

INDEPENDENT ENVIRONMENTAL AUDIT 2010-2012

Camden Gas Project

27 August 2013

Prepared for:
AGL Upstream Investments Pty Ltd



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Independent Environmental Audit 2010-2012

Camden Gas Project

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Abbreviations

AEPR	Annual Environmental Performance Report, Camden Gas Project
CGP	Camden Gas Project
EMP	Environmental Management Plan (July 2012)
EMS	Environmental Management System
EPA	Environment Protection Authority
EPL	Environment Protection Licence
NOW	NSW Office of Water
PEL	Petroleum Exploration Licence
POP	Production Operations Plan
PPL	Petroleum Production Licence
RPGP	Rosalind Park Gas Plant
DoPI	NSW Department of Planning and Infrastructure

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 Infrastructure (DoPI).

The requirement to conduct an independent environmental audit is reflected in the conditions of a number of development approvals (**Appendix A**). The scope of this audit, as defined by the development approvals for the project, was focussed on the environmental performance of the development, including supporting systems, and compliance with relevant standards, performance measures and statutory requirements.

The audit period was 1 July 2010 to 30 June 2012 and the findings of this report reflect conditions and documentation presented from 27 August 2012 to 5 October 2012. To ensure currency, information reported externally by AGL after 5 October 2012 has been reflected in this audit report.

The key requirements of the audit, as defined in the consent conditions, and the respective audit findings, are detailed below.

“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 fourth 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;***
- (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 by Denise Corish, a Director of Treo Environment and a registered Environmental Lead Auditor with RABQSA. Ms Corish was approved as independent auditor by the Director-General on 16 August 2012. The audit was conducted in accordance with ISO 19011:2002 – Guidelines for Quality and/or Environmental Management Systems Auditing.

(c) assess the environmental performance of the development, and its effects on the surrounding environment;

For the audit period, the environmental performance of the development was generally satisfactory and in accordance with statutory requirements. Environmental control measures were typically implemented and employees demonstrated an understanding of environmental risks and controls.

There were three environmental incidents during the audit period, none of which resulted in actual or potential environmental harm.

Environmental performance may be improved by ensuring all monitoring requirements are completed in accordance with approved programs and the conditions of consent. Additional assurance would be provided through the timely completion of independent audits as required by the development consents/project approvals.

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

AGL has demonstrated substantial compliance with the relevant standards, performance measures and statutory requirements that apply to the development. Non-conformances are primarily administrative in nature and unlikely to result in actual or potential harm to the environment or human health. As detailed in item (f) below, an isolated number of non-conformances were identified which should be prioritised by AGL in responding to this audit report.

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

The EMP presents an effective framework to achieve continual improvement and legislative compliance. The extensive number of statutory requirements that apply to the project presents a significant compliance challenge which has been effectively addressed through a consolidated EMP.

Non-conformances against the conditions of consent were identified in relation to the following matters:

- Traffic Management Sub-Plan – The restriction on the movement of heavy vehicles during school pick-up and drop-off times was omitted.
- Waste Management Plan – Details of the reuse and recycling of waste water produced/collected on the site, including waste classification procedures, were not included.
- EMP – The Statements of Commitments as detailed in the environmental assessments (project approvals only) have not been specifically incorporated into the EMP.
- Revision History – The EMP was not consistently reviewed and updated annually and in response to audit findings.

It is recommended that the EMP and sub-plans be reviewed and revised to reflect the conditions of consent. An annual review process should be adopted to reflect changes in operations and the findings of independent audits.

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

The audit findings and recommendations are detailed in Section 4.0 and summarised below.

- Air monitoring – Non-conformances were identified in relation to continuous emissions monitoring, quarterly monitoring and sampling positions. It is recommended that AGL resolve the matters of non-conformance in consultation with the EPA.
- Maintenance and operation of plant and equipment – The EPA issued AGL with a Warning Letter in relation to the emission of foam and water during well workover operations at well site SL03 on 17 May 2011. The EPA determined that the degasser unit was not being operated in a proper and efficient manner. It was noted in the EPA correspondence that AGL has taken corrective actions to reduce the likelihood of a reoccurrence.
- Independent audits – On a number of occasions, independent audits were not conducted within the required frequency or submitted to the Director-General within the required timeframe. It is recommended that AGL ensures suitably qualified and approved professionals are engaged to conduct the audits in a timely manner.
- Consultation – Stakeholder consultation on the CGP was not consistently undertaken by AGL. It is recommended that AGL engage with nominated stakeholders in accordance with consent conditions.
- Land subsidence – A Subsidence Report was prepared in April 2007 by Mine Subsidence Engineering Consultants Pty Ltd. The report notes the risk of subsidence is almost negligible and hence monitoring was not conducted. If AGL is satisfied, based on expert opinion that no subsidence monitoring is required, then they should seek to modify this condition accordingly.
- Reporting – Matters of non-conformance were identified in relation to a number of reporting requirements which were administrative in nature. It is recommended that AGL establish an appropriate system to identify reporting requirements, allocate responsibility and ensure completion within the required timeframe.
- Noise management – The content of the Noise Management Plan was largely in conformance with the conditions of consent with the exception of drilling and maintenance notification requirements. Two non-conformances were also identified in relation to implementation of the noise monitoring program. It is recommended that AGL review and revise the Noise Management Plan to establish effective monitoring tools to achieve conformance.
- Water monitoring – Load limits for the nominated water pollutants are not monitored or calculated in accordance with a condition of consent. It is noted that the EPA removed this requirement from EPL 12003. It is therefore recommended that AGL seek a modification of DA 282-6-2003-1 to align with the conditions of EPL 12003.

1.0 Introduction

1.1 Background

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 Infrastructure (DoPI).

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 summarised 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:

- (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.”

The audit was conducted by Denise Corish, a Director of Treo Environment and a registered Environmental Lead Auditor with RABQSA. Ms Corish was approved as independent auditor by the Director-General on 16 August 2012.

The findings of this report reflect conditions and documentation presented during the period 27 August 2012 to 5 October 2012, including site inspections on 29 August, 6 September, 11 September, 25 September and 5 October 2012. To ensure currency, information reported externally by AGL after 5 October 2012 has been reflected in this audit report.

1.2 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 requirements detailed in Section 1.1; and thereby:

- Provide reasonable assurance of compliance against development approvals, the Environment Protection Licence and other relevant statutory requirements;
- 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.

1.3 Scope and criteria

The scope of the audit is limited to an assessment of construction and operational activities of the CGP undertaken between 1 July 2010 and 30 June 2012. The Environment Protection Licence (EPL 12003) and the following development consents/project approvals (and modifications) form 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);
- PA 06_0137 (Razorback);
- PA 06_0138 (Elizabeth Macarthur);
- PA 06-0291 (Spring Farm and Menangle Park); and
- DA 171-7-2005 (El Bethel).

Each of the above development consents/project approvals is listed in Appendix A.

A high level assessment of the environmental requirements detailed in the following approvals was also conducted:

- Petroleum Exploration Licence (PEL) No. 2;
- Petroleum Production Leases (PPL) No. 1, No. 2, No. 4, No. 5 and No. 6;
- Pipeline Licence No. 30; and
- Bore Water Licences.

1.4 Methodology

The audit was conducted in accordance with ISO 19011:2003 – Guidelines for Quality and/or Environmental Management Systems Auditing and included the following tasks:

1. Reviewed relevant reports, documents and systems.
2. Developed a compliance register based on the audit criteria and provided an assessment of compliance.
3. Conducted inspections of a sample of sites representing operations during the audit period.
4. Interviewed nominated site personnel, including:
 - Aaron Clifton (Environment Manager, Upstream Gas);
 - Tom Lawler (Environmental Operator);
 - Peter Keep (Gas Plant Operations Manager); and
 - Mike Roy (Head of Gas Operations).
5. Prepared the audit findings and recommendations.

In conducting the assessment of compliance, the definitions detailed in Table 1.1 were applied.

TABLE 1.1 AUDIT FINDING DEFINITIONS

Finding	Definition
Conformance	Adequate and appropriate evidence was sighted to demonstrate conformance with all requirements of the condition.
Conformance Improvement Opportunity	Adequate and appropriate evidence was sighted to demonstrate conformance with all requirements of the condition. Additional actions or a modified approach may lead to a performance improvement.
Non-Conformance Category 1	Evidence was inadequate or absent for the audit criteria, resulting in increased likelihood of potential harm to the environment, human health or corporate reputation. Resolution of the matter should be prioritised with immediate action taken where practicable. Examples of Category 1 matters include failure to undertake monitoring, inadequate or absent consultation with regulating agencies, or failure to conduct independent audits.
Non-Conformance Category 2	Evidence was inadequate or absent for the audit criteria, resulting in a minor control exposure that is administrative in nature. The matter is unlikely to result in actual or potential environmental, human health or reputational harm. An example of Category 2 matter would be failure to complete reporting requirements in a timely manner.
No Finding	The condition was not activated during the audit period or was closed in a previous audit period.

In the event that a condition was considered completed and closed in a previous audit, the auditor has not conducted a specific assessment.

1.5 Structure of this report

The remainder of this report is structured as follows:

- Section 2** summarises operations at the CGP and details works undertaken during the audit period;
Section 3 assesses the environmental performance of the CGP;
Section 4 summarises the audit findings and recommendations performance; and
Section 5 presents the audit conclusions.

The detailed audit findings are provided in the Appendices as follows:

Appendix A details the environmental approvals and licences that apply to the CGP;

Appendix B provides a detailed assessment of performance against consent conditions; and

Appendix C provides a detailed assessment of performance against EPL 12003.

2.0 Camden Gas Project Operations

2.1 Overview of Operations

The CGP currently consists of 144 gas wells, low-pressure underground gas gathering lines and the RPGP. Exploration activities are conducted under PEL No. 2 and gas is produced under five PPLs.

Produced gas is gathered from wells through a low pressure gathering system and transported to the RPGP for cleaning and compression. The gas is then transported by a 500 metre sales pipeline into the Moomba to Sydney Natural Gas pipeline.

Operational activities included in the CGP include:

- Gas wells: Drilling, re-drilling (as required), commissioning, initial rehabilitation, extraction of coal seam gas, collection/storage and removal of production waters, maintenance, closure and final rehabilitation.
- Gas Gathering Lines: Excavation of trenches, installation of gas gathering lines, rehabilitation, maintenance and decommissioning.
- RGP: Treatment, pressurising and odorising of gas, water treatment including oil-water separation, water storage, and gas delivery by pressurised pipeline.
- Ancillary: Administrative facilities, maintenance workshop and vehicle washbay.

2.2 Audit Period Operations

Development works and operations conducted during the audit period (1 July 2010 to 30 June 2012) are detailed in Table 2.1 below.

TABLE 2.1 OPERATIONS CONDUCTED BETWEEN 1 JULY 2010 AND 30 JUNE 2012

Approval	Locality	Works conducted during audit period
DA 15-1-2002-I	Apap, Joe Stanley, Johndilo, Loganbrae, Lipscombe and Mahon	<ul style="list-style-type: none">• Operation of selected wells and gas gathering line
DA 246-8-2002-I	Kay Park	<ul style="list-style-type: none">• Operation of selected wells and gas gathering line• Drilling and rehabilitation of KP06• Receipt of modification (20 April 2011) for the construction, drilling and operation of 2 surface to in-seam wells (KP05 and KP06)

Approval	Locality	Works conducted during audit period
DA 282-6-2003-I	RPGP, Rosalind Park, Wandinong, EMAI	<ul style="list-style-type: none"> • Operation of selected wells and gas gathering line • Operation of the RPGP • Receipt of modification (25 November 2010) for the amendment of RPGP noise monitoring requirements, air emission concentration limits and waste storage and generation volumes
DA 183-8-2004-I	Mt Taurus and Menangle Park	<ul style="list-style-type: none"> • Operation of selected wells and gas gathering line
DA 9-1-2005	Glenlee Wells	<ul style="list-style-type: none"> • Operation of selected wells and gas gathering line • Receipt of modification (16 November 2010) for amendments of Schedule 2, Condition 26
DA 75-4-2005	Sugarloaf Farm	<ul style="list-style-type: none"> • Operation of selected wells and gas gathering line
DA 171-7-2005	El Bethel	<ul style="list-style-type: none"> • No works
PA 06_0137	Razerback	<ul style="list-style-type: none"> • Operation of selected wells and gas gathering line
PA 06_0138	Elizabeth Macarthur	<ul style="list-style-type: none"> • Operation of selected wells and gas gathering lines • Rehabilitation of a holding pond at the site of EM26
PA 06-0291	Spring Farm and Menangle Park	<ul style="list-style-type: none"> • Operation of selected wells and gas gathering line • Drilling of 10 production wells (MP12, MP23, MP05A, MP01, MP02, MP03, MP09, MP10, MP11, MP22) • Initial rehabilitation of MP05A well surface location, MP03 well surface location (MP01, MP02, MP03, MP09, MP10), MP11/22 well surface location, and MP12/23 well surface location • Installation of gas gathering lines (including installation under the freeway and railway via under-boring) • Receipt of modification (7 January 2011) for the construction and operation of gas gathering lines MP06-11 and MP11-MP23, via MP19 • Receipt of modification (20 April 2012) for the construction and operation of gas gathering lines MP03-05 and MP22-SL02

3.0 Environmental Performance

3.1 Introduction

Reflecting the scope of audit, an assessment of the environmental performance of the development was undertaken. By way of background, a brief overview of the key elements that informed this assessment is provided below.

The environmental assessment provides the baseline for evaluating the environmental performance of a development. This comprehensive process identifies and evaluates the environmental risks of a proposed development. In consultation with regulatory authorities and the wider community, risks are mitigated through changes in design or control measures.

The control measures identified in the environmental assessment may be reflected by the proponent in the Statement of Commitments (Part 3A) which is often informed by public submissions. On this basis, the Consent Conditions are issued by the Director-General and relevant licences are obtained by the proponent. While there is often a high degree of commonality between the Statement of Commitments and the Consent Conditions, unique controls exist in each instrument.

Implementation of the Statement of Commitments and Consent Conditions typically occurs through an Environmental Management Plan (EMP) or Environmental Management System (EMS). Developed by the proponent, an EMS defines the framework for achieving continual improvement of environmental performance. A key focus of the EMS is on achieving conformance with legal and other requirements. The environmental compliance demonstrated by a development can provide an indicator of the strength of systems and the degree of implementation. Together with site observations, the environmental performance may be assessed.

3.2 Statement of Commitments

The CGP has been constructed and operated in accordance with 10 development consents/project approvals and numerous modifications. Each approval was prepared on the basis of an environmental assessment and where appropriate, a Statement of Commitments.

It was reported by AGL that the Statement of Commitments are not reflected in the EMS for the project. An exception was noted in relation to the project approval for Spring Farm and Menangle Park (PA 06-0291) where the Statement of Commitments was appended by the Director-General to the Conditions of Consent. In this case, the Conditions of Consent largely replicates the Statement of Commitments.

As discussed above, there is often a high degree of overlap between the Statement of Commitments and the Conditions of Consent. However, to ensure conformance with all requirements, the Statements of Commitment should be reviewed and considered in the development of the EMS.

3.3 Environmental Management System

The CGP EMS provides a framework for achieving conformance with legal and other requirements while promoting continual improvement of environmental performance. Key elements of the system are listed below:

- AGL Energy Health, Safety and Environment Policy;
- Environmental Management Plan (EMP) (AGL, July 2012);
- EMP Sub-Plans;
- Compliance register; and
- Monitoring and reporting.

Reflecting the scope of this audit, the capability of the EMP to achieve legislative requirements and drive performance improvements was evaluated.

The EMP has been developed in accordance with the environmental requirements of AGL's Life Guard HSE System and the key elements of ISO 14001. As detailed within the EMP, the control measures were identified on the basis of Consent Conditions, PPLs, the Production Operations Plan (POP), the PEL and EPL 12003.

The strengths and improvement opportunities of the EMS are detailed in the sections below.

3.3.1 Strengths

The EMS is an effective framework to achieve continual improvement and legislative compliance. The extensive number of statutory requirements that apply to the project presents a significant compliance challenge which has been effectively addressed through a consolidated EMP. The EMP and Sub-Plans enable uniform implementation of statutory requirements across the development, including consent conditions, licence requirements and legal obligations. In the event that similar controls are included in multiple development/project approvals, the most stringent requirement is reported to be adopted in the EMP.

The auditor conducted a review of the EMP against the consent conditions and noted that the controls have been largely incorporated. A limited number of gaps were identified which are largely administrative in nature (Section 3.3.2).

The Compliance Register provides an additional tool for managing compliance requirements. The register is an automated and controlled electronic system which sends a reminder email to the responsible personnel to action to key requirements. The Register is reportedly revised when an approval, licence or lease is granted or modified.

The auditor reviewed the Compliance Register and found it to be an effective tool for managing compliance requirements. In the event that requirements are not completed by the target date, there is an appropriate escalation mechanism embedded into the Register. While competing priorities may compromise the ability to meet target dates, the escalation mechanism ensures that key internal stakeholders are aware of potential non-conformances.

3.3.2 Environmental Performance Audit Findings

While the EMP provides an effective framework for achieving legislative compliance, the following non-conformances were identified:

- Traffic Management Sub-Plan – The restriction on the movement of heavy vehicles during school pick-up and drop-off times was omitted.
- Waste Management Plan – Details of the reuse and recycling of waste water produced/collected on the site, including waste classification procedures, were not included.
- EMP – The Statements of Commitments as detailed in the environmental assessments (project approvals only) have not been specifically incorporated into the EMP.
- Revision History – The EMP was not consistently reviewed and updated annually and in response to audit findings.

The following improvement opportunities were also identified during the audit:

- Objectives and Targets - The EMP details an extensive number of objectives and targets against each environmental aspect. It was reported that objectives and targets are not currently monitored or used as an environmental management tool.
- Monitoring and Measurement - The EMP details a number of tools to monitor and measure implementation including the Drilling Operations Compliance Checklist, the Gas Gathering System Construction Checklist and the Rehabilitation Checklist (among others). It was reported that the checklists were developed by Sydney Gas and have not been amended to reflect the current EMP and sub-plans.

It is recommended that the EMP and sub-plans be reviewed and revised to reflect the conditions of consent and incorporate the above improvement opportunities. An annual review process should be adopted to reflect changes in operations and the findings of independent audits.

3.4 Environmental Compliance

As detailed in the following sections, there were three environmental incidents reported during the audit period and seven environmental complaints. There were a further four matters of non-compliance against EPL 12003 as reported by AGL in July 2012 and early 2013.

3.4.1 Environmental incidents (audit period)

There were three environmental incidents reported internally and externally during the audit period. A summary of each incident is provided below:

- Foam release - On 17 May 2011, there was a release of non-toxic, non-hazardous foam into the air during routine maintenance at the Sugarloaf 3 well site. While there was no significant harm to the surrounding environment, the EPA determined that the degasser unit was not being operated in a proper and efficient manner.

- Water leak - On 13 November 2011 there was a release of produced water from Spring Farm 09 well. It was estimated that 1,000 litres of water was discharged to the well site shale pad. There was no actual or potential environmental harm resulting from the incident.
- Third party strike – A third party struck a gas gathering line in Glenlee on 30 January 2012. There were no injuries or fire and the incident was deemed to be minor by the EPA.

Reflecting records provided to the auditor, there was no actual or potential environmental harm resulting from the above incidents. The actions taken by AGL were deemed to be adequate and commensurate with the risk presented by the incident.

3.4.2 Environmental complaints (audit period)

Environmental complaints were received during the audit period in relation to road congestion, dust and noise. The auditor sighted the register of complaints and noted records to be complete and conforming with the requirements of EPL 12003. Reasonable actions were taken by AGL and matters were closed in a timely manner.

Given the scale of the development, the number of complaints is considered to be low.

3.4.3 Licence Non Compliances (reported post-audit period)

The following four matters of non-compliance against EPL 12003 were reported by AGL between July 2012 and early 2013:

- Conditions O2 and M2.1 in relation to M2.3 – The continuous emissions monitoring system (CEMS) installed on compressors 1, 2 and 3 (monitoring points 1, 2 and 3) at the RGP was not operational during the audit period. It is understood that measures are currently being undertaken to address this non-compliance.
- Condition O2 in relation to L3.4 – Due to non-compliance with Condition O2, the CEMS on compressor 1 and compressor 2 recorded exceedances of the concentration limit for Oxides of Nitrogen.
- Condition M2.4 – The selection of sampling positions for quarterly monitoring at points 1, 4 and 5 were not carried out in accordance with test method TM-1 as specified in the “Approved Methods for the Sampling and Analysis of Air Pollutants in NSW, 2000”.
- Condition R1.5 – The Annual Return for the period 22 December 2011 to 21 December 2012 was not submitted within 60 days of the end of the reporting period (i.e., by 19 February 2013).

3.5 Site Observations

As part of the audit, site inspections were undertaken on 29 August, 6 September, 11 September, 25 September and 5 October 2012. The inspections provided an opportunity to assess implementation of the EMP. Specifically, the auditor evaluated the extent and effectiveness of environmental controls and the level of employee/contractor awareness of environmental roles and responsibilities.

In general, environmental control measures were effectively implemented and employees demonstrated an understanding of environmental risks and controls.

As detailed in Section 4 and summarised below, a limited number of non-conformances and improvement opportunities were identified during the site inspections.

In addition to the RPGP, a number of additional sites were inspected to assess the project at various phases of development. Each project phase, together with the sites inspected and audit observations are detailed below.

Construction (MP25, gas gathering line)

The well site MP25 and associated gas gathering line was inspected as an example of construction works. It is noted that the construction of MP25 did not occur during the audit period; all sites constructed during the audit period were completed prior to the audit site inspections.

During the site inspection, it was noted that the site was effectively managed and environmental controls were largely implemented. An improvement opportunity was noted in relation to the implementation of the Soil and Water Management Plan and specifically the management of batters. In creating the site pad, significant cut and fill works were required. One side of the site was battered and unsealed, creating a potential risk of erosion and loss of sediment off-site.

The size of the premises was also noted as an improvement opportunity. It was observed that a number of materials were stored outside of the fenced compound including storage tanks, containers and equipment. Although there was no impact to the surrounding environment, it is recommended that all materials are stored within the fenced compound.

Maintenance (MP03, SF05/07/08/09)

Maintenance operations or workovers were inspected at two sites. Environmental controls were observed to be effectively implemented and AGL employees were aware of site-specific environmental risks.

Rehabilitation (KP06, EM26, GL04, SF17)

Rehabilitation works were inspected at a number of sites across the CGP. In general, works were effective and rehabilitation was consistent with the surrounding landform. Where relevant, rehabilitation was undertaken in consultation with key stakeholders and site-specific requirements were incorporated in the final design.

An improvement opportunity was identified in relation to gas well MP03. Rehabilitation to date was observed to be of limited success and significant areas were unsealed and eroding. It is recommended that additional landscape works be undertaken to reduce erosion and promote vegetation establishment.

Operation (EM19, LB09, LB05, LB10, LB11, KP02, GL17, SL02, SL03)

Numerous operating well sites and gas gathering lines were observed during the site inspections. The sites were noted to be clean and tidy, fully rehabilitated and the grounds were maintained. The site footprints were minimal and restricted to the fenced enclosure.

Rosalind Park Gas Plant

The RPGP was observed to be in a clean and ordered condition. Landscaping on the site and surrounds is established and provides an effective screen to the Mount Gilead Homestead. There were no environmental complaints or incidents associated with the RPGP during the audit period.

A non-conformance was identified in relation to continuous emissions monitoring and the selection of sampling positions for quarterly air monitoring. Additional details on this matter are provided in Section 4.0.

4.0 Audit Findings and Recommendations

4.1 Overview

This section summarises the findings of the audit against consent conditions, EPL 12003 and other approvals as listed in **Appendix A**. Detailed audit findings are provided in **Appendix B** and **C** of this report.

4.2 Conditions of Consent and EPL 12003

A detailed assessment was undertaken of conformance against the consent conditions and EPL 12003. It is noted that there is a high degree of commonality between each of the 10 development consents/project approvals and EPL 12003, with many conditions replicated in one or more instrument. To avoid duplication in this report, each audit finding generally reflects more than one condition. On this basis, the audit identified the following key findings, each of which is detailed in the sections that follow:

- Air monitoring;
- Maintenance and operation of plant and equipment;
- Independent audits;
- Consultation;
- Land subsidence;
- Reporting;
- Noise management; and
- Water monitoring.

4.2.1 Air Monitoring

The monitoring of air quality emissions, including oxides of nitrogen (NOX) and oxides of sulphur (SOX), is a consent condition and licence requirement for the RGP. Air emissions are generated through the compression of the coal seam gas resource.

Key requirements of DA 282-6-2003-I and EPL 12003 include the monitoring of specific pollutants from discharge points at the RGP. Monitoring must be undertaken at the defined frequency (e.g. continuous or quarterly) and the sampling positions must conform with test method TM-1 as specified in Approved Methods for the Sampling and Analysis of Air Pollutants in NSW, 2000.

The following matters of non-conformance were identified:

1. **Continuous Emissions Monitoring:** Continuous emissions monitoring of sampling points 1, 2 and 3 was not performed during the audit period. This matter was reported to the EPA on discovery by AGL management in July 2012. It is understood that measures are currently being undertaken to address this non-compliance.

2. **Quarterly Sampling:** On average, three samples were obtained from each compressor in a given year rather than the required four samples. It was reported that only two of the three compressors are operating at any given time due to limited gas availability. However, all three compressors are typically operated during the quarter.
3. **Sampling Positions:** It was reported during the audit that sampling positions were established during the design of the RPGP and compliance with test method TM-1 was not known. Further investigations have since identified that the selection of sampling positions for quarterly monitoring at points 1, 4 and 5 were not carried out in accordance with test method TM-1 as specified in the “Approved Methods for the Sampling and Analysis of Air Pollutants in NSW, 2000”.

It is recommended that AGL resolve the above matters in consultation with the EPA.

4.2.2 Maintenance and Operation of Plant and Equipment

Maintaining and operating plant and equipment in a proper and efficient manner is requirement of DA 75- 4-2005 (condition 17) and EPL 12003 (condition O2.1). The term ‘proper and efficient’ refers to a range of practices, such as:

- undertaking maintenance in accordance with defined standards, industry practice and/or manufacturers specifications;
- documenting maintenance procedures;
- training employees to ensure plant and equipment is effectively maintained; and
- inspecting and auditing maintenance works to ensure conformance.

This broad condition applies to the RPGP, gas wells and underground gas gathering lines and the high pressure supply line.

In August 2011, the EPA issued AGL with a Warning Letter in relation to the emission of foam and water during well workover operations at well site SL03 on 17 May 2011. The EPA determined that the degasser unit was not being operated in a proper and efficient manner.

It was noted in the EPA correspondence that AGL has taken corrective actions to reduce the likelihood of a reoccurrence, including equipment modifications and procedural reviews.

There are no further recommendations in relation to this matter.

4.2.3 Independent Audits

Independent audits are a key requirement of development consents and project approvals. They are conducted to provide confidence to regulators and stakeholders that the project is meeting its requirements and commitments under the consent. For this project, several audits were required for a range of components including environmental performance, assessment of visual impact, landscaping, compliance reporting, and health and safety hazards.

On a number of occasions, the independent audits were not conducted within the required frequency or submitted to the Director-General within the required timeframe. By way of example, conditions DA 282-6-2003-I, 4-95; DA 9-1-2005, 34; DA 75-4-2005, 31; PA06_0137, 4.5; PA 06_0138, 4.5; and PA 06_0291, 4.5 require an independent hazard audit to be conducted every three years. However, more than 6 years has lapsed between hazard audits and the most recent report was not finalised at the time of writing.

It is recommended that AGL ensures suitably qualified and approved professionals are engaged to conduct the audits in accordance to the required frequency. Furthermore, auditors should be engaged early enough to allow completion of the audit and submission within the required timeframe.

4.2.4 Consultation

The development consents/project approvals specify numerous consultation requirements with relevant authorities and stakeholders. The consultation process is designed to identify issues and concerns and resolve matters during both construction and operational phases of the project.

Stakeholder consultation on the CGP was not consistently undertaken by AGL in accordance to the consent requirements. Specifically, the following non-conformances were identified:

- The EMP was not prepared in consultation with nominated authorities (DA 15-1-2002-I, 15); and
- Evidence was not provided to verify consultation with the Rural Fire Service and Councils in the preparation of the Emergency Response Plan (DA 282-6-2003-I, 4.119 and DA 75-4-2005, 44).

It is recommended that AGL engage with nominated stakeholders in accordance with consent conditions.

4.2.5 Land Subsidence

The issue of land subsidence was addressed in a single development approval issued in 2002 (DA 15-1-2001-I, 74). The condition requires AGL to 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. It is noted that the PAL 1 area has been redefined and is now included in a number of Petroleum Production Leases.

The auditor sighted a Subsidence Report prepared in April 2007 by Mine Subsidence Engineering Consultants Pty Ltd. The report notes the risk of subsidence is almost negligible and hence monitoring was not conducted.

If AGL is satisfied, based on expert opinion that no subsidence monitoring is required, then they should seek to modify this condition accordingly.

4.2.6 Reporting

Reporting requirements are defined in numerous conditions of consent and are designed to inform key stakeholders of relevant or requested information. Matters of non-conformance were identified in relation to the following reporting requirements:

- Annual Environmental Performance Report (omissions to the 2010-11 report only);
- Submission of wellhead configurations to Camden Council, Campbelltown City Council and Wollondilly Shire Council;
- Submission of the EMP to the EPA and relevant Councils following Director-General approval;
- Quarterly reports to the EPA on waste transporters and waste disposal facilities (Note: This condition was removed from EPL 12003 by the EPA);
- Submission of the Well Gathering System and Trunk Line Maintenance Noise Management Protocol to the Director-General;
- Preparation of a conformance report based on the DoPI Locational Guidelines;
- Reporting of noise monitoring results to the public and Director-General (6 monthly);
- Submission of the Noise Management Sub-Plan to the Director-General; and
- Submission of the Emergency Response Plan to the Director-General.

It is recommended that AGL establish an appropriate system to identify reporting requirements, allocate responsibility and ensure submission within the required timeframe.

With respect to requirement to prepared quarterly reports on waste transports and waste disposal facilities, AGL should seek a modification of the development consent to provide consistency with EPL12003.

4.2.7 Noise Management

Noise emissions are generated during construction and specific operational phases of the CGP. The Noise Management Plan defines noise monitoring and mitigation requirements and is intended to reflect legislative requirements environmental assessments and conditions of consent.

The content of the Noise Management Plan was largely in conformance with the conditions of consent with the exception of drilling and maintenance notification requirements.

Two non-conformances were also identified in relation to implementation of the noise monitoring program. Occasional exceedences of noise limits were recorded during the construction of gas well Kay Park 06 and monitoring records of steady state production (Spring Farm and Menangle Park, PA 06_0291) were incomplete.

It is recommended that AGL review and revise the Noise Management Plan to establish effective monitoring tools to achieve conformance.

4.2.8 Water Monitoring

The CGP Stage II development consent (DA 282-6-2003-I) includes a schedule of conditions for EPA licences (Schedule 6). The Environment Protection Licence established for the development (EPL 12003) initially included all requirements of Schedule 6. Over time, EPL 12003 has been modified on a number of occasions to reflect changes to the operations. However, amendments of EPL 12003 have not been consistently reflected in DA 282-6-2003-I. As a result, DA 282-6-2003-I has retained a requirement to monitor and calculate pollutant loads for a number of water pollutants. This condition applies to the evaporation pond at the RGP.

Load limits for the nominated water pollutants are not monitored or calculated in accordance with condition 5.12 of DA 282-6-2003-I. However, it was reported by AGL that the RGP evaporation pond is lined and only used for the storage of clean produced water.

It is recommended that AGL seek a modification of DA 282-6-2003-I to align with the conditions of EPL 12003.

4.3 Other Environmental Approvals

4.3.1 Petroleum Exploration Licence and Petroleum Production Leases

The CGP is subject to the conditions of PEL No. 2 and PPL No.1, No. 2, No. 4, No. 5 and No. 6.

A review was conducted of the environmental conditions detailed in the PPLs and the Pipeline Licence and it was noted that the requirements are fully replicated within the development/project approvals. As such, a separate assessment of compliance was not conducted as part of this audit.

The conditions of the PEL were subject to an independent audit conducted in 2011 (“Audit of Petroleum Exploration Licence No. 2”, 31 October 2011, URS). As such, a detailed assessment was not conducted as part of this audit.

4.3.2 Bore Water Licences

The auditor sighted an example Bore Water Licence Certificate (10BL603867) and noted that conditions that were activated during the audit period were reflected in the “2010/11 Technical Report, Industrial Bore Licences, Dewatering Activities, Camden Gas Project, AGL Energy Ltd” submitted by AGL to the NSW Office of Water (NOW) on 24 August 2011. The report provides a summary of status against the following conditions:

- Condition 10/11 – maintain records of water quality results
- Condition 11/12 – install monitoring bores (if and when called upon to do so)
- Condition 12/13 – provide all raw monitoring data to NOW
- Condition 13/14 – provide a interpreted technical groundwater report on an annual basis
- Condition 14/15 – right to request an audit of all groundwater monitoring data collection, archiving, and QA/QC procedures
- Condition 15/16 – volumes pumped shall not exceed 30 ML in any 12 month period commencing 1 July

The 2010/11 Technical Report notes conformance against the above requirements.

A detailed assessment of conformance against Bore Water Licence requirements was not undertaken as part of this independent audit.

4.3.3 Controlled Activity Approval

It was reported by AGL that the Controlled Activity Approval was not activated during the audit period.

5.0 Conclusion

5.1 Conclusion

An independent environmental audit was conducted of the CGP for the period 1 July 2010 to 30 June 2012. The scope of the audit, as defined by the development approvals for the project, was focussed on the environmental performance of the development, including supporting systems, and compliance with relevant standards, performance measures and statutory requirements.

The key requirements of the audit, as defined in the conditions of consent, and the respective conclusions, are detailed below.

“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 fourth 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;***
- (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 by Denise Corish, a Director of Treo Environment and a registered Environmental Lead Auditor with RABQSA. Ms Corish was approved as independent auditor by the Director-General on 16 August 2012. The audit was conducted in accordance with ISO 19011:2002 – Guidelines for Quality and/or Environmental Management Systems Auditing.

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

For the audit period, the environmental performance of the development was generally satisfactory and in accordance with statutory requirements. Environmental control measures were typically implemented and employees demonstrated an understanding of environmental risks and controls.

There were three environmental incidents during the audit period, none of which resulted in actual or potential environmental harm.

Environmental performance may be improved by ensuring all monitoring requirements are completed in accordance with approved programs and the conditions of consent. Additional assurance would be provided through the timely completion of independent audits as required by the development consents/project approvals.

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

AGL has demonstrated substantial compliance with the relevant standards, performance measures and statutory requirements that apply to the development. Non-conformances are primarily administrative in nature and unlikely to result in actual or potential harm to the environment or human health. As detailed in item (f) below, an isolated number of non-conformances were identified which should be prioritised by AGL in responding to this audit report.

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

The EMP presents an effective framework to achieve continual improvement and legislative compliance. The extensive number of statutory requirements that apply to the project presents a significant compliance challenge which has been effectively addressed through a consolidated EMP.

Non-conformances against the conditions of consent were identified in relation to the following matters:

- Traffic Management Sub-Plan – The restriction on the movement of heavy vehicles during school pick-up and drop-off times was omitted.
- Waste Management Plan – Details of the reuse and recycling of waste water produced/collected on the site, including waste classification procedures, were not included.
- EMP – The Statements of Commitments as detailed in the environmental assessments (project approvals only) have not been specifically incorporated into the EMP.
- Revision History – The EMP was not consistently reviewed and updated annually and in response to audit findings.

It is recommended that the EMP and sub-plans be reviewed and revised to reflect the conditions of consent. An annual review process should be adopted to reflect changes in operations and the findings of independent audits.

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

The audit findings and recommendations are detailed in Section 4.0 and summarised below.

- Air monitoring – Non-conformances were identified in relation to continuous emissions monitoring, quarterly monitoring and sampling positions. It is recommended that AGL resolve the matters of non-conformance in consultation with the EPA.

- Maintenance and operation of plant and equipment – The EPA issued AGL with a Warning Letter in relation to the emission of foam and water during well workover operations at well site SL03 on 17 May 2011. The EPA determined that the degasser unit was not being operated in a proper and efficient manner. It was noted in the EPA correspondence that AGL has taken corrective actions to reduce the likelihood of a reoccurrence.
- Independent audits – On a number of occasions, independent audits were not conducted within the required frequency or submitted to the Director-General within the required timeframe. It is recommended that AGL ensures suitably qualified and approved professionals are engaged to conduct the audits in a timely manner.
- Consultation – Stakeholder consultation on the CGP was not consistently undertaken by AGL. It is recommended that AGL engage with nominated stakeholders in accordance with consent conditions.
- Land subsidence – A Subsidence Report was prepared in April 2007 by Mine Subsidence Engineering Consultants Pty Ltd. The report notes the risk of subsidence is almost negligible and hence monitoring was not conducted. If AGL is satisfied, based on expert opinion that no subsidence monitoring is required, then they should seek to modify this condition accordingly.
- Reporting – Matters of non-conformance were identified in relation to a number of reporting requirements which were administrative in nature. It is recommended that AGL establish an appropriate system to identify reporting requirements, allocate responsibility and ensure completion within the required timeframe.
- Noise management – The content of the Noise Management Plan was largely in conformance with the conditions of consent with the exception of drilling and maintenance notification requirements. Two non-conformances were also identified in relation to implementation of the noise monitoring program. It is recommended that AGL review and revise the Noise Management Plan to establish effective monitoring tools to achieve conformance.
- Water monitoring – Load limits for the nominated water pollutants are not monitored or calculated in accordance with a condition of consent. It is noted that the EPA removed this requirement from EPL 12003. It is therefore recommended that AGL seek a modification of DA 282-6-2003-I to align with the conditions of EPL 12003.

6.0 Limitations

Treo Environment Pty Ltd (Treo Environment) has prepared this report in accordance with the usual care and thoroughness of the consulting profession for the use of AGL Upstream Investments Pty Ltd and only those third parties who have been authorised in writing by Treo Environment to rely on the report. Treo Environment does not accept liability for the unauthorised use of the contents of this document.

This report is based on generally accepted practices and standards at the time it was prepared. No other warranty, expressed or implied, is made as to the professional advice included in this report. It is prepared in accordance with the scope of work and for the purpose outlined in the Treo Environment Proposal dated 15 August 2012.

The methodology adopted and sources of information used by Treo Environment are outlined in this report. Treo Environment has made no independent verification of the information contained in this report except as expressly stated and assumes no responsibility for any inaccuracies or omissions. No indications were found during investigations that information provided to Treo Environment was false.

This report was prepared primarily between 27 August 2012 to 5 October 2012 and is based on the conditions encountered and information reviewed at the time of preparation. Treo Environment disclaims responsibility for any changes that may have occurred after this time.

This document is provided in printed format, electronic format or both. Where an electronic only version is provided to the client, a signed hard copy of this document is held on file by Treo Environment and will be provided if requested. It is requested that the client maintains the integrity of any electronic format documents in accordance with the requirements of the Commonwealth Electronic Transactions Act (ETA) 2000.

Appendix A: Approvals

A.1 Development approvals and project approvals

Approval	Issue Date	Description	Audit Period Works	Previous Audit?
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"> • Operation of selected wells and gas gathering line. 	Yes
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"> • Operation of well. 	Yes
	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 	Yes
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 	Yes
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"> • Operation of gas gathering line. 	Yes
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"> • Operation of wells. 	Yes

Approval	Issue Date	Description	Audit Period Works	Previous Audit?
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"> Operation of KP05. 	Yes
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"> Operation of gas gathering line. 	Yes
	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"> Operation of KP05. 	Yes
	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"> Drilling and rehabilitation of KP06; and Operation of KP05 and KP06. 	No
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"> Operation of wells, gas gathering line and RPGP 	Yes
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"> N/A 	Yes
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 	Yes

Approval	Issue Date	Description	Audit Period Works	Previous Audit?
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 	Yes
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"> Operation of wells. 	Yes
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"> Operation of wells. 	Yes
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"> Operation of wells. 	Yes
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"> Use of road. 	Yes
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"> Operation of well and gas gathering lines. 	Yes
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"> Operation of well and gas gathering lines. 	Yes

Approval	Issue Date	Description	Audit Period Works	Previous Audit?
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"> • Operation of gas gathering line. 	No
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"> • Operation of gas gathering line. 	No
MOD12	25/11/2010	Modification of DA 282-6-2003-i granted for: <ul style="list-style-type: none"> • Modification of RPGP noise monitoring requirements, air emission concentration limits and waste storage and generation volumes. 	<ul style="list-style-type: none"> • N/A 	No
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"> • Operation of wells and gas gathering lines. 	Yes
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"> • Operation of well and gas gathering lines. 	Yes
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"> • Operation of gas gathering line. 	Yes
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"> • Operation of wells. 	Yes
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"> • Operation of gas gathering line. 	Yes
	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 	No

Approval	Issue Date	Description	Audit Period Works	Previous Audit?
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. 	Yes
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"> • Operation of wells. 	Yes
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 RGP. 	<ul style="list-style-type: none"> • Operation of gas gathering line. 	Yes
DA 171-7-2005 (El Bethel)	25/03/2006	Project approval granted for: <ul style="list-style-type: none"> • Construction and drilling of 10 wells (EB01-EB10); • Construction of a gas and water gathering system and access roads; • Connection of the wells to the Stage 2 Camden Gas Project – Gas Treatment Plant; and • Production of methane gas. 	<ul style="list-style-type: none"> • N/A 	Yes
PA 06_0137 (Razorback)	9/12/2006	Project approval granted for: <ul style="list-style-type: none"> • Construction and drilling of wells RB03-RB12 and gas gathering lines. 	<ul style="list-style-type: none"> • Operation of wells and gas gathering lines. 	Yes
PA 06_0138 (Elizabeth Macarthur)	9/12/2006	Project approval granted for: <ul style="list-style-type: none"> • Construction and drilling of wells EM23-36 and gas gathering lines. 	<ul style="list-style-type: none"> • Operation of wells and gas gathering lines; and • Rehabilitation of holding pond at the site of EM26. 	Yes
MOD1	6/08/2007	Modification of PA 06_0138 granted for: <ul style="list-style-type: none"> • One additional drilling well at an existing well; • Changing an approved but not yet constructed well to a directional well; • Connection of the wells to the existing gas gathering system; and • Production of coal seam methane gas. 	<ul style="list-style-type: none"> • Operation of well and gas gathering lines. 	Yes

Approval	Issue Date	Description	Audit Period Works	Previous Audit?
PA 06-0291 (Spring Farm and Menangle Park)	4/09/2008	Project Approval granted for: <ul style="list-style-type: none"> • Drilling of well surface locations SF04A, SF10, SF17, and SF20 in Spring Farm. The Proponent shall not drill well surface location SF04; • Drilling of well surface locations MP02, MP03, MP04, MP05, MP06, MP11, MP19, MP21, MP22, MP23, MP24, and MP33 in Menangle Park. 	<ul style="list-style-type: none"> • Drilled 10 production wells (MP12, MP23, MP05A, MP01, MP02, MP03, MP09, MP10, MP11, MP22). • Rehabilitated MP05A well surface location, MP03 well surface location (MP01, MP02, MP03, MP09, MP10), MP11/22 well surface location, and MP12/23 well surface location. • Installed gas gathering lines. • Post construction rehabilitation. 	Yes
	7/01/2011	Modification of PA06_0291 was granted for: <ul style="list-style-type: none"> • Construction and operation of gas gathering lines MP06-11 and MP11-MP23 (Via MP19). 	<ul style="list-style-type: none"> • Gas gathering line installed under freeway and railway by means of underboring. 	No
	20/04/2012	Modification of PA06_0291 was granted for: <ul style="list-style-type: none"> • Construction and operation of gas gathering lines MP03-05 and MP22-SL02. 	<ul style="list-style-type: none"> • N/A 	No

A.2 Other relevant approvals

Approval	Issue Date	Description	Authority
Petroleum Exploration Licence (PEL) No. 2	27 March 2006	Licence granted under Part 3 of the Petroleum (Onshore) Act 1991 to undertake exploration activities.	DTIRIS-DRE
Petroleum Production Lease (PPL) No. 1	2 September 2002	Lease granted to undertake production operations in the lease area shown in Appendix B.	DTIRIS-DRE
PPL No. 2	10 October 2002	Lease granted to undertake production operations in the lease area shown in Appendix B.	DTIRIS-DRE
PPL No. 4	6 October 2004	Lease granted to undertake production operations in the lease area shown in Appendix B.	DTIRIS-DRE
PPL No. 5	28 February 2007	Lease granted to undertake production operations in the lease area shown in Appendix B.	DTIRIS-DRE
PPL No. 6	29 May 2008	Lease granted to undertake production operations in the lease area shown in Appendix B.	DTIRIS-DRE
EPL No. 12003	September 2003	Premises including all wells, the gas gathering lines and the Rosalind Park Gas Plant.	OEH
Pipeline Licence No. 30	19 May 2004	Licence to operate a pipeline to convey Coal Seam Methane between Rosalind Park Gas Plant and the Alinta Gas Networks Natural Gas Pipeline Number 1.	DTIRIS
Bore Water Licence No: 10BL159415	9 June 2010	Industrial (water supply) bore licence, Johndilo – Lot 64, DP 785367	NOW
Bore Water Licence No: 10BL160600	24 September 2009	Industrial (water supply) bore licence, Loganbrae – Lot 6, DP 808569	NOW
Bore Water Licence Nos: 10BL603867 to 10BL603878 10BL603881 to 10BL603893 10BL603897 to 10BL603903 10BL603905 to 10BL603906 10BL603911 to 10BL603915 10BL603917 to 10BL603922 10BL603924 to 10BL603942 10BL603952 to 10BL603965 10BL603976 10BL603978 10BL603981	February 2011	Industrial (CSG dewatering) bore licences – 136 production well sites licensed as at 24 August 2011 – various locations	NOW

Approval	Issue Date	Description	Authority
10BL603989 to 10BL603994 10BL604007 to 10BL604017 10BL604031 to 10BL604045 10BL604131 10BL604582 10BL604597 10BL604582 10BL604672 to 10BL604673 10BL604888 10BL604877 10BL604876 10BL604874 10BL604881 to 10BL604883 (duplicate licences) 10BL604878 to 10BL604880 10BL604884 to 10BL604887 10BL604623 to 10BL604626			
Controlled Activity Approval (CAA) ERM2008-7878, File SRW000063	3 June 2008	Extension of temporary culvert (from 10m to 20m) in drainage line at GL17 well site (Lot 1101/ DP8893495) under DA 282-6-2003i.	NOW
Controlled Activity Approval (CAA) ERM2008-7878, File SRW000063	3 June 2008	Temporary culvert (10m) in drainage line at GL17 well site (Lot 1101/ DP8893495) under DA 282-6-2003i. Issued pursuant to the Water Management Act 2000	NOW

Appendix B: Consent Conditions

B.1 DA 15-1-2002-I (Apap, Joe Stanley, Johndilo, Loganbrae, Lipscombe and Mahon)

No.	Consent Condition	Evidence	Finding
1	<p>Obligation to minimise harm The Applicant shall implement all practicable measures to prevent or minimise any harm to the environment that may result from the construction or operation of the development.</p>	<p>An Environmental Management System has been established to manage environmental risks and achieve performance improvements. This framework consists of an Environmental Management Plan (EMP), relevant sub-plans and a Compliance Register.</p> <p>A number of tools are reported to be in place to monitor and measure implementation of the EMS including the Drilling Operations Compliance Checklist, the Gas Gathering System Construction Checklist and the Rehabilitation Checklist (among others).</p> <p>The Environmental Compliance Register (Mipela) was sighted and found to be an effective tool for monitoring compliance against project approval deliverables.</p> <p>It is noted that there were no reported environmental incidents or non-compliances during the audit period.</p>	Conformance
2	<p>Terms of Approval The Applicant shall carry out the development generally in accordance with the:</p>	<p>It was reported that the development is undertaken in accordance with the EMP and sub-plans. On receipt of an approved consent or modification, it was reported that the EMP is revised to reflect the new requirements. This was evidenced by the revision history of the document.</p>	Conformance
2(a)	DA submitted to the Department on 31 January 2002;		Conformance
2(b)	Camden Coal bed Methane Project Petroleum Production Operations – Environmental Impact Statement for the Sydney Gas Company (four volumes), dated December 2001 and prepared by Harvest Scientific Services;		Conformance
2(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;		Conformance

B.1 DA 15-1-2002-I (Apap, Joe Stanley, Johndilo, Loganbrae, Lipscombe and Mahon)

No.	Consent Condition	Evidence	Finding
2(d)	Letter from Sydney Gas Company dated 8 April 2002 to the EPA in relation to background noise level monitoring;		Conformance
2(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;		Conformance
2(f)	Letter from Sydney Gas Company dated 11 April 2002 to the EPA in relation to nitrogen dioxide impact assessment and odour issues;		Conformance
2(g)	Letter from Sydney Gas Company dated 12 April 2002 to the EPA in relation to the 3 additional wells, and maintenance activities;		Conformance
2(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;		Conformance
2(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;		Conformance
2(j)	The modification application submitted to the Department on 11 April 2006 and the accompanying document "Camden Gas Project Joint Venture Proposed Multiple Gas Well Modifications" prepared by AGL Gas Production (Camden) Pty Ltd and Sydney Gas (Camden) Operations Pty Ltd, dated April 2006; and		Conformance
2(k)	Conditions of this consent.	Refer to relevant conditions for an assessment of conformance.	No Finding
3	Period of Approval This approval is for a period of twenty one (21) years from the date of granting of the production lease.	Condition not activated during the audit period.	No Finding
4	Special Conditions of Approval 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.	No Finding
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 noted. It was reported that were no wells were drilled during the audit period.	Conformance

B.1 DA 15-1-2002-I (Apap, Joe Stanley, Johndilo, Loganbrae, Lipscombe and Mahon)

No.	Consent Condition	Evidence	Finding
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.</p> <p>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.</p> <p>In the absence of a proven reserve, the Applicant shall make a further submission to the Director-General justifying why production should continue.</p> <p>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>	The auditor sighted the Reserve Report and correspondence from AGL to the DoPI (28 November 2012) confirming submission to the regulator.	Conformance
7	<p>Further Approvals</p> <p>Nothing in this consent permits the drilling and operation of any additional wells (beyond the approved 25 wells) or a new treatment plant. These shall be the subject of another development consent or development consents.</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.	Conformance
8	<p>Redrilling and Refracting Management Plan</p> <p>For the purposes of this consent the redrilling and/or additional fracturing of a well does not constitute wellhead maintenance.</p>	<p>Condition not activated during the audit period.</p> <p>It was reported by AGL that there were no re-drilling or fracturing activities during the audit period.</p>	No Finding
9	The Applicant shall obtain the approval of the Director-General for the redrilling and/or additional fracturing of a well.	<p>Condition not activated during the audit period.</p> <p>It was reported by AGL that there were no re-drilling or fracturing activities during the audit period.</p>	No Finding
10	The Applicant shall prepare a Redrilling and Refracting Management Plan in consultation with the Department of Mineral Resources for redrilling and/or refracting of an existing well. The Plan shall be submitted to the Director-General no later than one month prior to the commencement of the work or within such period as agreed by the Director-General. The Plan shall include, but not necessarily be limited to:	<p>Condition not activated during the audit period.</p> <p>It was reported by AGL that there were no re-drilling or fracturing activities during the audit period.</p>	No Finding
10(a)	A description of all the activities to be undertaken on the well site during the redrilling and/or refracting work;	<p>Condition not activated during the audit period.</p> <p>It was reported by AGL that there were no re-drilling or fracturing activities during the audit period.</p>	No Finding
10(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;		No Finding
10(c)	Reference to the relevant parts of the Environmental Management Plan required under condition 15 of this consent;		No Finding

B.1 DA 15-1-2002-I (Apap, Joe Stanley, Johndilo, Loganbrae, Lipscombe and Mahon)

