i> | <p>The Camden Gas Project (CGP) is located 60 km southwest of Sydney in the Wollondilly, Camden and Campbelltown Local Government Areas. The project consists of the Rosalind Park Gas Plant (RPGP), 144 gas wells, low-pressure underground gas gathering lines and a high pressure supply line enabling the production, gathering and sale of coal seam gas.</p> <p>The development of the CGP has occurred in a staged manner with exploration activities commencing in 1998 under Sydney Gas (Camden) Operations. Since that time, the ownership of the project has changed and now operates as AGL Upstream Investments Pty Limited (AGL). A total of ten development approvals and project approvals have been granted to the project by the now Department of Planning and Environment (DPE).</p> |
| <i>Development Address:</i> | Rosalind Park Gas Plant Medhurst Road Gilead, NSW 2560 |
| <i>Operator:</i> | AGL Upstream Investments, Pty Ltd |
| <i>Operator Address:</i> | PO Box 67 Menangle NSW 2568 |
| Independent Audit | |
| <i>Title of Audit</i> | Camden Gas Project Independent Environmental Audit 2014-2016 |
| <p><i>I certify that I have undertaken the independent audit and prepared the contents of the attached independent audit report and to the best of my knowledge:</i></p> <ul style="list-style-type: none"> • <i>The audit has been undertaken in accordance with relevant approval condition(s) and in accordance with the auditing standard AS/NZS ISO 19011:2014 and Post Approval Guidelines – Independent Audits</i> • <i>The findings of the audit are reported truthfully, accurately and completely;</i> • <i>I have exercised due diligence and professional judgement in conducting the audit;</i> • <i>I have acted professionally, in an unbiased manner and did not allow undue influence to limit or over-ride objectivity in conducting the audit;</i> | |

- I am not related to any owner or operator of the development as an employer, business partner, employee, sharing a common employer, having a contractual arrangement outside the audit, spouse, partner, sibling, parent, or child;
- I do not have any pecuniary interest in the audited development, including where there is a reasonable likelihood or expectation of financial gain or loss to me or to a person to whom I am closely related (i.e. immediate family);
- Neither I nor my employer have provided consultancy services for the audited development that were subject to this audit except as otherwise declared to the lead regulator prior to the audit; and
- I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from fair payment) from any owner or operator of the development, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

Note.

- a. The Independent Audit is an 'environmental audit' for the purposes of section 122B(2) of the Environmental Planning and Assessment Act 1979. Section 122E provides that a person must not include false or misleading information (or provide information for inclusion in) an audit report produced to the Minister in connection with an environmental audit if the person knows that the information is false or misleading in a material respect. The maximum penalty is \$1 million (corporation) and \$250,000 (individual).
- b. The Crimes Act 1900 contains other offences relating to false and misleading information: section 192G (Intention to defraud by false or misleading statement—maximum penalty 5 years imprisonment); sections 307A, 307B and 307C (False or misleading applications/information/documents—maximum penalty 2 years imprisonment or \$22,000, or both).

| | |
|---------------------------------|---|
| Signature: |  |
| Name of Lead/Principal Auditor: | Denise Corish |
| Address: | 78 Denison Street, Bondi Junction, NSW 2022 |
| Email Address: | Denise.corish@treoenvironment.com |
| Auditor Certification: | Lead Auditor, Exemplar Global |
| Date: | 8 February 2017 |

Treo Environment

78 Denison Street
Bondi Junction
NSW, 2022

Phone: 02 9398 7699
info@treoenvironment.com
www.treoenvironment.com

ABN: 42 158 013 944
ACN: 158 013 944