No.	Consent Condition	Evidence	Finding
10(d)	<p>Compliance with all the relevant environmental performance requirements of this consent; and arrangements for complaints handling procedures during the redrilling/refracting work.</p> <p>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>		No Finding
11	<p>Compliance</p> <p>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>	<p>The auditor sighted the EMP and noted the inclusion of legislative requirements, including reporting requirements, approvals, licenses, permits and leases.</p> <p>The Environmental Compliance Register (Mipela) was sighted and found to be an effective tool for monitoring compliance and maintaining statutory approvals. As new approvals or requirements are identified, these are added to the system. Email reminders are distributed to responsible employees and an escalation mechanism is in place.</p>	Conformance
12	<p>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>	<p>The auditor sighted the EMP (July 2012) which notes that employees and contractors must attend an induction prior to commencing operation, maintenance and construction works. In addition, job specific training is to be delivered in response to identified needs.</p> <p>The auditor sighted the site specific and role-specific induction program that is delivered to all AGL employees and contractors. The online system includes a module that is aligned with the EMP and the specific risks and controls.</p> <p>During the audit period, the following job specific training was delivered to nominated employees:</p> <ul style="list-style-type: none"> - Environmental incident management (October 2011); program and records sighted; - Water Sampling and Analysis (March 2011); program sighted; Environmental Law Update (November 2011); program and records sighted; and - Planning legislation update (October 2011); program sighted. 	Conformance

B.1 DA 15-1-2002-I (Apap, Joe Stanley, Johndilo, Loganbrae, Lipscombe and Mahon)

No.	Consent Condition	Evidence	Finding
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.	It was noted by the auditor that during the audit period, AGL has not contravened any of the environment protection legislation or other relevant legislation, or had a license suspended or revoked.	Conformance
14	PRODUCTION OPERATIONS PLAN The Applicant shall prepare a Production Operations Plan (POP) for the approval of the Department of Mineral Resources. The POP shall have regard to the conditions of this consent and the licence under the POEO Act. The POP will form the basis for the:	A non-conformance was reported against this condition in the 2008-2010 Independent Environmental Audit (24 August 2011) on the basis that the revised POP (v7) had not been approved by the relevant agency.	Conformance
14(a)	Ongoing operations and environmental management.	It was reported by AGL that meetings occurred with DTRIS (now Office of CSG) on 14 July 2011 and 5 June 2013 to discuss the revised POP (v7). The auditor sighted correspondence from the Office of CSG (8/8/2013) stating that conformance has been achieved due to the currency of the previous version (POP, v6) and submission of a revised version.	Conformance
14(b)	Ongoing monitoring of the development. A copy of the POP shall be forwarded to the Department within fourteen days of the DMR's acceptance.		Conformance
15	ENVIRONMENTAL MANAGEMENT Environmental Management Plan The Applicant shall prepare and implement an Environmental Management Plan (EMP) to provide an environmental management framework, practices and procedures to be followed during the drilling and operation of the development. The EMP shall be prepared in consultation with the relevant authorities (EPA, DMR, DLWC). The EMP shall include, but not necessarily be limited to:	The auditor sighted the Environmental Management Plan (July 2012). Although the EMP was informed by statutory conditions, it was not prepared in consultation with the nominated authorities.	Non-Conformance 1
15(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, licenses, approvals and consultations.	The auditor sighted the Environmental Management Plan (July 2012) and noted that the content complies with the requirements of this condition.	Conformance
15(b)	A description of the roles and responsibilities for all key personnel involved in the drilling and operation of the development.		Conformance
15(c)	The overall environmental policies and principles to be applied to the operation of the development.		Conformance
15(d)	Standards and performance measures to be applied to the development, and a means by which environmental performance can be periodically reviewed and improved.		Conformance
15(e)	Management policies to ensure that environmental performance goals are met and to comply with conditions of this consent.		Conformance

B.1 DA 15-1-2002-I (Apap, Joe Stanley, Johndilo, Loganbrae, Lipscombe and Mahon)

No.	Consent Condition	Evidence	Finding
15(f)	<p>Include the following detailed plans:</p> <ul style="list-style-type: none"> • Noise Management Plan; • Soil and Water Management Plan; • Water Quality Management Plan; • Traffic Management Plan; • Vegetation and Landscape Management Plan; • Waste Management Plan; and • Site Rehabilitation Management Plan 		Conformance
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.	No Finding
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.	No Finding
18	The Applicant shall review and update the EMP regularly, or as directed by the Director-General.	It was noted by the auditor that the EMP was revised in July 2012. The revision history is recorded within the document and it was noted that the previous revision occurred in October 2011.	Conformance
19	<p>Noise Management Plan</p> <p>The Applicant shall prepare and implement a Noise Management Plan for the whole site. The Plan shall include, but not necessarily be limited to:</p>	The auditor sighted the Noise Management Sub-Plan (August 2008) and noted that the Plan conforms to the requirements of this condition.	Conformance
19(a)	Identification of the potential sources of noise during drilling and operation.		Conformance
19(b)	The noise criteria for these activities.		Conformance
19(c)	Details of what actions and measures would be implemented to ensure that these operations would comply with the relevant noise criteria.		Conformance
19(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.		Conformance
19(e)	Describe what procedures would be followed to ensure compliance.		Conformance
20	<p>Soil and Water Management Plan</p> <p>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:</p>	The auditor sighted the Soil and Water Management Sub-Plan (July 2012) and noted that the Plan conforms to the requirements of this condition.	Conformance

B.1 DA 15-1-2002-I (Apap, Joe Stanley, Johndilo, Loganbrae, Lipscombe and Mahon)

No.	Consent Condition	Evidence	Finding
20(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		Conformance
20(b)	The measures to be implemented to mitigate the impacts of storm water run-off from and within the site following the completion of drilling activities.		Conformance
20(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 Storm water: Soils and Construction.		Conformance
20(d)	Consistency with the storm water management plan for the catchment, should one exist, or with the EPA's Managing Urban Storm water: Council Handbook should a storm water management plan for the catchment not exist.		Conformance
20(e)	Measures to rehabilitate erosion-affected areas and areas the subject of excavation, including tree, shrub and/or cover crop species and implementation.		Conformance
20(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.		Conformance
21	Water Quality Management Plan The Applicant shall prepare and implement a Water Quality Management Plan for the whole site. This plan shall include, but not necessarily be limited to:	The auditor sighted the Soil and Water Management Sub-Plan (July 2012) and an example Drilling and Evaluation Program (MP12, July 2011) and noted conformance with the requirements of this condition. There was no reported application of wastewater to land and as such, the water quality testing program was not warranted during the audit period. Evidence was sighted of wastewater disposal to licensed facilities.	Conformance
21(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.		Conformance
21(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.		Conformance
21(c)	Details of the well maintenance procedures to ensure the integrity of the well isolation components to prevent the cross contamination of groundwater aquifers.		Conformance
22	Traffic Management Plan The Applicant shall prepare and implement a Traffic Management Plan for the whole site. This plan shall include, but not necessarily be limited to:		The auditor sighted the Traffic Management Sub-Plan (August 2008) and noted conformance to the requirements of this condition.
22(a)	Identification of the potential traffic and transport impacts associated with the development and measures to limit traffic movements in the PAL 1 area.	Conformance	

B.1 DA 15-1-2002-I (Apap, Joe Stanley, Johndilo, Loganbrae, Lipscombe and Mahon)

No.	Consent Condition	Evidence	Finding
22(b)	Restrictions on the movement of heavy vehicles during school pick-up/drop-off times.	The auditor sighted the Traffic Management Sub-Plan (August 2008) and noted that there is not a requirement to restrict the movement of heavy vehicles during school pick-up/drop-off times.	Non-Conformance 2
22(c)	Details of traffic management measures associated with the construction of pipelines within public roads.	The auditor sighted the Traffic Management Sub-Plan (August 2008) and noted conformance to the requirements of this condition.	Conformance
22(d)	Measures to reduce the transportation of plant material and/or dirt off site.		Conformance
23	Vegetation and Landscape Management Plan The Applicant shall prepare and implement a Vegetation and Landscape Management Plan for the whole site. This plan shall include, but not necessarily be limited to:	The auditor sighted the Flora and Fauna Sub-Plan (August 2008) and the Rehabilitation and Landscape Management Sub-Plan (July 2012) and noted conformance with the requirements of this condition. It was noted that there were no landscaping works undertaken under this approval during the audit period.	Conformance
23(a)	Measures to protect mature trees as part of the well drilling or gas gathering pipeline construction activities.		Conformance
23(b)	Details of all landscaping to be undertaken on the site.		Conformance
23(c)	Ensure that tree and shrub species used for landscaping of the site are indigenous to the locality.		Conformance
23(d)	Details of a program to ensure that all landscaped areas are maintained in a tidy, healthy state.		Conformance
24	Waste Management Plan The Applicant shall prepare and implement a Waste Management Plan for the whole site. This plan shall include, but not necessarily be limited to: Details of the reuse and recycling of waste water produced/collected on the site, including collection and handling procedures.	The auditor sighted the Waste Management Sub-Plan (August 2008) and noted conformance with the requirements of this condition.	Conformance
24(a)	Measures to minimise the production and impact of waste produced at the site during drilling and operation.	The auditor sighted the Waste Management Sub-Plan (August 2008) and noted conformance with the requirements of this condition.	Conformance
24(b)	Implementation of waste reduction, reuse and recycling principles.	The auditor sighted the Waste Management Sub-Plan (August 2008) and noted conformance with the requirements of this condition.	Conformance
24(c)	Details of the reuse and recycling of waste water produced/collected on the site, including collection and handling procedures.	The auditor sighted the Waste Management Sub-Plan (August 2008) and noted that details of the reuse and recycling of wastewater produced on site, including collection and handling procedures, were not provided. It was reported by site personnel that produced water is reused in drilling works and workovers at other sites within the Camden Gas Project (CGP). The reuse process is guided by supply and demand. The produced water is reportedly analysed in-house and the level of suspended (coal fines) solids are assessed to determine if water is suitable for reuse.	Non-Conformance 2

B.1 DA 15-1-2002-I (Apap, Joe Stanley, Johndilo, Loganbrae, Lipscombe and Mahon)

No.	Consent Condition	Evidence	Finding
24(d)	Details of appropriate disposal methods in the event that reuse and recycling are not available or are not practicable.	The auditor sighted the Waste Management Sub-Plan (August 2008) and noted conformance with the requirements of this condition.	Conformance
24(e)	Programs for involving and encouraging employees and contractors to minimise domestic waste production on the site and reuse/recycle where appropriate.	The auditor sighted the Waste Management Sub-Plan (August 2008) and noted conformance with the requirements of this condition.	Conformance
25	Site Rehabilitation Management Plan The Applicant shall prepare and implement a Site Rehabilitation Management Plan for the whole site. This plan shall include, but not necessarily be limited to:	The auditor sighted the Rehabilitation and Landscape Management Sub-Plan (July 2012) and noted conformance with the requirements of this condition. It was reported that there were no rehabilitation works undertaken under this approval during the audit period.	Conformance
25(a)	Details of the staging and timing for rehabilitation works.		Conformance
25(b)	Ongoing management strategies to ensure the success of rehabilitation works.		Conformance
25(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.		Conformance
25(d)	The measures to remediate sites following the decommissioning of the wells, pipelines and treatment plant.		Conformance
26	PERFORMANCE REPORTING Condition Report 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.	No Finding
27	Incident Reporting The Applicant shall notify the EPA, DMR and the Director-General of any incident with significant off-site impacts on people or the biosphere environment as soon as practicable after the occurrence of the incident. The Applicant shall provide written details of the incident to the Director-General, the EPA, DMR, Wollondilly Council and Camden Council within seven days of the date on which the incident occurred.	The auditor sighted the Emergency Response Plan (October 2008) and noted conformance with the requirements of this condition. There were no reported environmental incidents associated with this development consent during the audit period.	Conformance

B.1 DA 15-1-2002-I (Apap, Joe Stanley, Johndilo, Loganbrae, Lipscombe and Mahon)

No.	Consent Condition	Evidence	Finding
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.	There were no reported environmental incidents associated with this development consent during the audit period.	Conformance
29	Complaints Register The Applicant shall record details of all complaints received in an up-to-date Complaints Register. The Register shall record, but not necessarily be limited to:	The 2007-2012 Complaints Register for the CGP was sighted by the auditor and noted to comply with this condition.	Conformance
29(a)	The date and time, where relevant of the complaint.		Conformance
29(b)	The means by which the complaint was made.		Conformance
29(c)	Any personal details of the complainant that were provided, or if no details were provided, a note to that effect.		Conformance
29(d)	The nature of the complaints.		Conformance
29(e)	Any action(s) taken by the Applicant in relation to the complaint, including any follow-up contact with the complainant.		Conformance
29(f)	If no action was taken by the Applicant in relation to the complaint, the reason(s) why no action was taken. The Complaints Register shall be made available for inspection by the EPA or the Director-General upon request. The Applicant shall also make summaries of the register, without details of the complainants, available for public inspection.		Conformance
30	Risk Assessment Within six months from the date of this consent, the Applicant shall submit a compliance report to the Director-General confirming that the recommendations (1 to 17) made in the Quantified Risk Assessment dated September 2000 by McCracken Consulting have been satisfactorily implemented. Where a recommendation has not been implemented or completed, justification must be provided in the compliance report.	Condition closed in a previous audit.	No Finding
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.	It was reported in a Sydney Gas Project Commitments Register that the compliance reports were completed and approved by the Director-General between 29 March 2004 and 9 August 2004. This condition is now closed.	Conformance

B.1 DA 15-1-2002-I (Apap, Joe Stanley, Johndilo, Loganbrae, Lipscombe and Mahon)

No.	Consent Condition	Evidence	Finding
32	Within six months from the date of this consent, the Applicant shall submit for approval by the Director-General, a document setting out a comprehensive Safety Management System, covering all operations on site and associated transport activities involving hazardous materials. The document shall clearly specify all safety related procedures, responsibilities and policies, along with details of mechanisms for ensuring adherence to procedures. Records shall be kept on site and shall be available for inspection by the Director-General on request. The Safety Management System shall be developed in accordance with the Department of Urban Affairs and Planning's Hazardous Industry Planning Advisory Paper No. 9 "Guidelines for the Development of Safety Management Systems".	<p>The auditor sighted the Health and Safety Management Plan, Camden Project NSW (3 August 2011) and noted conformance with the requirements of this condition.</p> <p>This condition was reported as closed in the previous audit. Given that there has been no further development during the audit period, a finding of conformance has been adopted.</p>	Conformance
33	<p>EPA Annual Return</p> <p>The applicant shall provide an Annual Return to the EPA in relation to the development as required by any license 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 license 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.</p>	The auditor sighted the December 2010 and December 2011 Annual Returns and noted conformance against this condition. It was reported that there were no monitoring requirements in relation to this development approval during the audit period.	Conformance
34	<p>Annual Environmental Performance Reporting</p> <p>Within twelve months of the date of this consent, and annually thereafter during the life of the development, the Applicant shall submit an Annual Environmental Performance Report to the Director-General. This report shall include, but not be limited to:</p>	The auditor sighted the Annual Environmental Performance Reports for July 2011 and July 2012 and noted conformance with the requirements of this condition.	Conformance
34(a)	The standards, performance measures and statutory requirements the development is required to comply with.		Conformance
34(b)	An assessment of the environmental performance of the development to determine whether it is complying with these standards, performance measures, and statutory requirements.		Conformance
34(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.		Conformance

B.1 DA 15-1-2002-I (Apap, Joe Stanley, Johndilo, Loganbrae, Lipscombe and Mahon)

No.	Consent Condition	Evidence	Finding
34(d)	Indication of what actions were taken to address any issue and/or recommendation raised by the Community Consultative Committee.	It was noted that the July 2011 report does not detail the actions taken to address any issues and/or recommendations raised by the Community Consultative Committee. The July 2011 report only notes that all issues were closed. This issue was rectified in the July 2012 report.	Non-Conformance 2
34(e)	Provision of the detailed results of all the monitoring required by this consent.	The auditor sighted the Annual Environmental Performance Reports for July 2011 and July 2012 and noted conformance with the requirements of this condition.	Conformance
34(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.		Conformance
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.	There were no matters identified by the Director-General during the audit period.	Conformance
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 AEPR to relevant authorities and verified that the AEPR is publicly available via the AGL Camden website.	Conformance
37	Independent Environmental Audit Within two years of the date of this consent and every two years thereafter, unless the Director-General directs otherwise, the Applicant shall commission and pay the full costs of an Independent Environmental Audit. The Independent Environmental Audit shall:	The scope of this 2010-2012 Independent Environmental Audit satisfies the requirements of this condition.	Conformance
37(a)	Be conducted by a suitably qualified, experienced, and independent person(s) whose appointment has been approved by the Director-General.		Conformance
37(b)	Be consistent with ISO 14010 – Guidelines and General Principles for Environmental Auditing, and ISO 14011 – Procedures for Environmental Auditing, or updated versions of these guidelines/manuals.		Conformance
37(c)	Assess the environmental performance of the development, and its effects on the surrounding environment.		Conformance
37(d)	Assess whether the development is complying with the relevant standards, performance measures, and statutory requirements.		Conformance
37(e)	Review the adequacy of the Applicant’s Environmental Management Plan.		Conformance

B.1 DA 15-1-2002-I (Apap, Joe Stanley, Johndilo, Loganbrae, Lipscombe and Mahon)

No.	Consent Condition	Evidence	Finding																				
37(f)	Recommend measures or actions to improve the environmental performance of the development, and/or its environmental management and monitoring systems. Within two months of commissioning the audit, the Applicant must submit a copy of the audit report to the Director-General and the EPA and the DMR. The Director-General may require the Applicant to address certain matters identified in the report and any comments received from the EPA and DMR. Any action required to be undertaken shall be completed within such period as the Director-General may agree.	<p>The 2010-2012 Independent Environmental Audit report was not submitted to the Director-General, EPA and DTIRIS within two months of commissioning.</p> <p>It was reported by AGL that an extension was sought from the DoPI on the basis that the audit criteria has increased significantly since the establishment of this development consent.</p>	Non-Conformance 2																				
38	<p>ENVIRONMENTAL PERFORMANCE</p> <p>Noise Limits</p> <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_{AEQ15min}</th> <th>Evening L_{AEQ15min}</th> <th>Night L_{AEQ15min}</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 _{AEQ15min}	Evening L _{AEQ15min}	Night L _{AEQ15min}	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	Condition closed in a previous audit.	No Finding
Location (identified in Fig. 10.1 of the EIS)	Day L _{AEQ15min}	Evening L _{AEQ15min}	Night L _{AEQ15min}																				
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	For the purposes of assessment of noise levels specified in this consent, noise from the development shall be:	Condition closed in a previous audit.	No Finding																				
39(a)	Measured at the most affected point on or within the residential boundary or, where the dwelling is more than 30m from the boundary, at the most affected point within 30m of the dwelling to determine compliance with the LAEQ15min, LAEQ day, LAEQ evening and LAEQ night noise limits.		No Finding																				
39(b)	Subject to the modification factors provided in Section 4 of the NSW Industrial Noise Policy.		No Finding																				
39(c)	Measured using the “FAST” response on the sound level meter.		No Finding																				

B.1 DA 15-1-2002-I (Apap, Joe Stanley, Johndilo, Loganbrae, Lipscombe and Mahon)

No.	Consent Condition	Evidence	Finding
40	Notwithstanding condition 39 of this consent, should direct measurement of noise from the site be impractical, the Applicant may employ an alternative noise assessment method deemed acceptable by the EPA (refer to Chapter 11 of the NSW Industrial Noise Policy). Details of such an alternative noise assessment method accepted by the EPA shall be submitted to the Director-General prior to the implementation of the assessment method.	Condition closed in a previous audit.	No Finding
41	All noise limits specified as part of this consent apply under: (a) wind speeds up to 3m/s at 10 metres above ground level; and (b) temperature inversion conditions of up to 30C/100m.	Condition closed in a previous audit.	No Finding
42	Noise – Well Maintenance The Applicant shall apply all feasible and reasonable noise mitigation measures to planned well maintenance activities in order to achieve the noise limits specified by this consent. Where the noise limits are not achievable the Applicant shall implement management practices as necessary to minimise the potential noise impacts. These management practices are to include, but not be limited to:	The auditor sighted the Noise Management Sub-Plan (August 2008) and noted conformance with the requirements of this condition. It was reported that there were no maintenance works undertaken during the audit period.	Conformance
42(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.		Conformance
42(b)	Documenting and implementing any specific work practices the Applicant will employ to limit noise.		Conformance
42(c)	Documenting the feasible and reasonable noise mitigation measures that will be undertaken to reduce noise impacts from planned well maintenance activities.		Conformance
42(d)	Conducting noise monitoring where appropriate.		Conformance
43	Noise – Drilling Impacts The Applicant shall implement management practices as necessary to minimise the potential noise impacts from drilling work at wells LB-1, LB-2 and LB-3. These management practices are to include, but not be limited to:	The auditor sighted the Noise Management Sub-Plan (August 2008) and noted conformance with the requirements of this condition. It was reported that there were no drilling works undertaken during the audit period.	Conformance
43(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.		Conformance
43(b)	Predicting potential noise levels from the proposed well drilling methods where appropriate.		Conformance
43(c)	Identifying and implementing all reasonable and feasible noise mitigation measures to reduce any drilling noise impacts.		Conformance

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No.	Consent Condition	Evidence	Finding
43(d)	Documenting and implementing any specific work practices the Applicant will employ to limit noise; conducting noise monitoring where appropriate.		Conformance
43(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.		Conformance
44	<p>Hours of Operation</p> <p>All site preparation works and construction activities and specifically those works involving the drilling of wells LB-1, LB-2 and LB-3, except where the Applicant has reached an agreement with all potentially affected residences and other noise sensitive receivers to conduct drilling works outside these hours, shall be restricted to the following times:</p>	The auditor sighted the Noise Management Sub-Plan (August 2008) and noted conformance with the requirements of this condition. It was reported that there were no drilling works undertaken during the audit period.	Conformance
44(a)	From 7.00am to 6.00pm, Monday to Friday inclusive.		Conformance
44(b)	From 8.00am to 1.00pm on Saturdays.		Conformance
44(c)	At no time on Sunday or a public holiday.		Conformance
45	Notwithstanding condition 44 of this consent, the specified hours of operation also apply to:		The auditor sighted the Noise Management Sub-Plan (August 2008) and noted conformance with the requirements of this condition. It was reported that there were no planned maintenance works undertaken during the audit period.
45(a)	Planned maintenance activities at any of the wells.	Conformance	
45(b)	Planned deliveries to the treatment plant.	Conformance	
45(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.	Conformance	
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.	No Finding
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 activated during the audit period.	No Finding

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No.	Consent Condition	Evidence	Finding
48	Ray Beddoe Treatment Plant –Reduction of Noise The Applicant shall prepare and submit to the Department and the EPA a Pollution Reduction Program (PRP) for noise designed to meet the following levels at receiver Locations A to M (identified in Fig. 10.1 of the EIS):	Condition closed in a previous audit.	No Finding
48(a)	An LAEQ15min level of 37 dB(A) for the day time period.		No Finding
48(b)	An LAEQ15min level of 37 dB(A) for the evening period.		No Finding
48(c)	An LAEQ15min level of 35 dB(A) for the night time period. These levels are to apply at the most affected point on or within the residential boundary of each nominated receiver or, where the dwelling is more than 30m from the boundary, at the most affected point within 30m of the dwelling.		No Finding
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.	No Finding
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.	No Finding
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.	No Finding
52	Odour Under the Protection of Environment Operations Act 1997, the Applicant shall not cause or permit any offensive odours to be emitted from the site. For the purposes of this condition, “offensive odour” has the same meaning as provided for by the Protection of the Environment Operations Act 1997.	Condition closed in a previous audit.	No Finding
53	Water Quality Impacts Except as may be expressly provided for by a license 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.	The auditor sighted the EMP for the CGP, including the Soil and Water Management Sub-Plan (July 2012) and the Waste Management Sub-Plan (August 2008). The plans detail a number of controls to prevent the pollution of water.	Conformance

B.1 DA 15-1-2002-I (Apap, Joe Stanley, Johndilo, Loganbrae, Lipscombe and Mahon)

No.	Consent Condition	Evidence	Finding
54	Waste Water Waste water from the construction, installation and operation of wells and associated infrastructure shall only be applied to the following areas:	It was reported that wastewater from the construction, installation and operation of wells is either disposed to a licensed waste transfer facility or reused during drilling and workover activities. Reinjection of wastewater (produced water) is not proposed and as such this condition was not activated during the audit period.	No Finding
54(a)	Dust suppression on any unsealed roads within PAL 1.		No Finding
54(b)	Irrigated onto pastures within PAL 1.		No Finding
54(c)	Evaporation dam.		No Finding
54(d)	Reinjection into gas wells. The Applicant shall prepare a detailed feasibility study of reinjection of waste water into a gas well if this method of disposal of waste water is proposed. The approval of the Director-General shall be obtained for reinjection of waste water into a gas well.		No Finding
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.	No Finding
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.	No Finding
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 not activated during the audit period. It was reported that waste water from the construction, installation and operation of wells is either disposed to a licensed waste transfer facility or reused for workover or drilling of gas wells within the CGP.	No Finding
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.	It was noted by the auditor that a number of dust mitigation measures are detailed in the Air Quality Management Sub-Plan (August 2008). There were no dust complaints raised during the audit period in relation to this condition.	Conformance
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.	It was noted by the auditor that a number of dust mitigation measures are detailed in the Air Quality Management Sub-Plan (August 2008). There were no dust complaints raised during the audit period in relation to this consent.	Conformance

B.1 DA 15-1-2002-I (Apap, Joe Stanley, Johndilo, Loganbrae, Lipscombe and Mahon)

No.	Consent Condition	Evidence	Finding
60	The Applicant shall take all practicable measures to minimise the generation of wind-blown dust from soil stockpiles.	The Soil and Water Management Sub-Plan (July 2012) requires stockpiles to be vegetated if they are to be stored on site for a long period of time. It was reported that topsoil stockpiles tend to naturally vegetate through the seed bank. Water carts are also employed to minimise the generation of wind-blown dust.	Conformance
61	Waste The Applicant shall not cause, permit or allow any waste generated outside the site to be received at the site for storage, treatment, processing, reprocessing or disposal or any waste generated at the site, to be disposed of at the site, except as expressly permitted by a license under the Protection of the Environment Operations Act 1997. This condition only applies to the storage, treatment, processing, reprocessing or disposal of waste at the site, if it requires a license under the Protection of the Environment Operations Act 1997.	The auditor sighted the AGL Environmental Footprint spread sheet for the financial years 2010/11 and 2011/12. These spread sheets provide a detailed record of waste streams generated, recycled/reused and disposed, including concrete and steel, water, hazardous waste, non-hazardous waste, and ozone-depleting substances. It was reported that there was no waste received at the premises.	Conformance
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.	It was reported that wastewater from the construction, installation and operation of wells is either disposed to a licensed waste transfer facility or reused during drilling and workover activities. Reinjection of wastewater (produced water) is not proposed and as such this condition was not activated during the audit period.	No Finding
63	Lighting The Applicant shall ensure that all external lighting associated with the development is mounted, screened and directed in such a manner so as to not create a nuisance to surrounding land uses. The lighting must be the minimum level of illumination necessary, and in general accordance with the Australian Standard 4282 – 1997 Control of the Obtrusive Effects of Outdoor Lighting.	Condition closed in a previous audit.	No Finding
64	Gas Flare The gas flare located at the treatment plant shall be ground-level (i.e.. Less than 6.1 metres in height), shrouded, provided with automatic combustion air control, automatic shut-off gas valve and automatic restart system.	Condition closed in a previous audit.	No Finding
65	Activated Carbon Filter The activated carbon filter on the odour control system shall be replaced prior to breakthrough occurring.	Condition closed in a previous audit.	No Finding
66	Steel Pipeline The 200 mm steel pipeline shall not be operated above a pressure of 1.05 MPa.	Condition closed in a previous audit.	No Finding

B.1 DA 15-1-2002-I (Apap, Joe Stanley, Johndilo, Loganbrae, Lipscombe and Mahon)

No.	Consent Condition	Evidence	Finding
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.	No Finding
67(a)	A Final Hazard Analysis of the proposal including the entire steel pipeline and those sections of the plant where the operating pressure will be increased. The analysis shall be prepared in accordance with the Department of Urban Affairs and Planning's Hazardous Industry Planning Advisory Paper No. 6 "Guidelines for Hazard Analysis". The existing land use and compliance with NSW criteria shall be clearly demonstrated. Where further risk reduction could be required as a result of changes in land use, additional risk reduction measures shall be outlined.		No Finding
67(b)	A Hazard and Operability Study for the proposal, chaired by an independent qualified person approved by the Director-General prior to the commencement of the study. The study shall be carried out in accordance with the Department of Urban Affairs and Planning's Hazardous Industry Planning Advisory Paper No. 8 "Hazard and Operability Studies".		No Finding
68	Gas Gathering System Pipeline The Applicant shall comply with the following in the construction of the gas gathering system pipeline:	The auditor sighted the EMP and noted that the requirements of this condition are largely incorporated.	No Finding
68(a)	Excavated trenches shall not be left uncovered overnight, unless adequate fencing and warning lights are erected.	There was no gas gathering line constructed during the audit period and as such, this condition was not activated.	No Finding
68(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.		No Finding
68(c)	Trenches are to be restored and reseeded with local grass seeds on completion of the work.		No Finding
68(d)	Local council traffic guidelines in respect of work carried out on road verges and underneath roads shall be implemented.		No Finding
68(e)	The pipeline shall be constructed in accordance with the AS 3723-1989.		No Finding
68(f)	The Department shall be notified on the completion of any trenching works.		No Finding
69	LPG Storage 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.	No Finding

B.1 DA 15-1-2002-I (Apap, Joe Stanley, Johndilo, Loganbrae, Lipscombe and Mahon)

No.	Consent Condition	Evidence	Finding
70	<p>Indigenous Heritage</p> <p>Prior to the commencement of site preparation works for the three (3) additional wellheads and the associated gas gathering system, the Applicant shall clearly indicate the locations of known aboriginal relics on the site, and ensure that all employees and contractors are aware of these locations, to prevent the known relics being impacted upon during site preparation and construction.</p>	Condition closed in a previous audit.	No Finding
71	<p>Cultural Heritage</p> <p>If, during the site preparation and/or drilling phases of the development, an unexpected archaeological relic is uncovered, excavation shall cease and an excavation permit under the Heritage Act 1977, shall be obtained from the NSW Heritage Office.</p>	Condition closed in a previous audit.	No Finding
72	<p>Site Rehabilitation</p> <p>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>	It was reported that there were no rehabilitation works undertaken during the audit period.	No Finding
73	The Applicant shall carry out rehabilitation of the site in accordance with the requirements of the DMR and the Site Rehabilitation Management Plan.	It was reported that there were no rehabilitation works undertaken during the audit period.	No Finding
74	<p>ENVIRONMENTAL MONITORING</p> <p>Land Subsidence</p> <p>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.</p>	<p>No subsidence monitoring was performed and no monitoring program has been prepared.</p> <p>The auditor sighted a Subsidence Report prepared in April 2007 by Mine Subsidence Engineering Consultants Pty Ltd. The report notes the risk of subsidence is almost negligible and hence monitoring was not conducted.</p> <p>If AGL is satisfied, based on expert opinion that no subsidence monitoring is required, then they should seek to modify this condition accordingly.</p>	Non Conformance 1
75	<p>Vibration Impacts</p> <p>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 Coal bed Methane Project Geotechnical Impact Assessment" and dated 5 December 2001. The results of the monitoring shall be submitted to the Director-General.</p>	It was reported that there were no drilling works undertaken during the audit period.	No Finding

B.1 DA 15-1-2002-I (Apap, Joe Stanley, Johndilo, Loganbrae, Lipscombe and Mahon)

No.	Consent Condition	Evidence	Finding																				
76	<p>Air Emissions 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"> <thead> <tr> <th>Discharge Monitoring Point Identification Number</th> <th>Type of Monitoring Point</th> <th>Type of Discharge</th> <th>Description of Location</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Air emissions monitoring</td> <td>Discharge to air</td> <td>TEG reboiler exhaust <i>(located on the dehydrator unit as shown in Fig. 3.9 of the EIS)</i></td> </tr> <tr> <td>2</td> <td>Air emissions monitoring</td> <td>Discharge to air</td> <td>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>3</td> <td>Air emissions monitoring</td> <td>Air</td> <td>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>4</td> <td>Air emissions monitoring</td> <td>Discharge to air</td> <td>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.	No Finding
Discharge Monitoring Point Identification Number	Type of Monitoring Point	Type of Discharge	Description of Location																				
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B.1 DA 15-1-2002-I (Apap, Joe Stanley, Johndilo, Loganbrae, Lipscombe and Mahon)

No.	Consent Condition	Evidence	Finding																
77	<p>Load Limits</p> <p>The Applicant will be required to pay load based licensing fees once a license under the POEO Act has been issued. The license 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	Condition closed in a previous audit.	No Finding
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78	<p>Testing Method – Load Limits</p> <p>Clause 17(1) and (2) of the Protection of the Environment Operations (General) Regulation 1998 requires that monitoring of actual loads of assessable pollutants listed in Table 3 of condition 78 of this consent shall be carried out in accordance with the testing method set out in the relevant load calculation protocol for the fee-based activity classification.</p>	Condition closed in a previous audit.	No Finding																

B.1 DA 15-1-2002-I (Apap, Joe Stanley, Johndilo, Loganbrae, Lipscombe and Mahon)

No.	Consent Condition	Evidence	Finding												
79	<p>Concentration Limits</p> <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	Condition closed in a previous audit.	No Finding
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80	<p>Destruction Efficiency</p> <p>The Applicant shall ensure that each parameter listed in Table 5 below are equal to or greater than the lower limits specified for that parameter at discharge monitoring point</p> <p>Table 5 – Discharge Monitoring Point 1: Destruction Efficiency</p> <table border="1"> <thead> <tr> <th>Parameter</th> <th>Units of measure</th> <th>Lower limit</th> <th>Reference conditions</th> </tr> </thead> <tbody> <tr> <td>Volatile organic compound (VOC) destruction efficiency</td> <td>%</td> <td>98</td> <td>N/A</td> </tr> </tbody> </table>	Parameter	Units of measure	Lower limit	Reference conditions	Volatile organic compound (VOC) destruction efficiency	%	98	N/A	Condition closed in a previous audit.	No Finding				
Parameter	Units of measure	Lower limit	Reference conditions												
Volatile organic compound (VOC) destruction efficiency	%	98	N/A												
81	<p>Combustion Parameters</p> <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	Condition closed in a previous audit.	No Finding
Parameter	Units of measure	Lower limit	Averaging period												
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Temperature	°C	760	Instantaneous												

B.1 DA 15-1-2002-I (Apap, Joe Stanley, Johndilo, Loganbrae, Lipscombe and Mahon)

No.	Consent Condition	Evidence	Finding															
82	<p>Site Specific Emission Concentration Limit</p> <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 license.</p>	Condition closed in a previous audit.	No Finding															
83	<p>The emission concentration limits shall be developed in accordance with the Approved Methods and Guidance for the Modeling and Assessment of Air Pollutants in NSW and utilise the ground-level concentration criteria specified in Table 7 below.</p> <p>Table 7 – Site Specific Emission Concentration Limit</p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Design Ground-Level Concentration Criteria (ug/m³)</th> <th>Averaging Time</th> <th>Percentile</th> </tr> </thead> <tbody> <tr> <td>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	Condition closed in a previous audit.	No Finding
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Sulfur dioxide	712	10 minutes	100															
	570	1 hour	100															
84	<p>Monitoring Records</p> <p>The Applicant shall record and retain the details of any monitoring required as a condition of this consent or a license under the POEO Act, in relation to the development or in order to comply with the load calculation protocol.</p>	Condition closed in a previous audit.	No Finding															
85	The monitoring required under this consent for the concentration of a pollutant emitted to the air, shall be carried out in accordance with:	Condition closed in a previous audit.	No Finding															
85(a)	Any methodology which is required under the POEO Act to be used for the testing of the concentration of the pollutant		No Finding															
85(b)	If no such requirement is imposed by or under the POEO Act or by the consent or a condition of the license or the protocol (as the case may be) requires to be used for that testing		No Finding															
85(c)	If no such requirement is imposed by or under the POEO Act or by the consent or a condition of the license 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.		No Finding															

B.1 DA 15-1-2002-I (Apap, Joe Stanley, Johndilo, Loganbrae, Lipscombe and Mahon)

No.	Consent Condition	Evidence	Finding
86	All records required to be kept by the license shall be:	Monitoring records prepared during the audit period were sighted by the auditor and found to be in conformance with this condition.	Conformance
86(a)	In a legible form, or in a form that can readily be reduced to a legible form.		Conformance
86(b)	Kept for at least four years after the monitoring or event to which they relate took place.		Conformance
86(c)	Produced in a legible form to any authorised officer of the EPA who asks to see them.		Conformance
87	The following records shall be kept in respect of any samples required to be collected:	Monitoring records prepared during the audit period were sighted by the auditor and found to be in conformance with this condition.	Conformance
87(a)	The date(s) on which the sample was taken.		Conformance
87(b)	The time(s) at which the sample was taken.		Conformance
87(c)	The point at which the sample was taken.		Conformance
87(d)	The name of the person who collected the sample.		Conformance

B.1 DA 15-1-2002-I (Apap, Joe Stanley, Johndilo, Loganbrae, Lipscombe and Mahon)

No.	Consent Condition	Evidence	Finding																																																																																			
88	<p>Requirement to Monitor Concentrations of Pollutants Discharged</p> <p>The Applicant shall determine the relevant pollutant concentrations and emission parameters specified in Table 8 below, at the discharge monitoring points indicated and employing the sampling and analysis method specified. All relevant pollutant concentrations and emission parameters for each discharge monitoring point shall be determined concurrently and at the frequency specified in the table. The discharge monitoring points are specified in condition 76 of this consent.</p> <p>Table 8 – Discharge Monitoring Point Pollutant and Parameter Monitoring</p> <p>Note1 : Units of measure, frequency and sampling method to be approved by the EPA in writing.</p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Discharge Monitoring Point</th> <th>Unit of Measure</th> <th>Frequency</th> <th>Sampling Method</th> </tr> </thead> <tbody> <tr> <td>carbon dioxide in stack gases</td> <td>1 and 3</td> <td>%</td> <td>Annual</td> <td>TM-24</td> </tr> <tr> <td>carbon monoxide</td> <td>1</td> <td>ppm</td> <td>Annual</td> <td>OM-1</td> </tr> <tr> <td>dry gas density</td> <td>1 and 3</td> <td>kg/m³</td> <td>Annual</td> <td>TM-23</td> </tr> <tr> <td>moisture content in stack gases</td> <td>1 and 3</td> <td>%</td> <td>Annual</td> <td>TM-22</td> </tr> <tr> <td>molecular weight of stack gases</td> <td>1 and 3</td> <td>g/gmole</td> <td>Annual</td> <td>TM-23</td> </tr> <tr> <td>nitrogen oxides</td> <td>1</td> <td>g/m³</td> <td>Annual</td> <td>TM-11</td> </tr> <tr> <td>oxygen in stack gases</td> <td>1 and 3</td> <td>%</td> <td>Annual</td> <td>TM-25</td> </tr> <tr> <td>sulfur dioxide</td> <td>1</td> <td>g/m³</td> <td>Annual</td> <td>TM-4</td> </tr> <tr> <td>sulfuric acid mist and/or sulfur trioxide</td> <td>1</td> <td>g/m³</td> <td>Annual</td> <td>TM-3</td> </tr> <tr> <td 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	Condition closed in a previous audit.	No Finding
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89	The selection of sampling positions is to be carried out in accordance with test method TM-1.	Condition closed in a previous audit.	No Finding																																																																																			

B.1 DA 15-1-2002-I (Apap, Joe Stanley, Johndilo, Loganbrae, Lipscombe and Mahon)

No.	Consent Condition	Evidence	Finding
90	Community Consultative Committee The Applicant shall establish a Community Consultative Committee to oversee the environmental performance of the development. This Committee shall:	The auditor sighted relevant documentation including meeting minutes and verified conformance with the requirements of this condition.	Conformance
90(a)	Be chaired by an independent chairperson approved by the Director-General in consultation with the Applicant, Wollondilly Council and Camden Council.		Conformance
90(b)	Have four community representatives residing in the PAL 1 area.		Conformance
90(c)	Have one representative from each council.		Conformance
90(d)	Two representatives appointed by the Applicant (including the environmental officer).		Conformance
90(e)	Two (2) representatives from a recognised environmental group.		Conformance
90(f)	Meet at least quarterly.		Conformance
90(g)	Take minutes of the meeting.		Conformance
90(h)	Make comments and recommendations about the implementation of the development and environmental management plans, monitor compliance with conditions of this consent and other matters relevant to the operation of the development during the term of the consent. Representatives from relevant government agencies or other individuals may be invited to attend meetings as required by the Chairperson.		Conformance
91	The Applicant shall:	The auditor reviewed relevant documentation including committee meeting minutes and presentations and verified conformance with the requirements of this condition. The committee minutes are publicly available on the CGP website and it was reported that they are emailed to committee members and the DoPI.	Conformance
91(a)	Provide the Committee with regular information on the environmental performance and management of the development.		Conformance
91(b)	Ensure that the Committee has reasonable access to the necessary plans to carry out its functions.		Conformance
91(c)	Consider the recommendations and comments of the Committee and provide a response to the Committee and Director-General.		Conformance
91(d)	Provide access for site inspections by the Committee.		Conformance
91(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.		Conformance
91(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.		Conformance

B.1 DA 15-1-2002-I (Apap, Joe Stanley, Johndilo, Loganbrae, Lipscombe and Mahon)

No.	Consent Condition	Evidence	Finding
92	<p>If required by the Committee, the Applicant shall establish a trust fund or other funding arrangement that may be agreed between the Applicant and Committee, to be managed by the Chair of the Committee to facilitate the functioning of the Committee, and pay \$5000 per annum to the fund or other arrangement, for the duration of operation in the PAL 1 area, or as otherwise directed by the Director-General.</p> <p>The monies are to be used only if required for the engagement of consultants to interpret technical information and the like. The annual payment shall be indexed according to the Consumer Price Index (CPI) at the time of payment. The first payment shall be made by the date of the first Committee meeting. A record of the finances of the trust fund during each year shall be provided to the Director-General and Applicant by the Chair on each anniversary of the first payment. Any unspent monies shall be returned to the Applicant each year.</p>	Condition not activated during the audit period.	No Finding

B.2 DA 246-8-2002-I (Kay Park)

No.	Consent Condition	Evidence	Finding
1	<p>Obligation to Minimise Harm to the Environment</p> <p>The Applicant shall implement all practicable measures to prevent or minimise any harm to the environment that may result from the construction or operation of the development.</p>	<p>An Environmental Management System has been established to manage environmental risks and achieve performance improvements. This framework consists of an Environmental Management Plan (EMP), relevant sub-plans and a Compliance Register.</p> <p>A number of tools are reported to be in place to monitor and measure implementation of the EMS including the Drilling Operations Compliance Checklist, the Gas Gathering System Construction Checklist and the Rehabilitation Checklist (among others).</p> <p>The Environmental Compliance Register (Mipela) was sighted and found to be an effective tool for monitoring compliance against project approval deliverables.</p> <p>It is noted that there were no reported environmental incidents or non-compliances during the audit period associated with this development consent. There was one noise complaint reported during the audit period associated with the drilling of KP6.</p>	Conformance
2	<p>Terms of Approval</p> <p>The Applicant shall carry out the development generally in accordance with the:</p>	<p>It was reported that the development is undertaken in accordance with the EMP and sub-plans. On receipt of an approved consent or modification, it was reported that the EMP is revised to reflect the new requirements. This was evidenced by the revision history of the document.</p>	Conformance
2(a)	DA submitted to the Department of Planning and Infrastructure on 2 August 2002		Conformance
2(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		Conformance
2(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		Conformance
2(d)	Conditions of the consent for DA No. 15-1-2002-i dated 23 July 2002		Conformance
2(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		Conformance

B.2 DA 246-8-2002-I (Kay Park)

No.	Consent Condition	Evidence	Finding
2(f)	Modification Application DA 246-8-2002i MOD2 and “Camden Gas Project: Kay Park and Loganbrae Gas Gathering Line Modification Project Statement of Environmental Effects”, dated July 2008		Conformance
2(g)	Conditions of this consent. If there is any inconsistency between the above documents, the latter document shall prevail over the former to the extent of the inconsistency. However, conditions of this consent shall prevail over all other documents to the extent of any inconsistency.		Conformance
3	Period of Approval This approval is for a period of twenty one (21) years from the date of granting of the production lease.	Condition was not activated during the audit period.	No Finding
3A	Special Condition of Approval The Applicant shall not produce gas from any well until a Production Lease under the Petroleum (Onshore) Act 1991 has been obtained for the full length of the well.	The map delineating the areas of the Petroleum Production Leases were sighted. It was noted that the wells under the terms of the approval, including directional wells, are located within the boundaries of PPL2 and PPL6.	Conformance
4	Redrilling and Refracking Management Plan For the purposes of this consent the redrilling and/or additional fracing of a well does not constitute wellhead maintenance.	Condition was not activated during the audit period. It was reported that there were no re-drilling or fracing activities during the audit period.	No Finding
5	The Applicant shall obtain the approval of the Director-General of the Department of Planning and Infrastructure, or delegate for the redrilling and/or additional fracing of a well.	Condition was not activated during the audit period. It was reported that there were no re-drilling or fracing activities during the audit period.	No Finding
6	The Applicant shall prepare and submit to the Director-General of the Department of Planning and Infrastructure, or delegate a Redrilling and Refracking 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 refracking of an existing well.	Condition was not activated during the audit period. It was reported that there were no re-drilling or fracing activities during the audit period.	No Finding
7	The Applicant shall give written notification of the proposed redrilling/refracking work to potentially affected residences and other noise sensitive receivers at least fourteen days prior to work commencing.	Condition was not activated during the audit period.	No Finding

B.2 DA 246-8-2002-I (Kay Park)

No.	Consent Condition	Evidence	Finding
8	<p>Compliance</p> <p>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>	<p>The auditor sighted the EMP and noted the inclusion of legislative requirements, including reporting requirements, approvals, licenses, permits and leases.</p> <p>The Environmental Compliance Register (Mipela) was sighted and found to be an effective tool for monitoring compliance and maintaining statutory approvals. As new approvals or requirements are identified, these are added to the system. Email reminders are distributed to responsible employees and an escalation mechanism is in place.</p>	Conformance
9	<p>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>	<p>The auditor sighted the EMP (July 2012) which notes that employees and contractors must attend an induction prior to commencing operation, maintenance and construction works. In addition, job specific training is to be delivered in response to identified needs.</p> <p>The auditor sighted the site specific and role-specific induction program that is delivered to all AGL employees and contractors. The online system includes a number of modules including one module that is aligned with the EMP and the specific risks and controls.</p> <p>During the audit period, the following job specific training was delivered to nominated employees:</p> <ul style="list-style-type: none"> - Environmental incident management (October 2011); program and records sighted; - Water Sampling and Analysis (March 2011); program sighted; - Environmental Law Update (November 2011); program and records sighted; and - Planning legislation update (October 2011); program sighted. 	Conformance
10	<p>Production Operations Plan</p> <p>The Applicant shall prepare a Production Operations Plan (POP) for the approval of the Office of Energy and Resources. The POP shall have regard to the conditions of this consent and the Environment Protection Licence under the Protection of the Environment Operations Act 1997. The POP will form the basis for the:</p>	<p>A non-conformance was reported against this condition in the 2008-2010 Independent Environmental Audit (24 August 2011) on the basis that the revised POP (v7) had not been approved by the relevant agency.</p> <p>It was reported by AGL that meetings occurred with DTRIS (now Office of CSG) on 14 July 2011 and 5 June 2013 to discuss the revised POP (v7). The auditor sighted correspondence from the</p>	Conformance
10(a)	Ongoing operations and environmental management.		Conformance

B.2 DA 246-8-2002-I (Kay Park)

No.	Consent Condition	Evidence	Finding
10(b)	Ongoing monitoring of the development. A copy of the POP shall be forwarded to the Department of Planning and Infrastructure within fourteen days of the Office of Energy and Resource's acceptance.	Office of CSG (8/8/2013) stating that conformance has been achieved due to the currency of the previous version (POP, v6) and submission of a revised version.	Conformance
11	Environmental Management Plan 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.	The auditor sighted the EMP (July 2012) and noted the inclusion of the operation of KP1, KP2, KP3, KP05 and KP06 and the associated gas gathering system.	Conformance
12	Condition Report The Applicant shall prepare a Condition Report on residences and structures that may be potentially affected by drilling/fracing work, including the redrilling and refracing of an existing well. The Applicant shall undertake an inspection of the residence and/or structure prior to work commencing, and a follow up inspection within one month of the completion of the work. The Applicant shall take immediate action for repair of any damage to the residence or structure as a result of the work and to avoid any further damage. A copy of the Condition Report shall be submitted to the Director-General of the Department of Planning and Infrastructure, or delegate and the Office of Energy and Resources after completion of the work.	Drilling works were undertaken at KP6 during the audit period. The nearest residence is located 300 meters from the well and as such was unlikely to be affected by the drilling works. A Condition Report was therefore not prepared. It was reported that there have been no incidents of structural impacts due to drilling/fracing works.	Conformance
13	Incident Reporting The Applicant shall notify the OEH, OER and the Director-General of the Department of Planning and Infrastructure, or delegate 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 of the Department of Planning and Infrastructure, or delegate, the OEH, OER and Wollondilly Council within seven days of the date on which the incident occurred.	The auditor sighted the Emergency Response Plan (October 2008) and noted conformance with the requirements of this condition. There were no reported environmental incidents associated with this development consent during the audit period.	Conformance
14	The Applicant shall meet the requirements of the Director-General of the Department of Planning and Infrastructure, or delegate 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 was not activated during the audit period.	No Finding
15	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 2007-2012 Complaints Register for the CGP was sighted by the auditor and noted to comply with this condition.	Conformance
15(a)	The date and time, where relevant of the complaint.	One noise complaint was received during the drilling of KP06 (29	Conformance

B.2 DA 246-8-2002-I (Kay Park)

No.	Consent Condition	Evidence	Finding
15(b)	The means by which the complaint was made.	April 2011). In consultation with the affected resident, all reasonable steps were undertaken to mitigate noise impacts.	Conformance
15(c)	Any personal details of the complainant that were provided, or if no details were provided, a note to that effect.		Conformance
15(d)	The nature of the complaints.		Conformance
15(e)	Any action(s) taken by the Applicant in relation to the complaint, including any follow-up contact with the complainant.		Conformance
15(f)	If no action was taken by the Applicant in relation to the complaint, the reason(s) why no action was taken. The Complaints Register shall be made available for inspection by the OEH or the Director-General of the Department of Planning and Infrastructure, or delegate upon request. The Applicant shall also make summaries of the register, without details of the complainants, available for public inspection.		Conformance
16	Annual Environmental Performance Reporting 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.		The auditor sighted the Annual Environmental Performance Reports for July 2011 and July 2012 (draft) and noted a number of references in relation to the operation of KP1, KP2, KP3, KP05 and KP06 and associated gas gathering system.
17	Independent Environmental Audit 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 audit satisfies this condition.	Conformance
18	Noise – Well Maintenance The Applicant shall apply all feasible and reasonable noise mitigation measures to planned well maintenance activities in order to achieve the noise limits specified by 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 Plan (August 2008) and noted conformance with the requirements of this condition.	Conformance

B.2 DA 246-8-2002-I (Kay Park)

No.	Consent Condition	Evidence	Finding
18(a)	Appropriately informing affected residences and other relevant parties at least two weeks in advance of any planned well maintenance activities and updating the information as required.	<p>The auditor sighted the Noise Management Sub-Plan (August 2008) and noted a requirement to notify affected receivers five days prior to planned maintenance activities. It is noted that this does not conform to the condition, which requires two weeks advance notification.</p> <p>It was reported by AGL that notification of workovers have not been undertaken in the past as this was not deemed to be warranted. However, it was acknowledged that changes in surrounding land uses may trigger this requirement in the future.</p>	Non-Conformance 2
18(b)	Documenting and implementing any specific work practices the Applicant will employ to limit noise.	The auditor sighted the Noise Management Plan (August 2008) and noted conformance with the requirements of this condition.	Conformance
18(c)	Documenting the feasible and reasonable noise mitigation measures that will be undertaken to reduce noise impacts from planned well maintenance activities.		Conformance
18(d)	Conducting noise monitoring where appropriate.		Conformance
19	<p>Noise – Drilling Impacts</p> <p>The Applicant shall implement management practices as necessary to minimise the potential noise impacts from any redrilling and refracturing work. These management practices are to include, but not be limited to:</p>	The auditor sighted the Noise Management Sub-Plan (August 2008) and noted conformance with the requirements of this condition.	Conformance
19(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.		Conformance
19(b)	Predicting potential noise levels from the proposed well drilling methods where appropriate.		Conformance
19(c)	Identifying and implementing all reasonable and feasible noise mitigation measures to reduce any drilling noise impacts.		Conformance
19(d)	Documenting and implementing any specific work practices the Applicant will employ to limit noise; conducting noise monitoring where appropriate		Conformance
19(e)	Appropriately informing affected residences and other relevant parties at least two weeks in advance of any drilling work and updating the information as required.	The auditor sighted the Noise Management Sub-Plan (August 2008) and noted a requirement to notify affected receivers five days prior to construction activities. It is noted that this does not conform to the condition, which requires two weeks advance notification.	Non-Conformance 2

B.2 DA 246-8-2002-I (Kay Park)

No.	Consent Condition	Evidence	Finding										
19A	<p>Construction Hours</p> <p>The Applicant shall ensure that all construction work (except for the drilling (including well casing and grouting) of SIS wells) shall only be conducted between 7.00am and 6.00pm Monday to Friday and between 8.00 am and 1.00 pm Saturdays, unless inaudible at any residential receiver.</p>	The auditor sighted the Noise Management Sub-Plan (August 2008) and noted conformance with the requirements of this condition.	Conformance										
19B	<p>Construction Noise Criteria for SIS Wells</p> <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" data-bbox="300 539 1037 738"> <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>53</td> <td>48</td> <td>41</td> <td>35</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	53	48	41	35	The auditor sighted noise assessment reports (SLR, 1 April to 30 April and SLR, 1 May to 30 May 2011, reported 27 June 2011) during the construction of KP06. Occasional exceedences of the specified noise limits were reported during the audit period (1 to 7 dBA). Reasonable actions were undertaken in consultation with the affected property owner.	Non-Conformance 1
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	53	48	41	35									
20	<p>Water Quality Impacts</p> <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>	The auditor sighted the EMP for the CGP, including the Soil and Water Management Sub-Plan (July 2012) and the Waste Management Sub-Plan (August 2008). The plans detail a number of controls to prevent the pollution of water.	Conformance										
21	<p>Waste Water</p> <p>Waste water from the construction, installation and operation of wells and associated infrastructure shall only be applied to the following areas:</p>	It was reported that wastewater from the construction, installation and operation of wells is either disposed to a licensed waste transfer facility or reused during drilling and workover activities. Reinjection of wastewater (produced water) is not proposed and as such this condition was not activated during the audit period.	No Finding										
21(a)	Dust suppression on any unsealed roads within the site.		No Finding										
21(b)	Irrigated onto pastures within the site.		No Finding										
21(c)	Evaporation dam.		No Finding										
21(d)	<p>Reinjection into gas wells.</p> <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 of the Department of Planning and Infrastructure, or delegate shall be obtained for reinjection of waste water into a gas well.</p>		No Finding										
22	Spray from waste water application shall not drift beyond the boundary of the waste water utilisation area to which it is applied.	Condition was not activated during the audit period.	No Finding										

B.2 DA 246-8-2002-I (Kay Park)

No.	Consent Condition	Evidence	Finding
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.	Condition was not activated during the audit period.	No Finding
24	The Applicant shall ensure that all waste water that is used for dust suppression and/or irrigation has a salinity measure that does not exceed 800 µS/cm.	Condition was not activated during the audit period.	No Finding
25	Dust The Applicant shall ensure that activities are carried out in a manner that will minimise the emission of dust from the site, including traffic generated dust from the site access roads.	It was noted by the auditor that a number of dust mitigation measures are detailed in the Air Quality Management Sub-Plan (August 2008). There were no dust complaints raised during the audit period in relation to this condition.	Conformance
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.	The Air Quality Management Sub-Plan (August 2008) was sighted by the auditor and noted to conform to the requirements of this condition. There were no dust complaints reported in relation to this development consent during the audit period and it was reported that vehicles were covered as required.	Conformance
27	The Applicant shall take all practicable measures to minimise the generation of wind-blown dust from soil stockpiles.	The Soil and Water Management Sub-Plan (July 2012) requires stockpiles to be vegetated if they are to be stored on site for a long period of time. It was reported that topsoil stockpiles tend to naturally vegetate through the seed bank. Water carts are also employed to minimise the generation of wind-blown dust.	Conformance
28	Gas Gathering System Pipeline The Applicant shall comply with the following in the construction of the gas gathering system pipeline:	This condition is addressed in a number of documents including the EMP (Section 3.3) (July 2012) and the Flora and Fauna Sub-Plan (August 2008).	No Finding
28(a)	excavated trenches shall not be left uncovered overnight, unless adequate fencing and warning lights are erected	There was no gas gathering line constructed during the audit period and as such, this condition was not activated.	No Finding
28(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		No Finding
28(c)	trenches are to be restored and reseeded with local grass seeds on completion of the work		No Finding
28(d)	local council traffic guidelines in respect of work carried out on road verges and underneath roads shall be implemented		No Finding
28(e)	the pipeline shall be constructed in accordance with the AS 3723-1989		No Finding

B.2 DA 246-8-2002-I (Kay Park)

No.	Consent Condition	Evidence	Finding
28(f)	the Department of Planning and Infrastructure shall be notified on the completion of any trenching works.		No Finding
28A	Threatened Species The Applicant shall ensure that, during the drilling and construction of KP05 and KP06, impacts on threatened species are minimised by implementing actions including, but not limited, to the following:	The auditor sighted the Flora and Fauna Management Sub-Plan (August 2008) and noted the inclusion of appropriate controls to minimise impacts on threatened species.	Conformance
28A(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".	It was reported by AGL that conformance was achieved against the recommendations of the Ecosearch Environmental Consultants report by establishing the gas gathering line within the existing cleared area. The works were supervised by AGL and the gas gathering line was surveyed prior to construction. Construction of KP05 and KP06 occurred within the existing cleared site of KP01.	Conformance
28A(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.		Conformance
28B	Heritage The Applicant shall ensure that, if any historical archaeological relics within the meaning of the Heritage Act 1997 are disturbed, the Heritage Council of NSW shall be notified in accordance with section 146 of the Heritage Act 1977.	Condition was not activated during the audit period.	No Finding
29	Site Rehabilitation The Applicant shall ensure the prompt and effective rehabilitation of all disturbed areas of the site following the completion of construction, operations and associated activities and/or the decommissioning of plant, to minimise the generation of wind erosion dust.	The auditor sighted the Rehabilitation and Landscape Management Sub-Plan (July 2012), which details a number of controls associated with rehabilitation works. The auditor inspected the KP06 site that was rehabilitated during the audit period. It was noted that vegetation was established and works were consistent with the requirements of the Rehabilitation and Landscape Management Sub-Plan.	Conformance
30	The Applicant shall carry out rehabilitation of the site in accordance with the requirements of the Office of Energy and Resources and the Site Rehabilitation Management Plan.	Condition was not activated during the audit period.	No Finding
31	Community Consultative Committee The Applicant shall include the operation of KP1, KP2, KP3, KP05 and KP06 and the associated gas gathering system, and the conditions of this consent, as a matter for the consideration of the Community Consultative Committee (established under Condition 90 of the consent for DA No. 15-1-2002-i dated 23 July 2002).	The auditor sighted the minutes of the Community Consultative Committee meetings that occurred during the audit period and noted conformance with the requirements of this condition.	Conformance

B.2 DA 246-8-2002-I (Kay Park)

No.	Consent Condition	Evidence	Finding
32	<p>Environment Protection Licence</p> <p>The Applicant shall seek a variation to the Environment Protection Licence issued by the OEH for the Petroleum Production Lease No.1 area, to include the operation of the Kay Park wells (KP1, KP2, KP3, KP05 and KP06) and associated gas gathering system.</p>	<p>The auditor sighted EPL12003 and noted that conformance with the requirements of this condition. The 'premises', as defined in EPL 12003, includes all gas wells and gas gathering lines.</p>	<p>Conformance</p>

B.3 DA 282-6-2003-I (RPGP, Rosalind Park, Wandinong, EMAI (EM01-20, 40))

No.	Consent Condition	Evidence	Finding
	SCHEDULE 3 Administrative Conditions		N/A
3-1	Obligation to Minimise Harm to the Environment The Applicant shall implement all practicable measures to prevent or minimise any harm to the environment that may result from the construction or operation of the development.	<p>An Environmental Management System has been established to manage environmental risks and achieve performance improvements. This framework consists of an Environmental Management Plan (EMP), relevant sub-plans and a Compliance Register.</p> <p>A number of tools are reported to be in place to monitor and measure implementation of the EMS including the Drilling Operations Compliance Checklist, the Gas Gathering System Construction Checklist and the Rehabilitation Checklist (among others).</p> <p>The Environmental Compliance Register (Mipela) was sighted and found to be an effective tool for monitoring compliance against project approval deliverables.</p> <p>There was one reported environmental incident during the audit period associated with the release of foamy water from SL03. Additional details of this incident are provided in this audit report.</p>	Conformance
3-2	Terms of Approval The Applicant shall carry out the development generally in accordance with the:	<p>It was reported that the development is undertaken in accordance with the EMP and sub-plans. On receipt of an approved consent or modification, the EMP is revised to reflect the new requirements. This was evidenced by the revision history of the document.</p>	Conformance
3-2(a)	DA submitted to the Department on 20 June 2003.		Conformance
3-2(b)	Camden Gas Project Stage II – Environmental Impact Statement for the Sydney Gas Company (four volumes), dated 19 June 2003.		Conformance
3-2(c)	All other documents listed in Appendix C.		Conformance
3-2(d)	Drawings No. 32339 SK010 Issue 17 and SK014 Issue 1 ; and URS Plan LC-0100 Revision G dated 16 June 2004.		Conformance
3-2(e)	Modification Application 42-3-2005 and the letter from Sydney Gas Operations Pty Ltd to the Department dated 14 March 2005 titled Camden Gas Project Stage II – Modification Application, and the accompanying attachments.		Conformance

B.3 DA 282-6-2003-I (RPGP, Rosalind Park, Wandinong, EMAI (EM01-20, 40))

No.	Consent Condition	Evidence	Finding
3-2(f)	The modification application submitted to the Department on 11 April 2006 and the accompanying document "Camden Gas Project Joint Venture Proposed Multiple Gas Well Modifications" prepared by AGL Gas Production (Camden) Pty Ltd and Sydney Gas (Camden) Operations Pty Ltd, dated April 2006.		Conformance
3-2(g)	The modification application submitted to the Department on 29 September 2006 and the accompanying document "Camden Gas Project Joint Venture Statement of Environmental Effects Proposed SIS Well Project" prepared by AGL Gas Production (Camden) Pty Ltd and Sydney Gas (Camden) Operations Pty Ltd, and dated September 2006.		Conformance
3-2(h)	The modification application submitted to the Department on 16 October 2006 and the accompanying document "Camden Gas Project Joint Venture Statement of Environmental Effects Proposed SIS Well Project (GL15)" prepared by AGL Gas Production (Camden) Pty Ltd and Sydney Gas (Camden) Operations Pty Ltd, and dated October 2006.		Conformance
3-2(i)	Modification Application MOD 11-2-2007 and Statement of Environmental Effects Section 96AA Modification of DA No 282-6-2003-I Relocation of an Existing Internal Road at Rosalind Park Gas Plant (RPGP) off Medhurst Road, Menangle, dated February 2007.		Conformance
3-2(j)	Modification Application MOD 26-3-2007 and "Camden Gas Project Joint Venture Gas Well and Gathering Line Modification Project Statement of Environmental Effects", dated March 2007.		Conformance
3-2(k)	Modification Application 282-6-2003 MOD 9, the Statement of Environmental Effects titled "Camden Gas Project Joint Venture – EM39 and GL17 Modification Project" dated February 2008, letter from AGL Gas Production (Camden) Pty Limited to the Department, dated 19 March 2008, and letter from Wilkinson Murray Pty Limited to AGL Gas Production (Camden) Pty Limited, dated 31 March 2008.		Conformance
3-2(l)	Modification Application 282-6-2003 MOD 10, the Statement of Environmental Effects titled, "Camden Gas Project: Rosalind Park Access Road and Gas Gathering Line Modification" dated December 2008 and letter from Cubbitch Barta Native Title Claimants Aboriginal Corporation to Biosis Research Pty Ltd, dated 22 October 2008.		Conformance
3-2(m)	Modification Application 282-6-2003 MOD 11, the letter titled, "Camden Gas Project - AGL Modification to Gas Gathering Line" dated September 2009 and letter from Biosis Research Pty Ltd, dated 12 June 2009.		Conformance

B.3 DA 282-6-2003-I (RPGP, Rosalind Park, Wandinong, EMAI (EM01-20, 40))

No.	Consent Condition	Evidence	Finding
3-2(n)	The modification application DA 282-6-2003i MOD 12 and accompanying letter prepared by AGL Energy Limited, dated 31 May 2010.		Conformance
3-2(o)	Conditions of this consent.		Conformance
3-3	If there is any inconsistency between the above documents, the latter document shall prevail over the former to the extent of the inconsistency. However, the conditions of this consent shall prevail over all other documents to the extent of any inconsistency.	Condition is noted.	No Finding
3-4	The Applicant shall comply with any reasonable requirement/s of the Director-General arising from the Department's assessment of:	Condition was not activated during the audit period.	No Finding
3-4(a)	Any reports, plans or correspondence that are submitted in accordance with this consent.		No Finding
3-4(b)	The implementation of any actions or measures contained in these reports, plans or correspondence.		No Finding
3-5	Limits of Approval This approval shall lapse twenty one (21) years from the granting of the production lease.	Condition was not activated during the audit period.	No Finding
3-6	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 spread sheet for the periods ending 21 December 2010 and 21 December 2011 and noted conformance with the requirements of this condition.	Conformance
3-6A	The Applicant shall not produce gas from GL14 until a Production Lease under the Petroleum (Onshore) Act 1991 has been obtained for the entirety of the well.	It was reported that GL14 is a horizontal well. The surface location of the well is located within PPL 4 and the well path traverses into PPL 5. The auditor sighted the maps of the PPL boundaries and noted that the surface location of GL14 is located in excess of 4km from the outer boundary of PPL 4 and PPL 5. Given that the maximum length of a horizontal well is less than 4km, conformance is achieved against the requirement of this condition.	Conformance
3-7	Special Conditions of Approval The Applicant must in the opinion of the DECCW be a fit and proper person to hold a licence under the Protection of the Environment Operations Act 1997, having regard to the matters in s83 of that Act.	It was noted by the auditor that AGL has not contravened any of the environment protection legislation or other relevant legislation, or had a license suspended or revoked.	Conformance

B.3 DA 282-6-2003-I (RPGP, Rosalind Park, Wandinong, EMAI (EM01-20, 40))

No.	Consent Condition	Evidence	Finding
3-8	Within one month of consent being issued and in any case before the commencement of any construction works causing the Gas Treatment Plant to become scheduled under the Protection of the Environment Operations Act 1997, the Applicant must submit, to the DECC's Manager Sydney Industry PO Box 668 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 was not activated during the audit period.	No Finding
3-9	If after five (5) years of the date of this consent any well that is the subject of this consent has not yet been drilled or completed, then the Applicant shall surrender the approval for that well.	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 gas wells, gas gathering lines and the Rosalind Park Gas Plant.	Conformance
3-10	At the expiration of ten (10) years from the date of this consent, the Applicant shall submit to the Director-General a reserve report covering the petroleum production lease (PPL) area. The report shall be prepared by an independent petroleum expert in accordance with relevant definitions approved by the Society of Petroleum Engineers and/or the World Petroleum Congress. In the absence of a proven reserve, the Applicant shall make a further submission to the Director-General justifying why production should continue. After reviewing this report, the Director-General may direct the Applicant to carry out certain actions (including the closure and rehabilitation of certain wells).	Condition was not activated during the audit period.	No Finding
3-11	Further Approvals The Applicant shall run verticality logs for new gas wells located within coal exploration titles. <i>Note: The Petroleum Production Lease that may be granted by the DPI will apply to the PEL 2 area, which is a much larger area than that which the development consent applies to.</i> <i>This consent applies to the land and structures identified in Schedule 1, being the gas wells, gas treatment plant, associated workshop and office facilities and gas gathering system.</i>	Condition was not activated during the audit period.	No Finding

B.3 DA 282-6-2003-I (RPGP, Rosalind Park, Wandinong, EMAI (EM01-20, 40))

No.	Consent Condition	Evidence	Finding
3-12	Nothing in this consent permits the drilling and operation of any additional wells (beyond the approved 49 wells for gas production) or gas gathering lines.	The auditor reviewed the list of gas wells provided by AGL against the development consent and modifications and confirmed that no additional wells have been drilled or operated during the audit period.	Conformance
3-13	<p>Structural Adequacy The Applicant shall ensure that all new buildings and structures, and any alterations or additions to existing buildings and structures, are constructed in accordance with the relevant requirements of the BCA.</p> <p><i>Note:</i></p> <p>a) Under Part 4A of the EP&A Act, the Applicant is required to obtain construction and occupation certificates for the proposed building works.</p> <p>b) Part 8 of the EP&A Regulation sets out the detailed requirements for the certification of development.</p> <p>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.</p>	Condition was not activated during the audit period.	No Finding
3-14	<p>Public Infrastructure The Applicant shall:</p>	It was reported that there was no damage to public infrastructure as a result of operations during the audit period.	Conformance
3-14(a)	Repair, or pay the full costs associated with repairing any existing public infrastructure that is damaged by the development.		Conformance
3-14(b)	Relocate or pay the full costs associated with relocating any existing public infrastructure that needs to be relocated as part of the development.		Conformance
3-14(c)	<p>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.</p> <p><i>Note: The Applicant may be required to apply to Sydney Water for a Section 73 Compliance Certificate under the Sydney Water Act 1994 and to meet Sydney Water's reasonable requirements.</i></p>		Conformance

B.3 DA 282-6-2003-I (RPGP, Rosalind Park, Wandinong, EMAI (EM01-20, 40))

No.	Consent Condition	Evidence	Finding
3-15	<p>Location of Gas Wells and Gas Gathering Systems</p> <p>The Applicant shall provide Camden Council, Campbelltown City Council and Wollondilly Shire Council with the Geographical Positioning System (GPS) co-ordinates and digital survey data for gas well sites and gas gathering systems within their respective Local Government Area, in a format suitable to each of these Councils, within two months of the completion of the gas wells and gas gathering system.</p>	<p>A non-conformance was reported against this condition in the 2008-2010 Independent Environmental Audit (24 August 2011) due to failure to provide evidence of submission of GPS coordinates and digital survey data to nominated Councils.</p> <p>The auditor sighted correspondence from Sydney Gas to Camden Council (31 October 2005), Wollondilly Shire Council (31 October 2005) and Campbelltown City Council (18 April 2005) which details the GPS coordinates for gas well sites within the respective Councils. Further correspondence was sighted from AGL to each respective Council (1 November 2011) providing updated data sets.</p>	Conformance
3-16	<p>The Applicant shall provide Camden Council, Campbelltown City Council and Wollondilly Shire Council with the wellhead configurations of each gas well within two months of the gas well being completed or two months from the date of this consent, whichever is the later.</p>	<p>A non-conformance was reported against this condition in the 2008-2010 Independent Environmental Audit (24 August 2011) due to failure to provide evidence of submission of wellhead configurations to nominated Councils.</p> <p>The auditor sighted correspondence dated 16 June 2013 from AGL to the respective Councils that included the wellhead configurations for nominated assets. It is noted that this information was not provided within two months of the completion of the gas wells and gas gathering system.</p>	Non-Conformance 2
3-17	<p>The Applicant shall provide written notification to the Director-General that it has fulfilled the requirements of Conditions 15 and 16, within two weeks of the information being provided to the Councils.</p>	<p>A non-conformance was reported against this condition in the 2008-2010 Independent Environmental Audit (24 August 2011).</p> <p>The auditor sighted correspondence dated 16 June 2013 from AGL to the DoPI noting fulfilment of the requirements of Condition 15 and 16.</p>	Conformance
3-18	<p>Compliance</p> <p>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:</p>	<p>Condition closed in a previous audit.</p>	No Finding

B.3 DA 282-6-2003-I (RPGP, Rosalind Park, Wandinong, EMAI (EM01-20, 40)

No.	Consent Condition	Evidence	Finding
3-18(a)	All commitments and initiatives (environmental, social, economic or project related) that the Applicant has agreed or suggested to implement for this development		No Finding
3-18(b)	Timeframe for implementation of the commitment or initiative		No Finding
3-18(c)	The responsibility for ensuring that the commitment or initiative is implemented in the manner and timeframe provided by the Applicant		No Finding
3-18(d)	A reference to the document or correspondence that the commitment or initiative was stated by the Applicant.		No Finding
3-19	The Applicant shall prior to the commencement of substantial construction certify in writing to the Director-General that all the relevant conditions applicable to construction have been complied with.	Condition closed in a previous audit.	No Finding
3-20	The Applicant shall submit for the approval of the Director-General two weeks prior to the commissioning of the development or within such other period that the Director-General may agree, a compliance report detailing compliance with all the relevant conditions that apply prior to the commissioning of the development.	Condition closed in a previous audit.	No Finding
	SCHEDULE 4 SPECIFIC ENVIRONMENTAL CONDITIONS	N/A	N/A
4-1	VISUAL AMENITY Visual Performance The Applicant shall implement visual mitigation measures as depicted on the plan "Camden Gas Project Stage 2: Vegetation and Landscape Management Plan" Drawing No LC-0100 Revision G prepared by URS for Sydney Gas dated 16 June 2004 (the "Landscape Design").	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 Australia Pty Ltd for Sydney Gas. An inspection was conducted of the RPGP and it was noted that vegetation is largely maintained in accordance with the plan.	Conformance
4-2	Prior to the commencement of construction of the workshop, office, plant and associated facilities at Rosalind Park, the Applicant shall submit for the approval of the Director-General, a colour scheme (paint colour specifications) for all proposed buildings, fences and associated structures.. Colours selected for the facilities (in particular the "Workshop" and "Offices") shall aim to minimise the visual impact of the facility on surrounding land uses and maximise the ability of the facilities to "blend into" the local landscape. <i>Note: The Applicant where practicable should aim to use darker paint colours on the facilities (such as a dark grey colour).</i> <i>Wherever practical, the Applicant shall ensure that ground surfaces and stabilisation materials for the facilities at Rosalind Park utilise material in dark shades of colour (such as blue metal and dark coloured mulch).</i>	Condition closed in a previous audit.	No Finding

B.3 DA 282-6-2003-I (RPGP, Rosalind Park, Wandinong, EMAI (EM01-20, 40))

No.	Consent Condition	Evidence	Finding
4-3	The Applicant shall implement reasonable measures to screen gas wells GL 4, GL 5 and GL 10 and the interconnecting gas gathering line from the Banksia Garden picnic area within the Mount Annan Botanic Garden. The Applicant shall undertake such measures to the satisfaction of the Director-General.	Condition closed in a previous audit.	No Finding
4-4	Lighting Performance The Applicant shall take all practicable measures to minimise any off-site lighting impacts from the development.	It was reported that lighting surveys were prepared at the commissioning of the RPGP and revised in response to Phase II works. All lighting was reported to be facing inward to the plant and facing away from the Mt Gilead Homestead. Visual barriers and directional screens have been installed as necessary. Further, lighting is limited or controlled (e.g. motion sensors or time switches) in sensitive areas. The RPGP reportedly complies with the Australian Standard 4282 – 1997 Control of the Obtrusive Effects of Outdoor Lighting. There were no lighting complaints recorded on the complaints register during the audit period.	Conformance
4-5	The Applicant shall ensure that all external lighting associated with the development is mounted, screened and directed in such a manner so as to achieve the minimum level of illumination necessary, and in accordance with the Australian Standard 4282 – 1997 Control of the Obtrusive Effects of Outdoor Lighting.	It was reported that lighting surveys were prepared at the commissioning of the RPGP and revised in response to Phase II works. All lighting was reported to be facing inward to the plant and facing away from the Gilead homestead. Visual barriers and directional screens have been installed as necessary. Further, lighting is limited or controlled (e.g. motion sensors or time switches) in sensitive areas. The RPGP reportedly complies with the Australian Standard 4282 – 1997 Control of the Obtrusive Effects of Outdoor Lighting. There were no lighting complaints recorded on the complaints register during the audit period.	Conformance
4-6	The Applicant shall ensure that measures to minimise lighting effects from the operation of the proposed development and the operation of the flare (including under emergency conditions) are implemented as recommended in the following reports (except where inconsistent with the Landscape Design or these conditions):	It was reported that lighting surveys were prepared at the commissioning of the RPGP and revised in response to Phase II works. All lighting was reported to be facing inward to the plant and facing away from the Mt Gilead Homestead. Visual barriers and	Conformance

B.3 DA 282-6-2003-I (RPGP, Rosalind Park, Wandinong, EMAI (EM01-20, 40))

No.	Consent Condition	Evidence	Finding
4-6(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.	directional screens have been installed as necessary. Further, lighting is limited or controlled (e.g. motion sensors or time switches) in sensitive areas.	Conformance
4-6(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.	The RPGP reportedly complies with the Australian Standard 4282 – 1997 Control of the Obtrusive Effects of Outdoor Lighting.	Conformance
4-6(c)	Plan titled "Lighting Review to Minimise Obtrusive Light to Mount Gilead Homestead – Drawing No. S5397-E001" prepared by Bassett dated October 2003.	There were no lighting complaints recorded on the complaints register during the audit period.	Conformance
4-6(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.		Conformance
4-6(e)	Report titled "Lighting Scope Camden Gas Phase II" prepared by Simon Engineering, Document Reference No 03 1212 LS-02 dated 13 October 2003.		Conformance
4-6(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.		Conformance
4-7	Prior to the commencement of construction of the Gas Treatment Plant, the Applicant must submit to the Director-General or the certifying authority a revised "area and perimeter lighting layout" and "electrical services lighting review" to replace the two plans of this name in the document referred to in condition 6(b) above, taking into account the revisions to the development plans for the Gas Treatment Plant as approved in this consent. The lighting design under these revised plans shall be designed to minimise the effect of obtrusive light on the Mount Gilead Homestead from the Gas Treatment Plant.	Condition closed in a previous audit.	No Finding
4-8	The Applicant must ensure that wherever possible, any scheduled use of the flare occurs during daylight hours.	It was reported that there is no scheduled use of the flare. Field to flare events are reportedly minimised during the course of operations and occur 1-2 times per year.	Conformance
4-9	The design of the flare pit must be amended by installing an opaque barrier to a height of 7.5m above the flare tip as depicted on the Landscape Design. The Applicant may remove this barrier with the consent of the owner of Lot 1 DP 807555.	This condition was closed in previous audits. It was reported that there were no changes made to the barrier during the audit period.	Conformance

B.3 DA 282-6-2003-I (RPGP, Rosalind Park, Wandinong, EMAI (EM01-20, 40))

No.	Consent Condition	Evidence	Finding
4-10	The Applicant shall report on the effectiveness of the lighting controls in the AEPR.	The auditor sighted the 2010/11 AEPR and the draft 2011/12 AEPR and noted a brief report on the effectiveness of lighting controls. It was reported that all recommendations of the independent visual impact audit regarding internal lighting on compressor 2 were satisfactorily completed during the 2008/09 reporting period. There were no lighting complaints recorded on the complaints register during the audit period.	Conformance
4-11	The Applicant shall record the frequency of the operation of the flare and shall make this information available for inspection by the Director-General on request. The records shall include but not be limited to the following:	The auditor sighted the 2012/11 AEPR and the 2011/12 AEPR and noted the inclusion of all relevant information on the operation of the flare. This information is derived from the SCADA system that 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 is publicly reported.	Conformance
4-11(a)	Date and time of each flare event.		Conformance
4-11(b)	Duration of each flare event.		Conformance
4-11(c)	Whether the flare operated during daylight or night-time hours.		Conformance
4-11(d)	The cause for the operation of the flare.		Conformance
4-11(e)	The number of compressor engines that have been commissioned and operating during the period.		Conformance
4-11(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."		Conformance
4-12	Landscaping design The site shall be landscaped as shown on the Landscape Design and this landscaping shall be maintained for the life of the development.	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 RPGP and it was noted that vegetation is largely being maintained in accordance with the plan.	Conformance
4-13	Vegetation and Landscape Management Plan The Applicant shall prepare and implement a Vegetation and Landscape Management Plan for the Gas Treatment Plant site and the gas well sites. The plan shall include, but not necessarily be limited to:	The auditor sighted the Vegetation and Landscape Management Plan, Proposed Gas Treatment Plant, URS (28 June 2004) and noted that the Plan conforms to the requirements of this condition. Implementation of the Plan occurred prior to the audit period.	Conformance
4-13(a)	Reasonable measures to protect mature trees as part of the well drilling, gas gathering system and Treatment Plant Site construction activities.		Conformance

B.3 DA 282-6-2003-I (RPGP, Rosalind Park, Wandinong, EMAI (EM01-20, 40)

No.	Consent Condition	Evidence	Finding
4-13(b)	A landscape strategy detailing the design and proposed planting of trees and shrubs to be undertaken.		Conformance
4-13(c)	Ensuring that tree and shrub species used for landscaping of the site are indigenous to the locality.		Conformance
4-13(d)	Details of a program to ensure that all landscaped areas are maintained in a tidy, healthy state.		Conformance
4-13(e)	Measures intended to maximise the screening of infrastructure from views from the Mt Gilead property through planting and other measures.		Conformance
4-13(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.		Conformance
4-13(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.		Conformance
4-13(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.		Conformance
4-13(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.		Conformance
4-13(j)	Reasonable measures to ensure that mature trees within the riparian corridor along Menangle Creek are retained and protected.		Conformance
4-13(k)	Details of proposed screening works including supplementary planting along the border of the site with Menangle Creek.		Conformance
4-13(l)	Reasonable measures to minimise the impacts of the gas wells on the cultural heritage landscape of the EMAI.		Conformance
4-13(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.		Conformance

B.3 DA 282-6-2003-I (RPGP, Rosalind Park, Wandinong, EMAI (EM01-20, 40))

No.	Consent Condition	Evidence	Finding
4-13(n)	Reporting the results of the visual impact monitoring in the Annual Environmental Performance Report. The monitoring results will specifically identify any remedial measures required. The Vegetation and Landscape Management Plan must be submitted and approved by the Director-General prior to commencement of construction on the Gas Treatment Plant site.		Conformance
4-14	As part of an independent audit required under condition 18, the Vegetation and Landscape Management Plan must make provision for ensuring that landscaping of the Gas Treatment Plant site and surrounds is maintained in an adequate condition by providing details of a monitoring program. Monitoring must be carried out pursuant to the monitoring program every 6 months for the first two years from the commencement of planting and thereafter every 2 years by an independent and suitably qualified and experienced arborist whose appointment has been approved for the purposes of this condition by the Director-General. The monitoring program must include the following features:	A non-conformance was reported against this condition in the 2008-2010 Independent Environmental Audit (24 August 2011) due to failure to complete monitoring every two years. Distinctive Living Design conducted the monitoring program in December 2008 and March 2012. In accordance with the requirements of this condition, monitoring must be carried out every two years.	Non-Conformance 1
4-14(a)	Identification of mature trees surrounding the site which afford screening of the Gas Treatment Plant from Mt Gilead Homestead.	The auditor sighted the independent audit conducted by Distinctive Living Design (March, 2012) and noted conformance with the requirements of this condition.	Conformance
4-14(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.		Conformance
4-14(c)	Description of the health of each tree identified under condition (a).		Conformance
4-14(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.		Conformance
4-14(e)	Recommendation of any watering or fertilising that needs to be implemented to maintain the landscaping and surrounding trees.		Conformance
4-14(f)	Recommendation of how to manage the landscaping to promote the maximisation of growth to maturity. The results and recommendations of the monitoring program must be submitted to the Director-General at the conclusion of each stage of monitoring.		The results and recommendations arising from the independent audit conducted by Distinctive Living Design (March, 2012) were submitted to the Director-General in July 2013.

B.3 DA 282-6-2003-I (RPGP, Rosalind Park, Wandinong, EMAI (EM01-20, 40))

No.	Consent Condition	Evidence	Finding
4-15(a)	The existing trees shown on the Landscape Design adjacent to the southern boundary of the Gas Treatment Plant site, must be retained. They must not be lopped or trimmed except on the advice of an independent arborist whose appointment has been approved for the purposes of this condition by the Director-General that the proposed work is reasonably necessary for safety reasons. The trees must be maintained in a healthy condition.	It was reported that the trees adjacent to the southern boundary of the RPGP have not been lopped or trimmed during the audit period. The auditor sighted the trees that provide screening of the premises from the Mt Gilead Homestead and noted that there were no obvious signs of tree removal.	Conformance
4-15(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.		Conformance
4-16	Prior to the commencement of construction on the Gas Treatment Plant site the Applicant must secure the right to implement on land outside the Gas Treatment Plant site for the life of the development any necessary mitigative or screening measures proposed for the Gas Treatment Plant as part of the Vegetation and Landscape Management Plan or as required by this Consent.	Condition closed in a previous audit.	No Finding
4-17	For the purpose of avoiding possible detrimental impact on vegetation screening of the Gas Treatment Plant from the Mt Gilead Homestead due to any clear felling of trees in the area marked "A" on the Applicant's Plan Map Ref M240212 dated 16 June 2004 ("Applicant's Plan") by the holder of the electricity transmission line easement over Lot 1 DP 807555 ("Holder"), the Applicant shall carry out any reasonable and necessary trimming and lopping of those trees provided the Holder requests the Applicant in writing to carry out this trimming and lopping and undertakes in return to refrain from the clear felling of those trees within 5 years of the date of this Consent.	It was reported that the trees that screen the RPGP from the Mt Gilead Homestead have not been lopped or trimmed during the audit period. The auditor sighted the trees that provide screening of the premises from the Mt Gilead Homestead and noted that there were no obvious signs of tree removal.	Conformance
4-18	Independent Audit 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:	A non-conformance was reported against this condition in the 2008-2010 Independent Environmental Audit (24 August 2011) due to failure to conduct the audit every two years. Distinctive Living Design conducted the independent audit in December 2008 and March 2012. The audit did not occur in 2010 as required.	Non-Conformance 1
4-18(a)	Be conducted by an independent landscape expert who is suitably qualified and experienced and whose appointment has been approved by the Director-General.	The auditor sighted the independent audit conducted by Distinctive Living Design (March, 2012) and noted conformance with the	Conformance

B.3 DA 282-6-2003-I (RPGP, Rosalind Park, Wandinong, EMAI (EM01-20, 40))

No.	Consent Condition	Evidence	Finding
4-18(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.	requirements of this condition.	Conformance
4-18(c)	Review the adequacy of the Vegetation and Landscape Management Plan.		Conformance
4-18(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).		Conformance
4-18(e)	Be submitted to the Director-General.	The results and recommendations arising from the independent audit conducted by Distinctive Living Design (March, 2012) were submitted to the Director-General in July 2013.	Conformance
4-18(f)	Be implemented to the satisfaction of the Director-General.	Implementation of the recommendations arising from the independent audit conducted by Distinctive Living Design (March, 2012) are in progress and as such, this condition was not activated during the audit period.	No Finding
4-19	Within 2 months of commissioning this audit the Applicant shall submit a copy of the audit report to the Director-General and provide a detailed response to any of the recommendations in the audit report. A copy of the Independent Audit, and/or the results and recommendations of any monitoring carried out under condition 14, will be provided to the owner of Lot 1 DP 807555 by the Director-General upon request.	<p>A non-conformance was reported against this condition in the 2008-2010 Independent Environmental Audit (24 August 2011) due to failure to provide records to verify submission to the Director-General.</p> <p>Distinctive Living Design conducted the independent audit in March 2012 and was submitted to the Director-General in July 2013. The independent audit was therefore not submitted to the Director-General within two months of commissioning.</p>	Non Conformance 2
4-19A	Landscape Planting Plan – Rosalind Park Access Road The Applicant shall prepare and implement a Landscape Planting Plan for the relocated Rosalind Park access road, to the satisfaction of the Director-General. This plan must be submitted to the Director-General for approval prior to the commencement of construction, and include:	Condition closed in a previous audit.	No Finding
4-19A(a)	Details of the landscaping measures along the road and visual bund.		No Finding
4-19A(b)	Measures to manage and maintain the landscaping.		No Finding
4-19A(c)	Describe the construction rehabilitation measures.		No Finding

B.3 DA 282-6-2003-I (RPGP, Rosalind Park, Wandinong, EMAI (EM01-20, 40)

No.	Consent Condition	Evidence	Finding
4-19B	Within 6 months of completion of the landscaping and every 2 years thereafter, unless the Director-General directs otherwise, the Applicant shall commission and pay the full costs of an Independent Audit of the performance of the mitigation measures. The audit shall:	<p>A non-conformance was reported against this condition in the 2008-2010 Independent Environmental Audit (24 August 2011) due to failure to conduct an independent audit of the Landscape Planting Plan every two years.</p> <p>The auditor sighted independent audits of the Landscape Planting Plan by Corkery Consulting (November 2008) and Distinctive Living Design (March 2012). The audits were not completed every two years as required by this condition.</p>	Non-Conformance 1
4-19B(a)	Be conducted by a suitably qualified, experienced and independent person(s) whose appointment has been approved by the Director-General.	The auditor sighted the independent audit conducted by Distinctive Living Design (March, 2012) and noted conformance with the requirements of this condition.	Conformance
4-19B(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.		Conformance
4-19B(c)	Review the adequacy of the Landscape Planting Plan.		Conformance
4-19B(d)	Recommend actions or measures to improve the performance of the visual mitigation measures and the adequacy of the Landscape Planting Plan (if required).		Conformance
4-19B(e)	Be submitted and implemented to the satisfaction of to the Director-General. 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.	<p>A non-conformance was reported against this condition in the 2008-2010 Independent Environmental Audit (24 August 2011) due to failure to provide evidence of submission of the independent audit to the Director-General.</p> <p>The results and recommendations arising from the independent audit conducted by Distinctive Living Design (March, 2012) were submitted to the Director-General in July 2013.</p> <p>Implementation of the recommendations arising from the independent audit conducted by Distinctive Living Design (March, 2012) are in progress.</p>	Conformance
4-20	<p>FLORA AND FAUNA Raptor Breeding Zones at EMAI The Applicant shall ensure that the drilling of gas wells and the construction of the gas gathering system and any related activities do not occur within 100 metres of the Raptor Breeding zones.</p>	The auditor sighted the Flora and Fauna Management Sub-Plan (August 2008) that noted conformance with the requirements of this condition. Correspondence was also sighted from AGL to the Elizabeth Macarthur Agricultural Institute (4 February 2008) confirming discussions that the proposed drilling of EM39 would not impact on raptor species within the EMAI.	Conformance

B.3 DA 282-6-2003-I (RPGP, Rosalind Park, Wandinong, EMAI (EM01-20, 40)

No.	Consent Condition	Evidence	Finding
4-21	The Applicant shall only drill and “fracc” wells EM 5, EM 7, EM 8, EM 9, EM 11 and EM12 during the months of February and/or March or such other period as agreed by the Director-General.	Condition not activated during the audit period. There were no reported drilling or fraccing works conducted during the audit period.	No Finding
4-22	The Applicant shall ensure that gas gathering lines connecting well sites listed in Condition 21 shall be constructed outside the breeding seasons of raptor species. <i>Note: The above condition provides protection for breeding raptor species on the EMAI, in proximity to the stated wells, through ensuring activities that are likely to generate noise are conducted outside of the breeding season of raptor species.</i>	Condition not activated during the audit period. It was reported that there were no gas gathering lines constructed during the audit period.	No Finding
4-23	Flora and Fauna Protection Measures The Applicant shall implement best practice flora and fauna management.	The auditor sighted the Flora and Fauna Management Sub-Plan (August 2008) and noted a number of controls to minimise the impacts to flora and fauna during construction, operation and rehabilitation. Given the significant period of time between the preparation of the environmental assessment and the conduct of construction and/or drilling works, it is recommended that the EMP include the following additional control measure: Prior to the commencement of construction, drilling and/or fraccing works, identify the presence of significant flora and fauna within the area of works. Establish site-specific controls as relevant and communicate to site personnel through the induction program. It was noted by AGL that the above control is currently undertaken prior to construction works.	Conformance - Improvement Opportunity
4-24	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 (August 2008) and noted a number of controls to minimise the impacts to flora and fauna during construction, operation and rehabilitation. There were no construction works undertaken during the audit period.	Conformance
4-25	The Applicant shall ensure that trenches constructed during the construction of gas gathering lines are not left open overnight unless otherwise agreed by the Director-General.	Condition not activated during the audit period.	No Finding

B.3 DA 282-6-2003-I (RPGP, Rosalind Park, Wandinong, EMAI (EM01-20, 40)

No.	Consent Condition	Evidence	Finding
4-26	The Applicant shall not remove mature trees as part of this development unless otherwise agreed by the Director-General.	<p>The auditor sighted the Flora and Fauna Management Sub-Plan (August 2008) and noted the inclusion of this control measure.</p> <p>It was reported that there were no mature trees removed during the audit period.</p> <p>It was noted that a new procedure has been adopted to ensure environmental controls are communicated to employees and contractors prior to the commencement of construction works. A pre-construction kick-off meeting is held whereby all environmental risks and controls are discussed, including conditions of consent.</p>	Conformance
4-27	The Applicant shall employ a suitably qualified ecologist with specific experience in identifying the Cumberland Plain Snail, during the construction period of the development. The ecologist shall monitor and examine areas for the presence of the threatened Cumberland Plain Snail, during the clearing for the proposed development.	Condition was not activated during the audit period.	No Finding
4-28	The Applicant shall prepare a translocation strategy for the threatened Cumberland Plain Snail which will be submitted for the Director-General's approval prior to construction. The Translocation strategy shall be implemented should any individuals or populations of the Cumberland Plain Snail be identified.	Condition closed in a previous audit.	No Finding
4-28A	<p>Threatened Species</p> <p>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:</p>	The auditor sighted the Flora and Fauna Management Sub-Plan (August 2008) and noted the inclusion of appropriate controls to minimise impacts on threatened species.	No Finding
4-28A(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)	It was reported that EM38 was constructed in 2008 and therefore completed prior to the audit period.	No Finding
4-28A(b)	Marking the boundaries of endangered ecological communities (EECs) and locations of other known threatened species and, where possible, avoiding construction activities within these areas.		No Finding
4-28B	The Applicant shall ensure that, during the drilling and construction of EM39 and GL17 and upgrading of the gas gathering lines, impacts on threatened species are minimised by implementing actions including, but not limited to the following:	Condition was not activated during the audit period.	No Finding

B.3 DA 282-6-2003-I (RPGP, Rosalind Park, Wandinong, EMAI (EM01-20, 40)

No.	Consent Condition	Evidence	Finding																				
4-28B(a)	The recommendations outlined in the flora an 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”.		No Finding																				
4-28B(b)	Marking the boundaries of endangered ecological communities (EECs) and locations of other known threatened species and, where possible, avoiding construction activities within these areas.		No Finding																				
4-29	<p>NOISE Noise Impact Assessment Criteria The Applicant shall ensure that noise from the normal operation of the premises, excluding flaring events, must not exceed the noise limits in the table below.</p> <table border="1"> <thead> <tr> <th>Receiver Location</th> <th>Day</th> <th>Evening</th> <th>Night</th> <th>Flaring (anytime)</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_{A1}(1minute)</td> </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} (1minute)	R1 Medhurst Street Gilead	35	35	35	45	R7 Mt. Gilead Gilead	37	36	36	45	<p>The auditor sighted two noise assessment reports (Wilkinson Murray, 14 February 2011 and 14 February 2012) for the Rosalind Park Gas Plant. The reports presented a summary of quarterly noise monitoring conducted at the two nominated receivers (R1 and R2 as detailed in the condition). The reports indicate that the plant did not exceed the nominated noise assessment criteria.</p> <p>It was noted that there were no measurements of noise during flaring events.</p>	Conformance
Receiver Location	Day	Evening	Night	Flaring (anytime)																			
	L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{A1} (1minute)																			
R1 Medhurst Street Gilead	35	35	35	45																			
R7 Mt. Gilead Gilead	37	36	36	45																			
4-29A	<p>Noise from the operation of EM39 and GL17 shall not exceed the noise limits in the table below:</p> <table border="1"> <thead> <tr> <th rowspan="2">Receiver Location</th> <th rowspan="2">Noise Criteria</th> <th>Day</th> <th>Evening</th> <th>Night</th> </tr> <tr> <th>dBA L_{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 quarterly noise reports prepared by Wilkinson Murray in 2010/11 and 2011/12 and noted conformance with the requirements of this condition.</p>	Conformance		
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																			
4-30	For the purposes of condition 29, 29A and 31:	<p>The auditor sighted quarterly noise reports prepared by Wilkinson Murray in 2010/11 and 2011/12 and noted conformance with the requirements of this condition.</p>	Conformance																				
4-30(a)	Day is defined as the period from 7am to 6pm Monday to Saturday and 8am to 6pm Sundays and Public holidays		Conformance																				
4-30(b)	Evening is defined as the period 6pm to 10pm		Conformance																				
4-30(c)	Night is defined as the period from 10pm to 7am Monday to Saturday and 10pm to 8am Sundays and Public Holidays		Conformance																				

B.3 DA 282-6-2003-I (RPGP, Rosalind Park, Wandinong, EMAI (EM01-20, 40))

No.	Consent Condition	Evidence	Finding																																						
4-30(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.		Conformance																																						
4-31	<p>Noise from flaring events, must not exceed the noise limits in the table below:</p> <table border="1"> <thead> <tr> <th>Location</th> <th>Duration of each Event</th> <th>Expected Type Of Event (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="3">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>15 min – 60 min</td> <td>Compressor Blowdown (ESD)</td> <td>40</td> <td>40</td> <td>35</td> </tr> <tr> <td>6 min – 15 min</td> <td>Compressor Blowdown (shutdown and unload)</td> <td>42</td> <td>42</td> <td>37</td> </tr> <tr> <td rowspan="3">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>15 min – 60 min</td> <td>Compressor Blowdown (ESD)</td> <td>42</td> <td>41</td> <td>40 (1)</td> </tr> <tr> <td>6 min – 15 min</td> <td>Compressor Blowdown (shutdown and unload)</td> <td>44</td> <td>43</td> <td>37</td> </tr> </tbody> </table> <p>1. Where ESD flare events exceed a frequency of occurrence of 1 per 21 days or duration higher than 15 minutes per event to a reduced flow rate of less than 0.5mmscf/d for each event, a lower limit of 36dB(A) Leq 15 minute applies at night.</p> <p>3. Definition: A flaring event is taken to be any gas flow to the flare greater than that which is necessary to maintain the pilot flame.</p>	Location	Duration of each Event	Expected Type Of Event (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 Blowdown (ESD)	40	40	35	6 min – 15 min	Compressor Blowdown (shutdown and unload)	42	42	37	R7 Mt. Gilead	> 2.5 hours	Spill Valve	37	36	36	15 min – 60 min	Compressor Blowdown (ESD)	42	41	40 (1)	6 min – 15 min	Compressor Blowdown (shutdown and unload)	44	43	37	<p>It was reported 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>	Conformance
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																																				
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	6 min – 15 min	Compressor Blowdown (shutdown and unload)	44	43	37																																				
4-32	<p>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.</p> <p>Where it can be demonstrated that direct measurement of noise from the premises is impractical, the DECC may accept alternative means of determining compliance. See Chapter 11 of the NSW Industrial Noise Policy.</p> <p>The modification factors presented in Section 4 of the NSW Industrial Noise Policy shall also be applied to the measured noise levels where applicable.</p>	The auditor sighted quarterly noise reports prepared by Wilkinson Murray in 2010/11 and 2011/12 and noted conformance with the requirements of this condition.	Conformance																																						

B.3 DA 282-6-2003-I (RPGP, Rosalind Park, Wandinong, EMAI (EM01-20, 40))

No.	Consent Condition	Evidence	Finding						
4-33	The noise emission limits identified in Conditions 29, 29A and 31 apply under meteorological conditions of: <ul style="list-style-type: none"> • Wind speed up to 3m/s at 10 metres above ground level; or • Temperature inversion conditions of up to 3oC/100m and wind speed up to 2m/s at 10 metres above the ground. 	The auditor sighted quarterly noise reports prepared by Wilkinson Murray in 2010/11 and 2011/12 and noted conformance with the requirements of this condition.	Conformance						
4-34	Noise – Construction and Well Maintenance The Applicant shall prepare and implement a Construction and Well Maintenance Noise Management Protocol to be used for the duration of the project. The Protocol must include, but is not necessarily limited to:	The auditor sighted the Noise Management Sub-Plan (August 2008) and noted that the Plan conforms to the requirements of this condition.	Conformance						
4-34(a)	Noise compliance standards.	Evidence of implementation of the plan includes quarterly noise monitoring, training and induction programs, Community Consultative Committee minutes and the complaints register. There were no noise complaints reported during the audit period in relation to this development consent.	Conformance						
4-34(b)	Community consultation.		Conformance						
4-34(c)	Advance notice to affected members of the community for planned well maintenance activities.		Conformance						
4-34(d)	Complaints handling monitoring/system.		Conformance						
4-34(e)	Site contact person to follow up complaints.		Conformance						
4-34(f)	Mitigation measures.		Conformance						
4-34(g)	The design/orientation of the proposed mitigation methods demonstrating best practice.		Conformance						
4-34(h)	Construction times.		Conformance						
4-34(i)	Contingency measures where noise complaints are received.		Conformance						
4-34(j)	Monitoring methods and program.		Conformance						
4-34A	Noise from the drilling and construction of GL14 and GL15 shall not exceed the sound pressure level (noise) limits presented in the table below: <table border="1" data-bbox="324 1053 1030 1173"> <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 was not activated during the audit period. It was reported that all construction works were completed prior to the audit period.	No Finding
Receiver Location	Night Time Noise Limit dB(A) L _{Aeq}								
Glenlee House	35								
Menangle Park	35								

B.3 DA 282-6-2003-I (RPGP, Rosalind Park, Wandinong, EMAI (EM01-20, 40))

No.	Consent Condition	Evidence	Finding															
4-34B	Noise from the drilling and construction of EM38 shall not exceed the sound pressure level (noise) limits in the table below:	Condition was not activated during the audit period. It was reported that all construction works were completed prior to the audit period.	No Finding															
	<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>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					
	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														
4-34C	Noise from the drilling and construction of EM39 and GL17 shall not exceed the sound pressure level (noise) limits in the table below:	Condition was not activated during the audit period. It was reported that all construction works were completed prior to the audit period.	No Finding															
	<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>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
	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														
4-35	<p>Noise – Drilling Impacts</p> <p>The Applicant shall implement management practices as necessary to minimise the potential noise impacts from drilling work at gas wells located on EMAI. These management practices are to include, but are not limited to:</p>	<p>The auditor sighted the Noise Management Sub-Plan (August 2008) and noted that the Plan conforms to the requirements of this condition.</p> <p>There were no drilling works undertaken during the audit period.</p>	Conformance															
4-35(a)	Identifying all potentially affected noise sensitive receivers (including residences of EMAI staff) that may be affected by drilling work at these wells.																	
4-35(b)	Predicting potential noise levels from the proposed well drilling methods where appropriate.																	
4-35(c)	Identifying and implementing all reasonable and feasible noise mitigation measures to reduce any drilling noise impacts.																	
4-35(d)	Documenting and implementing any specific work practices the Applicant will employ to limit noise; conducting noise monitoring where appropriate.																	
4-35(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.																	

B.3 DA 282-6-2003-I (RPGP, Rosalind Park, Wandinong, EMAI (EM01-20, 40)

No.	Consent Condition	Evidence	Finding
4-36	<p>Hours of Operation Planned maintenance activities at any of the wells must only be conducted between:</p> <ul style="list-style-type: none"> • 7am and 6pm on weekdays; and • 8am and 1pm on Saturdays (excluding Public Holidays). <p>This condition does not apply to the delivery of material outside the hours of operation permitted by the DECC's licence, if that delivery is required by police or other authorities for safety reasons; and/or the operation or personnel or equipment are endangered. In such circumstances, prior notification is to be provided to the DECC and affected residents as soon as possible, or within a reasonable period in the case of emergency.</p>	The auditor sighted the Noise Management Sub-Plan (August 2008) and noted that the Plan conforms to the requirements of this condition. It was reported that this condition is communicated to employees and contractors through the role-specific induction program.	Conformance
4-36 A	<p>Construction Hours 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.</p>	The auditor sighted the Noise Management Sub-Plan (August 2008) and noted that the Plan conforms to the requirements of this condition. It was reported that this condition is communicated to employees and contractors through the role-specific induction program.	Conformance
4-37	<p>Flare – Measures to Reduce Noise The Applicant must implement the following noise mitigation options to prevent noise impacts from flare operation:</p> <ul style="list-style-type: none"> • Noise mitigation options 1 through to 9 (exclusive of option 8) must be implemented to prevent undue noise impacts at Receiver Location R7 (Mount Gilead residence) as referred to in Table B.1 titled "Flare Mitigation Options – Mt. Gilead (R7)" in the Letter Report titled 'Stage 2 Coal Bed Methane Project – Response to the EPA's Request for Flare Noise Details' from Environmental Resources Management Australia to Sydney Gas Ltd dated 22 October 2003. • Measures identified in the report "Amendment to Statement of Evidence – Compressor Blow Down Systems" by Gary Scott dated 11 June 2004. 	It was reported that there were no changes during the audit period to the flare noise mitigation measures. 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.	Conformance
4-38	<p>Operational Noise Management Plan The Applicant shall prepare and implement a Noise Management Plan for the whole site. The Plan shall be submitted to the Director-General for approval within six months of the date of this consent. The Plan shall include, but not necessarily be limited to:</p>	The auditor sighted the Noise Management Sub-Plan (August 2008) and noted conformance to the requirements of this condition.	Conformance
4-38(a)	Identification of the potential sources of noise during drilling and operation.		Conformance

B.3 DA 282-6-2003-I (RPGP, Rosalind Park, Wandinong, EMAI (EM01-20, 40))

No.	Consent Condition	Evidence	Finding
4-38(b)	The noise criteria for these activities.		Conformance
4-38(c)	Details of what actions and measures would be implemented to ensure that these operations would comply with the relevant noise criteria.		Conformance
4-38(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.	The Noise Management Sub-Plan (August 2008) does not require noise monitoring results to be reported to the Director-General. Although noise monitoring results are included in the AEPR which is submitted to the Director-General, this information is not reflected in the Noise Management Sub-Plan.	Non-Conformance 2
4-38(e)	Describe what procedures would be followed to ensure compliance.	The auditor sighted the Noise Management Sub-Plan (August 2008) and noted conformance to the requirements of this condition.	Conformance
4-39	Operating Conditions 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 (August 2008) and noted the inclusion of a number of noise mitigation measures. The following controls were identified during an inspection of the Rosalind Park Gas Plant: -Noise barrier around the flare; -Acoustic buildings surrounding the compressors; -Sound barriers around compressor 1; and -Low noise fans on compressors 2 and 3. It was reported that piping upgrades were undertaken to reduce resonating noise from pipework. Further, no truck movements or heavy vehicles are scheduled at night except during emergency events. The auditor sighted quarterly noise reports prepared by Wilkinson Murray in 2010/11 and 2011/12 and noted conformance with defined noise limits.	Conformance
4-40	Monitoring The Applicant must submit a noise compliance report to the DECC and the Department within one month of commissioning of the Gas Treatment Plant and on an annual basis with the Annual Return required by the DECC's licence to assess the project's compliance with the noise limits in Conditions 29 and 31. The noise monitoring must be conducted in accordance with Condition 42.	A non-conformance was reported against this condition in the 2008-2010 Independent Environmental Audit (24 August 2011). The auditor sighted the Annual Returns for the periods ending 21 December 2010 and 21 December 2011 and noted conformance with this condition.	Conformance

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No.	Consent Condition	Evidence	Finding
4-41	Following the first 12 months of continuous noise monitoring, during the life of the Development or as otherwise agreed by the Director-General, the Applicant shall undertake quarterly attended monitoring at the Mt Gilead Homestead to the satisfaction of the Director-General, in accordance with the NSW Industrial Noise Policy and AS 1055: "Acoustics – Description and Measurement of Environmental Noise".	The Noise Management Sub-Plan (August 2008) notes that attended noise monitoring will be conducted quarterly from nominated receivers adjacent to the Rosalind Park Gas Plant. The following noise monitoring records were sighted for the audit period: -15 June 2010; -16 November 2010; -27 January 2011; -4 April 2011; -16 August 2011; -24 October 2011; -23 February 2012; and -17 May 2012.	Conformance
4-42	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 the DECCW. Following approval, the plan must be implemented to the satisfaction of the Director General. This Plan must:	The auditor sighted correspondence from AGL to the DoPI (10 September 2008 and 1 October 2008) verifying submission of the EMS. The auditor also sighted correspondence from the EPA (dated 18 November 2010) confirming consultation on the Noise Management Plan (August 2008).	Conformance
4-42(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.	The auditor sighted the Noise Management Sub-Plan (August 2008) and noted conformance to the requirements of this condition.	Conformance
4-42(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 22 and recording of meteorological conditions during monitoring (including wind speed, wind direction, and data suitable for quantifying the presence or otherwise of temperature inversions).		Conformance

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No.	Consent Condition	Evidence	Finding
4-43	<p>Noise Monitoring Report - Flare</p> <p>The Applicant must submit to the DECC's Manager Sydney Industry PO Box 668 Parramatta NSW 2124 within seven months of commissioning of the Gas Treatment Plant, a report on noise from operation of the flare in the first 6 months of operation of the plant. The report must assess the compliance of noise levels during the range of flaring incidents experienced since commissioning, with the noise limits provided in Conditions 29 and 31. The noise monitoring must be undertaken in accordance with the Noise Monitoring Program in condition 42. Where during the first six month period all flare types identified in Condition 31 have not occurred, noise measurements shall be carried out of a simulation of the remaining events by applying the appropriate flow rates in order to assess compliance.</p> <p>The report must contain the following information:</p> <ul style="list-style-type: none"> • A listing of each incident when the flare operated including the duration, gas discharge rate and cause of the incident; • The temperature and volume data for each flare event, as required by Condition 59; • The results of noise measurements for flare operation for each flare type event, as required by Condition 31, • The results of noise measurements for flare operation for each flare event for receivers at location R7; and • An assessment of compliance with noise limits provided in Condition 31. The noise monitoring must be undertaken in accordance with Condition 42. • Where noise levels do not comply with Condition 31, noise mitigation measures to ensure compliance. <p>Modification to the control system to reduce gas flow at the flare is considered a practical noise mitigation measure.</p>	Condition closed in a previous audit.	No Finding
4-44	<p>Redrilling and Refracking Management Plan</p> <p><i>Note: For the purposes of this consent the redrilling and/or additional fraccing of a well does not constitute wellhead maintenance.</i></p> <p>The Applicant shall obtain the prior approval of the Director-General for the redrilling and/or additional fraccing of a gas well.</p>	It was reported that there were no redrilling or fraccing works undertaken during the audit period.	No Finding

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No.	Consent Condition	Evidence	Finding
4-45	The Applicant shall prepare a Redrilling and Refracting Management Plan in consultation with the DoPI for the redrilling and/or refracting of an existing well. The Plan shall be submitted to the Director-General no later than one month prior to the commencement of the work or within such period as agreed by the Director-General. The Plan shall include, but not necessarily be limited to:	It was reported that there were no redrilling or fracing works undertaken during the audit period.	No Finding
4-45(a)	A description of all the activities to be undertaken on the well site during the redrilling and/or refracting work.		No Finding
4-45(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.		No Finding
4-45(c)	Reference to the relevant parts of the Environmental Management Plan required under conditions 1 and 2 (Schedule 5) of this consent.		No Finding
4-45(d)	Compliance with all the relevant environmental performance requirements of this consent.		No Finding
4-45(e)	Arrangements for complaints handling procedures during the redrilling/refracting work. The Applicant shall give written notification of the proposed redrilling/refracting work to potentially affected residences and other noise sensitive receivers at least fourteen days prior to work commencing.		No Finding
4-46	VIBRATION Condition Report The Applicant shall prepare a Condition Report for all residences or structures (including structures on EMAI) within 25 metres of a wellhead. The Applicant shall undertake an inspection of the residence and/or structure prior to work commencing, and a follow up inspection within one month of the completion of the work. The Applicant shall take immediate action for repair of any damage to the residence or structure as a result of the work and to avoid any further damage. A copy of the Condition Report shall be submitted to the Director-General and the DoPI after completion of the work.	It was reported that there were no redrilling or fracing works undertaken during the audit period.	No Finding

B.3 DA 282-6-2003-I (RPGP, Rosalind Park, Wandinong, EMAI (EM01-20, 40)

No.	Consent Condition	Evidence	Finding																					
4-47	<p>AIR QUALITY Air Emission Criteria The Applicant shall ensure that air pollutant emissions from the development do not exceed the following criteria at any privately owned residence.</p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Averaging Period</th> <th>Criterion</th> </tr> </thead> <tbody> <tr> <td>Nitrogen Dioxide</td> <td>1 Hour</td> <td>246 $\mu\text{g}/\text{m}^3$</td> </tr> <tr> <td>Nitrogen Dioxide</td> <td>Annual</td> <td>62 $\mu\text{g}/\text{m}^3$</td> </tr> <tr> <td>Sulphur Dioxide</td> <td>1 Hour</td> <td>570 $\mu\text{g}/\text{m}^3$</td> </tr> <tr> <td>Sulphur Dioxide</td> <td>Annual</td> <td>60 $\mu\text{g}/\text{m}^3$</td> </tr> <tr> <td>Sulphuric acid mist</td> <td>3 minute</td> <td>33 $\mu\text{g}/\text{m}^3$</td> </tr> <tr> <td>Methyl mercaptan</td> <td>3 minute</td> <td>0.84 $\mu\text{g}/\text{m}^3$</td> </tr> </tbody> </table>	Pollutant	Averaging Period	Criterion	Nitrogen Dioxide	1 Hour	246 $\mu\text{g}/\text{m}^3$	Nitrogen Dioxide	Annual	62 $\mu\text{g}/\text{m}^3$	Sulphur Dioxide	1 Hour	570 $\mu\text{g}/\text{m}^3$	Sulphur Dioxide	Annual	60 $\mu\text{g}/\text{m}^3$	Sulphuric acid mist	3 minute	33 $\mu\text{g}/\text{m}^3$	Methyl mercaptan	3 minute	0.84 $\mu\text{g}/\text{m}^3$	<p>The auditor sighted the 'Quarterly Stack Emission Survey, Camden Gas Project Stage 2, Stephenson Environmental Management Australia, June 2006' and noted conformance with the requirements of this condition.</p>	<p>Conformance</p>
Pollutant	Averaging Period	Criterion																						
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No.	Consent Condition	Evidence	Finding																																																												
4-48	<p>For each discharge point specified in the table below, the Applicant shall ensure that the concentration of a pollutant discharged at that point does not exceed the concentration limit specified for that pollutant in the table, and where a pH quality limit is specified in the table, the specified percentage of samples must be within the specified ranges.</p> <p>POINT 1, 2, 3</p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Units of measure</th> <th>100 percentile limit</th> <th>Reference Conditions</th> <th>Averaging Period</th> </tr> </thead> <tbody> <tr> <td>Oxides of Nitrogen</td> <td>mg/m³</td> <td>461</td> <td>Dry, 273K, 101.3kPa, 7% O₂</td> <td>As per test method</td> </tr> <tr> <td>Sulfur Dioxide</td> <td>mg/m³</td> <td>7</td> <td>Dry, 273 K, 101.3 kPa</td> <td>As per test method</td> </tr> <tr> <td>Sulphuric acid mist and/or sulphur trioxide</td> <td>mg/m³</td> <td>30</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>30</td> <td>Dry, 273 K, 101.3 kPa</td> <td>As per test method</td> </tr> </tbody> </table> <p>POINT 5</p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Units of measure</th> <th>100 percentile limit</th> <th>Reference Conditions</th> <th>Averaging Period</th> </tr> </thead> <tbody> <tr> <td>Oxides of Nitrogen</td> <td>mg/m³</td> <td>13</td> <td>Dry, 273K, 101.3kPa, 7% O₂</td> <td>As per test method</td> </tr> <tr> <td>Sulfur Dioxide</td> <td>mg/m³</td> <td>1042</td> <td>Dry, 273 K, 101.3 kPa</td> <td>As per test method</td> </tr> <tr> <td>Sulphuric acid mist and/or sulphur trioxide</td> <td>mg/m³</td> <td>35</td> <td>Dry, 273 K, 101.3 kPa</td> <td>As per test method</td> </tr> </tbody> </table> <p>Note 1: Concentration limits at points 1, 2, 3, 4 and 5 in the above Condition may be subject to review after the submission of the Air Emissions Reports in compliance with Conditions 62 and 63.</p> <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. This assessment must be undertaken in accordance with the document: Approved Methods and Guidance for the Modelling and Assessment of Air Pollutants in NSW. 	Pollutant	Units of measure	100 percentile limit	Reference Conditions	Averaging Period	Oxides of Nitrogen	mg/m ³	461	Dry, 273K, 101.3kPa, 7% O ₂	As per test method	Sulfur Dioxide	mg/m ³	7	Dry, 273 K, 101.3 kPa	As per test method	Sulphuric acid mist and/or sulphur trioxide	mg/m ³	30	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	30	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-conformance was reported against this condition in the 2008-2010 Independent Environmental Audit (24 August 2011) due to exceeding the limits for sulfuric acid mist and sulfur trioxide.</p> <p>The auditor sighted the quarterly air monitoring reported prepared by EML Air Pty Ltd for the audit period and noted conformance with the requirements of this condition.</p> <p>It was noted that the 100 percentile limit for nitrogen oxides was met on a number of occasions during the audit period. It is recommended that operations be reviewed to ensure ongoing compliance with concentration limits.</p>	<p>Conformance - Improvement Opportunity</p>
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																																																											
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No.	Consent Condition	Evidence	Finding												
4-49	To avoid any doubt, the above Condition does not authorise the discharge or emission of any other pollutants.	Condition noted.	No Finding												
4-50	<p>Combustion Parameters For each monitoring/discharge point or utilisation area specified in the table below (by point number), the Applicant shall ensure that the parameter is equal to or greater than the lower limits specified for that parameter in the table.</p> <p>POINT 7</p> <table border="1"> <thead> <tr> <th>Parameter</th> <th>Units of measure</th> <th>Lower limit</th> <th>Averaging period</th> </tr> </thead> <tbody> <tr> <td>Residence time</td> <td>S</td> <td>*TBD</td> <td>Instantaneous</td> </tr> <tr> <td>Temperature</td> <td>°C</td> <td>*TBD</td> <td>Instantaneous</td> </tr> </tbody> </table> <p>Note: *TBD = To be determined</p> <p><i>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.</i></p>	Parameter	Units of measure	Lower limit	Averaging period	Residence time	S	*TBD	Instantaneous	Temperature	°C	*TBD	Instantaneous	Condition noted.	No Finding
Parameter	Units of measure	Lower limit	Averaging period												
Residence time	S	*TBD	Instantaneous												
Temperature	°C	*TBD	Instantaneous												
4-51	<p>Operating Conditions The Applicant shall undertake the development and maintain the condition of the premises in a way that minimises or prevents the emission of dust generated by the development.</p>	<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>It was noted by the auditor that a number of dust mitigation measures are detailed in the Air Quality Management Sub-Plan (August 2008) 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>	Conformance												

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No.	Consent Condition	Evidence	Finding
4-52	The Applicant shall take all practicable measures to ensure that all vehicles entering or leaving a site, carrying a load that may generate dust, are covered at all times, except during loading and unloading. Any such vehicles shall be covered or enclosed in a manner that will minimise emissions of dust from the vehicle at all times.	The auditor sighted the Air Quality and Management Sub-Plan (August 2008) and noted a requirement to cover vehicle loads. It was reported that there have been no deliveries of shale or road base to the Rosalind Park Gas Plant during the audit period.	Conformance
4-53	The Applicant shall take all practicable measures to minimise the generation of wind blown dust from soil stockpiles.	The Soil and Water Management Sub-Plan (July 2012) requires stockpiles to be vegetated if they are to be stored on site for a long period of time. It was reported that topsoil stockpiles tend to naturally vegetate through the seed bank. Water carts are also employed to minimise the generation of wind-blown dust.	Conformance

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No.	Consent Condition	Evidence	Finding																																
4-54	<p>Monitoring Locations</p> <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="322 411 1140 1145"> <thead> <tr> <th data-bbox="322 411 434 512">EPA Identification no.</th> <th data-bbox="434 411 629 443">Type of Monitoring Point</th> <th data-bbox="629 411 786 480">Type of Discharge Point</th> <th data-bbox="786 411 1140 443">Description of Location</th> </tr> </thead> <tbody> <tr> <td data-bbox="322 512 434 608">1</td> <td data-bbox="434 512 629 544">Air emissions monitoring</td> <td data-bbox="629 512 786 544">Discharge to air</td> <td data-bbox="786 512 1140 608">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="322 608 434 703">2</td> <td data-bbox="434 608 629 639">Air emissions monitoring</td> <td data-bbox="629 608 786 639">Discharge to air</td> <td data-bbox="786 608 1140 703">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="322 703 434 799">3</td> <td data-bbox="434 703 629 735">Air emissions monitoring</td> <td data-bbox="629 703 786 735">Discharge to air</td> <td data-bbox="786 703 1140 799">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="322 799 434 879">4</td> <td data-bbox="434 799 629 831">Air emissions monitoring</td> <td data-bbox="629 799 786 831">Discharge to Air</td> <td data-bbox="786 799 1140 879">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="322 879 434 975">5</td> <td data-bbox="434 879 629 911">Air emissions monitoring</td> <td data-bbox="629 879 786 911">Discharge to Air</td> <td data-bbox="786 879 1140 975">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="322 975 434 1054">6</td> <td data-bbox="434 975 629 1007">Air emissions monitoring</td> <td data-bbox="629 975 786 1007">Discharge to Air</td> <td data-bbox="786 975 1140 1054">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 1054 434 1145">7</td> <td data-bbox="434 1054 629 1086">Air emissions monitoring</td> <td data-bbox="629 1054 786 1086">Discharge to Air</td> <td data-bbox="786 1054 1140 1145">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 EML Air Pty Ltd and noted that the description of monitoring points 1 to 7 aligns with this condition. An inspection of the Rosalind Park Gas Plant was undertaken and monitoring points 1 to 7 were directly observed.</p>	<p>Conformance</p>
EPA Identification no.	Type of Monitoring Point	Type of Discharge Point	Description of Location																																
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B.3 DA 282-6-2003-I (RPGP, Rosalind Park, Wandinong, EMAI (EM01-20, 40)

No.	Consent Condition	Evidence	Finding
4-55	<p>Testing Method – Concentration Limits</p> <p>The Applicant shall ensure that monitoring for the concentration of a pollutant emitted to the air required to be conducted by the DECC’s General Terms of Approval, or a licence under the Protection of the Environment Operations Act 1997, in relation to the development or in order to comply with a relevant local calculation protocol is done in accordance with:</p>	The auditor sighted the quarterly air monitoring reported prepared by EML Air Pty Ltd for the audit period and noted conformance against the requirements of this condition.	Conformance
4-55(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		Conformance
4-55(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		Conformance
4-55(c)	<p>If no such requirement is imposed by or under the POEO Act 1997 or by the general terms of approval or a condition of the licence or the protocol (as the case may be), any methodology approved in writing by the DECC for the purposes of that testing prior to the testing taking place.</p> <p>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”.</p>		Conformance
4-56	<p>Manufacturers Design Specifications</p> <p>At least 1 month prior to the commissioning of the Gas Treatment Plant, the Applicant shall submit to the DECC’s Manager Sydney Industry PO Box 668 Parramatta NSW 2124, a report containing Manufacturers Design Specifications for air emissions from each of the following:</p> <ul style="list-style-type: none"> • compressor engine; • TEG Fire tube; and • Reboiler still column. <p>The report must compare the Design Specifications with the limits specified in Condition 48 and 50 to demonstrate that compliance can be achieved.</p> <p><i>Note: The objective of this condition is to verify that the equipment installed is designed to comply with the air emissions limits specified in Condition 48.</i></p>	Condition closed in a previous audit.	No Finding

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No.	Consent Condition	Evidence	Finding
4-57	<p>Monitoring</p> <p>Within 6 months of the date of this consent, the Applicant shall submit a detailed Air Quality Monitoring Program for the development to the Director-General, which has been prepared in consultation with the DECC and includes a detailed air quality monitoring protocol for evaluating compliance of the development with the Air Quality Pollutants in Condition 47. The Applicant shall prepare the Air Quality Monitoring Program in accordance with the NSW DECC Guideline "Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales" 20 July 2001 or its latest version.</p>	Condition closed in a previous audit.	No Finding

B.3 DA 282-6-2003-I (RPGP, Rosalind Park, Wandinong, EMAI (EM01-20, 40))

No.	Consent Condition	Evidence	Finding																																																																																																																								
4-58	<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"> <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>POINTS 1, 2, 3, 4, 5</p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Units of measure</th> <th>Frequency</th> <th>Sampling Method</th> </tr> </thead> <tbody> <tr> <td>Velocity</td> <td>m/s</td> <td>Quarterly</td> <td>TM-2</td> </tr> <tr> <td>Volumetric flow rate</td> <td>m³/s</td> <td>Quarterly</td> <td>TM-2</td> </tr> <tr> <td>Temperature</td> <td>°C</td> <td>Quarterly</td> <td>TM-2</td> </tr> <tr> <td>Moisture</td> <td>%</td> <td>Quarterly</td> <td>TM-22</td> </tr> <tr> <td>Dry gas density</td> <td>Kg/m³</td> <td>Quarterly</td> <td>TM-23</td> </tr> <tr> <td>Molecular weight of stack gases</td> <td>g/g.mol</td> <td>Quarterly</td> <td>TM-23</td> </tr> <tr> <td>Oxygen</td> <td>%</td> <td>Quarterly</td> <td>TM-25</td> </tr> <tr> <td>Carbon dioxide</td> <td>%</td> <td>Quarterly</td> <td>TM-24</td> </tr> <tr> <td>Oxides of Nitrogen</td> <td>mg/m³</td> <td>Quarterly</td> <td>TM-11</td> </tr> <tr> <td>Sulfuric Acid Mist/Sulfur Trioxide</td> <td>mg/m³</td> <td>Quarterly</td> <td>TM-3</td> </tr> <tr> <td>Sulfur Dioxide</td> <td>mg/m³</td> <td>Quarterly</td> <td>TM-4</td> </tr> <tr> <td>Selection of sampling positions</td> <td>-</td> <td>-</td> <td>TM-1</td> </tr> </tbody> </table> <p><i>Note: The requirement for monitoring of emissions at Points 2 and 3 only applies after compressor engines 2 and 3 respectively, commence operations.</i></p> <p>POINT 6</p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Units of measure</th> <th>Frequency</th> <th>Sampling Method</th> </tr> </thead> <tbody> <tr> <td>Velocity</td> <td>m/s</td> <td>Quarterly</td> <td>TM-2</td> </tr> <tr> <td>Volumetric flow rate</td> <td>m³/s</td> <td>Quarterly</td> <td>TM-2</td> </tr> <tr> <td>Temperature</td> <td>°C</td> <td>Quarterly</td> <td>TM-2</td> </tr> <tr> <td>Moisture</td> <td>%</td> <td>Quarterly</td> <td>TM-22</td> </tr> <tr> <td>Dry gas density</td> <td>Kg/m³</td> <td>Quarterly</td> <td>TM-23</td> </tr> <tr> <td>Molecular weight of stack gases</td> <td>g/g.mol</td> <td>Quarterly</td> <td>TM-23</td> </tr> <tr> <td>Oxygen</td> <td>%</td> <td>Quarterly</td> <td>TM-25</td> </tr> <tr> <td>Carbon dioxide</td> <td>%</td> <td>Quarterly</td> <td>TM-24</td> </tr> <tr> <td>Odour</td> <td>OU</td> <td>Quarterly</td> <td>OM-7</td> </tr> <tr> <td>Selection of sampling positions</td> <td>-</td> <td>-</td> <td>TM-1</td> </tr> </tbody> </table>	Pollutant	Units of Measure	Frequency	Sampling Method	Oxides of Nitrogen	mg/m ³	Continuous	CEM-2	Temperature	oC	Continuous	TM-2	Moisture	%	Continuous	TM-22	Volumetric flow rate	m ³ /s	Continuous	CEM-6	Oxygen	%	Continuous	CEM-3	Pollutant	Units of measure	Frequency	Sampling Method	Velocity	m/s	Quarterly	TM-2	Volumetric flow rate	m ³ /s	Quarterly	TM-2	Temperature	°C	Quarterly	TM-2	Moisture	%	Quarterly	TM-22	Dry gas density	Kg/m ³	Quarterly	TM-23	Molecular weight of stack gases	g/g.mol	Quarterly	TM-23	Oxygen	%	Quarterly	TM-25	Carbon dioxide	%	Quarterly	TM-24	Oxides of Nitrogen	mg/m ³	Quarterly	TM-11	Sulfuric Acid Mist/Sulfur Trioxide	mg/m ³	Quarterly	TM-3	Sulfur Dioxide	mg/m ³	Quarterly	TM-4	Selection of sampling positions	-	-	TM-1	Pollutant	Units of measure	Frequency	Sampling Method	Velocity	m/s	Quarterly	TM-2	Volumetric flow rate	m ³ /s	Quarterly	TM-2	Temperature	°C	Quarterly	TM-2	Moisture	%	Quarterly	TM-22	Dry gas density	Kg/m ³	Quarterly	TM-23	Molecular weight of stack gases	g/g.mol	Quarterly	TM-23	Oxygen	%	Quarterly	TM-25	Carbon dioxide	%	Quarterly	TM-24	Odour	OU	Quarterly	OM-7	Selection of sampling positions	-	-	TM-1	<p>Continuous emissions monitoring of sampling points 1, 2 and 3 was not performed during the audit period. This matter was reported to the EPA on discovery by AGL management in July 2012. It is understood that measures are currently being undertaken to address this non-compliance.</p>	<p>Non conformance 1</p>
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No.	Consent Condition	Evidence	Finding
4-59	Deleted	Condition removed.	No Finding
4-60	Installation of Air Monitoring Points Report The Applicant must submit to the DECC's Manager Sydney Industry PO Box 668 Parramatta NSW 2124, one month prior to the completion of construction of the Gas Treatment Plant, a written report containing plans showing the locations of air monitoring points for discharges from:	Condition closed in a previous audit.	No Finding
4-60(a)	The compressor engines.		No Finding
4-60(b)	TEG Fire Tube.		No Finding
4-60(c)	Reboiler Still Column.		No Finding
4-60(d)	Carbon scrubber vent stack.		No Finding
4-61	Monitoring Program for Air Based Assessable Pollutants The Applicant must submit to the DECC's Manager Sydney Industry PO Box 668 Parramatta NSW 2124, one month prior to the completion of construction of the Gas Treatment Plant, a written report containing a program for monitoring of assessable pollutants from the start gas vents.	Condition closed in a previous audit.	No Finding
4-62	Requirement to Monitor Concentrations of Pollutants Discharged Post Commissioning Air Emissions Report The Applicant must submit to the DECC's Manager Sydney Industry PO Box 668 Parramatta NSW 2124, within six months of the commissioning of the Gas Treatment Plant, a written report detailing the results of post commissioning source air emissions sampling and analysis undertaken in accordance with the requirements specified in Condition 58 and Condition 59. The report must assess compliance with the limit conditions specified in Condition 48 and Condition 50. The report must also include an assessment of flare operations and report on the results of continuous temperature monitoring and flaring incidents.	Condition closed in a previous audit.	No Finding
4-63	Quarterly Reporting of Air Emissions The Applicant must submit the results of quarterly air emissions monitoring as required by Condition 58 on a quarterly basis for the first 12 months of the operation of the Gas Treatment Plant to the DECC's Manager Sydney Industry at PO Box 668 Parramatta NSW 2124. The results must be received by the DECC within one month of the date on which the sampling was undertaken for that quarter.	Condition was not activated during the audit period.	No Finding

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No.	Consent Condition	Evidence	Finding
4-64	<p>Odour</p> <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>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>The auditor sighted quarterly monitoring reports prepared by EML Air Pty Ltd and noted that the quarterly monitoring of odour is undertaken from Point 6 (odourised carbon vent). There is no emissions limits set on odour through EPL12003 or this development consent.</p> <p>There were no odours evident on the site and there were no reported odour complaints recorded during the audit period.</p>	Conformance
4-65	<p>The Applicant must not cause the emission of detectable mercaptan odour from the premises.</p> <p><i>Note: Should odour emissions become an issue, the DECC will consider requiring investigation and implementation of further odour control measures.</i></p>	<p>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 review 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>The auditor sighted quarterly monitoring reports prepared by EML Air Pty Ltd and noted the quarterly monitoring of odour is undertaken from Point 6 (odourised carbon vent). There is no emissions limits set on odour through EPL12003 or this development consent.</p> <p>There were no odours evident on the site and there were no reported odour complaints recorded during the audit period.</p>	Conformance
4-66	<p>SURFACE WATER MANAGEMENT</p> <p>Pollution of Waters</p> <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 the development.</p>	<p>The auditor sighted the EMP for the CGP, including the Soil and Water Management Sub-Plan (July 2012) and the Waste Management Sub-Plan (August 2008). The plans detail a number of controls to prevent the pollution of water.</p>	Conformance

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No.	Consent Condition	Evidence	Finding
4-67	<p>Management of Waste Water <i>Note: Section 120 of the Protection of the Environment Operations Act 1997 applies to the disposal of waste water. This section refers to the pollution of waters.</i></p> <p>Operating Conditions The Applicant shall undertake the development in a way that minimises the potential surface water impacts of the development.</p>	<p>It was reported in the AEPR that surface water is generated from the following sources: drill mud, gas plant water, and grey water and septic tank water from the Rosalind Park Gas Plant.</p> <p>A number of controls and monitoring requirements were sighted in the Soil and Water Management Plan (July 2012) to minimise potential surface water impacts.</p> <p>Within the Rosalind Park Gas Plant, a diversion drain is in place around the site perimeter.</p> <p>The auditor sighted a sample of service dockets from Theiss and Worth Recycling for the collection of septic tank waste and flare pit water, respectively. The collections align with the AGL Footprint workbooks ('AGL Enviro Footprint Workbook FY11' and 'AGL Enviro Footprint Workbook FY12').</p> <p>It is noted that a waste audit was not undertaken as part of this independent audit.</p>	Conformance

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No.	Consent Condition	Evidence	Finding																																								
4-68	<p>Monitoring Locations</p> <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"> <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.	No Finding																								
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4-69	<p>Monitoring of Effluent Parameters</p> <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 monitoring results for Point 8 (ALS) and noted conformance with the requirements of this condition.	Conformance
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No.	Consent Condition	Evidence	Finding
4-70	The Applicant must install a measurement device in the Evaporation Pond at the Gas Treatment Plant Site for recording the depth of effluent in the storage for the life of the Evaporation Pond.	The auditor sighted the measurement gauge installed in the Evaporation Pond and noted conformance with the requirements of this condition.	Conformance
4-71	Monitoring Program for Water Based Assessable Pollutants The Applicant must at least one month prior to the completion of construction of the Gas Treatment Plant, submit to the DECC's Manager Sydney Industry PO Box 668 Parramatta NSW 2128, a written report containing a program for monitoring assessable pollutants contained within the following waste streams:	Condition closed in a previous audit.	No Finding
4-71(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.		No Finding
4-71(b)	Sewage waste proposed to be transported to the Bargo Ponds or any other facility which can legally receive such wastes. <i>Note: Monitoring of non controlled aqueous waste is required by Condition 69.</i>		No Finding
4-72	Testing Methods – Concentration Limits Subject to any express provision to the contrary in this licence, the Applicant shall undertake monitoring for the concentration of a pollutant discharged to waters or applied to a utilisation area or taken off-site in accordance with the Approved Methods Publication unless another method has been approved by the DECC in writing before any tests are conducted.	The auditor sighted the Annual Returns for the periods ending 21 December 2010 and 21 December 2011 and noted conformance with this condition.	Conformance
4-73	Gas Gathering System - Stream Crossings <i>Note: The Rivers and Foreshore Improvement Act 1948 applies to the proposed development and therefore any excavation, removal of material from the bank, shore or bed of any stream, estuary or lake, or land within 40 metres from the top of the bank will require a Part 3A permit.</i> The Applicant shall ensure that stream crossings B and F, as shown on the plan Camden Gas Project Stage 2 – RFI Act 3A Permit Areas by Sydney Gas (Figure 2, Appendix B) are under-bored. The gas pipe is to be at least 2 metres below the bed of the watercourses. The bed and banks of the watercourses are not to be disturbed.	There were no reported under-boring works undertaken during the audit period.	No Finding

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No.	Consent Condition	Evidence	Finding
4-74	The Applicant is permitted to trench stream crossings A, C, D, E, J, K, L, M, N, O, X, Y, Z, as shown on plan Camden Gas Project Stage 2 – RFI Act 3A Permit Areas by Sydney Gas (Figure 2, Appendix B). The Applicant shall prepare and implement a representative trenched crossing design. The design shall be prepared and implemented by a person(s) with relevant knowledge, qualifications and experience, in consultation with the Director-General. The Applicant shall submit the plan for approval by the Department prior to the issue of the Part 3A Permit. The final crossing design is to be presented in plan view and cross section. The cross section is to be at right angles to the direction of flow, is to extend for a minimum distance of 10 metres from the top of both banks and is to include the location of all structures associated with the proposed crossing.	Condition not activated during the audit period.	No Finding
4-75	The Applicant shall ensure that stream crossing I as shown on plan Camden Gas Project Stage 2 – RFI Act 3A Permit Areas by Sydney Gas (Figure 2, Appendix B) is strapped to the Menangle Bridge.	Condition was not activated during the audit period.	No Finding
4-76	The Applicant shall ensure that stream crossing H as shown on plan Camden Gas Project Stage 2 – RFI Act 3A Permit Areas by Sydney Gas (Figure 2, Appendix B), is either strapped to the existing road crossing, strapped to an upgraded road crossing, under-bored or consist of a pipe bridge. Should a pipe bridge be proposed, the Applicant shall prepare and implement a design of the crossing which shall be prepared and implemented by a person(s) with relevant knowledge, qualifications and experience, in consultation with the 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.	Condition was not activated during the audit period.	No Finding
4-77	The Applicant shall advise the Director-General of the proposed stream crossing methods located on EMAI, which are to be assessed and approved by the NOW prior to the issue of the Part 3A Permit.	Condition was not activated during the audit period.	No Finding
4-78	The Applicant shall ensure that works within 20 m of watercourses are to be undertaken during dry weather conditions.	Condition was not activated during the audit period.	No Finding
4-79	The Applicant shall ensure that the disturbance to the bed and banks of all watercourses are kept at an absolute minimum during the construction procedure and reinstatement of the site.	There were no construction or rehabilitation works undertaken during the audit period.	No Finding

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No.	Consent Condition	Evidence	Finding
4-80	<p>Management of Site Water and Sediment Runoff</p> <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 Soil and Water Management Sub-Plan (July 2012) and noted the inclusion of appropriate controls to minimise soil erosion and discharge of sediments and water pollutants from the premises.</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 fire water drain.</p>	Conformance
4-81	<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 Soil and Water Management Sub-Plan (July 2012) and noted the inclusion of appropriate controls to minimise the loss of dirty water and impact on the surrounding environment. Key controls include:</p> <ul style="list-style-type: none"> -installation of diversion drains; and -use of silt fences and hay bale filters. <p>The plan also includes detailed principles for the design and construction of watercourse crossings and specific controls for the establishment of construction pads, gathering lines and access tracks.</p> <p>Implementation of the plan is achieved through the role-specific induction program.</p>	Conformance
4-82	<p>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>	<p>The auditor sighted the Soil and Water Management Sub-Plan (July 2012) and noted the inclusion of appropriate controls to minimise the loss of dirty water and impact on the surrounding environment.</p> <p>It was reported that AGL undertakes frequent site inspections to verify that pollution controls are established prior to the commencement of works. Although the EMP refers to a number of monitoring and measurement tools, it was reported that the checklists were developed by Sydney Gas and have not been amended to reflect the current EMP and sub-plans.</p> <p>It is recommended that monitoring and measurement tools be reviewed and revised to increase effectiveness.</p>	Conformance - Improvement Opportunity

B.3 DA 282-6-2003-I (RPGP, Rosalind Park, Wandinong, EMAI (EM01-20, 40))

No.	Consent Condition	Evidence	Finding
4-83	The Applicant shall document in detail the decommissioning of all sediment and erosion controls and any other water diversion structures to the satisfaction of the Director-General. The Applicant shall ensure that the decommissioning meets the requirements of the most recent version of the NSW Department of Housing's publication "Managing Urban Stormwater: Soils and Construction" (3rd Edition 1998).	A non-conformance was reported against this condition in the 2008-2010 Independent Environmental Audit (24 August 2011) due to failure to document the decommissioning process. AGL have subsequently developed the 'Sediment Control Removal Form'. The auditor sighted completed records for EM26 (2 December 2011).	Conformance
4-84	Soil and Water Management Plan The Applicant shall prepare and implement a Soil and Water Management Plan (SWMP) for the development. A person, with professional qualifications, knowledge and experience to industry standards, must prepare the SWMP. The Applicant shall seek the Director-General's prior approval of the person to prepare the Plan. The SWMP shall be prepared to the satisfaction of the Director-General prior to the issue of the Part 3A permit. This plan shall include, but not necessarily be limited to:	The auditor sighted the Soil and Water Management Sub-Plan (July 2012) and noted that the Plan largely complies with the requirements of this condition. It was reported that wastewater is not applied to land and as such, controls are not included in the Soil and Water Management Sub-Plan.	Conformance
4-84(a)	All works on protected land and in protected waters, and staging and maintenance requirements.		Conformance
4-84(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.		Conformance
4-84(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.		Conformance
4-84(d)	Demonstrate that erosion and sedimentation control measures will conform with, or exceed, the relevant requirements and guidelines contained in the Department of Housing's publication "Managing Urban Stormwater: Soils and Construction" (3rd Edition 1998) or its latest version.		Conformance
4-84(e)	Consistency with the stormwater management plan for the catchment, should one exist, or with the DECC's Managing Urban Stormwater: Council Handbook should a stormwater management plan for the catchment not exist.		Conformance
4-84(f)	Any DECC licence requirements.		Conformance
4-84(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.		Conformance

B.3 DA 282-6-2003-I (RPGP, Rosalind Park, Wandinong, EMAI (EM01-20, 40)

No.	Consent Condition	Evidence	Finding
4-84(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.		Conformance
4-84(i)	Implement a program of regular testing of waste water quality for compounds, nutrients and metals, as outlined in the EIS.		Conformance
4-84(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.		Conformance
4-84(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.		Conformance
4-84(l)	Details of the well maintenance procedures to ensure the integrity of the well isolation components to prevent the cross contamination of groundwater aquifers.		Conformance
4-84(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.		Conformance
4-84 A	Soil and Water Management Plan – Rosalind Park Access Road The Applicant shall prepare and implement a Soil and Water Management Plan for the relocated Rosalind Park access road, to the satisfaction of the Director-General. This plan must be submitted to the Director-General for approval prior to the commencement of construction, and:	Condition was not activated during the audit period.	No Finding
4-84A(a)	Be consistent with the requirements in Managing Urban Stormwater: Soils and Construction, Volume 1, 4th Edition, 2004 (Landcom).		No Finding
4-84A(b)	Identify activities that could cause soil erosion and generate sediment.		No Finding
4-84A(c)	Describe measures to minimise soil erosion and the potential for the transport of sediment to downstream waters.		No Finding
4-84A(d)	Describe the location, function, and capacity of erosion and sediment control structures.		No Finding
4-84A(e)	Describe what measures would be implemented to maintain (and if necessary, decommission) the structures over time.		No Finding

B.3 DA 282-6-2003-I (RPGP, Rosalind Park, Wandinong, EMAI (EM01-20, 40))

No.	Consent Condition	Evidence	Finding
4-84 B	<p>Piping and Filling of Watercourse</p> <p>The Applicant shall obtain a Controlled Activity Approval under the Water Management Act 2000 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.</p>	Condition was not activated during the audit period.	No Finding
4-85	<p>Evaporation Pond Liner Integrity Evaluation Program</p> <p>The Applicant must submit at least 1 month prior to completion of construction of the Treatment Plant, to the DECC's Manager Sydney Industry PO Box 668 Parramatta NSW 2124, a written report containing a program for future evaluation of the integrity testing of the liner in the evaporation pond. The report must contain details of an initial evaluation of the liner prior to use and then an on-going program for review of the integrity of the liner.</p>	<p>A non-conformance was reported against this condition in the 2008-2010 Independent Environmental Audit (24 August 2011) due to failure to provide evidence of conformance.</p> <p>The auditor sighted the Sydney Gas Project Commitments Register and noted that this condition was recorded as completed on 6 September 2004. It was reported by AGL that the initial evaluation of the liner was undertaken together with monthly inspections. Records of monthly inspections are now recorded on an inspection form ('Dam Inspection Form, DCS_GN_HSE_FM_010-Rev1') and there was no reported evidence of pond leaking.</p> <p>This condition is deemed to be closed.</p>	Conformance
4-86	<p>Within one month of the report above being provided to the licensee, the licensee must submit, to the DECC's Manager Sydney Industry PO Box 668 Parramatta NSW 2124, a copy of each written report containing the results of an evaluation of the integrity testing of the liner in the evaporation pond as specified in the report submitted to the DECC as required by Condition 85.</p>	Condition closed in a previous audit.	No Finding
4-87	<p>INDIGENOUS HERITAGE</p> <p>Protection of Indigenous Heritage</p> <p>Prior to the commencement of site preparation works for the gas wells, gas gathering system and the Gas Treatment Plant Site, the Applicant shall clearly indicate the locations of known aboriginal relics on the site, and ensure that all employees and contractors are aware of these locations, to prevent the known relics being impacted upon during site preparation and construction.</p>	Condition was not activated during the audit period.	No Finding

B.3 DA 282-6-2003-I (RPGP, Rosalind Park, Wandinong, EMAI (EM01-20, 40)

No.	Consent Condition	Evidence	Finding
4-88	The Applicant shall provide a report of the Indigenous Heritage Monitoring undertaken for the Stage II project to DECC and the Director-General within two months of the Heritage Monitoring being completed. <i>Note: Under Section 86 of the National Parks and Wildlife Act 1974, it is an offence to disturb or excavate any land with the purpose of discovering an Aboriginal object without first obtaining a Section 87 Permit.</i>	Condition was not activated during the audit period.	No Finding
4-88 A	Aboriginal Heritage – EM38 The Applicant shall ensure that development of EM38 and upgrade of the gas gathering lines are undertaken in accordance with the recommendations in the reports titled “Aboriginal Cultural Heritage Survey and Assessment Report – Camden Gas Joint Venture Project – Proposed Gas Well Location and Gas Gathering System Modifications, Camden, NSW” dated February 2007, and “Aboriginal Heritage Assessment – Sugarloaf Twin Gathering Line, Rosalind Park” dated 8 September 2006.	Condition was not activated during the audit period.	No Finding
4-88 B	Aboriginal Heritage – EM39 and GL17 The Applicant shall ensure that development of EM39 and GL17 and upgrade of the gas gathering lines are undertaken in accordance with the recommendations outlined in the cultural heritage assessment carried out by Biosis Research Pty Ltd in Appendix B of the Statement of Environmental Effects titled “Camden Gas Project Joint Venture – EM39 and GL17 Modification Project”.	Condition was not activated during the audit period.	No Finding
4-89	NON-INDIGENOUS HERITAGE Protection of the Heritage Landscape of EMAI The Applicant shall implement all mitigatory measures listed in Sections 7.1, 7.2 and 7.3 of the report titled “Statement of Heritage Impact for Land within the Elizabeth Macarthur Agricultural Institute NSW Agriculture, Menangle” by Geoffrey Britton dated September 2003.	Condition was not activated during the audit period.	No Finding
4-90	The Applicant shall ensure roadside plantings for sites EM 16, EM 18, EM 19 and EM 20 are strengthened using the species outline provided in the report titled “Statement of Heritage Impact for Land within the Elizabeth Macarthur Agricultural Institute NSW Agriculture, Menangle” by Geoffrey Britton dated September 2003. <i>Note: a relic is defined under the Heritage Act as any deposit, object or material evidence: (a) which relates to the settlement of the area that comprises NSW, not being Aboriginal settlement; and (b) which is more than 50 years old.</i>	Condition was not activated during the audit period.	No Finding

B.3 DA 282-6-2003-I (RPGP, Rosalind Park, Wandinong, EMAI (EM01-20, 40)

No.	Consent Condition	Evidence	Finding
4-90 A	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 was not activated during the audit period.	No Finding
4-91	<p>SAFETY AND RISK MANAGEMENT</p> <p>Risk Assessment</p> <p>Pre-Construction Studies</p> <p>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.</p>	Condition closed in a previous audit.	No Finding
4-91(a)	<p>Fire Safety Study</p> <p>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.</p>		No Finding
4-91(b)	<p>Hazard and Operability Study</p> <p>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.</p>		No Finding
4-91(c)	<p>Final Hazard Analysis.</p> <p>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”.</p>		No Finding

B.3 DA 282-6-2003-I (RPGP, Rosalind Park, Wandinong, EMAI (EM01-20, 40)

No.	Consent Condition	Evidence	Finding
4-92	<p>Pre-commissioning Studies</p> <p>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).</p>	<p>The auditor sighted the Emergency Response Plan (August 2008) and the Health and Safety Management Plan, Camden Project NSW (3 August 2011) and noted conformance with the requirements of this condition.</p> <p>It was reported in a Sydney Gas Project Commitments Register that the Emergency Plan and Safety Management System was completed and approved by the Director-General on 6 September 2004.</p>	Conformance
4-92(a)	<p>Emergency Plan</p> <p>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".</p>		Conformance
4-92(b)	<p>Safety Management System</p> <p>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".</p>		Conformance
4-93	<p>Compliance Report</p> <p>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:</p>	<p>It was reported in a Sydney Gas Project Commitments Register that the compliance reports were completed and approved by the Director-General between 29 March 2004 and 9 August 2004.</p>	Conformance
4-93(a)	Dates of study submission, approval, commencement of construction and commissioning.		Conformance
4-93(b)	Actions taken or proposed, to implement recommendations made in the studies.		Conformance
4-93(c)	Responses to any requirement imposed by the Director-General.		Conformance

B.3 DA 282-6-2003-I (RPGP, Rosalind Park, Wandinong, EMAI (EM01-20, 40)

No.	Consent Condition	Evidence	Finding
4-94	<p>Incident Report</p> <p>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.</p> <p>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.</p>	<p>The auditor sighted the Emergency Response Plan (October 2008) and noted conformance with the requirements of this condition. There were no reported environmental incidents associated with this development consent during the audit period.</p>	Conformance
4-95	<p>Hazard Audit</p> <p>Twelve months after the commencement of operations of the proposed development or within such further period as the Director-General may agree, the Applicant shall carry out a comprehensive hazard audit of the 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".</p> <p>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.</p>	<p>A non-conformance was reported against this condition in the 2008-2010 Independent Environmental Audit (24 August 2011) due to failure to complete hazard audits every three years.</p> <p>The auditor sighted the 'Hazard Audit Report for Sydney Gas Operations, 3 March 2006) and a draft report of the 2012 audit.</p> <p>The audits were not conducted every three years as required by this condition. Furthermore, the 2012 audit has not been finalised and submitted to the Director-General.</p>	Non-Conformance 1
4-96	<p>Crime Risk Performance</p> <p>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.</p>	<p>A non-conformance was reported against this condition in the 2008-2010 Independent Environmental Audit (24 August 2011) in relation to the pedestrian gate, which was not self-closing.</p> <p>The auditor inspected the pedestrian gate and noted that it is now</p>	Conformance

B.3 DA 282-6-2003-I (RPGP, Rosalind Park, Wandinong, EMAI (EM01-20, 40)

No.	Consent Condition	Evidence	Finding
4-96	<p>Gas Treatment Plant</p> <p>The Applicant is required to:</p> <ul style="list-style-type: none"> a) ensure the Plant is closed to community access; b) fully enclose the Plant with a 3-metre metal framed chain mesh fence with a 3-strand barbed wire head; c) ensure the Plant is gated and manned 24 hours per day; d) keep vehicular and pedestrian gates closed at all times (when not in immediate use); e) use self-closing and self-locking pedestrian gates; f) use gate locking mechanisms that facilitate emergency egress; and g) ensure plant staff are adequately trained in undertaking security functions. 	self-closing.	Conformance
4-96	<p>Gas Wellhead Sites</p> <p>The Applicant is required to:</p> <ul style="list-style-type: none"> a) install fixed (permanent) perimeter fencing and gates around each well head. The fencing and gates should be 3 metres high (all inclusive) metal framed and topped with a 3-strand barbed wire head; and b) keep gates securely hinged and permanently locked, unless otherwise agreed by NSW Police. 		Conformance
4-97	<p>Dangerous Goods</p> <p>The Applicant shall ensure that the storage, handling, and transport of:</p>	<p>The auditor sighted the Health and Safety Management Plan, Camden Project NSW (3 August 2011) and noted the inclusion of procedures for the assessment and management of risk. It was reported that there are no explosives stored on the site and methyl mercaptan is transported via a licenced contractor.</p> <p>It is noted that a dangerous goods audit was not included in the scope of this independent audit.</p>	No Finding
4-97(a)	Dangerous goods is done in accordance with the relevant Australian Standards, particularly AS1940 and AS1596, and the Dangerous Goods Code.		No Finding
4-97(b)	Explosives are carried out in accordance with the requirements of DPI.		No Finding
4-98	<p>WASTE</p> <p>Operating Conditions</p> <p><i>Note: These conditions only apply to the storage, treatment, processing, reprocessing or disposal of waste at the premises if it requires an environment protection licence under the Protection of the Environment Operations Act 1997.</i></p> <p>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>	<p>The auditor sighted the AGL Environmental Footprint spread sheet for the financial years 2010/11 and 2011/12. These spread sheets provide a detailed record of waste streams generated, recycled/reused and disposed, including concrete and steel, water, hazardous waste, non-hazardous waste, and ozone-depleting substances.</p> <p>It was reported that there was no waste received at the premises.</p>	Conformance

B.3 DA 282-6-2003-I (RPGP, Rosalind Park, Wandinong, EMAI (EM01-20, 40))

No.	Consent Condition	Evidence	Finding
4-99	Except as provided by any other condition of this consent, only the hazardous and/or industrial and/or Group A waste listed below may be generated and/or stored at the premises: - Waste oil/water, hydrocarbons/water mixtures or emulsions.	<p>The auditor sighted the AGL Environmental Footprint spread sheet for the financial years 2010/11 and 2011/12. These spread sheets provide a detailed record of hazardous, industrial and group A waste and are audited by AGL.</p> <p>It was reported that there was no waste generated off-site and accepted at the site.</p> <p>It is noted that a waste audit was not undertaken as part of this independent audit.</p>	Conformance
4-100	Deleted	Condition deleted.	No Finding
4-101	Deleted	Condition deleted.	No Finding
4-102	Deleted	Condition deleted.	No Finding
4-103	The Applicant must ensure that any hazardous, industrial or Group A waste at the premises is assessed and classified in accordance with the DECC's Environmental Guidelines: "Assessment Classification and Management of Liquid and Non-Liquid Wastes" in force as at 1 July 2003.	<p>It was reported that the waste service provider undertakes waste classification. The auditor sighted a sample of waste disposal dockets for contaminated soil and noted that the waste was disposed as special waste.</p> <p>It is noted that a waste audit was not within the scope of this independent audit.</p>	Conformance
4-104	The Applicant must ensure that waste identified for recycling is stored separately from other waste.	<p>It was reported that a number of waste streams are separated for recycling, including cardboard, batteries, oil filters, scrap metal and paper. This was verified through a review of the AGL Environmental Footprint spread sheet for the financial years 2010/11 and 2011/12. These spread sheets provide a detailed record of waste streams generated, recycled/reused and disposed, including concrete and steel, water, hazardous waste, non-hazardous waste, and ozone-depleting substances. The AGL Environmental Footprint is subject to independent audit.</p> <p>The auditor observed the separation of waste identified for recycling, including waste oil, oil filters, batteries, steel, paper, cardboard, plastics and timber.</p>	Conformance

B.3 DA 282-6-2003-I (RPGP, Rosalind Park, Wandinong, EMAI (EM01-20, 40))

No.	Consent Condition	Evidence	Finding
4-105	Any movement of hazardous, industrial or Group A waste from the premises must be conducted in accordance with the DECC's waste tracking requirements. A copy of these tracking requirements is included in Schedule 8.	The auditor sighted a sample of waste tracking documentation and noted individual records to be complete. Waste tracking documentation was found to align with the AGL Environmental Footprint spread sheet for the financial years 2010/11 and 2011/12. These spread sheets provide a detailed record of hazardous, industrial and group A waste and are audited by AGL. It is noted that a waste audit was not undertaken as part of this independent audit.	Conformance
4-106	Waste Management Plan The Applicant shall prepare and implement a Waste Management Plan for the whole site. This plan shall include, but not necessarily be limited to:	The auditor sighted the Waste Management Sub-Plan (August 2008) and noted conformance to the requirements of this condition.	Conformance
4-106(a)	Measures to minimise the production and impact of waste produced at the site during drilling and operation.		Conformance
4-106(b)	Implementation of waste reduction, reuse and recycling principles.		Conformance
4-106(c)	Details of the reuse and recycling of waste water produced/collected on the site, including collection and handling procedures.	The auditor sighted the Waste Management Sub-Plan (August 2008) and noted that details of the reuse and recycling of wastewater produced on site, including collection and handling procedures, were not provided. It was reported by site personnel that produced water is reused in drilling works and workovers at other sites within the Camden Gas Project. The reuse process is guided by supply and demand. The produced water is reportedly analysed in-house and the level of suspended (coal fines) solids are assessed to determine if water is suitable for reuse.	Non-Conformance 2
4-106(d)	Details of appropriate disposal methods in the event that reuse and recycling are not available or are not practicable.	The auditor sighted the Waste Management Sub-Plan (August 2008) and noted conformance to the requirements of this condition.	Conformance
4-106(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.		Conformance

B.3 DA 282-6-2003-I (RPGP, Rosalind Park, Wandinong, EMAI (EM01-20, 40))

No.	Consent Condition	Evidence	Finding
4-107	<p>ROADS AND TRAFFIC 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).</p>	Condition was not activated during the audit period.	No Finding
4-108	The Applicant shall ensure that the existing access roads marked blue on Figure 3 (Appendix B) (between gas well sites EM 6 and EM 8) are used by light vehicles only.	Condition was not activated during the audit period.	No Finding
4-109	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 (August 2008) and noted the inclusion of this condition. It was reported that vehicle operators are advised of specified access routes during the induction process.	Conformance
4-110	The Applicant shall ensure that during and immediately following heavy rainfall events, vehicle movements to gas well sites and / or gas gathering systems will cease.	The auditor sighted the Soil and Water Management Sub-Plan (July 2012) and noted the inclusion of this condition.	Conformance
4-111	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 was not activated during the audit period.	No Finding
4-112	<p>Works within the Wollondilly Shire Council Road Reserve The Applicant shall prepare a Road Reserve Environment Management Plan (EMP) in consultation with Wollondilly Shire Council and Campbelltown City Council. The Road Reserve EMP shall be submitted to the Director-General for approval one month prior to the construction of the gas gathering line within the Road Reserve or within such period as approved the Director-General. The Road Reserve EMP shall include:</p>	Condition closed in a previous audit.	No Finding
4-112(a)	Proposed construction methods.		No Finding
4-112(b)	Soil erosion and sediment control measures for works undertaken during construction and following completion of the works.		No Finding
4-112(c)	Traffic control plans.		No Finding
4-112(d)	Techniques for construction of the gas gathering line across Menangle Bridge.		No Finding
4-113	The Applicant shall liaise with Wollondilly Shire Council regarding the proposed crossing of the gas gathering line across Menangle Bridge and undertake the proposed works to the satisfaction of Wollondilly Shire Council.	Condition closed in a previous audit.	No Finding

B.3 DA 282-6-2003-I (RPGP, Rosalind Park, Wandinong, EMAI (EM01-20, 40))

No.	Consent Condition	Evidence	Finding
4-114	M5 Underbore – Menangle Park The Applicant shall conduct the underboring of the M5 road to the satisfaction of the RTA. The Applicant shall ensure that the M5 underbore:	Condition closed in a previous audit.	No Finding
4-114(a)	Has a minimum depth of 1.2 metres at the lowest point of the road formation.		No Finding
4-114(b)	Excavation for the thrust pits are outside the Freeway Reserve.		No Finding
4-114(c)	Requires no access from within the Freeway for construction or maintenance purposes; unless otherwise agreed by the RTA.		No Finding
4-115	BUSHFIRE Bushfire Hazard Measures The Applicant shall implement the following bushfire hazard measures at the site:	The auditor inspected the Rosalind Park Gas Plant and sighted the Emergency Response Plan (October 2008) and noted conformance with the requirements of this condition.	Conformance
4-115(a)	Provision of a two-lane access road to the Treatment Plant area from Menangle Road.		Conformance
4-115(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.		Conformance
4-115(c)	Provision of a dedicated water supply tank of 20,000 Litres for the sole use of fire-fighting.		Conformance
4-115(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. <i>Note: The terms “Asset Protection Zone” and “Inner Protection Area” as specified in this Condition are defined within the “Planning for Bushfire Protection 2001” Guidelines published jointly by the NSW Rural Fire Service and the Department.</i>		Conformance
4-116	Measures for the Living Quarters Building The Applicant shall consult with the NSW Rural Fire Service and lodge an application to the NSW Rural Fire Service for any approval or authorisation required in respect to the structure identified as “Living Quarters”;	Condition closed in a previous audit.	No Finding
4-117	The Applicant shall comply with the requirements of any such further approval or authorisation granted by the NSW Rural Fire Service in respect of the structure “Living Quarters.”	Condition closed in a previous audit.	No Finding
4-118	The Applicant shall construct and maintain the building “Living Quarters” and the surrounding area in accordance with the requirements of the “Planning for Bushfire Protection 2001” Guidelines published jointly by the NSW Rural Fire Service and the Department.	Condition closed in a previous audit.	No Finding

B.3 DA 282-6-2003-I (RPGP, Rosalind Park, Wandinong, EMAI (EM01-20, 40)

No.	Consent Condition	Evidence	Finding
4-119	<p>Bushfire Management Plan</p> <p>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:</p>	The auditor sighted the Emergency Response Plan (October 2008). Evidence was not provided to demonstrate that the Rural Fire Service was engaged in the development of the Plan.	Non-Conformance 1
4-119(a)	Adequate fire protection works, fire fighting equipment and hazard reduction measures with particular attention to boundaries of adjoining landholdings.	The auditor sighted the Emergency Response Plan (October 2008) and noted conformance to the requirements of this condition.	Conformance
4-119(b)	An annual report on fire management activities to the Campbelltown Fire Management Committee.	An annual report on fire management activities is not submitted to the Campbelltown Fire Management Committee.	Non-Conformance 2
4-119(c)	The incorporation of relevant bushfire hazard measures and policies of the three Councils.	The Emergency Response Plan (October 2008) does not incorporate the relevant bushfire hazard measures and policies of the three Councils.	Non-Conformance 2
4-120	<p>REHABILITATION</p> <p>Site Rehabilitation Performance</p> <p>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 (July 2012) and noted conformance with the requirements of this condition. It was reported that there were no rehabilitation works undertaken under this approval during the audit period.	Conformance
4-121	The Applicant shall carry out rehabilitation of the site in accordance with the requirements of the DPI.	Condition was not activated during the audit period.	No Finding
4-122	The Applicant shall ensure that all areas of earthworks associated with the construction of the gas gathering system are rehabilitated to the pre-existing site conditions on completion of construction.	The auditor sighted the Rehabilitation and Landscape Management Sub-Plan (July 2012) and noted conformance with the requirements of this condition. It was reported that there were no rehabilitation works undertaken under this approval during the audit period.	Conformance
4-123	<p>Rehabilitation of Gas Gathering System - Stream Crossings</p> <p>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 (July 2012) and noted conformance with the requirements of this condition.	Conformance

B.3 DA 282-6-2003-I (RPGP, Rosalind Park, Wandinong, EMAI (EM01-20, 40)

No.	Consent Condition	Evidence	Finding
4-124	The Applicant shall stabilise and rehabilitate as soon as possible all disturbed soil surfaces with sterile exotic cover crops and local native grasses. The Applicant is not permitted to use Kikuyu and other invasive grass species.	The auditor sighted the Rehabilitation and Landscape Management Sub-Plan (July 2012) and noted conformance with the requirements of this condition. It was reported that there were no rehabilitation works undertaken under this approval during the audit period.	Conformance
4-125	The Applicant shall maintain and monitor all rehabilitated riparian zones for a period of at least two years after final planting. Maintenance must include sediment and erosion control, watering, weed control, replacement of plant losses, disease and insect control, mulching and any other requirements for achieving successful vegetation establishment. Note: The Director-General may require the Applicant to prepare and implement a Vegetation Management Plan and remedial works if disturbance is deemed excessive.	The auditor sighted the Rehabilitation and Landscape Management Sub-Plan (July 2012) and noted conformance with the requirements of this condition.	Conformance
4-126	CONFIRMATION OF PROJECT COMPONENTS Gas Flare Design Report The Applicant shall submit a written report at least one month prior to the commissioning of the flare, to the DECC's Manager Sydney Industry PO Box 668 Parramatta NSW 2124, containing the following information:	Condition closed in a previous audit.	No Finding
4-126(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.		No Finding
4-126(b)	Benchmark the design of the proposed Stage II flare against best practice as identified in subclause (a).		No Finding
4-126(c)	Assess the ability of the proposed Stage II flare to meet a destruction efficiency of 98% for VOCs plus methane.		No Finding
4-126(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.		No Finding
4-126(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. <i>Note: This condition confirms the gas flare structure and specifications.</i>		No Finding

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No.	Consent Condition	Evidence	Finding
4-127	Gas Gathering System The Applicant shall comply with the following in the construction of the gas gathering system pipeline:	The auditor sighted the EMP and noted that the requirements of this condition are incorporated. There was no gas gathering system constructed during the audit period in relation to this development approval.	Conformance
4-127(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.		Conformance
4-127(b)	Trenches are to be restored and reseeded with local grass seeds on completion of the work.		Conformance
4-127(c)	Local council traffic guidelines in respect of work carried out on road verges and underneath roads shall be implemented.		Conformance
4-127(d)	The Applicant shall construct the gas gathering system so as not to impeach lateral water flows.		Conformance
4-127(e)	The Applicant shall ensure that no crown or camber remains along the gas gathering systems, following construction.		Conformance
4-127(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.		Conformance
4-127(g)	The Department shall be notified on the completion of any trenching works.	A non-conformance was reported against this condition in the 2008-2010 Independent Environmental Audit (24 August 2011) due to failure to notify the DoPI on completion of any trenching works. This condition was not activated during the audit period.	No Finding
4-128	Menangle Park Urban Release Should the future Local Environmental Plan and/or Master Plan for the Menangle Park urban release area identify the need to relocate any gas gathering lines the subject of this consent to ensure an efficient and environmentally sustainable urban outcome, that infrastructure shall be relocated by, and at the cost of the applicant to the satisfaction of the Director-General following consultation with Campbelltown City Council.	Condition noted.	No Finding
5	SCHEDULE 5 ENVIRONMENTAL MANAGEMENT, MONITORING, AUDITING AND REPORTING	N/A	N/A

B.3 DA 282-6-2003-I (RPGP, Rosalind Park, Wandinong, EMAI (EM01-20, 40)

No.	Consent Condition	Evidence	Finding
5-1	<p>CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN</p> <p>The Applicant shall prepare and implement a Construction Environmental Management Plan (CEMP) to provide environmental management, practices and procedures to be followed during the 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.</p>	The auditor sighted the Environmental Management Plan (July 2012) and noted that the content conforms to the requirements of this condition. Evidence was sighted to demonstrate that the Director-General approved the EMP.	Conformance
5-2	<p>OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN</p> <p>The Applicant shall prepare and implement an Operational Environmental Management Plan (OEMP) to provide environmental management practices and procedures to be followed during the operation of the development. The OEMP shall be forwarded to the Director-General for approval one month prior to commissioning. The OEMP shall include, but not necessarily be limited to:</p>	The auditor sighted the Environmental Management Plan (July 2012) and noted that the content complies with the requirements of this condition.	Conformance
5-2(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.		Conformance
5-2(b)	A description of the roles and responsibilities for all key personnel involved in the drilling and operation of the development.		Conformance
5-2(c)	The overall environmental policies and principles to be applied to the operation of the development.		Conformance
5-2(d)	Standards and performance measures to be applied to the development, and a means by which environmental performance can be periodically reviewed and improved.	An improvement opportunity was noted in relation to objectives and targets. The EMP includes an extensive number of objectives and targets for each environmental aspect. It was reported that performance against targets is not currently measured. It is recommended that objectives and targets be established for significant environmental aspects only. Performance against the targets should then be measured to drive continual improvement of performance.	Conformance-Improvement Opportunity
5-2(e)	Management policies to ensure that environmental performance goals are met and to comply with conditions of this consent.	The auditor sighted the Environmental Management Plan (July 2012) and noted that the content complies with the requirements of this condition.	Conformance

B.3 DA 282-6-2003-I (RPGP, Rosalind Park, Wandinong, EMAI (EM01-20, 40))

No.	Consent Condition	Evidence	Finding
5-3	The Applicant shall supply a copy of the CEMP and OEMP to the DECC, DPI, Camden Council, Campbelltown City Council and Wollondilly Shire Council within fourteen days of the Director-General's approval. The Applicant shall ensure that a copy of the CEMP and OEMP is publicly available.	It was reported that the EMP and Sub-Plans were not provided to the EPA, DoPI, Camden Council, Campbelltown City Council and Wollondilly Shire Council following the Director-General's approval. The EMP and Sub-Plans are publicly available via the AGL Camden website.	Non-Conformance 2
5-4	The Applicant shall review and update the OEMP annually, or as directed by the Director-General. Note: Submission of a copy of the approved Plan to other Government agencies does not mean that their approval is required. The Plan is for the information of the agency.	The OEMP was not reviewed and updated annually as required by this condition. Although the EMP was reviewed on a number of occasions during the audit period (August 2008, May 2011, October 2011 and July 2012), most of the EMP Sub-Plans were last reviewed in 2008.	Non-Conformance 2
5-5	ANNUAL ENVIRONMENTAL PERFORMANCE REPORTING Within twelve months of the date of this consent, and annually thereafter during the life of the development, the Applicant shall submit an Annual Environmental Performance Report to the Director-General. This report shall include, but not be limited to:	The auditor sighted the Annual Environmental Performance Reports for July 2011 and July 2012 and noted conformance with the requirements of this condition.	Conformance
5-5(a)	The standards, performance measures and statutory requirements the development is required to comply with.		Conformance
5-5(b)	An assessment of the environmental performance of the development to determine whether it is complying with these standards, performance measures, and statutory requirements.		Conformance
5-5(c)	Reporting against the implementation of the Project Commitments Register.		Non-Conformance 2
5-5(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.		Conformance
5-5(e)	Indication of what actions were taken to address any issue and/or recommendation raised by the Community Consultative Committee.		Non-Conformance 2
5-5(f)	Provision of the detailed results of all the monitoring required by this consent.	The auditor sighted the Annual Environmental Performance Reports for July 2011 and July 2012 and noted conformance with the requirements of this condition.	Conformance

B.3 DA 282-6-2003-I (RPGP, Rosalind Park, Wandinong, EMAI (EM01-20, 40)

No.	Consent Condition	Evidence	Finding
5-5(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 	The 2011 AEPR does not compare noise monitoring and air quality monitoring data against the predictions in the EIS. This matter was rectified in the 2012 AEPR.	Non-Conformance 2
5-5(h)	Identify any non-compliance during the year.	The auditor sighted the Annual Environmental Performance Reports for July 2011 and July 2012 and noted conformance with the requirements of this condition.	Conformance
5-5(i)	Identify any significant trends in the data.		Conformance
5-5(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.		Conformance
5-6	The Director-General may require the Applicant to address certain matters identified in the Annual Environmental Performance Report. Any action required to be undertaken shall be completed within such period as the Director-General may agree.	There were no matters identified by the Director-General during the audit period.	Conformance
5-7	The Applicant shall also submit a copy of the Annual Environmental Performance Report to the DECC, DPI, Camden Council, Campbelltown City Council and Wollondilly Shire Council. The Applicant shall make a copy of the Report publicly available.	A non-conformance was reported against this condition in the 2008-2010 Independent Environmental Audit (24 August 2011) due to failure to submit a copy of the AEPR to nominated agencies.. The auditor sighted correspondence confirming that the AEPR was sent to all relevant agencies in September 2011.	Conformance
5-8	INDEPENDENT ENVIRONMENTAL AUDIT – CONSTRUCTION AT EMAI The Applicant shall commission and pay the full costs of an Independent Environmental Audit of the construction of the gas gathering system, construction of the access roads and drilling and 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.	No Finding
5-8	The Independent Environmental Audit shall: <ul style="list-style-type: none"> (a) be conducted by a suitably qualified, experienced, and independent person(s) whose appointment has been approved by the Director-General; and (b) be consistent with ISO 19011:2002 - Guidelines for Quality and/ or Environmental Management Systems Auditing, or updated versions of these guidelines/manuals. 		No Finding

B.3 DA 282-6-2003-I (RPGP, Rosalind Park, Wandinong, EMAI (EM01-20, 40)

No.	Consent Condition	Evidence	Finding
5-8	The Audit shall: (a) assess the environmental performance of the construction of the development on EMAI, and its effects on the surrounding environment; (b) assess whether the development is complying with the relevant standards, performance measures, and statutory requirements; (c) consider the Applicant's proposed Construction Environmental Management Plan for the EMAI Site; and (d) recommend measures or actions to improve the environmental performance of the construction of the development on EMAI, and/or its environmental management and monitoring systems (if required).		No Finding
5-9	Within one month of completion of the audit, the Applicant must submit a copy of the audit report to the Director-General, the NSW Heritage Office and NSW Agriculture. The Director-General may require the Applicant to address certain matters identified in the report and any comments received from the NSW Heritage Office and NSW Agriculture. Any action required to be undertaken shall be completed within such period as the Director-General may agree.	Condition closed in a previous audit.	No Finding
5-10	INDEPENDENT ENVIRONMENTAL AUDIT - OPERATION 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 2010-2012 Independent Environmental Audit satisfies this condition.	Conformance
5-10(a)	Be conducted by a suitably qualified, experienced, and independent person(s) whose appointment has been approved by the Director-General.		Conformance
5-10(b)	Be consistent with ISO 19011:2002 - Guidelines for Quality and/ or Environmental Management Systems Auditing, or updated versions of these guidelines/manuals.		Conformance
5-10(c)	Assess the environmental performance of the development, and its effects on the surrounding environment.		Conformance
5-10(d)	Assess whether the development is complying with the relevant standards, performance measures, and statutory requirements.		Conformance
5-10(e)	Review the adequacy of the Applicant's Environmental Management Plan.		Conformance
5-10(f)	Recommend measures or actions to improve the environmental performance of the development, and/or its environmental management and monitoring systems.		Conformance

B.3 DA 282-6-2003-I (RPGP, Rosalind Park, Wandinong, EMAI (EM01-20, 40))

No.	Consent Condition	Evidence	Finding
5-11	Within two months of commissioning the audit, the Applicant must submit a copy of the audit report to the Director-General, DECC and the DPI.	<p>The 2010-2012 Independent Environmental Audit report was not submitted to the Director-General, EPA and DTIRIS within two months of commissioning.</p> <p>It was reported by AGL that an extension was sought from the DoPI on the basis that the audit criteria has increased significantly since the establishment of this condition.</p>	Non-Conformance 2

B.3 DA 282-6-2003-I (RPGP, Rosalind Park, Wandinong, EMAI (EM01-20, 40)

No.	Consent Condition	Evidence	Finding																										
5-12	<p>ASSESSABLE POLLUTANTS – LOAD LIMITS</p> <p>The Applicant shall pay the load based licensing fees once a licence under the Protection of the Environment Operations Act 1997 has been issued. The licence will identify the assessable pollutants for each fee-based activity classification. These assessable pollutants will be required to be monitored and pollutant loads calculated in accordance with the DECC’s Load Calculation Protocol. The assessable pollutants and load limits applicable to this activity are given in the table below.</p> <table border="1"> <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.</p> <p>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.</p> <p>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 spread sheet 'LBL Summary 2010-11 RPGP' 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 air limit. The spread sheet was reviewed by Pacific Environment Limited (correspondence dated 13 February 2013) to ensure compliance with licence reporting requirements.</p> <p>It was reported by AGL that load limits for the nominated water pollutants are not monitored or calculated. It is noted that the load limits for water were previously removed from EPL 12003.</p>	<p>Non-Conformance 2</p>
Assessable Pollutant	Load Limit (kg)																												
Benzene (air)	47																												
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No.	Consent Condition	Evidence	Finding
5-13	<p>MONITORING AND RECORDING CONDITIONS</p> <p>The results of any monitoring required to be conducted by the DECC's General Terms of Approval, or a licence under the Protection of the Environment Operations Act 1997, in relation to the development or in order to comply with the load calculation protocol must be recorded and retained as set out in the conditions below (Condition 14 and 15).</p>	The auditor sighted the AGL spread sheet 'LBL Summary 2010-11 RPGB' 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.	Conformance
5-14	<p>The Applicant shall keep all records required to be kept by the licence:</p> <ul style="list-style-type: none"> • in a legible form, or in a form that can readily be reduced to a legible form; • kept for at least 4 years after the monitoring or event to which they relate took place; and • produced in a legible form to any authorised officer of the DECC who asks to see them. 	Monitoring records prepared during the audit period were sighted by the auditor and found to be in conformance with this condition.	Conformance
5-15	<p>The Applicant shall keep the following records in respect of any samples required to be collected:</p> <ul style="list-style-type: none"> • the date(s) on which the sample was taken; • the time(s) at which the sample was collected; • the point at which the sample was taken; and • the name of the person who collected the sample. 	Monitoring records prepared during the audit period were sighted by the auditor and found to be in conformance with this condition.	Conformance
5-16	<p>REPORTING CONDITIONS</p> <p>The Applicant shall provide an Annual Return to the DECC in relation to the development as required by any licence under the Protection of the Environment Operations Act 1997 in relation to the development. In the Annual Return the Applicant must report on the annual monitoring undertaken (where the activity results in pollutant discharges), provide a summary of complaints relating to the development, report on compliance with licence conditions and provide a calculation of licence fees (administrative fees and, where relevant, load based fees) that are payable. If load based fees apply to the activity the Applicant will be required to submit load-based fee calculation worksheets with the return.</p>	The auditor sighted the December 2010 and December 2011 Annual Returns and noted conformance against this condition.	Conformance
5-17	<p>COMMUNITY CONSULTATIVE COMMITTEE</p> <p>The Applicant shall ensure the continuation of the existing Sydney Gas Operations Camden Project Community Consultative Committee to oversee the environmental performance of the development. The Committee shall continue to be chaired by an independent chairperson approved by the Director-General in consultation with the Applicant, Camden Council, Campbelltown City Council and Wollondilly Shire Council. The Committee shall:</p>	The auditor sighted relevant documentation including meeting minutes and verified conformance with the requirements of this condition.	Conformance

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No.	Consent Condition	Evidence	Finding
5-17(a)	Have four community representatives residing in the PEL 2 area.		Conformance
5-17(b)	Have one representative from each of the following Councils: Camden Council, Campbelltown City Council and Wollondilly Shire Council.		Conformance
5-17(c)	Meet at least quarterly.		Conformance
5-17(d)	Take minutes of the meeting.		Conformance
5-17(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. Representatives from relevant government agencies or other individuals may be invited to attend meetings as required by the Chairperson.		Conformance
5-18	The Applicant shall:	The auditor reviewed relevant documentation including committee meeting minutes and presentations and verified conformance with the requirements of this condition. The committee minutes are publicly available on the Camden Gas Project website and it was reported that they are emailed to committee members and the DoPI.	Conformance
5-18(a)	Ensure that two of its representatives attend the Committee's meetings.		Conformance
5-18(b)	Provide the Committee with regular information on the environmental performance and management of the development.		Conformance
5-18(c)	Ensure that the Committee has reasonable access to the necessary plans to carry out its functions.		Conformance
5-18(d)	Consider the recommendations and comments of the Committee and provide a response to the Committee and Director-General.		Conformance
5-18(e)	Provide access for site inspections by the Committee.		Conformance
5-18(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.		Conformance
5-18(g)	Forward a copy of the minutes of each Committee meeting, and any responses to the Committee's recommendations to the Director-General and the DPI within a month of each Committee meeting.		Conformance
5-19	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 2007-2012 Complaints Register for the CGP was sighted by the auditor and noted to comply with this condition.	Conformance
5-19(a)	The date and time, where relevant of the complaint.		Conformance
5-19(b)	The means by which the complaint was made.		Conformance

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No.	Consent Condition	Evidence	Finding
5-19(c)	Any personal details of the complainant that were provided, or if no details were provided, a note to that effect..		Conformance
5-19(d)	The nature of the complaints.		Conformance
5-19(e)	Any action(s) taken by the Applicant in relation to the complaint, including any follow-up contact with the complainant.		Conformance
5-19(f)	If no action was taken by the Applicant in relation to the complaint, the reason(s) why no action was taken. The Complaints Register shall be made available for inspection by the 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.		Conformance
5-20	COMMUNITY AWARENESS PROTOCOL The Applicant shall prepare a Community Awareness Protocol to advise nearby residents and appropriate authorities if a leak of mercaptan odourant occurs from the Gas Treatment Plant and/or associated facilities. The Protocol shall detail the circumstances when it will be implemented and describe the procedure and timeframe in which residents and authorities will be notified. The residents and authorities to be notified will be identified in the Protocol. The Applicant shall submit the Community Awareness Protocol to the Director-General for approval one month prior to commissioning of the Gas Treatment Plant.	A non-conformance was reported against this condition in the 2008-2010 Independent Environmental Audit (24 August 2011). The auditor sighted the Emergency Response Plan (October 2008) and noted conformance with the requirements of this condition. There were no reported mercaptan leaks associated with this development consent during the audit period. The document history detailed in the Sydney Gas ERP records noted approval by DIPNR on 9 August 2004 prior commissioning of the RPGP.	Conformance
6	SCHEDULE 6 MANDATORY CONDITIONS FOR ALL DECC LICENCES	N/A	N/A
6-1	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 the following actions:	Conformance
6-1(a)	The processing, handling, movement and storage of materials and substances used to carry out the activity.	1. Roles and responsibilities - Defined in the EMP (August 2012) and position descriptions. The position description of the Gas Plant Operator (19 October 2011) was sighted by the auditor and noted to	Conformance

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No.	Consent Condition	Evidence	Finding
6-1(b)	The treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.	include a requirement to implement the AGL Environmental Management Plan and a range of control measures. 2. Training - Employees reported a number of training sessions including environmental compliance and the Empower E-learning modules and refresher program. The auditor sighted training programs and records. 3. Audit and inspection - Assurance of competence is provided through the biannual independent audit, annual Lifeguard Audits (AGL HSE System) and the annual greenhouse and energy use verification program.	Conformance
6-2	Maintenance of plant and equipment All plant and equipment installed at the premises or used in connection with the licensed activity:	Preventative maintenance of plant and equipment is controlled through the MEX system. The auditor sighted the MEX system and it was noted that maintenance schedules are defined by usage and manufacturers requirements. It was reported that the MEX system has been operating for eight months but is not fully functional. A back-up system is being maintained until the MEX system achieves the required outcomes.	Conformance
6-2(a)	Must be maintained in a proper and efficient condition.		Conformance
6-2(b)	Must be operated in a proper and efficient manner.		Conformance
6-3	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 record must include details of the following:	The 2007-2012 Complaints Register for the CGP was sighted by the auditor and noted to comply with this condition.	Conformance
6-3(a)	The date and time of the complaint.		Conformance
6-3(b)	The method by which the complaint was made.		Conformance
6-3(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.		Conformance
6-3(d)	The nature of the complaint.		Conformance
6-3(e)	The action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant.		Conformance
6-3(f)	If no action was taken by the licensee, the reasons why no action was taken. The record of a complaint must be kept for at least 4 years after the complaint was made. The record must be produced to any authorised officer of the DECC who asks to see them.		Conformance

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No.	Consent Condition	Evidence	Finding
6-5	<p>REPORTING CONDITIONS</p> <p>Annual Return documents</p> <p>What documents must an Annual Return contain?</p> <p>The licensee must complete and supply to the DECC an Annual Return in the approved form comprising:</p>	The auditor sighted the December 2010 and December 2011 Annual Returns and noted conformance against this condition.	Conformance
6-5(a)	A Statement of Compliance.		Conformance
6-5(b)	<p>A Monitoring and Complaints Summary.</p> <p>A copy of the form in which the Annual Return must be supplied to the DECC accompanies this licence. Before the end of each reporting period, the DECC will provide to the licensee a copy of the form that must be completed and returned to the DECC.</p>		Conformance
6-6	<p>Period covered by Annual Return</p> <p>An Annual Return must be prepared in respect of each reporting, except as provided below.</p> <p><i>Note: The term "reporting period" is defined in the dictionary at the end of this licence. Do not complete the Annual Return until after the end of the reporting period.</i></p>	Condition was not activated during the audit period.	No Finding
6-6.1	<p>Where this licence is transferred from the licensee to a new licensee,</p> <p>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</p> <p>b) the new licensee must prepare an annual return for the period commencing on the date the application for the transfer of the licence is granted and ending on the last day of the reporting period.</p> <p><i>Note: An application to transfer a licence must be made in the approved form for this purpose.</i></p>		No Finding
6-6.2	<p>Where this licence is surrendered by the licensee or revoked by the DECC or Minister, the licensee must prepare an annual return in respect of the period commencing on the first day of the reporting period and ending on</p> <p>a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or</p> <p>b) in relation to the revocation of the licence – the date from which notice revoking the licence operates.</p>		No Finding

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No.	Consent Condition	Evidence	Finding
6-7	<p>Deadline for Annual Return</p> <p>The Annual Return for the reporting period must be supplied to the DECC by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date').</p>	The auditor sighted the Annual Returns for the periods ending 21 December 2010 and 21 December 2011 and correspondence from AGL to the EPA, dated 16 February 2011 and 15 February 2012, respectively, which verify conformance with this condition.	Conformance
6-8	<p>Notification where actual load can not be calculated</p> <p>Where the licensee is unable to complete a part of the Annual Return by the due date because the licensee was unable to calculate the actual load of a pollutant due to circumstances beyond the licensee's control, the licensee must notify the DECC in writing as soon as practicable, and in any event not later than the due date. The notification must specify:</p>	Condition was not activated during the audit period.	No Finding
6-8(a)	The assessable pollutants for which the actual load could not be calculated		No Finding
6-8(b)	The relevant circumstances that were beyond the control of the licensee.		No Finding
6-9	<p>Licensee must retain copy of Annual Return</p> <p>The licensee must retain a copy of the annual return supplied to the DECC for a period of at least 4 years after the annual return was due to be supplied to the DECC.</p>	It was reported that Annual Returns are retained for a period in excess of four years.	Conformance
6-10	<p>Certifying of Statement of Compliance and Signing of Monitoring and Complaints Summary</p> <p>Within the Annual Return, the Statement of Compliance must be certified and the Monitoring and Complaints Summary must be signed by:</p>	The auditor sighted the Annual Returns for the periods ending 21 December 2010 and 21 December 2011 and noted conformance with this condition.	Conformance
6-10(a)	The licence holder; or		Conformance
6-10(b)	By a person approved in writing by the DECC to sign on behalf of the licence holder.		Conformance
6-11	<p>Notification of environmental harm</p> <p><i>Note: The licensee or its employees must notify the DECC of incidents causing or threatening material harm to the environment as soon as practicable after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act</i></p> <p>Notifications must be made by telephoning the DECC's Pollution Line service on 131 555.</p> <p>The licensee must provide written details of the notification to the DECC within 7 days of the date on which the incident occurred.</p>	The auditor sighted the Emergency Response Plan (October 2008) and noted conformance with the requirements of this condition. There were no reported environmental incidents associated with this development consent during the audit period.	Conformance

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No.	Consent Condition	Evidence	Finding
6-12	<p>Written report</p> <p>Where an authorised officer of the DECC suspects on reasonable grounds that:</p> <p>(a) where this licence applies to premises, an event has occurred at the premises; or</p> <p>(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.</p> <p>The licensee must make all reasonable inquiries in relation to the event and supply the report to the DECC within such time as may be specified in the request.</p>	Condition was not activated during the audit period.	No Finding
6-12.1	<p>The request may require a report which includes any or all of the following information:</p> <p>a) the cause, time and duration of the event;</p> <p>b) the type, volume and concentration of every pollutant discharged as a result of the event;</p> <p>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</p> <p>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;</p> <p>e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants;</p> <p>f) (details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event;</p> <p>g) (any other relevant matters.</p> <p>The DECC may make a written request for further details in relation to any of the above matters if it is not satisfied with the report provided by the licensee. The licensee must provide such further details to the DECC within the time specified in the request.</p>	Condition was not activated during the audit period.	No Finding
6-13	<p>GENERAL CONDITIONS</p> <p>Copy of licence kept at the premises or on the vehicle or mobile plant</p> <p>A copy of this licence must be kept at the premises or on the vehicle or mobile plant to which the licence applies.</p> <p>The licence must be produced to any authorised officer of the DECC who asks to see it. The licence must be available for inspection by any employee or agent of the licensee working at the premises or operating the vehicle or mobile plant.</p>	It was reported that a copy of the licence is kept at the premises.	Conformance

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No.	Consent Condition	Evidence	Finding
7	SCHEDULE 7 GENERAL CONDITIONS FOR PART 3A PERMITS DEPARTMENT OF WATER AND ENERGY	N/A	N/A
7-1	Irrespective of the granting of this consent or approval by any other Authority, work is not to commence in, or within a horizontal distance of 40m from the top of the bank of the watercourse/foreshore, without the prior issue of a Part 3A permit by the DWE.	Condition was not activated during the audit period.	No Finding
7-2	Prior to the issue of the Part 3A permit the applicant must provide the DWE 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 DWE's General Terms of Approval and recommendations which are included in the consent conditions; and • The appropriate permit fee paid to the DWE. 	Condition was not activated during the audit period.	No Finding
7-3	Work is to be carried out in accordance with drawings and any management plans required by these conditions and approved by the DWE that will accompany the 3A permit.	Condition was not activated during the audit period.	No Finding
7-4	Any Part 3A permit issued is to be renewed on an annual basis until all works and all rehabilitation, including maintenance provisions, have been satisfactorily completed in accordance with the permit conditions. Any application for renewal will be lodged at least 1 month prior to the permit expiry date.	Condition was not activated during the audit period.	No Finding
7-5	Work shall not cause unnecessary damage to, or increase erosion of, the stream bed or banks. The permit holder shall carry out any instructions given by the DWE with a view to preventing degradation of the stream bed or banks.	Condition was not activated during the audit period.	No Finding
7-6	Any vegetation or other material removed from the area of works shall be disposed of so that the material cannot be swept back into the stream during a flood.	Condition was not activated during the audit period.	No Finding
7-7	All works proposed must be designed, constructed and operated so they do not cause erosion or sedimentation and to minimise adverse impacts on aquatic and riparian environments.	The auditor sighted the Soil and Water Management Sub-Plan (July 2008) and noted the inclusion of appropriate controls for watercourse crossings. It was reported that no works were undertaken within 40m of watercourses/foreshores during the audit period.	Conformance

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No.	Consent Condition	Evidence	Finding
7-8	No plastic netting is to be used, for any purpose, in the stream or within the riparian zone unless such netting is of a rapidly biodegradable variety.	The auditor sighted the Soil and Water Management Sub-Plan (July 2008) and noted the inclusion of appropriate controls for watercourse crossings. It was reported that no works were undertaken within 40m of watercourses/foreshores during the audit period.	Conformance
7-9	Erosion and sediment control measures are required to be implemented prior to any works commencing, and must be maintained for as long as necessary after the completion of works, to prevent sediment and dirty water entering the river system. These measures are to be in accordance with Council's requirements and follow best management practices as outlined in the NSW Department of Housing's "Managing Urban Stormwater: Soils and Construction" (1998) manual (the "Blue Book").	The auditor sighted the Soil and Water Management Sub-Plan (July 2012) and noted the inclusion of appropriate controls to prevent sediment and dirty water entering the river system. It was reported that no works were undertaken within 40m of watercourses/foreshores during the audit period.	Conformance
7-10	The excavation of soil/spoil and its removal is the responsibility of the permit holder and the owner or occupier of the land.	Condition noted.	No Finding
7-11	The approval of NSW Fisheries is required for all proposed designs of in-stream works prior to the issue of the Part 3A permit.	Condition was not activated during the audit period.	No Finding
7-12	These conditions are issued with the proviso that operations shall be carried-out on freehold land. Should operations be on Crown Land, these conditions are null and void and the occupier of Crown Land should contact the Department of Lands to obtain landowner's consent.	Condition was not activated during the audit period.	No Finding
7-13	Work is to be carried out in accordance with any conditions imposed by other government agencies, provided such conditions do not conflict with these conditions or the conditions on the Part 3A permit.	Condition noted.	No Finding
7-14	The permit holder and the owner or occupier of the land are responsible for any works undertaken by any other person or company on this site.	Condition noted.	No Finding
7-15	The rehabilitation of the area in accordance with the Part 3A permit conditions is the responsibility of the permit holder and the owner or occupier of the land.	Condition noted.	No Finding
7-16	Any Part 3A permit granted is not transferable to any other person or company without the written approval of the DWE and does not authorise works at any other site.	Condition noted.	No Finding

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No.	Consent Condition	Evidence	Finding
7-17	Any Part 3A permit granted does not give the holder the right to occupy any land without the owner(s) consent nor does it relieve the holder of any obligation which may exist to also obtain permission from local government and other authorities who may have some form of control over the site and/or the activities proposed.	Condition noted.	No Finding
7-18	Work as executed survey plans of a professional standard shall be provided to the DWE upon request.	It was reported that survey plans were not required during the audit period.	No Finding
7-19	If, in the opinion of a the DWE officer, any activity is being carried out in such a manner that it may unnecessarily degrade the riparian zone, stream, lake or foreshore environment, all work shall cease immediately upon oral or written direction of such officer.	Condition was not activated during the audit period.	No Finding
7-20	If the permit conditions have been breached, the permit holder shall restore the site in accordance with the permit conditions and/or as directed by the DWE. If any breach of the permit conditions requires a special site inspection by the DWE, then the permit holder shall pay a fee prescribed by the DWE for this inspection and all subsequent breach inspections.	Condition was not activated during the audit period.	No Finding
7-21	If works are to cease prior to completion the DWE must be notified in writing one month in advance of the cessation of the operation.	Condition was not activated during the audit period.	No Finding
	SCHEDULE 8 DECC WASTE TRACKING REQUIREMENTS	N/A	N/A
O5	Monitoring of waste movements within NSW	N/A	N/A
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.	N/A	N/A
O5.2	Prerequisites for waste movements If the waste is transported from the premises, the licensee must ensure that the waste is transported:	The auditor sighted a sample of waste tracking documentation and noted individual records to be complete. Waste tracking documentation was found to align with the AGL Environmental Footprint spread sheet for the financial years 2010/11 and 2011/12. These spread sheets provide a detailed record of hazardous, industrial and group A waste and are audited by AGL. It is noted that a waste audit was not undertaken as part of this independent audit.	Conformance
O5.2(a)	To a place which has been licensed by the DECC to issue consignment authorisation numbers.		Conformance
O5.2(a)	To a place that can otherwise lawfully accept that class of waste.		Conformance
O5.3	If the waste is transported from the premises, the licensee must;	The auditor sighted a sample of waste tracking documentation and noted individual records to be complete. Waste tracking	Conformance
O5.3(a)	Obtain a consignment authorisation number from the consignee.		Conformance

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No.	Consent Condition	Evidence	Finding
05.3(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.	documentation was found to align with the AGL Environmental Footprint spread sheet for the financial years 2010/11 and 2011/12. These spread sheets provide a detailed record of hazardous, industrial and group A waste and are audited by AGL.	Conformance
05.3(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	Worth Recycling is contracted by AGL for the collection of wastewater and have established processes to track consigned waste in accordance with NSW regulatory requirements.	Conformance
05.3(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.	It is noted that a waste audit was not undertaken as part of this independent audit.	Conformance
05.4	Application for a consignment authorisation number To obtain a consignment authorisation number as required by 05.3 (a), the licensee must apply in writing to the consignee. An application must include the following information:	The auditor sighted evidence of an application for a consignment authorisation number for the disposal of wastewater. The records sighted were prepared in accordance with the requirements of this condition.	Conformance
05.4(a)	A statement identifying the classification of the waste in accordance with the requirements of condition 04.1.	Worth Recycling is contracted by AGL for the collection of wastewater and have established processes to track consigned waste in accordance with NSW regulatory requirements.	Conformance
05.4(b)	Copies of all information used to classify the waste.		Conformance
05.4(c)	An estimate of the amount of waste to which the application applies.	It is noted that a waste audit was not undertaken as part of this independent audit.	Conformance
05.4(d)	Whether the consignment will consist a single load or multiple loads.		Conformance
05.4(e)	An estimate of the total period required for transportation of the consignment.		Conformance
05.4(f)	The date of dispatch of at least the first load in the consignment. 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.		Conformance

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No.	Consent Condition	Evidence	Finding
05.5	Once an application for a consignment authorisation number, as set out in 05.4 has been submitted, the licensee must not submit an application for the same consignment to another consignee until notification is received concerning the outcome of the application.	Condition noted.	No Finding
05.6	Notification of dates of dispatch of the second and subsequent loads in a consignment The licensee must provide the consignee with written notification of the date of dispatch of each load of waste.	Worth Recycling is contracted by AGL for the collection of wastewater and have established processes to track consigned waste in accordance with NSW regulatory requirements. It is noted that a waste audit was not undertaken as part of this independent audit.	No Finding
05.7	The notification referred to in 05.6 must be received by consignee no later than the date of arrival of the preceding load at the destination.	Worth Recycling is contracted by AGL for the collection of wastewater and have established processes to track consigned waste in accordance with NSW regulatory requirements. It is noted that a waste audit was not undertaken as part of this independent audit.	No Finding
05.8	Notification of a final load in a consignment. Unless the movement of an entire consignment of waste occurs in a single load, by the time the final load in a consignment is accepted at the destination, the licensee must have informed the consignee in writing, that no further loads are to be dispatched under that consignment authorisation number. <i>Note: The notifications referred to in conditions 05.6 and 05.8 may be attached to the waste data form of the preceding load.</i>	Worth Recycling is contracted by AGL for the collection of wastewater and have established processes to track consigned waste in accordance with NSW regulatory requirements. It is noted that a waste audit was not undertaken as part of this independent audit.	No Finding
05.9	Amendments to the nominated date(s) of dispatch If the date of dispatch for a load of waste is changed, the licensee must give written notification of this to the consignee and nominate a revised date of dispatch.	Worth Recycling is contracted by AGL for the collection of wastewater and have established processes to track consigned waste in accordance with NSW regulatory requirements. It is noted that a waste audit was not undertaken as part of this independent audit.	No Finding
05.10	A notification referred to in 05.9 must occur on or before the date of delivery as previously nominated. <i>Note: More than one amendment to dates of dispatch may occur.</i>	Worth Recycling is contracted by AGL for the collection of wastewater and have established processes to track consigned waste in accordance with NSW regulatory requirements. It is noted that a waste audit was not undertaken as part of this independent audit.	No Finding

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No.	Consent Condition	Evidence	Finding
05.11	<p>Cancellation of consignment authorisations</p> <p>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.</p>	<p>Worth Recycling is contracted by AGL for the collection of wastewater and have established processes to track consigned waste in accordance with NSW regulatory requirements.</p> <p>It is noted that a waste audit was not undertaken as part of this independent audit.</p>	No Finding
05.12	<p>Notification of delayed delivery by transporter</p> <p>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.</p>	Condition was not activated during the audit period.	No Finding
05.13	<p>Record keeping</p> <p>The licensee must record and retain all information related to each consignment of waste.</p> <p><i>Note: This includes waste data forms and copies of other documents such as notifications of revised delivery dates, regular and other reports, etc.</i></p>	<p>The auditor sighted a sample of waste tracking documentation and noted individual records to be complete. Waste tracking documentation was found to align with the AGL Environmental Footprint spread sheet for the financial years 2010/11 and 2011/12. These spread sheets provide a detailed record of hazardous, industrial and group A waste and are audited by AGL.</p> <p>It was noted that a waste audit was not undertaken as part of this independent audit.</p>	Conformance
05.14	The records referred to in 05.13 must be kept so that:	The auditor sighted a sample of waste tracking documentation and noted conformance against the requirements of this condition.	Conformance
05.14 (a)	All records relating to individual consignment authorisation numbers are kept physically together.		Conformance
05.14 (b)	Consignments transported by each transporter can be readily identified and accessed.		Conformance
05.14 (c)	Consignments sent to each destination can readily be identified and accessed.		Conformance
	<i>Note: The licensee must keep all information for at least 4 years.</i>		
05.15	<p>Exception reporting</p> <p>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.</p>	Condition was not activated during the audit period.	No Finding
05.16	The licensee must notify the DECC in writing within 48 hours of becoming aware of any of the following:	Condition was not activated during the audit period.	No Finding

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No.	Consent Condition	Evidence	Finding
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.		No Finding
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.		No Finding
05.16 (c)	A transporter who transports, or attempts to transport, waste without a waste data form completed to the extent required.		No Finding
05.16 (d)	The refusal of a consignee to accept waste from the licensee.		No Finding
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.		No Finding
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. Note: The DECC should be notified of exception reports by sending a facsimile to: Manager, Hazardous Waste Regulation, NSW Environment Protection Authority.		No Finding
O6	Monitoring of interstate movements of controlled wastes	N/A	N/A
O6.1	Conditions O6.2 to O6.11 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.	It was reported that there was no interstate transport of controlled wastes during the audit period.	No Finding
O6.2	Classification of controlled waste The licensee must accurately identify the waste, in accordance with 04.1, and determine if the waste is a controlled waste within the meaning of the NEPM. <i>Note: The waste producer must check with the agency in the State or Territory of destination to determine whether waste is classified as a controlled waste under the NEPM. Unless advised otherwise by the agency of the State or Territory of destination, any waste included in Appendix 1 of this licence is a controlled waste for the purposes of the NEPM.</i>	It was reported that there was no interstate transport of controlled wastes during the audit period.	No Finding

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No.	Consent Condition	Evidence	Finding
O6.3	<p>Application for a consignment authorisation</p> <p>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.</p> <p><i>Note: The waste producer is required by the Protection of the Environment Operations (Waste) Regulation 1996 to obtain, prior to the waste being dispatched, a consignment authorisation from an agency, or a facility delegated by an agency, in the destination State or territory to allow the movement of controlled waste.</i></p>	It was reported that there was no interstate transport of controlled wastes during the audit period.	No Finding
O6.4	<p>Waste movements</p> <p>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.</p>	It was reported that there was no interstate transport of controlled wastes during the audit period.	No Finding
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.	It was reported that there was no interstate transport of controlled wastes during the audit period.	No Finding
O6.6	The licensee must:	It was reported that there was no interstate transport of controlled wastes during the audit period.	No Finding
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.		No Finding
O6.6(b)	<p>Make the copy of the waste transport certificate available for inspection by an authorised officer on request.</p> <p><i>Note: The waste producer is required by the Protection of the Environment Operations (Waste) Regulation 1996 to complete a waste transport certificate for the waste. This should be done in accordance with the instructions printed on the certificate and the required copy of the waste transport certificate should be forwarded to the agency in the State of destination.</i></p>		No Finding
O6.7	<p>Notification of delayed delivery by transporter</p> <p>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.</p>	It was reported that there was no interstate transport of controlled wastes during the audit period.	No Finding

B.3 DA 282-6-2003-I (RPGP, Rosalind Park, Wandinong, EMAI (EM01-20, 40))

No.	Consent Condition	Evidence	Finding
06.8	<p>Record keeping The licensee must record and retain all information related to each consignment of waste. <i>Note: This includes the waste transport certificates and copies of other documents such as consignment authorisations issued by an agency in the destination State or Territory, notifications of revised delivery dates by transporters, regular and other reports, etc.</i></p>	It was reported that there was no interstate transport of controlled wastes during the audit period.	No Finding
06.9	The records referred to in 06.8 must be kept so that:	It was reported that there was no interstate transport of controlled wastes during the audit period.	No Finding
06.9(a)	All records relating to each consignment authorisation are kept physically together.		No Finding
06.9(b)	Consignments transported by each transporter can be readily identified and accessed.		No Finding
06.9(c)	Consignments sent to each destination can readily be identified and accessed. <i>Note: The licensee must keep all information for at least 4 years.</i>		No Finding
06.10	<p>Exception Reporting The licensee must notify the DECC in writing within 48 hours of becoming aware of a suspected breach of the Act, the Protection of the Environment Operations (Waste) Regulation 1996 or this licence.</p>	It was reported that there was no interstate transport of controlled wastes during the audit period.	No Finding
06.11	The licensee must notify the DECC in writing within 48 hours of becoming aware of any of the following:	It was reported that there was no interstate transport of controlled wastes during the audit period.	No Finding
06.11 (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.		No Finding
06.11 (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.		No Finding
06.11 (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.		No Finding
06.11 (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.		No Finding

B.3 DA 282-6-2003-I (RPGP, Rosalind Park, Wandinong, EMAI (EM01-20, 40)

No.	Consent Condition	Evidence	Finding
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. <i>Note: The DECC should be notified of exception reports by sending a facsimile to: Manager, Hazardous Waste Regulation, NSW Environment Protection Authority.</i>		No Finding
R4	Regular reporting of transportation of certain wastes within NSW	N/A	N/A
R4.1	Conditions R4.2 to R4.5 apply to the transport of hazardous and/or industrial and/or Group A waste within NSW.	N/A	N/A
R4.2	Regular reporting The licensee must supply to the DECC, for each transporter that transported waste from the licensee's premises, the information as set out in Appendix 2, table 1.	It was reported that information on waste transporters is not currently provided to the EPA. It is noted that this condition is no longer included in EPL 12003 following a variation of the licence by the EPA.	Non-Conformance 2
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 was reported that information on waste disposal facilities is not currently provided to the EPA. It is noted that this condition is no longer included in EPL 12003 following a variation of the licence by the EPA.	Non-Conformance 2
R4.4	Reporting periods Reports to the DECC in accordance with R4.2 and R4.3 shall be supplied on or before:	Reports on waste transporters and waste disposal facilities were not submitted to the EPA during the audit period. It is noted that this condition is no longer included in EPL 12003 following a variation of the licence by the EPA.	Non-Conformance 2
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.		Non-Conformance 2
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.		Non-Conformance 2
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.		Non-Conformance 2
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. <i>Note: The DECC should be notified of exception reports by sending a facsimile to: Manager, Hazardous Waste Regulation NSW Department of Environment and Climate Change.</i>		Non-Conformance 2

B.3 DA 282-6-2003-I (RPGP, Rosalind Park, Wandinong, EMAI (EM01-20, 40)

No.	Consent Condition	Evidence	Finding
R4.5	Nil reports If waste has not been transported from the premises in any reporting period as set out in R4.4 the DECC must be advised in writing by the licensee, by the dates referred to in R4.4 in lieu of reporting as required in R4.2 and R4.3.	Condition was not activated during the audit period.	No Finding
R5	Regular reporting of interstate movements of controlled wastes	N/A	N/A
R5.1	Conditions R5.2 to R5.5 apply to the movement of hazardous and/or industrial and/or Group A waste as listed in L5.3, into and out of NSW. <i>Note: The requirements of the NEPM apply to the interstate movement of any of the wastes listed in Appendix 1 of this licence.</i>	It was reported that there was no interstate transport of controlled wastes during the audit period.	No Finding
R5.2	Regular reporting The licensee must supply to the DECC, for each transporter that transported waste from the premises to a destination in another participating State or Territory, the information as set out in Appendix 2, table 3.	It was reported that there was no interstate transport of controlled wastes during the audit period.	No Finding
R5.3	Reporting periods Reports to the DECC in accordance with R5.2 shall be supplied on or before:	It was reported that there was no interstate transport of controlled wastes during the audit period.	No Finding
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.		No Finding
R5.3(b)	31 July for the reporting of information relating to wastes transported from the premises between 1 April and 30 June of that year.		No Finding
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.		No Finding
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.		No Finding
R5.4	Nil reports If waste has not been transported from the premises in any reporting period as set out in R5.3, the DECC must be advised in writing by the licensee, by the dates referred to in R5.3 in lieu of reporting as defined in R5.2.	It was reported that there was no interstate transport of controlled wastes during the audit period.	No Finding
R5.5	Interstate transport of controlled wastes The licensee must comply with the requirements of the NEPM.	It was reported that there was no interstate transport of controlled wastes during the audit period.	No Finding

B.4 DA 183-8-2004-I (Mt Taurus and Menangle Park)

No.	Consent Condition	Evidence	Finding
1	<p>Obligation to minimise harm to the Environment</p> <p>The Applicant shall implement all practicable measures to prevent or minimise any harm to the environment that may result from the construction or operation of the development.</p>	<p>An Environmental Management System has been established to manage environmental risks and achieve performance improvements. This framework consists of an Environmental Management Plan (EMP), relevant sub-plans and a Compliance Register.</p> <p>A number of tools are reported to be in place to monitor and measure implementation of the EMS including the Drilling Operations Compliance Checklist, the Gas Gathering System Construction Checklist and the Rehabilitation Checklist (among others).</p> <p>The Environmental Compliance Register (Mipela) was sighted and found to be an effective tool for monitoring compliance against project approval deliverables.</p> <p>It is noted that there were no reported environmental incidents or non-compliances during the audit period.</p>	Conformance
2	<p>Terms of Approval</p> <p>The Applicant shall carry out the development generally in accordance with the:</p>	<p>It was reported that the development is undertaken in accordance with the EMP and sub-plans. On receipt of an approved consent or modification, it was reported that the EMP is revised to reflect the new requirements. This was evidenced by the frequent revision history of the document.</p>	Conformance
2(a)	DA submitted to the Department on 28 July 2004.		Conformance
2(b)	“Statement of Environmental Effects -Harness Racing Drilling Program” Sydney Gas Company dated 24 June 2003.		Conformance
2(c)	“Review of Environmental Effects -Mt Taurus Drilling Program” Sydney Gas Company dated March 2004.		Conformance
2(d)	Modification application MOD 27-3-2007 and Camden Gas project Venture Gas well and Gathering Line Modification Project Statement of Environmental Effects”, dated March 2007.		Conformance
2(e)	<p>Conditions of this consent.</p> <p>If there is any inconsistency between the above documents, the latter document shall prevail over the former to the extent of the inconsistency. However, the conditions of this consent shall prevail over all other documents to the extent of the inconsistency.</p>		Conformance

B.4 DA 183-8-2004-I (Mt Taurus and Menangle Park)

No.	Consent Condition	Evidence	Finding
3	The Applicant shall comply with any reasonable requirement/s of the Director-General arising from the Department's assessment of:	Condition is noted.	No Finding
3(a)	Any reports, plans or correspondence that are submitted in accordance with this consent.		No Finding
3(b)	The implementation of any actions or measures contained in these reports, plans or correspondence.		No Finding
4	This approval is for a period of twenty one (21) years from the granting of the production lease.	Condition was not activated during the audit period	No Finding
5	Nothing in this consent permits the drilling and operation of any additional wells (beyond the approved 16 wells for gas production) or gas gathering lines.	The auditor reviewed the gas wells against the development consents and confirmed that no additional wells have been drilled or operated beyond the approved 16 wells.	Conformance
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-conformance was reported against this condition in the 2008-2010 Independent Environmental Audit (24 August 2011) due to failure to provide evidence of submission of GPS coordinates and digital survey data to nominated Councils.</p> <p>The auditor sighted correspondence from Sydney Gas to Camden Council (31 October 2005), Wollondilly Shire Council (31 October 2005) and Campbelltown City Council (18 April 2005) which details the GPS coordinates for gas well sites within the respective Councils. Further correspondence was sighted from AGL to each respective Council (1 November 2011) providing updated data sets.</p>	Conformance
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-conformance was reported against this condition in the 2008-2010 Independent Environmental Audit (24 August 2011) due to failure to provide wellhead configurations to the respective Councils.</p> <p>The auditor sighted correspondence dated 16 June 2013 from AGL to the respective Councils, which included the wellhead configurations for nominated assets. It is noted that this information was not provided within two months of the completion of the gas wells and gas gathering system.</p>	Non-Conformance 2

B.4 DA 183-8-2004-I (Mt Taurus and Menangle Park)

No.	Consent Condition	Evidence	Finding
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.	A non-conformance was reported against this condition in the 2008-2010 Independent Environmental Audit (24 August 2011). The auditor sighted correspondence dated 16 June 2013 from AGL to the DoPI noting fulfilment of the requirements of Condition 15 and 16.	Conformance
9	Environmental Management Except as may be expressly provided for by a licence under the Protection of the Environment Operations Act 1997 in relation to the development, the Applicant shall comply with section 120 of the Protection of the Environment Operations Act 1997, in carrying out this development. <i>Note: Section 120 of the Protection of the Environment Operations Act 1997 applies to the disposal of wastewater.</i>	The auditor sighted the EMP for the CGP, including the Soil and Water Management Sub-Plan (July 2012) and the Waste Management Sub-Plan (August 2008). The plans detail a number of controls to prevent the pollution of water.	Conformance
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.	No Finding
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.	No Finding
12	The Applicant is required to store and manage the use and disposal of water in accordance with the current version of the Department of Environment and Climate Change's "Environmental Guidelines: Assessment, Classification and Management of Liquid and Non-Liquid Wastes."	The auditor sighted the EMP for the CGP, including the Soil and Water Management Sub-Plan (July 2012) and the Waste Management Sub-Plan (August 2008). It was noted that details of the reuse and recycling of wastewater produced on site, including collection and handling procedures, were not provided. It was reported by site personnel that produced water is reused in drilling works and workovers at other sites within the Camden Gas Project. The reuse process is guided by supply and demand. The produced water is reportedly analysed in-house and the level of suspended (coal fines) solids are assessed to determine if water is suitable for reuse.	Non-Conformance 2
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 (August 2008) and noted the inclusion of controls to minimise noise impacts. It was reported that there were no drilling works undertaken during the audit period.	Conformance

B.4 DA 183-8-2004-I (Mt Taurus and Menangle Park)

No.	Consent Condition	Evidence	Finding
13A	The Applicant shall ensure that all construction work (except for drilling (including well casing and grouting) of surface to in seam wells), shall only be conducted between 7.00am and 6.00pm Monday to Friday and between 8.00am to 1.00pm on Saturdays unless inaudible at any residential receiver	The auditor sighted the Noise Management Sub-Plan (August 2008) and noted conformance with the requirements of this condition. There were no construction works undertaken during the audit period.	Conformance
13B	Noise from the drilling and construction of MP30 shall not exceed the sound pressure level (noise) limits in the table below:	Condition was not activated during the audit period.	No Finding
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.	No Finding
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	Condition closed in a previous audit.	No Finding
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.	No Finding
16A	The Applicant shall ensure that, if any historical archaeological relics within the meaning of the Heritage Act 1977 are disturbed, the Heritage Council of NSW shall be notified in accordance with section 146 of the Heritage Act 1977.	It was reported that this condition was not activated during the audit period. This requirement is communicated to employees and contractors through the role-specific induction program.	Conformance
16B	The Applicant shall ensure that, during the drilling and construction of MP30 and upgrading of the gas gathering lines, impacts on threatened species are minimised by implementing actions including, but not limited, to the following:	The auditor sighted the Flora and Fauna Management Sub-Plan (August 2008) and noted the inclusion of appropriate controls to minimise impacts on threatened species.	Conformance
16B(a)	The recommendations outlined in Sections 6 and 7 of the Ecosarch Environmental Consultants Pty Ltd report titled "Flora and fauna Assessment, AGL Gas Well and Gathering Line Project Modifications"	It was reported that there was no drilling, construction or upgrading works undertaken during the audit period.	Conformance
16B(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.		Conformance

B.4 DA 183-8-2004-I (Mt Taurus and Menangle Park)

No.	Consent Condition	Evidence	Finding
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.	<p>The auditor sighted the Landscape and Rehabilitation Management Sub-Plan (July 2012) and noted conformance with the requirements of this condition.</p> <p>The requirement to submit the Plan to the Director-General occurred prior to the audit period. However, it is noted that the revised version of the Plan was submitted to the Director-General on 11 July 2012.</p>	Conformance
18	<p>Redrilling and Refracting Management Plan</p> <p><i>Note: For the purposes of this consent the redrilling and/or additional fracing of a well does not constitute wellhead maintenance</i></p> <p>The Applicant shall obtain the prior approval of the Director-General for the redrilling and/or additional fracing of a gas well.</p>	It was reported that there were no redrilling or fracing works undertaken during the audit period.	No Finding
19	The Applicant shall prepare a Redrilling and Refracting Management Plan in consultation with the Department of Primary Industries for the redrilling and/or refracting of an existing well. The Plan shall be submitted to the Director-General no later than one month prior to the commencement of the work or within such period as agreed by the Director-General. The Plan shall include, but not necessarily be limited to:	It was reported that there were no redrilling or fracing works undertaken during the audit period.	No Finding
19(a)	A description of all the activities to be undertaken on the well site during the redrilling and/or refracting work.		No Finding
19(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.		No Finding
19(c)	Reference to the relevant parts of the Environmental Management Plan required under condition 21 of this consent.		No Finding
19(d)	Compliance with all the relevant environmental performance requirements of this consent.		No Finding
19(e)	Arrangements for complaints handling procedures during the redrilling/refracting work.		No Finding
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.	It was reported that there were no redrilling or fracing works undertaken during the audit period.	No Finding

B.4 DA 183-8-2004-I (Mt Taurus and Menangle Park)

No.	Consent Condition	Evidence	Finding
21	Operational Environmental Management Plan (OEMP) The Applicant shall prepare and implement an Operational Environmental Management Plan (OEMP) to provide environmental management practices and procedures to be followed during the operation of the development. The OEMP shall be forwarded to the Director-General for approval within one month of the date of this consent. The OEMP shall include, but not necessarily be limited to:	The auditor sighted the Environmental Management Plan (July 2012) and noted that the content conforms to the requirements of this condition. Correspondence was provided from the DoPI to AGL (11/7/2012) confirming approval of the EMP, the Soil and Water Management Sub-Plan and the Rehabilitation and Landscape Management Sub-Plan.	Conformance
21(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.		
21(b)	A description of the roles and responsibilities for all key personnel involved in the operation of the development.		
21(c)	The overall environmental policies and principles to be applied to the operation of the development.		
21(d)	Standards and performance measures to be applied to the development, and a means by which environmental performance can be periodically reviewed and improved.		
21(e)	Management policies to ensure that environmental performance goals are met and to comply with conditions of this consent.		
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.	No Finding
23	The Applicant shall review and update the OEMP annually, or as directed by the Director-General	The OEMP was not reviewed and updated annually as required by this condition. Although the EMP was reviewed on a number of occasions during the audit period (August 2008, May 2011, October 2011 and July 2012), most of the EMP Sub-Plans were last reviewed in 2008.	Non-Conformance 2
24	Annual Environmental Performance Reporting The Applicant shall include the operation of MT1 -MT 10 inclusive, MP13 -MP17 and MP30, inclusive and the associated gas gathering system and the conditions of this consent, in the Annual Environmental Performance Report required under Schedule 5 Condition 5 of development consent DA-282-6-2003-i, dated 16 June 2004.	The auditor sighted the Annual Environmental Performance Reports for July 2011 and July 2012 (draft) and noted conformance with this condition.	Conformance

B.4 DA 183-8-2004-I (Mt Taurus and Menangle Park)

No.	Consent Condition	Evidence	Finding
25	<p>Independent Environmental Audit</p> <p>The Applicant shall include the operation of MT1 -MT 10 inclusive, MP13 -MP17 inclusive and MP30, and the associated gas gathering system, and the conditions of this consent, in the Independent Environmental Audit required under Schedule 5 Condition 8 of development consent DA-282-6-2003-i, dated 16 June 2004.</p>	The scope of this independent audit satisfies this condition.	Conformance

B.5 DA 9-1-2005 (Glenlee Wells)

No.	Consent Condition	Evidence	Finding
1	<p>Obligation to Minimise Harm to the Environment</p> <p>The Applicant shall implement all practicable measures to prevent or minimise any harm to the environment that may result from the construction or operation of the development.</p>	<p>An Environmental Management System has been established to manage environmental risks and achieve performance improvements. This framework consists of an Environmental Management Plan (EMP), relevant sub-plans and a Compliance Register.</p> <p>A number of tools are reported to be in place to monitor and measure implementation of the EMS including the Drilling Operations Compliance Checklist, the Gas Gathering System Construction Checklist and the Rehabilitation Checklist (among others).</p> <p>The Environmental Compliance Register (Mipela) was sighted and found to be an effective tool for monitoring compliance against project approval deliverables.</p> <p>It is noted that there were no reported environmental incidents or non-compliances during the audit period.</p>	Conformance
2	<p>Terms of Approval</p> <p>The Applicant shall carry out the development generally in accordance with the:</p>	<p>It was reported that the development is undertaken in accordance with the EMP and sub-plans. On receipt of an approved consent or modification, it was reported that the EMP is revised to reflect the new requirements. This was evidenced by the revision history of the document.</p>	Conformance
2(a)	DA submitted to the Department on 4 January 2005.		Conformance
2(b)	“Statement of Environmental Effects – Elizabeth Macarthur Agricultural Institute Horizontal Drilling Project” Sydney Gas Company dated July 2002.		Conformance
2(c)	“Statement of Environmental Effects – Glenlee Drilling Project Drilling Operations” Sydney Gas Company dated September 2002.		Conformance
2(d)	Letter from Sydney Gas Operations Pty Ltd to the Department dated 13 May 2005, modifying the application to relocate well GL3.		Conformance
2(e)	The modification application submitted to the Department on 11 April 2006 and the accompanying document “Camden Gas Project Joint Venture Proposed Multiple Gas Well Modifications” prepared by AGL Gas Production (Camden) Pty Ltd and Sydney Gas (Camden) Operations Pty Ltd, dated April 2006.		Conformance
2(f)	Modification Application MOD 28-3-2007 and “Camden Gas Project Joint Venture Gas Well and Gathering Line Modification Project Statement of Environmental Effects”, dated March 2007.		Conformance

B.5 DA 9-1-2005 (Glenlee Wells)

No.	Consent Condition	Evidence	Finding
2(g)	Letter from AGL Energy Limited to the Department dated 28th May 2010, modifying the application to revise condition 26 of schedule 2.		Conformance
2(h)	The conditions of this consent. If there is any inconsistency between the above documents, the latter document shall prevail over the former to the extent of the inconsistency. However, the conditions of this consent shall prevail over all other documents to the extent of any inconsistency.		Conformance
3	This approval is for a period of twenty one (21) years from the granting of the production lease.	Condition was not activated during the audit period.	No Finding
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.	No Finding
5	The Applicant shall comply with any reasonable requirement/s of the Director-General arising from the Department's assessment of:	Condition is noted.	No Finding
5(a)	Any reports, plans or correspondence that are submitted in accordance with this consent		No Finding
5(b)	The implementation of any actions or measures contained in these reports, plans or correspondence.		No Finding
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 against the development consents and confirmed that no additional wells have been drilled or operated.	Conformance
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.	A non-conformance was reported against this condition in the 2008-2010 Independent Environmental Audit (24 August 2011) due to failure to provide evidence of submission of GPS coordinates and digital survey data to nominated Councils. The auditor sighted correspondence from Sydney Gas to Camden Council (31 October 2005), Wollondilly Shire Council (31 October 2005) and Campbelltown City Council (18 April 2005) which details the GPS coordinates for gas well sites within the respective Councils. Further correspondence was sighted from AGL to each respective Council (1 November 2011) providing updated data sets.	Conformance

B.5 DA 9-1-2005 (Glenlee Wells)

No.	Consent Condition	Evidence	Finding
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.	A non-conformance was reported against this condition in the 2008-2010 Independent Environmental Audit (24 August 2011). The auditor sighted correspondence dated 16 June 2013 from AGL to the respective Councils, which included the wellhead configurations for nominated assets. It is noted that this information was not provided within two months of the completion of the gas wells and gas gathering system.	Non-Conformance 2
9	The Applicant shall provide written notification to the Director-General that it has fulfilled the requirements of Conditions 7 and 8, within two weeks of the information being provided to the Councils.	A non-conformance was reported against this condition in the 2008-2010 Independent Environmental Audit (24 August 2011). The auditor sighted correspondence dated 16 June 2013 from AGL to the DoPI noting fulfilment of the requirements of Condition 7 and 8.	Conformance
10	The Applicant shall comply with the following in the construction of the gas gathering system pipeline:	The auditor sighted the EMP and noted that the requirements of this condition are incorporated. There was no gas gathering system constructed during the audit period in relation to this development approval.	Conformance
10(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.		Conformance
10(b)	Trenches are to be restored and reseeded with local grass seeds on completion of the work.		Conformance
10(c)	Local council traffic guidelines in respect of work carried out on road verges and underneath roads shall be implemented.		Conformance
10(d)	The Applicant shall construct the gas gathering system so as not to impeach lateral water flows.		Conformance
10(e)	The Applicant shall ensure that no crown or camber remains along the gas gathering systems, following construction.		Conformance
10(f)	The pipeline shall be designed, constructed and operated in accordance with the Australian Standard for the installation and maintenance of Plastic Pipe Systems for Gas AS 3723-1989 (or its latest version).		Conformance
10(g)	The Department shall be notified on the completion of any trenching works.		Conformance

B.5 DA 9-1-2005 (Glenlee Wells)

No.	Consent Condition	Evidence	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 was not activated during the audit period.	No Finding
12	Hours of Operation The Applicant may conduct construction activities on land owned by Waste Service NSW, during the following hours: Monday to Friday 7.00 am to 6.00 pm; Saturday and Sunday 7.00 am to 6.00 pm. (Excluding Public Holidays)	The auditor sighted the Noise Management Sub-Plan (August 2008) and noted that the plan conforms to the requirements of this condition. There were no construction activities reported during the audit period.	Conformance
13	For development carried out on land not owned by Waste Service NSW, the Applicant is restricted to the following hours of construction: Monday to Friday 7.00 am to 6.00 pm; Saturday 8.00 am to 1.00 pm. (Excluding Public Holidays)	The auditor sighted the Noise Management Sub-Plan (August 2008) and noted that the plan conforms to the requirements of this condition. There were no construction activities reported during the audit period.	Conformance
14	Environmental Management The Applicant shall obtain a Part 3A Permit prior to the commencement of construction of any crossing of a stream by the gas gathering line.	Condition was not activated during the audit period.	No Finding
15	Except as may be expressly provided for by a licence under the Protection of the Environment Operations Act 1997 in relation to the development, the Applicant shall comply with section 120 of the Protection of the Environment Operations Act 1997, in carrying out this development.	The auditor sighted the EMP for the CGP, including the Soil and Water Management Sub-Plan (July 2012) and the Waste Management Sub-Plan (August 2008). The plans detail a number of controls to prevent the pollution of water.	Conformance
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 (July 2012) and noted the inclusion of appropriate controls to minimise soil erosion and discharge of sediment and water pollutants from the premises.	Conformance
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.	There were no reported construction works undertaken during the audit period.	Conformance
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 was not activated during the audit period.	No Finding

B.5 DA 9-1-2005 (Glenlee Wells)

No.	Consent Condition	Evidence	Finding
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 (August 2008) and noted the inclusion of appropriate controls to minimise noise. With respect to this development consent, there was no noise monitoring warranted within the audit period and there were no noise complaints.	Conformance
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.	The auditor sighted the Emergency Response Plan (October 2008) and noted the inclusion of a flood emergency procedure. The procedure included a number of controls to minimise and mitigate flood impacts.	Conformance
21	The Applicant shall ensure that the route of the gas gathering system follows previously or currently disturbed areas wherever possible.	The auditor sighted the Flora and Fauna Management Sub-Plan (August 2008) and noted the inclusion of this condition. It was reported that there was no gas gathering line constructed during the audit period.	Conformance
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.	It was reported that there was no gas gathering line constructed during the audit period. As such, this condition was not activated.	No Finding
22A	Threatened Species The Applicant shall ensure that during the upgrading of the gas gathering lines, impacts on threatened species are minimised by implementing actions including, but not limited to the following:	The auditor sighted the Flora and Fauna Management Sub-Plan (August 2008) and noted the inclusion of appropriate controls to minimise impacts on threatened species.	Conformance
22A(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".	It was reported that there was no gas gathering line constructed during the audit period. However, repair works were undertaken following an incident where the gas gathering line was struck by a third party.	Conformance
22A(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.		Conformance

B.5 DA 9-1-2005 (Glenlee Wells)

No.	Consent Condition	Evidence	Finding
23	The Applicant shall not remove mature trees as part of this development unless otherwise agreed by the Director-General.	<p>The auditor sighted the Flora and Fauna Management Sub-Plan (August 2008) and noted the inclusion of this control measure.</p> <p>It was reported that there were no mature trees removed during the audit period.</p> <p>It was noted that a new procedure has been adopted to ensure environmental controls are communicated to employees and contractors prior to the commencement of construction works. A pre-construction kick-off meeting is held whereby all environmental risks and controls are discussed, including conditions of consent.</p>	Conformance
24	The Applicant shall implement best practice flora and fauna management.	<p>The auditor sighted the Flora and Fauna Management Sub-Plan (August 2008), which includes a number of controls to minimise the impacts to flora and fauna during construction, operation and rehabilitation.</p> <p>Given the significant period of time between the preparation of the environmental assessment and the conduct of construction and/or drilling works, it is recommended that the EMP include the following additional control measure:</p> <p>Prior to the commencement of construction, drilling and/or fracing works, identify the presence of significant flora and fauna within the area of works. Establish site-specific controls as relevant and communicate to site personnel through the induction program.</p> <p>It was noted by AGL that the above control is currently undertaken prior to construction works.</p>	Conformance - Improvement Opportunity

B.5 DA 9-1-2005 (Glenlee Wells)

No.	Consent Condition	Evidence	Finding
25	The Applicant shall take all practicable measures to minimise potential flora and fauna impacts of the proposed development.	<p>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.</p> <p>Given the significant period of time between the preparation of the environmental assessment and the conduct of construction and/or drilling works, it is recommended that the EMP include the following additional control measure:</p> <p>Prior to the commencement of construction, drilling and/or fracing works, identify the presence of significant flora and fauna within the area of works. Establish site-specific controls as relevant and communicate to site personnel through the induction program.</p> <p>It was noted by AGL that the above control is currently undertaken prior to construction works.</p>	Conformance - Improvement Opportunity
26	The Applicant shall provide landscaping around the well heads using appropriate species in consultation with the landowner.	The auditor sighted the Rehabilitation and Landscape Management Sub-Plan (July 2012) and noted the inclusion of this condition. It was reported that there were no rehabilitation works undertaken during the audit period.	Conformance
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.	The auditor sighted the Flora and Fauna Management Sub-Plan (August 2008) and noted the inclusion of this condition. It was reported that there were no construction works undertaken during the audit period.	Conformance
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.	No Finding

B.5 DA 9-1-2005 (Glenlee Wells)

No.	Consent Condition	Evidence	Finding
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.	<p>The auditor sighted the Landscape and Rehabilitation Management Sub-Plan (July 2012) and noted conformance with the requirements of this condition.</p> <p>The requirement to submit the Plan to the Director-General occurred prior to the audit period. However, it is noted that the revised version of the Plan was submitted to the Director-General on 11 July 2012.</p>	Conformance
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 was not activated during the audit period.	No Finding
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 was not activated during the audit period.	No Finding
32	<p>Safety and Risk Management</p> <p>The Applicant shall develop and implement an Emergency Plan and Safety Management System for the development. The plan/system shall be submitted for the approval of the Director-General, at least one month prior to the commissioning of the development, or within such further period as the Director-General may agree. Commissioning shall not commence until the Director-General has approved the plan/system.</p>	<p>The auditor sighted the Emergency Response Plan (August 2008) and the Health and Safety Management Plan, Camden Project NSW (3 August 2011) and noted conformance with the requirements of this condition.</p> <p>This condition was recorded within a Sydney Gas Project Commitments Register as completed and approved by the Director-General on 6 September 2004.</p>	Conformance
32(a)	<p>Emergency Plan</p> <p>A comprehensive emergency plan and detailed emergency procedures for the development shall be prepared in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 1, "Industry Emergency Planning Guidelines". The plan shall include detailed procedures for the safety of all people outside of the development who may be at risk from the development.</p>		Conformance

B.5 DA 9-1-2005 (Glenlee Wells)

No.	Consent Condition	Evidence	Finding
32(b)	<p>Safety Management System</p> <p>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>		Conformance
33	<p>Compliance Report</p> <p>Three months after commencement of operation of the development, the Applicant shall submit to the Director-General a compliance report detailing compliance with Condition 32, including:</p> <p>(a) dates of study/plan/system completion/submission and commencement of construction and commissioning;</p> <p>(b) actions taken or proposed, to implement recommendations made in the studies/plans/systems; and</p> <p>(c) responses to any requirement imposed by the Director-General under Condition 35.</p>	<p>It was reported in a Sydney Gas Project Commitments Register that the compliance reports were completed and approved by the Director-General between 29 March 2004 and 9 August 2004.</p> <p>This condition is deemed to be closed.</p>	Conformance
33	<p>This report shall verify that:</p> <p>(a) The Emergency Plan required under Condition 32(a) is effectively in place and that at least one emergency exercise has been conducted; and</p> <p>(b) The Safety Management System required under Condition 32(b) has been fully implemented and that records required by the system are being kept.</p>		Conformance
33	<p>The report shall include a signed commitment by the Applicant’s representative responsible for the operation of the development, that for each study/plan/system:</p> <p>(a) The required study/plan/system has been undertaken or prepared to the relevant Hazardous Industry Planning Advisory Panel;</p> <p>(b) All recommendations of each study/plan/system have been implemented; and</p> <p>(c) All safety management system and their associated risk controls have been implemented and are being maintained.</p>		Conformance

B.5 DA 9-1-2005 (Glenlee Wells)

No.	Consent Condition	Evidence	Finding
34	<p>Hazard Audit</p> <p>Twelve months after the commencement of operations of the proposed development or within such further period as the Director-General may agree, the Applicant shall carry out a comprehensive hazard audit of the development and within one month of the audit submit a report to the Director-General.</p> <p>The audit shall be carried out at the Applicant's expense by a duly qualified independent person or team approved by the Director-General prior to commencement of the audit. Further audits shall be carried out every three years or as determined by the Director-General and a report of each audit shall, within one month of the audit, be submitted to the Director-General. Hazard audits shall be carried out in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 5, "Hazard Audit Guidelines".</p>	<p>A non-conformance was reported against this condition in the 2008-2010 Independent Environmental Audit (24 August 2011) due to failure to complete hazard audits every three years.</p> <p>The auditor sighted the 'Hazard Audit Report for Sydney Gas Operations, 3 March 2006) and a draft report of the 2012 audit.</p> <p>The audits were not conducted every three years as required by this condition. Furthermore, the 2012 audit has not been finalised and submitted to the Director-General.</p>	Non-Conformance 1
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 was not activated during the audit period.	No Finding
36	<p>Drilling and Fracching Management Plan</p> <p>The Applicant shall obtain the prior approval of the Director-General for the drilling, redrilling and/or additional fracching of a gas well.</p>	Condition was not activated during the audit period. There was no reported drilling, redrilling or fracching works undertaken during the audit period.	No Finding
37	The Applicant shall prepare a Drilling and Fracching Management Plan in consultation with the Department of Primary Industries for the drilling of a well, or redrilling and/or refracching of an existing well. The Plan shall be submitted to the Director-General no later than one month prior to the commencement of the work or within such period as agreed by the Director-General. The Plan shall include, but not necessarily be limited to:	Condition was not activated during the audit period. There were no reported drilling, redrilling or fracching works undertaken during the audit period.	No Finding
37(a)	A description of all the activities to be undertaken on the well site during the drilling, redrilling and/or refracching work.		No Finding
37(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.		No Finding
37(c)	Reference to the relevant parts of the Environmental Management Plan required under condition 41.		No Finding
37(d)	Compliance with all the relevant environmental performance requirements of this consent.		No Finding

B.5 DA 9-1-2005 (Glenlee Wells)

No.	Consent Condition	Evidence	Finding
37(e)	Arrangements for complaints handling procedures during the drilling, redrilling and/or refracring work.		No Finding
38	The Applicant shall give written notification of the proposed drilling, redrilling and/or refracring work to potentially affected residences and other noise sensitive receivers at least fourteen days prior to work commencing.	Condition was not activated during the audit period.	No Finding
39	Construction Environmental Management Plan (CEMP) The Applicant shall prepare and implement a Construction Environmental Management Plan (CEMP) to provide environmental management, practices and procedures to be followed during the construction phases of the proposed development. A framework plan outlining key practices, procedures and environmental management practices should be approved by the Director-General prior to the commencement of construction.	The auditor sighted the Environmental Management Plan (July 2012) and noted that the content conforms to the requirements of this condition. Evidence was sighted to demonstrate that the Director-General approved the EMP.	Conformance
40	The Applicant shall consult with the EMAI in the preparation of the CEMP. The CEMP shall identify measures to minimise the impact of construction of the gas gathering system and any related activities, within and adjacent to the Raptor Breeding zones on the EMAI site.	Condition was not activated during the audit period. Previous audit reports have identified this condition to be conforming. The auditor did not sight evidence to verify conformance.	No Finding
41	Operational Environmental Management Plan (OEMP) The Applicant shall prepare and implement an Operational Environmental Management Plan (OEMP) to provide environmental management practices and procedures to be followed during the operation of the development. The OEMP shall be forwarded to the Director-General for approval within one month of the date of this consent. The OEMP shall include, but not necessarily be limited to:	The auditor sighted the Environmental Management Plan (July 2012) and noted that the content complies with the requirements of this condition.	Conformance
41(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.		Conformance
41(b)	A description of the roles and responsibilities for all key personnel involved in the operation of the development.		Conformance
41(c)	The overall environmental policies and principles to be applied to the operation of the development.		Conformance

B.5 DA 9-1-2005 (Glenlee Wells)

No.	Consent Condition	Evidence	Finding
41(d)	Standards and performance measures to be applied to the development, and a means by which environmental performance can be periodically reviewed and improved.	An improvement opportunity was noted in relation to objectives and targets. The EMP includes an extensive number of objectives and targets for each environmental aspect. It was reported that performance against targets is not currently measured. It is recommended that objectives and targets be established for significant environmental aspects only. Performance against the targets should then be measured to drive continual improvement of performance.	Conformance-Improvement Opportunity
41(e)	Management policies to ensure that environmental performance goals are met and to comply with conditions of this consent.	The auditor sighted the Environmental Management Plan (July 2012) and noted that the content complies with the requirements of this condition.	Conformance
42	Annual Environmental Performance Reporting The Applicant shall include the operation of wells GL2 – 4 inclusive, GL 6, EMAI-1H and EMAI-1V and the associated gas gathering system and the conditions of this consent, in the Annual Environmental Performance Report required under Schedule 5 Condition 5 of development consent DA-282-6-2003-i, dated 16 June 2004.	The auditor sighted the Annual Environmental Performance Reports for July 2011 and July 2012 (draft) and noted a number of references in relation to the operation of wells GL2 – 4, GL 6, EMAI-1H and EMAI-1V, the associated gas gathering system and the conditions of this consent.	Conformance
43	Independent Environmental Audit – Construction at EMAI The Applicant shall commission and pay the full costs of an Independent Environmental Audit of the construction of the gas gathering system, construction of the access roads and drilling and 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.	No Finding
43.1	The Independent Environmental Audit shall: (a) be conducted by a suitably qualified, experienced, and independent person(s) whose appointment has been approved by the Director-General; and (b) be consistent with ISO 19011:2002 -Guidelines for Quality and/ or Environmental Management Systems Auditing, or updated versions of these guidelines/manuals.		No Finding

B.5 DA 9-1-2005 (Glenlee Wells)

No.	Consent Condition	Evidence	Finding
43.2	The Audit shall: (a) assess the environmental performance of the construction of the development on EMAI, and its effects on the surrounding environment; (b) assess whether the development is complying with the relevant standards, performance measures, and statutory requirements; (c) consider the Applicant's proposed Construction Environmental Management Plan for the EMAI Site; and (d) recommend measures or actions to improve the environmental performance of the construction of the development on EMAI, and/or its environmental management and monitoring systems (if required).		No Finding
43.3	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.		No Finding
44	Independent Environmental Audit – Operation The Applicant shall include the operation of wells GL2 – 4 inclusive, GL 6, EMAI-1H and EMAI-1V and the associated gas gathering system, and the conditions of this consent, in the Independent Environmental Audit required under Schedule 5 Condition 10 of development consent DA-282-6-2003i, dated 16 June 2004.	The scope of this 2010-2012 Independent Environmental Audit satisfies this condition.	Conformance

B.6 DA 75-4-2005 (Sugarloaf Farm)

No.	Consent Condition	Evidence	Finding
1	<p>Obligation to Minimise Harm to the Environment</p> <p>The Applicant shall implement all practicable measures to prevent or minimise any harm to the environment that may result from the construction or operation of the development.</p>	<p>An Environmental Management System has been established to manage environmental risks and achieve performance improvements. This framework consists of an Environmental Management Plan (EMP), relevant sub-plans and a Compliance Register.</p> <p>A number of tools are reported to be in place to monitor and measure implementation of the EMS including the Drilling Operations Compliance Checklist, the Gas Gathering System Construction Checklist and the Rehabilitation Checklist (among others).</p> <p>The Environmental Compliance Register (Mipela) was sighted and found to be an effective tool for monitoring compliance against project approval deliverables.</p> <p>It is noted that there were no reported environmental incidents or non-compliances during the audit period.</p>	Conformance
2	<p>Terms of Approval</p> <p>The Applicant shall carry out the development generally in accordance with the:</p>	<p>It was reported that the development is undertaken in accordance with the EMP and sub-plans. On receipt of an approved consent or modification, it was reported that the EMP is revised to reflect the new requirements. This was evidenced by the revision history of the document.</p>	Conformance
2(a)	Development Application submitted to the Department of Planning and Infrastructure on 18 April 2005.		Conformance
2(b)	“Statement of Environmental Effects – Camden Gas Project, Sugarloaf Farm Drilling Program, PPL4” Sydney Gas (Camden) Operations Pty Ltd, dated March 2005.		Conformance
2(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.		Conformance
2(d)	Letter from Sydney Gas (Camden) Operations Pty Ltd to the Department, dated 20 May 2005, amending the application to relocate SL5.		Conformance
2(e)	Letter from Sydney Gas (Camden) Operations Pty Ltd to the Department, dated 30 May 2005, providing a response to general public submissions.		Conformance
2(f)	Letter from Sydney Gas (Camden) Operations Pty Ltd to the Department, dated 17 June 2005,, about the access roads.		Conformance
2(g)	Letter from Sydney Gas (Camden) Operations Pty Ltd to the Department of Environment and Conservation, dated 10 June 2005, about Aboriginal heritage issues.		Conformance

B.6 DA 75-4-2005 (Sugarloaf Farm)

No.	Consent Condition	Evidence	Finding
2(h)	Letter from Sydney Gas (Camden) Operations Pty Ltd to the Department of Planning and Infrastructure, dated 11 July 2005, showing the updated plan of Aboriginal and archaeological assessment areas.		Conformance
2(i)	Modification Application MOD 29-3-2007 and a "Camden Gas Project Joint Venture Gas Well and Gathering Line Modification Project Statement of Environmental Effects", dated March 2007.		Conformance
2(j)	Modification Application DA 75-4-2005 MOD 2 and letter dated 18 December 2009.		Conformance
2(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.		Conformance
2(l)	Conditions of this approval. 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.		Conformance
3	The Applicant shall comply with any reasonable requirement/s of the Director-General of the Department of Planning and Infrastructure, or delegate arising from the Department of Planning and Infrastructure's assessment of:	Condition is noted.	No Finding
3(a)	Any reports, plans or correspondence that are submitted in accordance with this consent.		No Finding
3(b)	The implementation of any actions or measures contained in these reports, plans or correspondence.		No Finding
4	Limits on Approval This approval shall lapse within 21 years of the date of this consent or on the expiry date of Petroleum Production Lease No. 4, whichever is the shorter period.	Condition was not activated during the audit period.	No Finding
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 against the development consents and confirmed that no additional wells have been drilled or operated.	Conformance
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.	It is noted that the approval has lapsed for any well that has not been drilled. It was reported that there were no wells drilled during the audit period.	Conformance
7	The access road near SL7 shall only be used in an emergency.	It was reported that the access road to the SL7 site was not constructed.	Conformance

B.6 DA 75-4-2005 (Sugarloaf Farm)

No.	Consent Condition	Evidence	Finding
8	Administration Construction shall not commence until the Applicant has obtained a Part 3A Permit under the Rivers and Foreshores Improvement Act 1948, a Licence from the OEH under the Protection of the Environment Operations Act 1997, and an approval under section 60 of the Heritage Act 1977 from the NSW Heritage Council.	Condition was not activated during the audit period. It was reported that there were no wells constructed during the audit period.	No Finding
9	An application must be made to the OEH under section 90 of the National Parks and Wildlife Act 1974 for approval to destroy the known objects at Sugarloaf Farm Site 1 (Locale 5) and Sugarloaf Farm Site 5.	Condition was not activated during the audit period.	No Finding
10	The Applicant must, in the opinion of the OEH 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.	It was noted by the auditor that AGL has not had a licence suspended or revoked. However, in response to the environmental incident at SL03 resulting in the emission of foam and water, the EPA issued a formal warning to AGL (4 August 2011). The EPA investigation found that AGL failed to operate the degasser unit in a proper and efficient manner.	Conformance
11	The premises for the purposes of the Licence under the Protection of the Environment Operations Act 1997, includes the gas gathering system, access roads and gas wells and any associated effluent storages, temporary work areas and infrastructure associated with the gas gathering systems, access roads and gas wells.	Condition is noted.	No 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.	The auditor sighted a number of operations during the course of the audit including: a) Well construction - MP25 b) Workovers - MP03, SF05/SF07/SF08/SF09 An improvement opportunity was noted in relation to housekeeping. During the construction of MP25, it was noted that a number of materials were stored outside of the fenced compound including empty plastic storage tanks, storage containers and equipment not in use. It is recommended that all materials are stored within the fenced compound.	Conformance-Improvement Opportunity

B.6 DA 75-4-2005 (Sugarloaf Farm)

No.	Consent Condition	Evidence	Finding
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.	<p>A non-conformance was reported against this condition in the 2008-2010 Independent Environmental Audit (24 August 2011).</p> <p>The auditor sighted correspondence dated 1 November 2011 from AGL to the respective Councils that included the GPS co-ordinates and digital survey data for nominated assets. It is noted that this information was not provided within two months of completion of the gas wells and gas gathering system.</p>	Non-Conformance 2
14	The Applicant shall provide Council with the wellhead configurations of each gas well within two months of the gas well being completed or two months from the date of this consent, whichever is the later.	<p>A non-conformance was reported against this condition in the 2008-2010 Independent Environmental Audit (24 August 2011).</p> <p>The auditor sighted correspondence dated 16 June 2013 from AGL to the respective Councils that included the wellhead configurations for nominated assets. It is noted that this information was not provided within two months of the completion of the gas wells and gas gathering system.</p>	Non-Conformance 2
15	The Applicant shall provide written notification to the Director-General of the Department of Planning and Infrastructure, or delegate that it has fulfilled the requirements of Conditions 13 and 14, within two weeks of the information being provided to the Council.	<p>A non-conformance was reported against this condition in the 2008-2010 Independent Environmental Audit (24 August 2011).</p> <p>The auditor sighted correspondence dated 16 June 2013 from AGL to the DoPI noting fulfilment of the requirements of Condition 13 and 14.</p>	Conformance

B.6 DA 75-4-2005 (Sugarloaf Farm)

No.	Consent Condition	Evidence	Finding
16	<p>Activities Must be Carried out in a Competent Manner</p> <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 a number of actions as detailed below:</p> <ol style="list-style-type: none"> 1. Roles and responsibilities - Defined in the EMP (August 2012) and position descriptions. The position description of the Gas Plant Operator (19 October 2011) was sighted by the auditor and noted to include a requirement to implement the AGL Environmental Management Plan and a range of control measures. 2. Training - Employees reported a number of training sessions including environmental compliance and the Empower E-learning modules and refresher program. The auditor sighted training programs and records. 3. Audit and inspection - Assurance of competence is provided through the biannual independent audit, annual Lifeguard Audits (AGL HSE System) and the annual greenhouse and energy use verification program. 	Conformance
17	<p>Maintenance of Plant and Equipment</p> <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>Preventative maintenance of plant and equipment is controlled through the MEX system. The MEX was sighted by the auditor and it was noted that maintenance schedules are defined by usage and manufacturers requirements. It was reported that the MEX system has been operating for 8 months but is not fully functional. A back-up system is being maintained until the MEX system achieves the required outcomes.</p> <p>It is noted that AGL received a Warning Letter from the EPA (correspondence dated 4 August 2011) in relation to the emission of foam and water during well workover operations at well site SL03 on 17 May 2011. The EPA determined that the degasser unit was not being operated in a proper and efficient manner.</p>	Non-Conformance 1

B.6 DA 75-4-2005 (Sugarloaf Farm)

No.	Consent Condition	Evidence	Finding														
18	<p>Noise Limits 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>L_{A1} (1 minute)</th> </tr> </thead> <tbody> <tr> <td>Any residential premise</td> <td>35</td> <td>35</td> <td>35</td> <td>45</td> </tr> </tbody> </table> <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. 	Location	Day	Evening	Night		L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{A1} (1 minute)	Any residential premise	35	35	35	45	<p>The auditor sighted the Noise Management Sub-Plan (August 2008) and noted the inclusion of this condition and appropriate controls to minimise noise. With respect to DA 75-4-12005, there was no noise monitoring warranted within the audit period and there were no noise complaints.</p>	<p>Conformance</p>
Location	Day		Evening	Night													
	L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{A1} (1 minute)													
Any residential premise	35	35	35	45													

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No.	Consent Condition	Evidence	Finding										
18A	Noise from the drilling and construction of SL08 and SL09 shall not exceed the sound pressure level (noise) limits in the table below:	Condition not activated during the audit period. There were no reported drilling works undertaken during the audit period. It is further noted that approval has lapsed for any well that has not been drilled and as such this condition will not be activated in the future.	No Finding										
	<table border="1"> <thead> <tr> <th>Receiver Location</th> <th>Weekday (7.00am-6.00pm) Saturday (7.00am-1.00pm)</th> <th>Saturday Sunday (7.00am-6.00pm)</th> <th>Evening (6.00pm-10.00pm)</th> <th>Night (10.00pm-7.00am)</th> </tr> </thead> <tbody> <tr> <td>Nearest Receiver</td> <td>54</td> <td>44</td> <td>47</td> <td>41</td> </tr> </tbody> </table>			Receiver Location	Weekday (7.00am-6.00pm) Saturday (7.00am-1.00pm)	Saturday Sunday (7.00am-6.00pm)	Evening (6.00pm-10.00pm)	Night (10.00pm-7.00am)	Nearest Receiver	54	44	47	41
	Receiver Location			Weekday (7.00am-6.00pm) Saturday (7.00am-1.00pm)	Saturday Sunday (7.00am-6.00pm)	Evening (6.00pm-10.00pm)	Night (10.00pm-7.00am)						
Nearest Receiver	54	44	47	41									
19	The Applicant shall prepare and implement a Construction Noise Management Protocol for construction of the development. The Protocol shall be submitted for the approval of the OEH and the Director-General of the Department of Planning and Infrastructure, or delegate at least one week prior to commencement of construction. The Protocol must include but is not limited to:	The auditor sighted correspondence from AGL to the DoPI (10 September 2008 and 1 October 2008) verifying submission of the EMS prior to construction.	Conformance										
19(a)	Compliance with the noise criteria in Condition 18A during all construction activities, when assessed at sensitive locations including residences and schools.	The auditor sighted the Noise Management Sub-Plan (August 2008) and noted that the Plan conforms to the requirements of this condition.	Conformance										
19(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.		Conformance										
19(c)	Identification of sensitive receivers likely to be impacted by noise levels exceeding the noise goal in (a) above.		Conformance										
19(d)	Details of proposed best practice mitigation measures to seek achieve the noise goal in (a) above.		Conformance										
19(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.		Conformance										
19(f)	Community consultation including advance notice of commencement of construction activities and site contact details.		Conformance										
19(g)	A system to receive, document, respond, action and monitor complaints.		Conformance										
19(h)	Monitoring methods and program.		Conformance										

B.6 DA 75-4-2005 (Sugarloaf Farm)

No.	Consent Condition	Evidence	Finding
20	At least one month prior to operation of the development the Applicant shall prepare and submit for the Director-General of the Department of Planning and Infrastructure, or delegate'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>A non-conformance was reported against this condition in the 2008-2010 Independent Environmental Audit (24 August 2011) due to a lack of evidence to demonstrate submission of the plan to the Director-General one month prior to operation.</p> <p>It was reported that the Noise Management Sub-Plan was reviewed during the audit period. However, the revised plan has not been submitted to the Director-General.</p>	Non-Conformance 2
20(a)	A primary objective of attaining the noise limits in condition 18.	The auditor sighted the Noise Management Sub-Plan (August 2008) and noted that the Plan conforms to the requirements of this condition.	Conformance
20(b)	Community consultation.		Conformance
20(c)	Advance notice to affected members of the community for planned well maintenance activities.		Conformance
20(d)	Complaints handling monitoring system.		Conformance
20(e)	Mitigation measures.		Conformance
20(f)	The design/orientation of the proposed mitigation methods demonstrating best practice.		Conformance
20(g)	Construction times.		Conformance
20(h)	Contingency measures where noise complaints are received.		Conformance
20(i)	Monitoring methods and programs.		Conformance
21	<p>Hours of Operation</p> <p>The Applicant shall ensure that all construction works (except for the drilling (including well casing and grouting) of SIS wells) must be conducted between 7.00am and 6.00pm Monday to Friday and between 8.00am and 1.00pm Saturdays and at no time on Sundays and Public Holidays, unless inaudible at any residential receiver.</p>	The auditor sighted the Noise Management Sub-Plan (August 2008) and noted conformance with the requirements of this condition.	Conformance
22	Planned maintenance activities at any of the wells must only be conducted between:	The auditor sighted the Noise Management Sub-Plan (August 2008) and noted that the Plan conforms to the requirements of this condition. It was reported that this condition is communicated to employees and contractors through the role-specific induction program.	Conformance
22(a)	7.00 am to 6.00 pm on weekdays.		Conformance
22(b)	8.00am and 1.00pm on Saturdays (excluding Public Holidays).		Conformance
23	<p>Air Quality</p> <p>The Applicant shall carry out the development in a manner that will minimise emissions of dust from the site.</p>	It was noted by the auditor that a number of dust mitigation measures are detailed in the Air Quality Management Sub-Plan (August 2008). There were no dust complaints raised during the audit period in relation to this condition.	Conformance

B.6 DA 75-4-2005 (Sugarloaf Farm)

No.	Consent Condition	Evidence	Finding
24	Except as may be expressly provided by a Licence, the Applicant shall comply with section 120 of the Protection of the Environment Operations Act 1997 during the carrying out of the development.	The auditor sighted the EMP for the CGP, including the Soil and Water Management Sub-Plan (July 2012) and the Waste Management Sub-Plan (August 2008). The plans detail a number of controls to prevent the pollution of water.	Conformance
25	<p>Stormwater/Sediment Control</p> <p>At least one week prior to the commencement of construction, the Applicant shall submit for the approval of the Director-General of the Department of Planning and Infrastructure, or delegate, an Erosion and Sediment Control Plan. The Plan must be implemented and used for the duration of all construction activities associated with the development. The Plan must describe the measures that will be employed to minimise soil erosion and the discharge of sediment and other pollutants to land and/or waters during construction activities. The Plan should be prepared in accordance with the requirements for such plans outlined in the Landcom's Managing Urban Stormwater: Soils and Construction.</p>	The auditor sighted the Soil and Water Management Sub-Plan (July 2012) and noted that the Plan conforms to the requirements of this condition.	Conformance
26	<p>Waste</p> <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 Protection of the Environment Operations Act 1997.</p>	<p>The auditor sighted the AGL Environmental Footprint spread sheet for the financial years 2010/11 and 2011/12. These spread sheets provide a detailed record of waste streams generated, recycled/reused and disposed, including concrete and steel, water, hazardous waste, non-hazardous waste, and ozone-depleting substances.</p> <p>It was reported that there was no waste received at the premises.</p>	Conformance
27	The Applicant must ensure that any hazardous, industrial or Group A waste is assessed and classified in accordance with the OEH's Environmental Guidelines: "Assessment Classification and Management of Liquid and Non-Liquid Wastes".	<p>It was reported that the waste service provider undertakes waste classification. The auditor sighted a sample of waste disposal dockets for contaminated soil and noted that the waste was disposed as special waste.</p> <p>It is noted that a waste audit was not within the scope of this independent audit.</p>	Conformance

B.6 DA 75-4-2005 (Sugarloaf Farm)

No.	Consent Condition	Evidence	Finding
28	<p>Safety and Risk Management</p> <p>Prior to construction of the wellhead, the Applicant shall provide a Report to the Department of Planning and Infrastructure from an independent and suitably qualified person approved by the Director-General of the Department of Planning and Infrastructure, or delegate, to confirm that the design and operation of the wellhead complies with the Department's Locational Guidelines - Development in the Vicinity of Operating Coal Seam Methane Wells (May 2004) for an Automatically Controlled Well (with Separator/Optional Pump). In particular, the Report shall confirm that all safety related systems required by the Guidelines have been included.</p>	<p>It was reported by AGL that Sydney Gas submitted a report to the DPI to confirm that the design and operation of the wellhead complies with the Department's Locational Guidelines - Development in the Vicinity of Operating Coal Seam Methane Wells (May 2004) for an Automatically Controlled Well (with Separator/Optional Pump). However, there was no evidence provided to demonstrate conformance with this condition.</p>	<p>Non conformance 2</p>
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 of the Department of Planning and Infrastructure, or delegate, 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 (August 2008) and the Health and Safety Management Plan, Camden Project NSW (3 August 2011) and noted conformance with the requirements of this condition.</p> <p>This condition was recorded within a Sydney Gas Project Commitments Register as completed and approved by the Director-General on 6 September 2004.</p>	<p>Conformance</p>
29(a)	<p>Emergency Plan</p> <p>A comprehensive emergency plan and detailed emergency procedures for the development shall be prepared in accordance with the Department of Planning and Infrastructure's Hazardous Industry Planning Advisory Paper No. 1, "Industry Emergency Planning Guidelines".. The plan shall include detailed procedures for the safety of all people outside of the development who may be at risk from the development.</p>		<p>Conformance</p>
29(b)	<p>Safety Management System</p> <p>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 of Planning and Infrastructure'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 of the Department of Planning and Infrastructure, or delegate 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.</p>		<p>Conformance</p>

B.6 DA 75-4-2005 (Sugarloaf Farm)

No.	Consent Condition	Evidence	Finding
30	Compliance Report Three months after commencement of operation of the development, the Applicant shall submit to the Director-General of the Department of Planning and Infrastructure, or delegate a compliance report detailing compliance with Condition 29, including:	A non-conformance was reported against this condition in the 2008-2010 Independent Environmental Audit (24 August 2011) due to failure to prepare and submit a compliance report within three months of commencement of operation of the development.	Non-Conformance 1
30.1	(a) Dates of study/plan/system completion/submission and commencement of construction and commissioning; (b) Actions taken or proposed, to implement recommendations made in the studies/plans/systems; and (c) Responses to any requirement imposed by the Director-General under Condition 32.	The Compliance Report was commissioned in 2012 following DoPI approval on 17 August 2012 of an independent expert. To date, the Compliance Report has not been submitted to the Director-General.	Non-Conformance 1
30.2	This report shall verify that: (a) The Emergency Plan required under Condition 29(a) is effectively in place and that at least one emergency exercise has been conducted; and (b) The Safety Management System required under Condition 29(b) has been fully implemented and that records required by the system are being kept.		Non-Conformance 1
30.3	The report shall include a signed commitment by the Applicant's representative responsible for the operation of the development, that for each study/plan/system: (a) The required study/plan/system has been undertaken or prepared to the relevant Hazardous Industry Planning Advisory Paper; (b) All recommendations of each study/plan/system have been implemented; and (c) All safety management system and their associated risk controls have been implemented and are being maintained.		Non-Conformance 1

B.6 DA 75-4-2005 (Sugarloaf Farm)

No.	Consent Condition	Evidence	Finding
31	<p>Hazard Audit</p> <p>Twelve months after the commencement of operations of the proposed development or within such further period as the Director-General of the Department of Planning and Infrastructure, or delegate 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 of the Department of Planning and Infrastructure, or delegate.</p> <p>The audit shall be carried out at the Applicant's expense by a duly qualified independent person or team approved by the Director-General of the Department of Planning and Infrastructure, or delegate prior to commencement of the audit.</p> <p>Further audits shall be carried out every three years or as determined by the Director-General of the Department of Planning and Infrastructure, or delegate and a report of each audit shall, within one month of the audit, be submitted to the Director-General of the Department of Planning and Infrastructure, or delegate. Hazard audits shall be carried out in accordance with the Department of Planning and Infrastructure's Hazardous Industry Planning Advisory Paper No. 5, "Hazard Audit Guidelines".</p>	<p>A non-conformance was reported against this condition in the 2008-2010 Independent Environmental Audit (24 August 2011) due to failure to complete hazard audits every three years.</p> <p>The auditor sighted the 'Hazard Audit Report for Sydney Gas Operations, (3 March 2006) and a draft report of the 2012 audit.</p> <p>The audits were not conducted every three years as required by this condition. Furthermore, the 2012 audit has not been finalised and submitted to the Director-General.</p>	Non-Conformance 1
32	The Applicant shall comply with all reasonable requirements of the Director-General of the Department of Planning and Infrastructure, or delegate 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 of the Department of Planning and Infrastructure, or delegate may agree.	Condition was not activated during the audit period.	No Finding
33	<p>Redrilling and Fracching Management Plan</p> <p>The Applicant shall obtain the prior approval of the Director-General of the Department of Planning and Infrastructure, or delegate for the redrilling and/or additional fracching of a gas well.</p>	It was reported that there was no redrilling or fracching undertaken during the audit period.	No Finding
34	The Applicant shall prepare a Redrilling and Fracching Management Plan in consultation with the Department of Primary Industries for the redrilling and/or refracching of an existing well. The Plan shall be submitted to the Director-General of the Department of Planning and Infrastructure, or delegate 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:	It was reported that there was no redrilling or fracching undertaken during the audit period.	No Finding
34(a)	A description of all the activities to be undertaken on the well site during the redrilling and/or refracching work		No Finding
34(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		No Finding

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No.	Consent Condition	Evidence	Finding
34(c)	Reference to the relevant parts of the Environmental Management Plan required under condition 52		No Finding
34(d)	Compliance with all the relevant environmental performance requirements of this consent		No Finding
34(e)	Arrangements for complaints handling procedures during the redrilling and/or refracing work.		No Finding
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.	It was reported that there was no redrilling or fracing undertaken during the audit period.	No Finding
36	Gas Gathering System The Applicant shall ensure that the route of the gas gathering system follows previously or currently disturbed areas wherever possible.	The auditor sighted the Flora and Fauna Management Sub-Plan (August 2008) and noted the inclusion of this condition. It was reported that there was no gas gathering line constructed during the audit period.	Conformance
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 of the Department of Planning and Infrastructure, or delegate.	Condition not activated during the audit period. It was reported that there was no gas gathering line constructed during the audit period.	No Finding
38	The Applicant shall comply with the following in the construction of the gas gathering system pipeline:	The auditor sighted the EMP and noted that the requirements of this condition are largely incorporated. There was no gas gathering line constructed during the audit period.	Conformance
38(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		Conformance
38(b)	Trenches are to be restored and reseeded with local grass seeds on completion of the work		Conformance
38(c)	Construct the gas gathering system so as not to impeach lateral water flows		Conformance
38(d)	Ensure that no crown or camber remains along the gas gathering systems, following construction		Conformance
38(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)		Conformance
38(f)	Notify the Department of Planning and Infrastructure on the completion of any trenching works.		Conformance

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No.	Consent Condition	Evidence	Finding
39	Flora and Fauna 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) and noted the inclusion of appropriate controls to minimise impacts on flora and fauna.	Conformance
40	The Applicant shall not remove mature trees as part of this development unless otherwise agreed by the Director-General of the Department of Planning and Infrastructure, or delegate.	The auditor sighted the Flora and Fauna Management Sub-Plan (August 2008) and noted the inclusion of this control measure. It was reported that there were no mature trees removed during the audit period. It was noted that a new procedure has been adopted to ensure environmental controls are communicated to employees and contractors prior to the commencement of construction works. A pre-construction kick-off meeting is held whereby all environmental risks and controls are discussed, including conditions of consent.	Conformance
41	The Applicant shall prepare a translocation strategy for the threatened Cumberland Plain Snail, which will be submitted for the Director-General of the Department of Planning and Infrastructure, or delegate's approval prior to construction. The translocation strategy shall be implemented should any individuals or populations of the Cumberland Plain Snail be identified.	It was reported that an expert was engaged prior to commencement of works to conduct a survey of Cumberland Plain Snails. There were no individuals or populations reportedly identified and as such a translocation strategy was not warranted. This condition is deemed to be closed.	Conformance
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 of the Department of Planning and Infrastructure, or delegate's approval within one month of the date of this consent.	The auditor sighted the Landscape and Rehabilitation Management Sub-Plan (July 2012) and noted conformance with the requirements of this condition. The requirement to submit the Plan to the Director-General occurred prior to the audit period. However, it is noted that the revised version of the Plan was submitted to the Director-General on 11 July 2012.	Conformance
42A	The Applicant shall ensure that during the upgrading of the gas gathering lines, impacts on threatened species are minimised by implementing actions including, but not limited to the following:	The auditor sighted the Flora and Fauna Management Sub-Plan (August 2008) and noted the inclusion of appropriate controls to minimise impacts on threatened species.	Conformance
42A(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".	It was reported that there was no upgrading works of gas gathering line conducted during the audit period.	Conformance

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No.	Consent Condition	Evidence	Finding
42A (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.		Conformance
43	Bushfire Management The Applicant shall:	The auditor sighted the Emergency Response Plan (October 2008) for the project and noted the inclusion of controls to manage bushfire risk.	Conformance
43(a)	Ensure that the development is suitably equipped to respond to any fires on the site.		Conformance
43(b)	Assist the Rural Fire Service and emergency services as much as possible if there is a fire on the site.		Conformance
44	Prior to operation the Applicant shall prepare a Bushfire Management Plan for the development, to the satisfaction of the Director-General of the Department of Planning and Infrastructure, or delegate. The Applicant shall consult with Council and the Rural Fire Service in the preparation of the Plan.	<p>A non-conformance was reported against this condition in the 2008-2010 Independent Environmental Audit (24 August 2011) due to failure to provide evidence of stakeholder consultation or submission of the Emergency Response Plan to the Director-General.</p> <p>Evidence was not provided to demonstrate consultation has occurred with nominated stakeholders on the Emergency Response Plan. Further, the Plan has not been submitted to the DPI for approval.</p>	Non-Conformance 1
45	Heritage The Applicant must ensure that should any historical relics be uncovered, excavation or disturbance of the area is to stop immediately and the Heritage Council of NSW is notified within a reasonable time of the discovery or location of these relics. Archaeological assessment and approval, or endorsement, may be required prior to works continuing in the affected area(s) based on the nature of the discovery.	It was reported that this condition was not activated during the audit period. This requirement is communicated to employees and contractors through the role-specific induction program.	Conformance
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 was not activated during the audit period.	No Finding
47	Aboriginal Relics The Applicant must ensure that should any Aboriginal objects be uncovered, excavation or disturbance of the area is to stop immediately and the OEH is to be informed in accordance with section 91 of the National Parks and Wildlife Act 1974.	<p>The auditor sighted the Landscape and Rehabilitation Management Sub-Plan (July 2012) and noted conformance with the requirements of this condition.</p> <p>The requirement to submit the Plan to the Director-General occurred prior to the audit period. However, it is noted that the revised version of the Plan was submitted to the Director-General on 11 July 2012.</p>	Conformance

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No.	Consent Condition	Evidence	Finding
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 was not activated during the audit period.	No Finding
49	Sydney Water Supply Canal The Applicant shall carry out the construction and operation of the development in a manner that will not adversely affect the structural integrity of the Upper Canal and associated structures nor impact the quality of water in the Upper Canal. The Applicant shall be responsible for ensuring that all persons involved in the development are informed of these requirements.	The auditor sighted the Sugarloaf site-specific induction ('Sugarloaf 02, 03, 09 Site Induction') and noted conformance with the requirements of this condition.	Conformance
50	The Applicant shall comply with the requirements in Sydney Water's Guidelines on Precautions to be taken when Building Over or Adjacent to Sydney Water's Assets.	Condition was not activated during the audit period.	No Finding
51	ENVIRONMENTAL MANAGEMENT AND MONITORING Construction Environmental Management Plan (CEMP) The Applicant shall prepare and implement a Construction Environmental Management Plan (CEMP) to provide environmental management, practices and procedures to be followed during the construction phases of the proposed development. A framework plan outlining key practices, procedures and environmental management practices should be approved by the Director-General of the Department of Planning and Infrastructure, or delegate prior to the commencement of construction.	The auditor sighted the Environmental Management Plan (July 2012) and noted that the content conforms to the requirements of this condition. Evidence was sighted to demonstrate that the Director-General approved the EMP.	Conformance
52	Operational Environmental Management Plan (OEMP) The Applicant shall prepare and implement an Operational Environmental Management Plan (OEMP) to provide environmental management practices and procedures to be followed during the operation of the development. The OEMP shall be forwarded to the Director-General of the Department of Planning and Infrastructure, or delegate 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 Environmental Management Plan (July 2012) and noted that the content complies with the requirements of this condition.	Conformance
52(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.		Conformance
52(b)	A description of the roles and responsibilities for all key personnel involved in the operation of the development.		Conformance

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No.	Consent Condition	Evidence	Finding
52(c)	The overall environmental policies and principles to be applied to the operation of the development.		Conformance
52(d)	Standards and performance measures to be applied to the development, and a means by which environmental performance can be periodically reviewed and improved.	An improvement opportunity was noted in relation to objectives and targets. The EMP includes an extensive number of objectives and targets for each environmental aspect. It was reported that performance against targets is not currently measured. It is recommended that objectives and targets be established for significant environmental aspects only. Performance against the targets should then be measured to drive continual improvement of performance.	Conformance-Improvement Opportunity
52(e)	Management policies to ensure that environmental performance goals are met and to comply with conditions of this consent.	The auditor sighted the Environmental Management Plan (July 2012) and noted that the content conforms to the requirements of this condition. Evidence was sighted to demonstrate that the Director-General approved the EMP.	Conformance
53	Annual Return The Applicant shall provide an annual return to the OEI in relation to the development as required by any Licence under the Protection of the Environment Operations Act 1997 in relation to the development. In the return the Applicant must report on the annual monitoring undertaken (where the activity results in pollutant discharges), provide a summary of complaints relating to the development, report on compliance with Licence conditions and provide a calculation of licence fees (administrative fees and where relevant, load based fees) that are payable.	The auditor sighted the December 2010 and December 2011 Annual Returns and noted conformance against this condition.	Conformance
54	Annual Environmental Performance Reporting Within twelve months of the date of this consent, and annually thereafter during the life of the development, the Applicant shall submit an Annual Environmental Performance Report to the Director-General of the Department of Planning and Infrastructure, or delegate. This report shall include, but not be limited to:	The auditor sighted the Annual Environmental Performance Reports for July 2011 and July 2012 and noted conformance with the requirements of this condition.	Conformance
54(a)	The standards, performance measures and statutory requirements the development is required to comply with.		Conformance
54(b)	An assessment of the environmental performance of the development to determine whether it is complying with these standards, performance measures, and statutory requirements.		Conformance
54(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.		Conformance

B.6 DA 75-4-2005 (Sugarloaf Farm)

No.	Consent Condition	Evidence	Finding
54(d)	Indication of what actions were taken to address any issue and/or recommendation raised by the Camden Gas Project's Community Consultative Committee.	The 2011 AEPR does not provide details of actions taken to address any issues and/or recommendation raised by the Community Consultative Committee. The report only notes that all issues were closed. This matter was rectified in the 2012 AEPR.	Non-Conformance 2
54(e)	Provision of the detailed results of all the monitoring required by this consent.	The auditor sighted the Annual Environmental Performance Reports for July 2011 and July 2012 and noted conformance with the requirements of this condition.	Conformance
54(f)	Identify any non-compliance during the year.		Conformance
54(g)	Identify any significant trends in the data.		Conformance
54(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.		Conformance
55	The Director-General of the Department of Planning and Infrastructure, or delegate 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 was not activated during the audit period.	No Finding
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 AEPR to relevant authorities and verified that the AEPR is publicly available via the AGL Camden website.	Conformance
57	Independent Environmental Audit – Construction at Sugarloaf Farm On completion of all construction works, the Applicant shall commission and pay the full costs of an Independent Environmental Audit of the drilling and fracing of gas wells and construction of the gas gathering system and access roads on the site. The objective of the audit is to monitor the performance and effect of construction activities on the site.	It was reported that construction works were completed prior to the audit period. The auditor conducted an inspection of the Sugarloaf Farm assets and noted that rehabilitation works have been undertaken in accordance with the requirements of the Rehabilitation and Landscape Management Sub-Plan (July 2012).	Conformance
57.1	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 of the Department of Planning and Infrastructure, or delegate; and (b) Be consistent with ISO 19011:2002 - Guidelines for Quality and/ or Environmental Management Systems Auditing, or updated versions of these guidelines/manuals.	The scope of this 2010-2012 Independent Environmental Audit satisfies the requirements of this condition.	Conformance

B.6 DA 75-4-2005 (Sugarloaf Farm)

No.	Consent Condition	Evidence	Finding
57.2	The Audit shall: (a) Assess the environmental performance of the construction of the development on the site, and its effects on the surrounding environment; (b) Assess whether the development is complying with the relevant standards, performance measures, and statutory requirements; (c) Consider the Applicant's proposed Construction Environmental Management Plan; and (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).		Conformance
57.3	Within one month of completion of the audit, the Applicant must submit a copy of the audit report to the Director-General of the Department of Planning and Infrastructure, or delegate and the NSW Heritage Office. The Director-General of the Department of Planning and Infrastructure, or delegate 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 of the Department of Planning and Infrastructure, or delegate may agree.		Conformance
58	Independent Environmental Audit – Operation Within two years of the date of this consent and every two years thereafter, unless the Director-General of the Department of Planning and Infrastructure, or delegate 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 2010-2012 Independent Environmental Audit satisfies the requirements of this condition.	Conformance
58(a)	Be conducted by a suitably qualified, experienced, and independent person(s) whose appointment has been approved by the Director-General		Conformance
58(b)	Be consistent with ISO 19011:2002 - Guidelines for Quality and/ or Environmental Management Systems Auditing, or updated versions of these guidelines/manuals		Conformance
58(c)	Assess the environmental performance of the development, and its effects on the surrounding environment		Conformance
58(d)	Assess whether the development is complying with the relevant standards, performance measures, and statutory requirements		Conformance
58(e)	Review the adequacy of the Applicant's Environmental Management Plan		Conformance
58(f)	Recommend measures or actions to improve the environmental performance of the development, and/or its environmental management and monitoring systems.		Conformance

B.6 DA 75-4-2005 (Sugarloaf Farm)

No.	Consent Condition	Evidence	Finding
59	Complaints Register 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 2007-2012 Complaints Register for the CGP was sighted by the auditor and noted to comply with this condition.	Conformance
59(a)	Record the date and time of the complaint.		Conformance
59(b)	Record the method by which the complaint was made.		Conformance
59(c)	Note any personal details of the complainant or, if no such details were provided, a note to that effect.		Conformance
59(d)	The nature of the complaint.		Conformance
59(e)	The action taken by the applicant in relation to the complaint, including any follow-up contact with the complainant.		Conformance
59(f)	State, if no action was taken by the Applicant, the reasons why no action was taken. 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 of Planning and Infrastructure who asks to see them.		Conformance
60	The Applicant must:	The auditor sighted the Camden Gas Project website and noted the inclusion of a telephone line, contact and feedback form.	Conformance
60(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.		Conformance
60(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.		Conformance
61	Community Liaison 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 relevant documentation including meeting minutes and verified conformance with the requirements of this condition.	Conformance

B.7 DA 171-7-2005 (EI Bethel)

No.	Consent Condition	Evidence	Finding
	SCHEDULE 2 Administrative Conditions		N/A
2.1	Obligation to Minimise Harm to the Environment The Applicant shall implement all practicable measures to prevent or minimise any harm to the environment that may result from the construction or operation of the development.	There was no reported development under this consent during the audit period.	No Finding
2.2	Terms of Approval The Applicant shall carry out the development generally in accordance with the:	There was no reported development under this consent during the audit period.	No Finding
2.2(a)	Development Application submitted to the Department on 14 July 2005.		No Finding
2.2(b)	“Statement of Environmental Effects – Camden Gas Project, EI Bethel Drilling Program, PPL4” Sydney Gas (Camden) Operations Pty Ltd, dated July 2005.		No Finding
2.2(c)	Letter from Sydney Gas (Camden) Operations Pty Ltd to the Department dated, 21 July 2005, providing copies of various environmental studies for the proposal.		No Finding
2.2(d)	Conditions of this consent. If there is any inconsistency between the above, the conditions of this consent shall prevail to the extent of the inconsistency		No Finding
2.8	The Applicant shall comply with any reasonable requirement/s of the Director-General arising from the Department’s assessment of:	There was no reported development under this consent during the audit period.	No Finding
2.8(a)	Any reports, plans or correspondence that are submitted in accordance with this consent.		No Finding
2.8(b)	The implementation of any actions or measures contained in these reports, plans or correspondence.		No Finding
2.9	Limits on Approval This approval shall lapse within 21 years of the date of this consent or on the expiry date of Petroleum Production Lease No. 4, whichever is the sooner.	Condition not activated to date.	No Finding
2.10	Nothing in this consent permits the drilling and operation of any additional wells (beyond the approved 10 wells for gas production).	There was no reported development under this consent during the audit period.	No Finding
2.11	If after 5 years of the date of this consent any well that is the subject of this consent has not yet been drilled or completed, then the Applicant shall surrender the approval for that well.	There were no wells drilled during the audit period and as such the entire approval is considered surrendered.	No Finding
2.12	Well EB01 and associated works are to be located at least 40 m, measured horizontally and at right angles from the top of the bank of the Nepean River.	There was no reported development under this consent during the audit period.	No Finding

B.7 DA 171-7-2005 (EI Bethel)

No.	Consent Condition	Evidence	Finding
2.13	Well EB02 and associated works are to be located at least 20 m, measured horizontally and at right angles from the top of the bank of the unnamed tributary of the Nepean River.	There was no reported development under this consent during the audit period.	No Finding
2.14	Administration Construction shall not commence until the Applicant has obtained a Part 3A Permit from the DNR under the Rivers and Foreshores Improvement Act 1948, and a Licence from the DEC under the Protection of the Environment Operations Act 1997. <i>Note: The Rivers and Foreshore Improvement Act 1948 applies to the proposed development and therefore any excavation, removal of material from the bank, shore or bed of any stream, estuary or lake, or land within 40 metres from the top of the bank will require a Part 3A Permit.</i>	There was no reported development under this consent during the audit period.	No Finding
2.15	The Applicant must, in the opinion of the Environment Protection Authority (EPA), be a fit and proper person to hold a Licence under the Protection of the Environment Operations Act 1997, having regard to the matters in section 83 of that Act.	There was no reported development under this consent during the audit period.	No Finding
2.16	The premises for the purposes of the Licence under the Protection of the Environment Operations Act 1997, includes the gas gathering system, access roads and gas wells and any associated effluent storages, temporary work areas and infrastructure associated with the gas gathering systems, access roads and gas wells.	There was no reported development under this consent during the audit period.	No Finding
2.17	The premises also apply to the gas well heads consisting of the area bounded by the fenced enclosure during gas well operation. During well establishment, the premise has a nominal area of 100 m x 70 m and is surrounded by fencing. At various times during well head maintenance, the premises at the gas well head comprises an area of dimensions 25 m x 25 m.	There was no reported development under this consent during the audit period.	No Finding
2.18	The Applicant must provide Council with the Geographical Positioning System (GPS) co-ordinates and digital survey data for the gas well sites and gas gathering system in a format suitable to the Council, within two months of the completion of the gas wells and gas gathering system.	There was no reported development under this consent during the audit period.	No Finding
2.19	The Applicant shall provide Council with the wellhead configurations of each gas well within two months of the gas well being completed or two months from the date of this consent, whichever is the later.	There was no reported development under this consent during the audit period.	No Finding
2.20	The Applicant shall provide written notification to the Director-General that it has fulfilled the requirements of Conditions 18 and 19, within two weeks of the information being provided to the Council.	There was no reported development under this consent during the audit period.	No Finding

B.7 DA 171-7-2005 (EI Bethel)

No.	Consent Condition	Evidence	Finding
3	SCHEDULE 3 ENVIRONMENTAL PERFORMANCE CONDITIONS	There was no reported development under this consent during the audit period.	No Finding
3.1	Activities must be carried out in a competent manner The development must be carried out in a competent manner. This includes: <ul style="list-style-type: none"> • The processing, handling, movement and storage of materials and substances used to carry out the activity; and • The treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity. 	There was no reported development under this consent during the audit period.	No Finding
3.2	Maintenance of Plant and Equipment All plant and equipment installed at the premises or used in connection with the development must be maintained and operated in a proper and efficient condition.	There was no reported development under this consent during the audit period.	No Finding

B.7 DA 171-7-2005 (EI Bethel)

No.	Consent Condition	Evidence	Finding														
3.3	<p>Noise Limits 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>L_{A1} (1 minute)</th> </tr> </thead> <tbody> <tr> <td>Any residential or noise sensitive premises.</td> <td>35</td> <td>35</td> <td>35</td> <td>45</td> </tr> </tbody> </table> <p>Notes</p> <ul style="list-style-type: none"> • The limits represent the sound pressure level (noise) contribution, at the nominated receiver locations in the table. • Day is defined as the period from 7.00am to 6.00pm Monday to Saturday and 8.00am to 6.00pm Sundays and Public Holidays. • Evening is defined as the period from 6.00pm to 10.00pm. • Night is defined as the period from 10.00pm to 7.00am Monday to Saturday and 10.00pm to 8.00am Sundays and Public Holidays. • Noise from the site is to be measured at the most affected point within the residential boundary, or at the most affected point within 30 metres of the dwelling where the dwelling is more than 30 metres from the boundary to determine compliance with the noise limits set out in the table. • Noise from the premises is to be measured at 1 metre from the dwelling facade to determine compliance with the LA1 (1 minute) noise level in the table. • Where it can be demonstrated that direct measurement of noise from the premises is impractical, the DEC may accept alternative means of determining compliance (see Chapter 11 of the NSW Industrial Noise Policy). • The modification factors presented in section 4 of the NSW Industrial Noise Policy shall also be applied to the measured noise level where applicable. • The noise emission limits identified in the table apply under meteorological conditions of wind speed up to 3m/s at 10 metres above ground level, and temperature inversion conditions. 	Location	Day	Evening	Night		L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{A1} (1 minute)	Any residential or noise sensitive premises.	35	35	35	45	There was no reported development under this consent during the audit period.	No Finding
Location	Day		Evening	Night													
	L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{A1} (1 minute)													
Any residential or noise sensitive premises.	35	35	35	45													
3.4	The Applicant shall prepare and implement a Construction Noise Management Protocol for construction of the development. The Protocol shall be submitted for the approval of the DEC and the Director-General at least one week prior to commencement of construction. The Protocol must include but is not limited to:	There was no reported development under this consent during the audit period.	No Finding														

B.7 DA 171-7-2005 (EI Bethel)

No.	Consent Condition	Evidence	Finding	
3.4(a)	A primary objective of attaining a noise goal of LA10 (15 minutes) 54 DB(A) during all construction activities when assessed at sensitive locations including residences and schools (particularly to avoid noise impacts during exam or other sensitive times).		No Finding	
3.4(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.		No Finding	
3.4(c)	Identification of sensitive receivers likely to be impacted by noise levels exceeding the noise goal in (a) above.		No Finding	
3.4(d)	Details of proposed best practice mitigation measures to seek achieve the noise goal in (a) above.		No Finding	
3.4(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.		No Finding	
3.4(f)	Community consultation including advance notice of commencement of construction activities and site contact details.		No Finding	
3.4(g)	A system to receive, document, respond, action and monitor complaints.		No Finding	
3.4(h)	Monitoring methods and program.		No Finding	
3.5	At least one month prior to operation of the development the Applicant shall prepare and submit for the Director-General's approval, a Well Gathering System and Trunk Line Maintenance Noise Management Protocol to be used for the premises for the life of the consent. The Protocol shall include but is not limited to:		There was no reported development under this consent during the audit period.	No Finding
3.5(a)	A primary objective of attaining the noise limits in condition 3.			No Finding
3.5(b)	Community consultation.	No Finding		
3.5(c)	Advance notice to affected members of the community for planned well maintenance activities.	No Finding		
3.5(d)	Complaints handling monitoring system.	No Finding		
3.5(e)	Site contact person to follow up complaints.	No Finding		
3.5(f)	Mitigation measures.	No Finding		
3.5(g)	The design/orientation of the proposed mitigation methods demonstrating best practice.	No Finding		
3.5(h)	Construction times.	No Finding		
3.5(i)	Contingency measures where noise complaints are received.	No Finding		
3.5(j)	Monitoring methods and programs.	No Finding		

B.7 DA 171-7-2005 (EI Bethel)

No.	Consent Condition	Evidence	Finding
3.6	<p>Noise Compliance Monitoring</p> <p>Within 3 months of commissioning of the wells, the Applicant shall submit a Noise Compliance Assessment to the DEC. The Noise Assessment shall be prepared by a suitably qualified and experienced acoustical consultant, who shall assess compliance with the noise limits in Condition 3.</p>	There was no reported development under this consent during the audit period.	No Finding
3.7	<p>Hours of Operation</p> <p>All construction work must be conducted between 7.00am and 6.00pm Monday to Friday and between 8.00am and 1.00pm Saturdays and at no time on Sundays and Public Holidays, unless inaudible at any residential premises.</p>	There was no reported development under this consent during the audit period.	No Finding
3.8	Planned maintenance activities at any of the wells must only be conducted between:	There was no reported development under this consent during the audit period.	No Finding
3.8(a)	7.00 am to 6.00 pm on weekdays.		No Finding
3.8(b)	<p>8.00am and 1.00pm on Saturdays (excluding Sundays and Public Holidays).</p> <p><i>Note: This condition does not apply to the delivery of material outside the hours of operation under condition 7. if that delivery is required by police or other authorities for safety reasons; and /or the operation or personnel or equipment are endangered. In such circumstances, prior notification is to be provided to the EPA and affected residents as soon as possible, or within a reasonable period in the case of an emergency.</i></p>		No Finding

B.7 DA 171-7-2005 (EI Bethel)

No.	Consent Condition	Evidence	Finding
3.9	<p>Air Quality The Applicant shall carry out the development in a manner that will minimise emissions of dust from the site.</p> <p><i>Note: The Protection of the Environment Operations Act 1997 states that no offensive odour may be emitted from particular premises unless potentially offensive odours are identified in the Licence and the odours are emitted in accordance with conditions specifically directed at minimising the odours are permitted. Where it is appropriate for a Licence to identify and control odours, conditions for the Licence should be developed in consultation with Air Policy.</i></p> <p>Odour <i>Note: The POEO Act states that no offensive odour may be emitted from particular premises unless potentially offensive odours are identified in the licence and odours are emitted in accordance with conditions specifically directed at minimising the odours are permitted. Where it is appropriate for a Licence to identify and control offensive odours, conditions for the Licence should be developed in consultation with DEC's Air Policy</i></p>	There was no reported development under this consent during the audit period.	No Finding
3.10	<p>Water Except as may be expressly provided by a Licence, the Applicant shall comply with section 120 of the Protection of the Environment Operations Act 1997 during the carrying out of the development.</p> <p><i>Note: Section 120 of the Protection of the Environment Operations Act 1997 applies to the disposal of wastewater.</i></p>	There was no reported development under this consent during the audit period.	No Finding
3.11	<p>Stormwater/Sediment Control At least one week prior to the commencement of construction, the Applicant shall submit for the approval of the Director-General, an Erosion and Sediment Control Plan. The Plan must be implemented and used for the duration of all construction activities associated with the development. The Plan must describe the measures that will be employed to minimise soil erosion and the discharge of sediment and other pollutants to land and/or waters during construction activities. The Plan should be prepared in accordance with the requirements for such plans outlined in Managing Urban Stormwater: Soils and Construction Volume 1,4th Edition, 2004 (Landcom).</p>	There was no reported development under this consent during the audit period.	No Finding

B.7 DA 171-7-2005 (EI Bethel)

No.	Consent Condition	Evidence	Finding
3.12	<p>Flood Management</p> <p>The Applicant is required to prepare and implement a Flood Management Plan for the sites for the life of the development. The Flood Management Plan will include (and not be limited to) measures to minimise and mitigate flooding impacts. The Applicant shall submit the Flood Management Plan for the Director-General's approval within one month of the date of this consent.</p>	There was no reported development under this consent during the audit period.	No Finding
3.13	<p>Waste</p> <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 Protection of the Environment Operations Act 1997.</p> <p><i>Note: this condition only applies to the storage, treatment, processing, reprocessing or disposal of waste at the site if it requires an environment protection licence under the Protection of the Environment Operations Act 1997.</i></p>	There was no reported development under this consent during the audit period.	No Finding
3.14	The Applicant must ensure that any hazardous, industrial or Group A waste is assessed and classified in accordance with the EPA's Environmental Guidelines: "Assessment Classification and Management of Liquid and Non-Liquid Wastes".	There was no reported development under this consent during the audit period.	No Finding
3.15	<p>Safety and Risk Management</p> <p>Prior to construction of the wellhead, the Applicant shall provide a Report to the Department from an independent and suitably qualified person approved by the Director-General, to confirm that the design and operation of the wellhead complies with the Department's Locational Guidelines - Development in the Vicinity of Operating Coal Seam Methane Wells (May 2004) for an Automatically Controlled Well (with Separator/Optional Pump). In particular, the Report shall confirm that all safety related systems required by the Guidelines have been included.</p>	There was no reported development under this consent during the audit period.	No Finding
3.16	The Applicant shall develop and implement an Emergency Plan and Safety Management System for the development. The plan/system shall be submitted for the approval of the Director-General, at least one month prior to the commissioning of the development, or within such further period as the Director-General may agree. Commissioning shall not commence until the Director-General has approved the plan/system.	There was no reported development under this consent during the audit period.	No Finding

B.7 DA 171-7-2005 (EI Bethel)

No.	Consent Condition	Evidence	Finding
3.16 (a)	<p>Emergency Plan A comprehensive emergency plan and detailed emergency procedures for the development shall be prepared in accordance with the DIPNR Hazardous Industry Planning Advisory Paper No. 1, "Industry Emergency Planning Guidelines".. The plan shall include detailed procedures for the safety of all people outside of the development who may be at risk from the development.</p>		No Finding
3.16 (b)	<p>Safety Management System A document setting out a comprehensive safety management system, covering all operations on the gas wells and gathering system shall be developed in accordance with the DIPNR Hazardous Industry Planning Advisory Paper No. 9, "Safety Management". The document shall clearly specify all safety related procedures, responsibilities and policies, along with details of mechanisms for ensuring adherence to procedures. Records shall be kept on site and shall be made available for inspection by the Director-General and the independent auditor upon request. In particular records shall be maintained to demonstrate that management of change procedures were followed for the connection of the new gas lines to the existing network and for the integration of the new wells into the automatic control system. <i>Note: The Applicant may update the current approved version of the relevant study/plan/system prepared to comply with Schedule 4 Condition 92 of development consent DA-282-6-2003-i, dated 16 June 2004. The updated version shall incorporate and adequately address the relevant aspects of the additional wells and related plant.</i></p>		No Finding
3.17	<p>Compliance Report Three months after commencement of operation of the development, the Applicant shall submit to the Director-General a compliance report detailing compliance with Condition 16, including: (a) Dates of study/plan/system completion/submission and commencement of construction and commissioning; (b) Actions taken or proposed, to implement recommendations made in the studies/plans/systems; and (c) Responses to any requirement imposed by the Director-General under Condition 19.</p>	There was no reported development under this consent during the audit period.	No Finding

B.7 DA 171-7-2005 (EI Bethel)

No.	Consent Condition	Evidence	Finding
3.17.1	This report shall verify that: (a) The Emergency Plan required under Condition 16(a) is effectively in place and that at least one emergency exercise has been conducted; and (b) The Safety Management System required under Condition 16(b) has been fully implemented and that records required by the system are being kept.		No Finding
3.17.2	The report shall include a signed commitment by the Applicant's representative responsible for the operation of the development, that for each study/plan/system: (a) The required study/plan/system has been undertaken or prepared to the relevant Hazardous Industry Planning Advisory Paper; (b) All recommendations of each study/plan/system have been implemented; and (c) All safety management system and their associated risk controls have been implemented and are being maintained.		No Finding
3.18	Twelve months after the commencement of operations of the proposed development or within such further period as the Director-General may agree, the Applicant shall carry out a comprehensive hazard audit of the development and within one month of the audit submit a report to the Director- General. The audit shall be carried out at the Applicant's expense by a duly qualified independent person or team approved by the Director-General prior to commencement of the audit. Further audits shall be carried out every three years or as determined by the Director-General and a report of each audit shall, within one month of the audit, be submitted to the Director-General. Hazard audits shall be carried out in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 5, "Hazard Audit Guidelines". 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.	There was no reported development under this consent during the audit period.	No Finding
3.19	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 15 to 18 inclusive, within such time as the Director-General may agree.	There was no reported development under this consent during the audit period.	No Finding

B.7 DA 171-7-2005 (EI Bethel)

No.	Consent Condition	Evidence	Finding
3.20	<p>Redrilling and Fraccing 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> The Applicant shall obtain the prior approval of the Director-General for the redrilling and/or additional fraccing of a gas well.</p>	There was no reported development under this consent during the audit period.	No Finding
3.21	The Applicant shall prepare a Redrilling and Fraccing Management Plan in consultation with the Department of Primary Industries 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:	There was no reported development under this consent during the audit period.	No Finding
3.21 (a)	A description of all the activities to be undertaken on the well site during the redrilling and/or refraccing work.		No Finding
3.21 (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.		No Finding
3.21 (e)	Reference to the relevant parts of the Environmental Management Plan required under Schedule 4, Conditions 1 and 2.		No Finding
3.21 (d)	Compliance with all the relevant environmental performance requirements of this consent.		No Finding
3.21 (e)	Arrangements for complaints handling procedures during the redrilling and/or refraccing work.		No Finding
3.22	The Applicant shall give written notification of the proposed redrilling and/or refraccing work to potentially affected residences and other noise sensitive receivers at least fourteen days prior to work commencing.	There was no reported development under this consent during the audit period.	No Finding
3.23	<p>Gas Gathering System and Access Roads Road access crossing may consist of a bed level crossing. The finished surface of the crossing is to be at the same height as the existing bed level of the creek. There is to be no obstruction to water flow or fish passage along the creek as a result of the construction of the crossing. The crossing is to be evenly aligned with the adjoining bank and floodplain profile and must not reduce the capacity of protected waters in any way.</p>	There was no reported development under this consent during the audit period.	No Finding
3.24	The Applicant shall ensure that the route of the gas gathering system follows previously or currently disturbed areas wherever possible.	There was no reported development under this consent during the audit period.	No Finding

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No.	Consent Condition	Evidence	Finding
3.25	Gas gathering stream crossings may be trenched. For all trenched crossings, the natural bed and bank profiles are to be restored to their original condition, with smooth and even surfaces, following installation of the gas pipe.	There was no reported development under this consent during the audit period.	No Finding
3.26	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.	There was no reported development under this consent during the audit period.	No Finding
3.27	The Applicant shall comply with the following in the construction of the gas gathering system pipeline:	There was no reported development under this consent during the audit period.	No Finding
3.27 (a)	Works within 20 m of watercourses are to be undertaken during dry weather conditions.		No Finding
3.27 (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.		No Finding
3.27 (c)	Trenches are to be restored and reseeded with local grass seeds on completion of the work.		No Finding
3.27 (d)	Construct the gas gathering system so as not to impeach lateral water flows.		No Finding
3.27 (e)	Ensure that no crown or camber remains along the gas gathering systems, following construction.		No Finding
3.27 (f)	Design, construct and operate the pipeline in accordance with the Australian Standard for the Installation and Maintenance of Plastic Pipe Systems for Gas AS 3723-1989 (or its latest version).		No Finding
3.27 (g)	Notify the Department on the completion of any trenching works.		No Finding
3.28	Site rehabilitation must protect any remnant local native riparian vegetation at the site and restore any riparian zones disturbed or otherwise affected by the work to a state that is reasonably representative of the natural ecotone of the protected waters system, in accordance with the endorsed plans and these conditions.	There was no reported development under this consent during the audit period.	No Finding
3.29	Rehabilitated areas must be maintained to ensure successful native plant establishment. Maintenance must include any watering, weed control, replacement of plant losses, disease and insect control, mulching etc, necessary for successful plant establishment.	There was no reported development under this consent during the audit period.	No Finding

B.7 DA 171-7-2005 (EI Bethel)

No.	Consent Condition	Evidence	Finding
3.30	All erosion control matting used is to consist of biodegradable materials. No plastic netting is to be used for any purpose unless such netting is of a rapidly biodegradable variety.	There was no reported development under this consent during the audit period.	No Finding
3.31	The Applicant shall prepare a Road Reserve Environment Management Plan (EMP) in consultation with Wollondilly Shire Council. The Road Reserve EMP shall be submitted to the Director-General for approval one month prior to the construction of the gas gathering line within the Road Reserve or within such period as approved the Director-General. The Road Reserve EMP shall include:	There was no reported development under this consent during the audit period.	No Finding
3.31 (a)	Proposed construction methods.		No Finding
3.31 (b)	Soil erosion and sediment control measures for works undertaken during construction and following completion of the works.		No Finding
3.31 (c)	Traffic control plans. <i>Note: The Applicant may update the current approved version of the Road Reserve Environment Management Plan prepared to comply with Schedule 4 Condition 112 of development consent DA-282-6-2003-i, dated 16 June 2004. The updated version shall incorporate and adequately address the relevant aspects of the additional wells and related gas gathering system.</i>		No Finding
3.32	Underbore of M5 Menangle The Applicant shall conduct the underboring of the M5 road to the satisfaction of the RTA. The Applicant shall ensure that the M5 underbore:		There was no reported development under this consent during the audit period.
3.32 (a)	Has a minimum depth of 1.2 m below the road at all times.	No Finding	
3.32 (b)	Excavation for the thrust pits are outside the road reserve.	No Finding	
3.32 (c)	Requires no access from within the Freeway for construction or maintenance purposes.	No Finding	
3.32 (d)	In the road reserve the pipeline is to be placed outside the table drain at a depth of not less than 800 mm below the natural surface.	No Finding	
3.32 (e)	All areas within the road reserve that are disturbed are to be restored to their original; condition on completion of the work.	No Finding	
3.32 (f)	The gas gathering system is to be sleeved within the road reserve for ease of future maintenance.	No Finding	

B.7 DA 171-7-2005 (EI Bethel)

No.	Consent Condition	Evidence	Finding
3.32 (g)	Pipeline markers are to be placed either side of the M5 in the road reserve to enable ease of location.		No Finding
3.32 (h)	The Applicant (and its contractors) are to be fully responsible for matters regarding: (i) Occupational health and safety; (ii) Environmental control and restoration; and (iii) Traffic control. unless otherwise agreed by the RTA.		No Finding
3.33	Underbore of Main Southern Railway Line No work is permitted within the rail corridor or its easements unless the prior approval or a Rail Site Works Licence has been entered into with the Australian Rail Track Corporation.	There was no reported development under this consent during the audit period.	No Finding
3.34	As the proposal is located in the immediate vicinity of a heritage item (Nepean River underbridge Menangle – rail ref: 64.8 km, and Menangle Station (old building)), the Applicant must retain the services of a heritage expert/architect to supervise works that are in close proximity to the heritage items in order to conserve heritage values.	There was no reported development under this consent during the audit period.	No Finding
3.35	Flora and Fauna The Applicant shall take all practicable measures to minimise potential flora and fauna impacts of the development.	There was no reported development under this consent during the audit period.	No Finding
3.36	The Applicant shall not remove mature trees as part of this development unless otherwise agreed by the Director-General. 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.	There was no reported development under this consent during the audit period.	No Finding
3.37	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.	There was no reported development under this consent during the audit period.	No Finding
3.38	Bushfire Management The Applicant shall:	There was no reported development under this consent during the audit period.	No Finding
3.38 (a)	Ensure that the development is suitably equipped to respond to any fires on the site.		No Finding
3.38 (b)	Assist the Rural Fire Service and emergency services as much as possible if there is a fire on the site.		No Finding

B.7 DA 171-7-2005 (El Bethel)

No.	Consent Condition	Evidence	Finding
3.39	<p>Prior to operation the Applicant shall prepare a Bushfire Management Plan for the development, to the satisfaction of the Director-General. The Applicant shall consult with Council and the Rural Fire Service in the preparation of the Plan.</p> <p><i>Note: The Applicant may update the current approved version of the Bushfire Management Plan prepared to comply with Schedule 4 Condition 110 of development consent DA-282-6-2003-i, dated 16 June 2004. The updated version shall incorporate and adequately address the relevant aspects of the additional wells and related gas gathering system.</i></p>	There was no reported development under this consent during the audit period.	No Finding
3.40	<p>Aboriginal Heritage The Applicant must not excavate for drill sites or for other plant and equipment in connection to the development within the alluvial terraces bordering the Nepean River.</p> <p>Note: The alluvial terraces are those referred to in section 3.2 of the Aboriginal Archaeological Survey and Assessment report dated June 2005 and shown in "Approved Sand/Alluvial Mining" area on map reference M240449R15 titled "El Bethel Pty Ltd Well Locations, Access and Gathering" dated 23 September 2005.</p>	There was no reported development under this consent during the audit period.	No Finding
3.41	At least one month prior to construction commencing, the applicant shall prepare and submit a Cultural Heritage Management Protocol to DEC. The Protocol must include, but is not limited to:	There was no reported development under this consent during the audit period.	No Finding
3.41 (a)	Details of local Aboriginal community consultation undertaken to develop this Protocol.		No Finding
3.41 (b)	Details of the procedures that adequately record previously recorded Aboriginal sites.		No Finding
3.41 (c)	Details of construction times.		No Finding
3.41 (d)	A list of 24-hour site contact person covering all construction and operation activities.		No Finding
3.41 (e)	Details of the protective barriers and site markings to be used and dedicated to Aboriginal Cultural Heritage matters.		No Finding
3.41 (f)	Details of the programs that will adequately monitor, maintain and remove protective barriers and site markings to be used and dedicated to Aboriginal Cultural Heritage matters throughout construction, rehabilitation and operation.		No Finding

B.7 DA 171-7-2005 (EI Bethel)

No.	Consent Condition	Evidence	Finding
3.41 (g)	Details of the procedure that will ensure all employees and contractors are informed of the requirements for the management and protection of Aboriginal sites and the specific protocols in place.		No Finding
3.41 (h)	Details of a complaints handling monitoring system that relate to any Aboriginal Cultural Heritage matters.		No Finding
3.41 (i)	Details to follow up complaints that relate to Aboriginal Cultural Heritage matters.		No Finding
3.41 (j)	Details of the procedures that adequately consult and notify the Aboriginal community throughout construction and operation.		No Finding
3.42	All activities in connection to the construction and rehabilitation of the development must cease within a 50 m radii of a previously unrecorded Aboriginal site at all times prior to the implementation of the measures detailed in the Cultural Heritage Management Protocol submitted in accordance with condition 41	There was no reported development under this consent during the audit period.	No Finding
3.43	<p>The Applicant must effectively record and manage previously unrecorded Aboriginal sites.</p> <p>For the purposes of this condition “effectively record and manage” includes the procedures and programs set up in the Cultural Heritage Management Protocol.</p> <p><i>Notes</i></p> <ul style="list-style-type: none"> • For the purposes of Condition 41, previously unrecorded Aboriginal sites may be uncovered during the duration of construction, rehabilitation and maintenance activities. • For the purposes of Condition 41, previously unrecorded Aboriginal sites mean sites that have not been in a study that was published prior to the submission of this application. • All monitoring for Aboriginal objects must be undertaken under a section 87 of the National Parks and Wildlife Act 1974. • The Applicant must ensure that appropriate section 87 and section 90 of the National Parks and Wildlife Act 1974 consents are in place where appropriate. 	There was no reported development under this consent during the audit period.	No Finding
4	SCHEDULE 4 ENVIRONMENTAL MANAGEMENT AND MONITORING	There was no reported development under this consent during the audit period.	No Finding

B.7 DA 171-7-2005 (EI Bethel)

No.	Consent Condition	Evidence	Finding
4.1	<p>Construction Environmental Management Plan (CEMP)</p> <p>The Applicant shall prepare and implement a Construction Environmental Management Plan (CEMP) to provide environmental management, practices and procedures to be followed during the construction phases of the proposed development. A framework plan outlining key practices, procedures and environmental management practices should be approved by the Director-General prior to the commencement of construction.</p> <p><i>Note: The Applicant may update the current approved version of the CEMP prepared to comply with Schedule 5 Condition 1 of development consent DA-282-6-2003-i, dated 16 June 2004. The updated version shall incorporate and adequately address the relevant aspects of the additional wells and related plant.</i></p>	There was no reported development under this consent during the audit period.	No Finding
4.2	<p>Operational Environmental Management Plan (OEMP)</p> <p>The Applicant shall prepare and implement an Operational Environmental Management Plan (OEMP) to provide environmental management practices and procedures to be followed during the operation of the development. The OEMP shall be forwarded to the Director-General for approval within one month of the date of this consent. The OEMP shall include, but not necessarily be limited to:</p>	There was no reported development under this consent during the audit period.	No Finding
4.2(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.		No Finding
4.2(b)	A description of the roles and responsibilities for all key personnel involved in the operation of the development.		No Finding
4.2(c)	The overall environmental policies and principles to be applied to the operation of the development.		No Finding
4.2(d)	Standards and performance measures to be applied to the development, and a means by which environmental performance can be periodically reviewed and improved.		No Finding
4.2(e)	<p>Management policies to ensure that environmental performance goals are met and to comply with conditions of this consent.</p> <p><i>Note: The Applicant may update the current approved version of the OEMP prepared to comply with Schedule 5 Condition 2 of development consent DA-282-6-2003-i, dated 16 June 2004. The updated version shall incorporate and adequately address the relevant aspects of the additional wells and related plant.</i></p>		No Finding

B.7 DA 171-7-2005 (EI Bethel)

No.	Consent Condition	Evidence	Finding
4.3	<p>Annual Return</p> <p>The Applicant shall provide an annual return to the EPA in relation to the development as required by any Licence under the Protection of the Environment Operations Act 1997 in relation to the development. In the return the Applicant must report on the annual monitoring undertaken (where the activity results in pollutant discharges), provide a summary of complaints relating to the development, report on compliance with Licence conditions and provide a calculation of licence fees (administrative fees and where relevant, load based fees) that are payable.</p>	There was no reported development under this consent during the audit period.	No Finding
4.4	<p>Annual Environmental Performance Reporting</p> <p>Within twelve months of the date of this consent, and annually thereafter during the life of the development, the Applicant shall submit an Annual Environmental Performance Report to the Director-General. This report shall include, but not be limited to:</p>	There was no reported development under this consent during the audit period.	No Finding
4.4(a)	The standards, performance measures and statutory requirements the development is required to comply with.		No Finding
4.4(b)	An assessment of the environmental performance of the development to determine whether it is complying with these standards, performance measures, and statutory requirements.		No Finding
4.4(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.		No Finding
4.4(d)	Indication of what actions were taken to address any issue and/or recommendation raised by the Camden Gas Project's Community Consultative Committee.		No Finding
4.4(e)	Provision of the detailed results of all the monitoring required by this consent.		No Finding
4.4(f)	Identify any non-compliance during the year.		No Finding
4.4(g)	Identify any significant trends in the data.		No Finding
4.4(h)	<p>If any non-compliance is detected, describe what actions and measures would be carried out to ensure compliance, clearly indicating who would carry out these actions and measures, when they would be carried out, and how the effectiveness of these measures would be monitored over time.</p> <p><i>Note: The Applicant may include the operation of wells EB1 to EB10 and the associated gas gathering system and the conditions of this consent, in the Annual Environmental Performance Report required under Schedule 5 Condition 5 of development consent DA-282-6-2003-i, dated 16 June 2004.</i></p>		No Finding

B.7 DA 171-7-2005 (EI Bethel)

No.	Consent Condition	Evidence	Finding
4.5	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.	There was no reported development under this consent during the audit period.	No Finding
4.6	The Applicant shall also submit a copy of the Annual Environmental Performance Report to the DEC, Department of Primary Industries and Council. The Applicant shall make a copy of the Report publicly available.	There was no reported development under this consent during the audit period.	No Finding
4.7	Independent Environmental Audit – Operation 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:	There was no reported development under this consent during the audit period.	No Finding
4.7(a)	Be conducted by a suitably qualified, experienced, and independent person(s) whose appointment has been approved by the Director-General.		No Finding
4.7(b)	Be consistent with ISO 19011:2002 - Guidelines for Quality and/or Environmental Management Systems Auditing, or updated versions of these guidelines/manuals.		No Finding
4.7(c)	Assess the environmental performance of the development, and its effects on the surrounding environment.		No Finding
4.7(d)	Assess whether the development is complying with the relevant standards, performance measures, and statutory requirements.		No Finding
4.7(e)	Review the adequacy of the Applicant’s Operational Environmental Management Plan.		No Finding
4.7(f)	Recommend measures or actions to improve the environmental performance of the development, and/or its environmental management and monitoring systems.		No Finding
4.7	Within one month of completion of the audit, the Applicant must submit a copy of the audit report to the Director-General, DEC and Council. The Director-General may require the Applicant to address certain matters identified in the report and any comments received from DEC and the Council. Any action required to be undertaken shall be completed within such period as the Director-General may agree. <i>Note: The Applicant may include the operation of wells EB1 to EB10 and the associated gas gathering system and the conditions of this consent, in the Independent Environmental Audit required under Schedule 5 Condition 10 of development consent DA-282-6-2003-i, dated 16 June 2004.</i>		No Finding

B.7 DA 171-7-2005 (EI Bethel)

No.	Consent Condition	Evidence	Finding
4.8	Independent Environmental Audit – Construction at EI Bethel On completion of all construction works, the Applicant shall commission and pay the full costs of an Independent Environmental Audit of the drilling and fracing of gas wells and construction of the gas gathering system and access roads on the site. The objective of the audit is to monitor the performance and effect of construction activities on the site.	There was no reported development under this consent during the audit period.	No Finding
4.8.1	The Environmental Audit shall: (a) Be conducted by a suitably qualified, experienced, and independent person(s) whose appointment has been approved by the Director-General; and (b) Be consistent with ISO 19011:2002 - Guidelines for Quality and/or Environmental Management Systems Auditing, or updated versions of these guidelines/manuals.		No Finding
4.8.2	The Audit shall: (a) Assess the environmental performance of the construction of the development on the site, and its effects on the surrounding environment; (b) Assess whether the development is complying with the relevant standards, performance measures, and statutory requirements; (c) Consider the Applicant’s Construction Environmental Management Plan; and (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).		No Finding
4.8.3	Within one month of completion of the audit, the Applicant must submit a copy of the audit report to the Director-General and Council. The Director-General may require the Applicant to address certain matters identified in the report and any comments received from Council. Any action required to be undertaken shall be completed within such period as the Director-General may agree.		No Finding
4.9	Complaints Register 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:	There was no reported development under this consent during the audit period.	No Finding
4.9(a)	Record the date and time of the complaint.		No Finding
4.9(b)	Record the method by which the complaint was made.		No Finding
4.9(c)	Note any personal details of the complainant or, if no such details were provided, a note to that effect.		No Finding
4.9(d)	The nature of the complaint.		No Finding

B.7 DA 171-7-2005 (EI Bethel)

No.	Consent Condition	Evidence	Finding
4.9(e)	The action taken by the applicant in relation to the complaint, including any follow-up contact with the complainant.		No Finding
4.9(f)	State, if no action was taken by the Applicant, the reasons why no action was taken.		No Finding
4.9	The record of a complaint must be kept for at least 4 years after the complaint was made, and must be produced to any authorised officer of the DEC or the Department who asks to see them.		No Finding
4.10	The Applicant must:	There was no reported development under this consent during the audit period.	No Finding
4.10 (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.		No Finding
4.10 (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.		No Finding
4.11	Community Liaison The Applicant shall ensure the continuation of the existing Camden Gas Project Community Consultative Committee to oversee the environmental performance of the development.	There was no reported development under this consent during the audit period.	No Finding

B.8 PA 06_0137 (Razorback)

No.	Consent Condition	Evidence	Finding
1.1	<p>Obligation to Minimise Harm to the Environment</p> <p>The Proponent shall implement all practicable measures to prevent or minimise any harm to the environment that may result from the construction or operation of the project.</p>	<p>An Environmental Management System has been established to manage environmental risks and achieve performance improvements. This framework consists of an Environmental Management Plan (EMP), relevant sub-plans and a Compliance Register.</p> <p>A number of tools are reported to be in place to monitor and measure implementation of the EMS including the Drilling Operations Compliance Checklist, the Gas Gathering System Construction Checklist and the Rehabilitation Checklist (among others).</p> <p>The Environmental Compliance Register (Mipela) was sighted and found to be an effective tool for monitoring compliance against project approval deliverables.</p> <p>It is noted that there were no reported environmental incidents or non-compliances during the audit period.</p>	Conformance
1.2	<p>Terms of Approval</p> <p>The Proponent shall carry out the project generally in accordance with the:</p>	<p>It was reported that the development is undertaken in accordance with the EMP and sub-plans. On receipt of an approved consent or modification, it was reported that the EMP is revised to reflect the new requirements. This was evidenced by the revision history of the document.</p>	Conformance
1.2(a)	Project Application 06_0137.		Conformance
1.2(b)	EA titled "Environmental Assessment – Camden Gas Project Joint Venture Stage 2 Drilling Program, Razorback Wells (RB03-RB12)", dated 20 July 2006, and prepared by HLA Envirosciences Pty Ltd.	<p>It was reported that the EMP is informed by the approval conditions only; the statement of commitments detailed in environmental assessments have not specifically been incorporated into the EMP. In the event that the statement of commitments vary from the approval conditions, they would not be reflected in the EMP and may not be incorporated into the project.</p>	Non-Conformance 2
1.2(c)	Proposed changes to works in the EMAI and Razorback projects contained in a letter from AGL to the Department, dated 23 November 2006.	<p>It was reported that the development is undertaken in accordance with the EMP and sub-plans. On receipt of an approved consent or modification, it was reported that the EMP is revised to reflect the new requirements. This was evidenced by the revision history of the document.</p>	Conformance
1.2(d)	Revised Statement of Commitments contained in a letter from AGL to the Department, dated 4 December 2006.		Conformance
1.2(e)	Conditions of this approval.		Conformance

B.8 PA 06_0137 (Razorback)

No.	Consent Condition	Evidence	Finding
1.3	If there is any inconsistency between the above documents, the latter document shall prevail over the former to the extent of the inconsistency. However, the conditions of this consent shall prevail over all other documents to the extent of any inconsistency.	Condition is noted.	No Finding
1.4	The Proponent shall comply with any reasonable requirement/s of the Director-General arising from the Department's assessment of:	Condition is noted.	No Finding
1.4(a)	Any reports, plans or correspondence that are submitted in accordance with this approval.		No Finding
1.4(b)	The implementation of any actions or measures contained in these reports, plans or correspondence.		No Finding
1.5	Limits on Approval This approval shall lapse 21 years after the date of this approval or on the expiry date of Petroleum Production Lease No. 4, whichever is the sooner.	Condition was not activated during the audit period.	No Finding
1.6	Nothing in this approval permits the drilling and operation of any additional gas wells (beyond the approved 10 wells for gas production).	The auditor reviewed the gas wells against the development consents and confirmed that no additional wells have been drilled or operated.	Conformance
1.7	The Proponent shall surrender the approval for any well that has not been drilled within 5 years of the date of this approval.	It is noted that the approval has lapsed for any well that has not been drilled. It was reported that there were no wells drilled during the audit period.	Conformance
1.8	Notification Within 3 months of the commissioning of the wells, the Proponent shall provide Council with:	A non-conformance was reported against this condition in the 2008-2010 Independent Environmental Audit (24 August 2011) due to failure to provide GPS coordinates to respective Councils..	Non-Conformance 2
1.8(a)	The Geographical Positioning System (GPS) co-ordinates and digital survey data for the gas well sites and gas gathering system, in a format suitable to the Council.	The auditor sighted correspondence dated 1 November 2011 from AGL to the respective Councils that included the GPS co-ordinates and digital survey data for nominated assets. It is noted that this information was not provided within three months of commissioning of the gas wells and gas gathering system.	Non-Conformance 2
1.8(b)	The wellhead configuration of each gas well.	Correspondence was sighted on 16 June 2013 from AGL to the respective Councils, which included the wellhead configurations for nominated assets. It is noted that this information was not provided within three months of commissioning of the wells.	Non-Conformance 2
1.9	Operation of Plant and Equipment The Proponent shall ensure that all plant and equipment used at the site is:	Preventative maintenance of plant and equipment is controlled through the MEX system. The auditor sighted the MEX system and	Conformance

B.8 PA 06_0137 (Razorback)

No.	Consent Condition	Evidence	Finding																	
1.9(a)	Maintained in a proper and efficient condition.	it was noted that maintenance schedules are defined by usage and manufacturers requirements. It was reported that the MEX system has been operating for 8 months but is not fully functional. A back-up system is being maintained until the MEX system achieves the required outcomes.	Conformance																	
1.9(b)	Operated in a proper and efficient condition.		Conformance																	
3	SCHEDULE 3 ENVIRONMENTAL PERFORMANCE CONDITIONS	N/A	N/A																	
3.1	<p>NOISE</p> <p>Construction and Maintenance Hours</p> <p>The Proponent shall comply with the construction and maintenance hours in Table 1: Table 1: Construction and Maintenance Hours for the Project</p> <table border="1"> <thead> <tr> <th>Activity</th> <th>Day</th> <th>Time</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Construction</td> <td>Monday – Friday</td> <td>7:00am to 6:00pm</td> </tr> <tr> <td>Saturday</td> <td>8:00am to 1:00pm</td> </tr> <tr> <td>Sunday and Public Holidays</td> <td>Nil</td> </tr> <tr> <td rowspan="3">Planned maintenance activities</td> <td>Monday – Friday</td> <td>7:00am to 6:00pm</td> </tr> <tr> <td>Saturday</td> <td>8:00am to 1:00pm</td> </tr> <tr> <td>Sunday and Public Holidays</td> <td>Nil (unless inaudible at any residential receiver)</td> </tr> </tbody> </table> <p><i>Notes:</i></p> <ul style="list-style-type: none"> • <i>Inaudible means that the construction activity cannot be heard by the human ear at the nearest affected residential receivers</i> • <i>This condition does not apply to the delivery of material if that delivery is required by the police or other authorities for safety reasons; and/or the operation or personnel or equipment is endangered. In such circumstances, prior notification is to be provided to affected residents where possible.</i> 	Activity	Day	Time	Construction	Monday – Friday	7:00am to 6:00pm	Saturday	8:00am to 1:00pm	Sunday and Public Holidays	Nil	Planned maintenance activities	Monday – Friday	7:00am to 6:00pm	Saturday	8:00am to 1:00pm	Sunday and Public Holidays	Nil (unless inaudible at any residential receiver)	The auditor sighted the Noise Management Sub-Plan (August 2008) and noted conformance with the requirements of this condition. It was reported that this condition is communicated to employees and contractors through the role-specific induction program.	Conformance
Activity	Day	Time																		
Construction	Monday – Friday	7:00am to 6:00pm																		
	Saturday	8:00am to 1:00pm																		
	Sunday and Public Holidays	Nil																		
Planned maintenance activities	Monday – Friday	7:00am to 6:00pm																		
	Saturday	8:00am to 1:00pm																		
	Sunday and Public Holidays	Nil (unless inaudible at any residential receiver)																		
3.2	<p>Construction Noise Goals</p> <p>The Proponent shall use its best endeavours to undertake construction activities to comply with the construction noise goal specified in Table 2.</p> <table border="1"> <thead> <tr> <th>Location</th> <th>Day</th> </tr> </thead> <tbody> <tr> <td>Any residential receiver</td> <td>54</td> </tr> </tbody> </table> <p><i>Note: See notes to condition 4</i></p>	Location	Day	Any residential receiver	54	The auditor sighted the Noise Management Sub-Plan (August 2008) and noted conformance with the requirements of this condition. It was reported that there were no construction works undertaken during the audit period and as such no noise monitoring was conducted.	Conformance													
Location	Day																			
Any residential receiver	54																			

B.8 PA 06_0137 (Razorback)

No.	Consent Condition	Evidence	Finding
3.3	Construction Noise Management Plan The Proponent shall prepare and implement a Construction Noise Management Plan for construction of the project to the satisfaction of the Director-General. The plan shall be submitted to the Director-General prior to commencing construction and shall include:	The auditor sighted correspondence from the Department of Planning to AGL (9/01/2007) confirming that the Department reviewed the Construction Noise Management Plan (Razerback) and was satisfied that the Plan addresses the relevant conditions of PA 06_0137.	Conformance
3.3(a)	A detailed description of the measures that would be implemented to achieve the construction noise goal in condition 2.	The auditor sighted the Noise Management Sub-Plan (August 2008) and noted that the Plan conforms to the requirements of this condition.	Conformance
3.3(b)	A community notification protocol for the proposed construction activities (including any redrilling or re-fracking of wells).		Conformance
3.3(c)	A description of the measures that would be implemented where the construction noise goal in condition 2 is unlikely to be achieved or is not being achieved.		Conformance
3.3(d)	Details of who would be responsible for monitoring, reviewing and implementing the plan.		Conformance

B.8 PA 06_0137 (Razorback)

No.	Consent Condition	Evidence	Finding														
3.4	<p>Operational Noise Criteria</p> <p>The Proponent shall ensure that the noise generated by the project does not exceed the noise impact assessment criteria in Table 3.</p> <table border="1"> <thead> <tr> <th rowspan="2">Location</th> <th colspan="2">Day</th> <th colspan="2">Night</th> </tr> <tr> <th><i>L_{Aeq}(15 minute)</i></th> <th><i>L_{Aeq}(15 minute)</i></th> <th><i>L_{Aeq}(15 minute)</i></th> <th><i>L_{A1}(1 minute)</i></th> </tr> </thead> <tbody> <tr> <td>Any residential receiver</td> <td>39</td> <td>39</td> <td>35</td> <td>45</td> </tr> </tbody> </table> <p>Notes:</p> <ul style="list-style-type: none"> • Noise from the site is to be measured at the most affected point within the residential boundary, or at the most affected point within 30 metres of the dwelling where the dwelling is more than 30 metres from the boundary, to determine compliance with the identified noise limits, except where otherwise specified below. • Noise from the project is to be measured at 1 metre from the dwelling facade to determine compliance with the LA1 (1 minute) noise level. • Where it can be demonstrated that direct measurement of noise from the project is impractical, alternative means of determining compliance may be acceptable (see Chapter 11 of the NSW Industrial Noise Policy). • The modification factors presented in Section 4 of the NSW Industrial Noise Policy shall also be applied to the measured noise level where applicable. • The identified noise emission limits apply under meteorological conditions of wind speed up to 3m/s at 10 metres above ground level, and temperature inversion conditions. 	Location	Day		Night		<i>L_{Aeq}(15 minute)</i>	<i>L_{Aeq}(15 minute)</i>	<i>L_{Aeq}(15 minute)</i>	<i>L_{A1}(1 minute)</i>	Any residential receiver	39	39	35	45	<p>The auditor sighted the Noise Management Sub-Plan (August 2008) and noted the inclusion of this condition and appropriate controls to minimise noise.</p> <p>Noise monitoring of a selection of operational wells, including wells within PA06_0137 (RB07 and RB10) was undertaken on 19 September 2011. The results of the monitoring conformed to the requirements of this condition.</p>	Conformance
Location	Day		Night														
	<i>L_{Aeq}(15 minute)</i>	<i>L_{Aeq}(15 minute)</i>	<i>L_{Aeq}(15 minute)</i>	<i>L_{A1}(1 minute)</i>													
Any residential receiver	39	39	35	45													
3.5	<p>Continuous Improvement</p> <p>The Proponent shall, to the satisfaction of the Director-General:</p>	<p>The auditor sighted the Noise Management Plan (August 2008) and noted the inclusion of noise mitigation measures. It was also reported in the 2010/11 AEPR that AGL has been actively working with drilling companies to attenuate noise from drill rigs.</p>	Conformance														
3.5(a)	Implement all reasonable and feasible best practice noise mitigation measures.		Conformance														
3.5(b)	Investigate ways to reduce the noise generated by the project.		Conformance														
3.5(c)	Report on these investigations and the implementation and effectiveness of these measures in the AEPR.		Conformance														

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No.	Consent Condition	Evidence	Finding
3.6	<p>Noise Monitoring Program</p> <p>The Proponent shall prepare and implement a Noise Monitoring Program for the construction and operation of the project to the satisfaction of the Director-General. The Program shall be submitted to the Director-General prior to construction commencing and shall include a noise monitoring protocol for evaluating compliance with the construction noise goals and the operational noise impact assessment criteria in this approval</p>	<p>A non-conformance was reported against this condition in the 2008-2010 Independent Environmental Audit (24 August 2011) due to inconsistent implementation of the Noise Monitoring Program.</p> <p>There were no matters of non-conformance identified during the audit period in regards to the implementation of the Noise Monitoring Program.</p> <p>The auditor sighted correspondence from the Department of Planning to AGL (9/01/2007) confirming that the Department reviewed the Construction Noise Management Plan (Razerback) and was satisfied that the Plan addresses the relevant conditions of PA 06_0137.</p>	Conformance
3.7	<p>AIR QUALITY</p> <p>The Proponent shall implement all practicable measures to minimise dust emissions generated by the construction and operation of the project to the satisfaction of the Director-General.</p>	It was noted by the auditor that a number of dust mitigation measures are detailed in the Air Quality Management Sub-Plan (August 2008). There were no dust complaints raised during the audit period in relation to this condition.	Conformance
3.8	<p>SURFACE WATER</p> <p>The Proponent shall prepare and implement a Soil and Water Management Plan for the project to the satisfaction of the Director-General. The plan shall be submitted to the Director-General prior to commencing construction and shall:</p>	The auditor sighted the Soil and Water Management Sub-Plan (July 2012) and noted the inclusion of appropriate controls as detailed in this condition. It was reported that AGL conduct frequent site inspections to verify that pollution controls are established prior to the commencement of works.	Conformance
3.8(a)	Be consistent with the requirements in Managing Urban Stormwater: Soils and Construction, Volume 1, 4th Edition, 2004 (Landcom).		Conformance
3.8(b)	Identify construction and operational activities that could cause soil erosion and generate sediment.		Conformance
3.8(c)	Describe measures to minimise soil erosion and the potential for the transport of sediment to downstream waters.		Conformance
3.8(d)	Describe the location, function, and capacity of erosion and sediment control structures for both construction and operation.		Conformance
3.8(e)	Describe what measures would be implemented to maintain the structures over time.		Conformance

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No.	Consent Condition	Evidence	Finding
3.8(f)	Describe the procedures that would be followed for planned and unplanned water discharges from the site. <i>Note: To fulfil this condition, the Proponent may prepare and implement an updated version of the Soil and Water Management Plan prepared under Schedule 4 Condition 84 of development consent DA-282-6-2003-i, dated 16 June 2004.</i>		Conformance
3.9	WASTE MANAGEMENT The Proponent shall ensure that any waste or wastewater is assessed and classified in accordance with the DEC's Environmental Guidelines: "Assessment Classification and Management of Liquid and Non-Liquid Wastes", and disposed of at a licensed waste disposal facility or as otherwise agreed with the DEC.	It was reported that the waste service provider undertakes waste classification. The auditor sighted a sample of waste disposal dockets for contaminated soil and noted that the waste was disposed as special waste. It is noted that a waste audit was not within the scope of this independent audit.	Conformance
3.10	HAZARDS AND RISK Safety and Risk Management The Proponent shall prepare and implement an Emergency Plan for the project to the satisfaction of the Director-General. The plan shall be submitted to the Director-General prior to commissioning of the project and shall be prepared in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 1- Industry Emergency Planning Guidelines. <i>Note: To fulfil this condition the Proponent may prepare and implement an updated version of the Plan prepared under Schedule 4 condition 92(a) development consent DA-282-6-2003-i, dated 16 June 2004.</i>	The auditor sighted the Emergency Response Plan (August 2008) and noted conformance with the requirements of this condition. The auditor sighted correspondence from AGL to the DoPI (10 September 2008 and 1 October 2008) verifying submission of the EMS (Emergency Response Plan is provided in Appendix N).	Conformance
3.11	The Proponent shall prepare and implement Safety Management System (SMS) for the project, to the satisfaction of the Director-General. The SMS shall be submitted to the Director-General prior to commissioning of the project and shall be prepared in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 9 - Safety Management. The SMS shall:	The auditor sighted the Health and Safety Management Plan, Camden Project NSW (3 August 2011) and noted conformance with the requirements of this condition.	Conformance
3.11 (a)	Cover all operations on the wells and gas gathering system		Conformance
3.11 (b)	Clearly specify all safety related procedures, responsibilities and policies, along with details of mechanisms for ensuring adherence to procedures		Conformance
3.11 (c)	Include a summary of records to demonstrate that management of change procedures were followed for the connection of new gas lines to the existing network and for the integration of new wells into the automatic control system		Conformance

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No.	Consent Condition	Evidence	Finding
3.11 (d)	<p>Confirm that the design and operation of all wellheads comply with the Department's Locational Guidelines - Development in the Vicinity of Operating Coal Seam Methane Wells (May 2004) for an Automatically Controlled Well (with Separator/Optional Pump) and that all safety related systems required by the guidelines have been included.</p> <p>Note: To fulfil this condition the Proponent may prepare and implement an updated version of the SMS prepared under Schedule 4 condition 92(b) of development consent DA-282-6-2003-i, dated 16 June 2004.</p>		Conformance
3.12	<p>Compliance Report</p> <p>Within 3 months of commissioning of the project, the Proponent shall prepare a compliance report to the satisfaction of the Director-General. The report shall be prepared by a suitably qualified, experienced, and independent expert whose appointment has been endorsed by the Director-General and shall include:</p>	A non-conformance was reported against this condition in the 2008-2010 Independent Environmental Audit (24 August 2011) due to failure to prepare and submit a compliance report within three months of commencement of operation of the development.	Non-Conformance 1
3.12 (a)	Dates of commencement of construction and commissioning.	The Compliance Report was commissioned in 2012 following DoPI approval on 17 August 2012 of an independent expert. To date, the Compliance Report has not been submitted to the Director-General.	Non-Conformance 1
3.12 (b)	Actions taken (or proposed to be taken) to implement conditions 10 and 11.		Non-Conformance 1
3.12 (c)	<p>A signed statement that:</p> <ul style="list-style-type: none"> the Emergency Plan required under condition 10 is effectively in place and that at least one emergency exercise has been conducted; the SMS required under condition 11 has been fully implemented and that records required by the system are being kept; the Emergency Plan and SMS have been prepared in accordance with the relevant Hazardous Industry Planning Advisory Paper; all recommendations of the Emergency Plan and SMS have been implemented and are being maintained; and all safety management systems and their associated risk controls have been implemented and are being maintained. 		Non-Conformance 1

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No.	Consent Condition	Evidence	Finding
3.13	ABORIGINAL HERITAGE The Proponent shall prepare and implement an Aboriginal Heritage Management Plan for the project, in consultation with the DEC and relevant Aboriginal communities, and to the satisfaction of the Director-General. The plan shall be submitted to the Director-General prior to commencing construction (unless otherwise agreed with the Director-General) and shall include:	The auditor sighted the Aboriginal Cultural Heritage Management Plan (2008) and noted the inclusion of high level principles for consultation, mapping, salvage or relocation of known and unknown relics. It was reported that RB05 was not constructed and the works on RB11 were undertaken in accordance with the controls defined in the project-specific archaeology report. These controls are not included in the Aboriginal Cultural Heritage Management Plan as the document was prepared following completion of construction works. There was no reported construction works associated with this development consent undertaken during the audit period.	Conformance
3.13 (a)	A description of the measures that would be implemented for the test pit excavation, mapping and salvage or relocation of the archaeological relics on RB5 IF 1, RB5 Site 1, and RB11 IF 2.		Conformance
3.13 (b)	A description of the measures that would be implemented if any new Aboriginal objects are discovered during the project.		Conformance
3.13 (c)	A protocol for the ongoing consultation and involvement of the Aboriginal communities in the conservation and management of Aboriginal cultural heritage on the site. Note: The archaeological site references in conditions 13 are the same as those in the "Aboriginal Archaeological Survey and Assessment Report for Twelve Proposed Gas Production Well Sites, Gathering Systems & Access Routes The Razor Back Property" prepared by Dominic Steele Consulting Archaeology, and dated July 2005.		Conformance
3.14	ONGOING OPERATIONS Redrilling and Re-fracking The Proponent shall obtain the prior approval of the Director-General prior to undertaking work involving the redrilling and/or re-fracking of wells approved under this approval. <i>Note: For the purposes of this approval the redrilling and/or re-fracking of a well does not constitute wellhead maintenance.</i>	It was reported by AGL that there were no re-drilling or fracking activities during the audit period.	No Finding
3.15	Gas Gathering System The Proponent shall, to the satisfaction of the Director-General, ensure that:	The auditor sighted the EMP and relevant sub-plans and noted conformance with the requirements of this condition.	Conformance
3.15 (a)	Pipelines are designed, constructed and operated in accordance with the Australian Standard for the Installation and Maintenance of Plastic Pipe Systems for Gas AS 3723-1989 (or its latest version).	It is noted that there were no construction works undertaken during the audit period.	Conformance
3.15 (b)	The route of gas gathering and water transport systems and access roads follow previously or currently disturbed areas wherever possible.		Conformance

B.8 PA 06_0137 (Razorback)

No.	Consent Condition	Evidence	Finding
3.15 (c)	Trenches are not left open overnight, unless adequately covered.		Conformance
3.15 (d)	Routes of gas gathering and water transport lines are rehabilitated and reseeded with local grasses on completion of pipe laying.		Conformance
3.15 (e)	Works within 20 metres of watercourses are only undertaken during dry weather conditions.		Conformance
3.15 (f)	The pipeline crossing of Finns Road is located at a depth of at least 1.2 metres below the road surface.		Conformance
3.15 (g)	Construction activities do not impede lateral water flows.		Conformance
3.15 (h)	No crown or camber remains along any gas gathering system line, following rehabilitation.		Conformance
3.15 (i)	Signs are erected at intervals along all gas gathering system lines indicating the presence of a buried gas pipeline.		Conformance
3.16	REHABILITATION The Proponent shall progressively rehabilitate the site to the satisfaction of the Director-General, in a manner that is generally consistent with the landform of the surrounding land.	It was reported that there were no rehabilitation works undertaken during the audit period.	No Finding
3.17	The Proponent shall prepare and implement a Rehabilitation Management Plan to the satisfaction of the Director-General. The Plan shall be submitted to the Director-General within 6 months of the date of this approval and shall:	The auditor sighted the Rehabilitation and Landscape Management Sub-Plan (July 2012) and noted conformance with the requirements of this condition.	No Finding
3.17 (a)	Identify the areas likely to be disturbed by the project.	It is noted that this condition was not activated during the audit period.	No Finding
3.17 (b)	Describe the measures that would be implemented to rehabilitate the site.		No Finding
4	SCHEDULE 4 ENVIRONMENTAL MANAGEMENT AND MONITORING CONDITIONS	N/A	N/A
4.1	OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN (OEMP) The Proponent shall prepare and implement an Operational Environmental Management Plan (OEMP) for the project to the satisfaction of the Director-General. The OEMP shall be submitted to the Director-General prior to commissioning of the project and shall:	The auditor sighted the Environmental Management Plan (July 2012) and noted that the content complies with the requirements of this condition.	Conformance

B.8 PA 06_0137 (Razorback)

No.	Consent Condition	Evidence	Finding
4.1(a)	Incorporate the various environmental management plans, monitoring programs and other requirements set out in Schedule 3 of this approval.		Conformance
4.1(b)	Identify statutory and other obligations that the Proponent is required to fulfil during the operation of the project.		Conformance
4.1(c)	Describe the environmental policies and principles to be applied to the operation of the project.		Conformance
4.1(d)	Describe in general how the environmental performance of the project would be monitored and managed.	An improvement opportunity was noted in relation to objectives and targets. The EMP includes an extensive number of objectives and targets for each environmental aspect. It was reported that performance against targets is not currently measured. It is recommended that objectives and targets be established for significant environmental aspects only. Performance against the targets should then be measured to drive continual improvement of performance.	Conformance-Improvement Opportunity
4.1(e)	Describe the procedures that would be implemented to: <ul style="list-style-type: none"> • keep the local community and relevant agencies informed about the environmental performance of the project; • receive, handle, respond to, and record complaints; • resolve any disputes that may arise during the course of the project; • respond to any non-compliance; • manage cumulative impacts; and • respond to emergencies (including bushfires) 	The auditor sighted the Environmental Management Plan (July 2012) and noted that the content complies with the requirements of this condition.	Conformance
4.1(f)	Describe the role, responsibility, authority, and accountability of all the key personnel involved in environmental management of the project. Note: To fulfil this condition, the Proponent may prepare and implement an updated version of the OEMP prepared under Schedule 5 condition 2 of development consent DA-282-6-2003-i, dated 16 June 2004.		Conformance
4.2	INCIDENT REPORTING Within 7 days of detecting an exceedance of the goals/limits/performance criteria in this approval or an incident causing (or threatening to cause) material harm to the environment; the Proponent shall report the exceedance/incident to the Department (and any relevant agency). The report shall:	Condition was not activated during the audit period.	No Finding
4.2(a)	Describe the date, time, and nature of the exceedance/incident.		No Finding

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No.	Consent Condition	Evidence	Finding
4.2(b)	Identify the cause (or likely cause) of the exceedance/incident.		No Finding
4.2(c)	Describe what action has been taken to date.		No Finding
4.2(d)	Describe the proposed measures to address the exceedance/incident.		No Finding
4.3	ANNUAL REPORTING Within 12 months of the date of this approval, and annually thereafter during the life of the project, the Proponent shall prepare an Annual Environmental Performance Report (AEPR) for the project to the Director-General. The AEPR shall:	The auditor sighted the Annual Environmental Performance Reports for July 2011 and July 2012 and noted conformance with the requirements of this condition.	Conformance
4.3(a)	Identify the standards, performance measures and statutory requirements that apply to the project.		Conformance
4.3(b)	Assess the environmental performance of the project to determine whether it is complying with these standards, performance measures, and statutory requirements.		Conformance
4.3(c)	Identify any non-compliance during the year with the conditions of this approval or any standard, performance measure or statutory requirement that applies to the project.		Conformance
4.3(d)	Describe, if any non-compliance is identified, the actions and measures carried out or being carried out to ensure compliance, clearly indicating who would carry out these actions and measures, when they would be carried out, and how the effectiveness of these measures would be monitored over time.		Conformance
4.3(e)	Include a copy of complaints for the year and a description of actions taken or being taken to address registered complaints.		Conformance
4.3(f)	Include a discussion of issues or recommendations raised by the Camden Gas Project's Community Consultative Committee and a description of actions taken or being taken to address these issues or recommendations.	The 2011 AEPR does not detail actions taken to address any issues and/or recommendation raised by the Community Consultative Committee. The report only notes that all issues were closed. This matter was rectified in the 2012 AEPR.	Non-Conformance 2
4.3(g)	Include a detailed summary of results of all monitoring required by this approval and a discussion of any significant results, trends or exceptions in these results. Note: The Proponent may include this report in the Annual Environmental Performance Report required under Schedule 5 condition 5 of development consent DA-282-6-2003-i, dated 16 June 2004. The due date for a combined report shall be the earlier of the due dates for the separate reports.	The auditor sighted the Annual Environmental Performance Reports for July 2011 and July 2012 and noted conformance with the requirements of this condition.	Conformance
4.4	The Proponent shall submit a copy of the AEPR to the DPI, DEC and Council.	The auditor sighted evidence of submission of the AEPR to relevant authorities and verified that the AEPR is publicly available via the AGL Camden website.	Conformance

B.8 PA 06_0137 (Razorback)

No.	Consent Condition	Evidence	Finding
4.5	INDEPENDENT ENVIRONMENTAL AUDIT Within 2 years of the date of this approval and every 3 years thereafter, unless the Director-General directs otherwise, the Proponent shall commission and pay the full costs of an Independent Environmental Audit. The Independent Environmental Audit shall:	The scope of this 2010-2012 Independent Environmental Audit satisfies this condition.	Conformance
4.5(a)	Be conducted by a suitably qualified, experienced, and independent person(s) whose appointment has been approved by the Director-General.		Conformance
4.5(b)	Be consistent with ISO 19011:2002 - Guidelines for Quality and/or Environmental Management Systems Auditing, or updated versions of these guidelines/manuals.		Conformance
4.5(c)	Assess the environmental performance of the project, and its effects on the surrounding environment.		Conformance
4.5(d)	Include a hazard audit of the project in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 5, "Hazard Audit Guidelines".	The auditor sighted the 'Hazard Audit Report for Sydney Gas Operations, (3 March 2006) and a draft report of the 2012 audit. The audits were not conducted every three years as required by this condition. Furthermore, the 2012 audit has not been finalised and submitted to the Director-General.	Non-Conformance 1
4.5(e)	Assess whether the project is complying with the relevant standards, performance measures, and statutory requirements.	The scope of this 2010-2012 Independent Environmental Audit satisfies this condition.	Conformance
4.5(f)	Review the adequacy of the OEMP.		Conformance
4.5(g)	Recommend measures or actions to improve the environmental performance of the project, and/or its environmental management and monitoring systems. Note: The Proponent may include audit in the Independent Environmental Audit required under Schedule 5 condition 10 of development consent DA-282-6-2003-i, dated 16 June 2004. The due date for a combined audit shall be the earlier of the due dates for the separate audits.		Conformance
4.6	Within 1 month of completion of each Independent Environmental Audit, the Proponent shall submit a copy of the audit report to the Director-General, DPI and DEC, with a response to any of the recommendations contained in the audit report.	The auditor sighted correspondence confirming that the 2008-2010 Independent Environmental Audit (24 August 2011) was submitted to relevant authorities within one month of completion.	Conformance

B.8 PA 06_0137 (Razorback)

No.	Consent Condition	Evidence	Finding
4.7	Following each Independent Environmental Audit, the Proponent shall review and if necessary revise the OEMP (and any documents contained in the plan), to the satisfaction of the Director-General. The revised OEMP shall be submitted to the Director-General within 6 months of completing the audit.	<p>A non-conformance was reported against this condition in the 2008-2010 Independent Environmental Audit (24 August 2011) due to failure to provide evidence of submission of the EMP to the Director-General.</p> <p>Following the 2008-2010 Independent Audit (24 August 2011), the EMP, Soil and Water Management Sub-Plan (July 2012), and Rehabilitation and Landscape Management Plan (July 2012) were revised and submitted to the DoPI.</p> <p>The Noise Management Sub-Plan required amendments in response to the 2008-2010 Independent Environmental Audit. The Plan was revised, but not submitted to the DoPI.</p>	Non-Conformance 2
4.8	<p>COMMUNITY CONSULTATIVE COMMITTEE</p> <p>The Proponent shall ensure that the construction and operation of the project is subject to the consideration of the Camden Gas Project Community Consultative Committee, as established under Schedule 5 Condition 17 of development consent DA No. 282-6-2003-I, dated 16 June 2004.</p>	The auditor sighted relevant documentation including meeting minutes and verified conformance with the requirements of this condition.	Conformance
4.9	<p>ACCESS TO INFORMATION</p> <p>From 31 March 2007, and during the life of the project thereafter, the Proponent shall place a copy of the following documents and information (and any subsequent revisions) required under this approval on its website:</p>	The auditor sighted the AGL website and verified conformance with the requirements of this condition.	Conformance
4.9(a)	All current environmental management plans, strategies and programs.		Conformance
4.9(b)	All Independent Environmental Audits.		Conformance
4.9(c)	All AEPRs.		Conformance
4.9(d)	A summary of all environmental monitoring results required under this consent (to be updated at least every 6 months).		Conformance

B.9 PA 06_0138 (Elizabeth Macarthur)

No.	Consent Condition	Evidence	Finding
2	SCHEDULE 2 Administrative Conditions	N/A	N/A
2.1	Obligation to Minimise Harm to the Environment The Proponent shall implement all practicable measures to prevent or minimise any harm to the environment that may result from the construction or operation of the project.	<p>An Environmental Management System has been established to manage environmental risks and achieve performance improvements. This framework consists of an Environmental Management Plan (EMP), relevant sub-plans and a Compliance Register.</p> <p>A number of tools are reported to be in place to monitor and measure implementation of the EMS including the Drilling Operations Compliance Checklist, the Gas Gathering System Construction Checklist and the Rehabilitation Checklist (among others).</p> <p>The Environmental Compliance Register (Mipela) was sighted and found to be an effective tool for monitoring compliance against project approval deliverables.</p> <p>It is noted that there were no reported environmental incidents or non-compliances during the audit period.</p>	Conformance
2.2	Terms of Approval The Proponent shall carry out the project generally in accordance with the:	It was reported that the development is undertaken in accordance with the EMP and sub-plans. On receipt of an approved consent or modification, it was reported that the EMP is revised to reflect the new requirements. This was evidenced by the revision history of the document.	Conformance
2.2(a)	Project Application 06_0138.		Conformance
2.2(b)	EA titled "Environmental Assessment – Camden Gas Project Joint Venture Stage 2 Drilling Program, Elizabeth Macarthur Agricultural Institute Wells (EM23-EM36)", dated 20 July 2006, and prepared by HLA Envirosciences Pty Ltd.		Non-Conformance 2
2.2(c)	EM32 and EM34 Additional Noise Assessment contained in a letter from AGL to the Department, dated 26 September 2006.		Conformance
2.2(d)	Proposed changes to works in the EMAI and Razorback projects contained in a letter from AGL to the Department, dated 23 November 2006.	It was reported that the development is undertaken in accordance with the EMP and sub-plans. On receipt of an approved consent or modification, it was reported that the EMP is revised to reflect the new requirements. This was evidenced by the revision history of the	Conformance

B.9 PA 06_0138 (Elizabeth Macarthur)

No.	Consent Condition	Evidence	Finding
2.2(e)	Raptor breeding seasons and revised Statement of Commitments contained in a letter from AGL to the Department, dated 4 December 2006.	document.	Conformance
2.2(f)	Modification application (06_0138 Mod 1) titled "EM37 Well Modification Project Environmental Assessment" , dated 21 March 2007.		Conformance
2.2(g)	Letter concerning E\$M32 from AGL Gas Production (Camden) Pty Limited to the Department, dated 31 May 2007.		Conformance
2.2(h)	Conditions of this approval.		Conformance
2.3	If there is any inconsistency between the above documents, the latter document shall prevail over the former to the extent of the inconsistency. However, the conditions of this consent shall prevail over all other documents to the extent of any inconsistency.	Condition is noted.	No Finding
2.4	The Proponent shall comply with any reasonable requirement/s of the Director-General arising from the Department's assessment of:	Condition is noted.	No Finding
2.4(a)	Any reports, plans, programs or correspondence that are submitted in accordance with this approval.		No Finding
2.4(b)	The implementation of any actions or measures contained in these reports, plans, programs or correspondence.		No Finding
2.5	Limits on Approval This approval shall lapse 21 years after the date of this approval or on the expiry date of Petroleum Production Lease No. 1 or Petroleum Production Lease No. 4, whichever is the sooner.	Condition was not activated during the audit period.	No Finding
2.6	Nothing in this approval permits the drilling and operation of any additional gas wells (beyond the approved 15 wells for gas production).	The auditor reviewed the gas wells against the development consents and confirmed that no additional wells have been drilled or operated during the audit period.	Conformance
2.7	The Proponent shall surrender the approval for any well that has not been drilled within 5 years of the date of this approval.	It is noted that the approval has lapsed for any well that has not been drilled. It was reported that there were no wells drilled during the audit period.	Conformance
2.8	Notification of Council Within 3 months of the commissioning of the wells, the Proponent shall provide Council with:	A non-conformance was reported against this condition in the 2008-2010 Independent Environmental Audit (24 August 2011).	Non-Conformance 2

B.9 PA 06_0138 (Elizabeth Macarthur)

No.	Consent Condition	Evidence	Finding
2.8(a)	The Geographical Positioning System (GPS) co-ordinates and digital survey data for the gas well sites and gas gathering system, in a format suitable to the Council.	The auditor sighted correspondence dated 1 November 2011 from AGL to the respective Councils that included the GPS co-ordinates and digital survey data for nominated assets. It is noted that this information was not provided within three months of commissioning of the gas wells and gas gathering system.	Non-Conformance 2
2.8(b)	The wellhead configuration of each well.	Correspondence was sighted on 16 June 2013 from AGL to the respective Councils, which included the wellhead configurations for nominated assets. It is noted that this information was not provided within three months of commissioning of the wells.	Non-Conformance 2
2.9	Operation of Plant and Equipment The Proponent shall ensure that all plant and equipment used at the site is:	Preventative maintenance of plant and equipment is controlled through the MEX system. The auditor sighted the MEX system and it was noted that maintenance schedules are defined by usage and manufacturers requirements. It was reported that the MEX system has been operating for eight months but is not fully functional. A back-up system is being maintained until the MEX system achieves the required outcomes.	Conformance
2.9(a)	Maintained in a proper and efficient condition.		Conformance
2.9(b)	Operated in a proper and efficient condition.		Conformance
3	SCHEDULE 3 ENVIRONMENTAL PERFORMANCE CONDITIONS	N/A	N/A

B.9 PA 06_0138 (Elizabeth Macarthur)

No.	Consent Condition	Evidence	Finding																	
3.1	<p>NOISE</p> <p>Construction and Maintenance Hours</p> <p>Except for the drilling (including well casing and grouting) of SIS wells EM32 and EM34, the Proponent shall comply with the construction and maintenance hours in Table 1:</p> <p>Table 1: Construction and Maintenance Hours for the Project</p> <table border="1"> <thead> <tr> <th>Activity</th> <th>Day</th> <th>Time</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Construction</td> <td>Monday – Friday</td> <td>7:00am to 6:00pm</td> </tr> <tr> <td>Saturday</td> <td>8:00am to 1:00pm</td> </tr> <tr> <td>Sunday and Public Holidays</td> <td>Nil</td> </tr> <tr> <td rowspan="3">Planned maintenance activities</td> <td>Monday – Friday</td> <td>7:00am to 6:00pm</td> </tr> <tr> <td>Saturday</td> <td>8:00am to 1:00pm</td> </tr> <tr> <td>Sunday and Public Holidays</td> <td>Nil (unless inaudible at any residential receiver)</td> </tr> </tbody> </table> <p><i>Notes:</i></p> <ul style="list-style-type: none"> • <i>Inaudible means that the construction activity cannot be heard by the human ear at the nearest affected residential receivers</i> • <i>This condition does not apply to the delivery of material if that delivery is required by the police or other authorities for safety reasons; and/or the operation or personnel or equipment is endangered. In such circumstances, prior notification is to be provided to affected residents where possible.</i> 	Activity	Day	Time	Construction	Monday – Friday	7:00am to 6:00pm	Saturday	8:00am to 1:00pm	Sunday and Public Holidays	Nil	Planned maintenance activities	Monday – Friday	7:00am to 6:00pm	Saturday	8:00am to 1:00pm	Sunday and Public Holidays	Nil (unless inaudible at any residential receiver)	<p>The auditor sighted the Noise Management Sub-Plan (August 2008) and noted that the Plan conforms to the requirements of this condition. It was reported that this condition is communicated to employees and contractors through the role-specific induction program.</p>	Conformance
Activity	Day	Time																		
Construction	Monday – Friday	7:00am to 6:00pm																		
	Saturday	8:00am to 1:00pm																		
	Sunday and Public Holidays	Nil																		
Planned maintenance activities	Monday – Friday	7:00am to 6:00pm																		
	Saturday	8:00am to 1:00pm																		
	Sunday and Public Holidays	Nil (unless inaudible at any residential receiver)																		
3.2	<p>Construction Noise Goals</p> <p>The Proponent shall use its best endeavours to undertake construction activities to comply with the construction noise goals specified in Table 2.</p> <p>Table 2: Construction Noise Goals dB(A) LA10(15 min)</p> <table border="1"> <thead> <tr> <th>Location</th> <th>Day</th> <th>Evening</th> <th>Night</th> </tr> </thead> <tbody> <tr> <td>Any residential receiver</td> <td>54</td> <td>39</td> <td>35</td> </tr> </tbody> </table> <p><i>Note: See notes to condition 4</i></p>	Location	Day	Evening	Night	Any residential receiver	54	39	35	<p>The auditor sighted the Noise Management Sub-Plan (August 2008) and noted the inclusion of the construction noise goals as detailed in this condition. It was reported that there were no construction works undertaken during the audit period.</p>	Conformance									
Location	Day	Evening	Night																	
Any residential receiver	54	39	35																	
3.3	<p>Construction Noise Management Plan</p> <p>The Proponent shall prepare and implement a Construction Noise Management Plan for construction of the project to the satisfaction of the Director-General. The plan shall be submitted to the Director-General prior to construction commencing and shall include:</p>	<p>The auditor sighted the Noise Management Sub-Plan (August 2008) and noted that the Plan conforms to the requirements of this condition.</p>	Conformance																	

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No.	Consent Condition	Evidence	Finding														
3.3(a)	A detailed description of the measures that would be implemented to achieve the construction noise goals in condition 2.		Conformance														
3.3(b)	A community notification protocol for the proposed construction activities (including any re-drilling or re-fracking of wells).		Conformance														
3.3(c)	A description of the measures that would be implemented where the construction noise goals in condition 2 are unlikely to be achieved or are not being achieved.		Conformance														
3.3(d)	Details of who would be responsible for monitoring, reviewing and implementing the plan.		Conformance														
3.4	<p>Operational Noise Criteria</p> <p>The Proponent shall ensure that the noise generated by the project does not exceed the noise impact assessment criteria in Table 3.</p> <p>Table 3: Noise Impact Assessment Criteria dB(A)</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 receiver</td> <td>39</td> <td>39</td> <td>35</td> <td>45</td> </tr> </tbody> </table> <p>Notes:</p> <ul style="list-style-type: none"> Noise from the site is to be measured at the most affected point within the residential boundary, or at the most affected point within 30 metres of the dwelling where the dwelling is more than 30 metres from the boundary, to determine compliance with the identified noise limits, except where otherwise specified below. Noise from the project is to be measured at 1 metre from the dwelling facade to determine compliance with the LA1 (1 minute) noise level. Where it can be demonstrated that direct measurement of noise from the project is impractical, alternative means of determining compliance may be acceptable (see Chapter 11 of the NSW Industrial Noise Policy). The modification factors presented in Section 4 of the NSW Industrial Noise Policy shall also be applied to the measured noise level where applicable. The identified noise emission limits apply under meteorological conditions of wind speed up to 3m/s at 10 metres above ground level, and temperature inversion conditions. 	Location	Day	Evening	Night		L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	LA1(1 minute)	Any residential receiver	39	39	35	45	<p>The auditor sighted the Noise Management Sub-Plan (August 2008) and noted the inclusion of this condition and appropriate controls to minimise noise.</p> <p>Noise monitoring of a selection of operational wells, including wells within PA06_0138 was undertaken on 19 September 2011. The results of the monitoring conformed to the requirements of this condition.</p>	Conformance
Location	Day		Evening	Night													
	L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	LA1(1 minute)													
Any residential receiver	39	39	35	45													
3.5	<p>Continuous Improvement</p> <p>The Proponent shall, to the satisfaction of the Director-General</p>	<p>The auditor sighted the Noise Management Plan (August 2008) and noted the inclusion of noise mitigation measures. It was also reported in the 2010/11 AEPR that AGL has been actively working with drilling companies to attenuate noise from drill rigs.</p>	Conformance														
3.5(a)	Implement all reasonable and feasible best practice noise mitigation measures.		Conformance														
3.5(b)	Investigate ways to reduce the noise generated by the project.		Conformance														

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No.	Consent Condition	Evidence	Finding
3.5(c)	Report on these investigations and the implementation and effectiveness of these measures in the AEPR.		Conformance
3.6	<p>Noise Monitoring Program</p> <p>The Proponent shall prepare and implement a Noise Monitoring Program for the construction and operation of the project to the satisfaction of the Director-General. The Program shall be submitted to the Director-General prior to construction commencing and shall include a noise monitoring protocol for evaluating compliance with the construction noise goals and the operational noise impact assessment criteria in this approval.</p>	<p>A non-conformance was reported against this condition in the 2008-2010 Independent Environmental Audit (24 August 2011) due to inconsistent implementation of the Noise Monitoring Program.</p> <p>There were no matters of non-conformance identified during the audit period in regards to the implementation of the Noise Monitoring Program.</p> <p>The auditor sighted correspondence from the Department of Planning to AGL (9/01/2007) confirming that the Department reviewed the Construction Noise Management Plan (EMAI) and was satisfied that the Plan addresses the relevant conditions of PA 06_0138.</p>	Conformance
3.7	<p>AIR QUALITY</p> <p>The Proponent shall implement all practicable measures to minimise dust emissions generated by the construction and operation of the project to the satisfaction of the Director-General.</p>	<p>It was noted by the auditor that a number of dust mitigation measures are detailed in the Air Quality Management Sub-Plan (August 2008) 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>	Conformance
3.8	<p>SURFACE WATER</p> <p>The Proponent shall prepare and implement a Soil and Water Management Plan for the project to the satisfaction of the Director-General. The plan shall be submitted to the Director-General prior to construction commencing and shall:</p>	<p>The auditor sighted the Soil and Water Management Sub-Plan (July 2012) and noted that the Plan conforms to the requirements of this condition.</p>	Conformance
3.8(a)	Be consistent with the requirements in Managing Urban Stormwater: Soils and Construction, Volume 1, 4th Edition, 2004 (Landcom).		Conformance
3.8(b)	Identify construction and operational activities that could cause soil erosion and generate sediment.		Conformance
3.8(c)	Describe measures to minimise soil erosion and the potential for the transport of sediment to downstream waters.		Conformance

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No.	Consent Condition	Evidence	Finding
3.8(d)	Describe the location, function, and capacity of erosion and sediment control structures for both construction and operation.		Conformance
3.8(e)	Describe what measures would be implemented to maintain the structures over time.		Conformance
3.8(f)	Describe the procedures that would be followed for planned and unplanned water discharges from the site. <i>Note: To fulfil this condition, the Proponent may prepare and implement an updated version of the Soil and Water Management Plan prepared under Schedule 4 Condition 84 of development consent DA-282-6-2003-i, dated 16 June 2004.</i>		Conformance
3.9	FLOOD MANAGEMENT The Proponent shall prepare and implement a Flood Management Plan for wells EM34 and EM35 located within the 1 in 100 year flood level, to the satisfaction of the Director-General. The plan shall be submitted to the Director-General prior to commissioning of wells EM34 and EM35, and shall include measures to minimise and mitigate flooding impacts associated with the project. <i>Note: To fulfil this condition, the Proponent may prepare and implement an updated version of the Flood Management Plan prepared under Schedule 3 condition 12 of development consent DA-171-7-2005i, dated 25 March 2006.</i>	The auditor sighted the Emergency Response Plan (August 2008) and noted the inclusion of controls to minimise and mitigate flooding impacts. Control measures in relation to EM34 and EM35 were not activated in the audit period.	No Finding
3.10	WASTE MANAGEMENT The Proponent shall ensure that any waste or wastewater is assessed and classified in accordance with the DEC's Environmental Guidelines: "Assessment Classification and Management of Liquid and Non-Liquid Wastes", and disposed of at a licensed waste disposal facility or as otherwise agreed with the DEC.	The auditor sighted the EMP for the CGP, including the Soil and Water Management Sub-Plan (July 2012) and the Waste Management Sub-Plan (August 2008). It was noted that details of the reuse and recycling of wastewater produced on site, including collection and handling procedures, were not provided. It was reported by site personnel that produced water is reused in drilling works and workovers at other sites within the Camden Gas Project. The reuse process is guided by supply and demand. The produced water is reportedly analysed in-house and the level of suspended (coal fines) solids are assessed to determine if water is suitable for reuse.	Non-Conformance 2

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No.	Consent Condition	Evidence	Finding
3.11	<p>HAZARDS AND RISK Safety and Risk Management</p> <p>The Proponent shall prepare and implement an Emergency Plan for the project to the satisfaction of the Director-General. The plan shall be submitted to the Director-General prior to commissioning of the project and shall be prepared in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 1 - Industry Emergency Planning Guidelines. <i>Note: To fulfil this condition the Proponent may prepare and implement an updated version of the Plan prepared under Schedule 4 condition 92(a) development consent DA-282-6-2003-i, dated 16 June 2004.</i></p>	<p>The auditor sighted the Emergency Response Plan (August 2008) and noted conformance with the requirements of this condition.</p> <p>The auditor sighted correspondence from AGL to the DoPI (10 September 2008 and 1 October 2008) verifying submission of the EMS (Emergency Response Plan is provided in Appendix N).</p>	Conformance
3.12	<p>The Proponent shall prepare and implement a Safety Management System (SMS) for the project, to the satisfaction of the Director-General. The SMS shall be submitted to the Director-General prior to commissioning of the project and shall be prepared in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 9 - Safety Management. The SMS shall:</p>	<p>The auditor sighted the Health and Safety Management Plan, Camden Project NSW (3 August 2011) and noted conformance with the requirements of this condition.</p>	Conformance
3.12 (a)	Cover all operations on the wells and gas gathering system.		Conformance
3.12 (b)	Clearly specify all safety related procedures, responsibilities and policies, along with details of mechanisms for ensuring adherence to procedures.		Conformance
3.12 (c)	Include a summary of records to demonstrate that management of change procedures were followed for the connection of new gas lines to the existing network and for the integration of new wells into the automatic control system.		Conformance
3.12 (d)	<p>Confirm that the design and operation of all wells comply with the Department's Locational Guidelines - Development in the Vicinity of Operating Coal Seam Methane Wells (May 2004) for an Automatically Controlled Well (with Separator/Optional Pump) and that all safety related systems required by the guidelines have been included.</p> <p><i>Note: To fulfil this condition the Proponent may prepare and implement an updated version of the SMS prepared under Schedule 4 condition 92(b) of development consent DA-282-6-2003-i, dated 16 June 2004.</i></p>		Conformance
3.13	<p>Compliance Report</p> <p>Within 3 months of commissioning of the project, the Proponent shall prepare a compliance report to the satisfaction of the Director-General. The report shall be prepared by a suitably qualified, experienced, and independent expert whose appointment has been endorsed by the Director-General and shall include:</p>	<p>A non-conformance was reported against this condition in the 2008-2010 Independent Environmental Audit (24 August 2011) due to failure to prepare and submit a compliance report within three months of commencement of operation.</p>	Non-Conformance 1

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No.	Consent Condition	Evidence	Finding
3.13 (a)	Dates of commencement of construction and commissioning.	The Compliance Report was commissioned in 2012 following DoPI approval on 17 August 2012 of an independent expert. To date, the Compliance Report has not been submitted to the Director-General.	Non-Conformance 1
3.13 (b)	Actions taken (or proposed to be taken) to implement conditions 11 and 12.		Non-Conformance 1
3.13 (c)	A signed statement that: <ul style="list-style-type: none"> the Emergency Plan required under condition 11 is effectively in place and that at least one emergency exercise has been conducted; the SMS required under condition 12 has been fully implemented and that records required by the system are being kept; the Emergency Plan and SMS have been prepared in accordance with the relevant Hazardous Industry Planning Advisory Paper; all recommendations of the Emergency Plan and SMS have been implemented and are being maintained; and all safety management systems and their associated risk controls have been implemented and are being maintained. 		Non-Conformance 1
3.14	FLORA AND FAUNA The Proponent shall only undertake drilling and fracking of EM23, EM27, EM33 and EM36, and construction of gas gathering lines and access roads located within the raptor zones outside of the recognised breeding season (June to January) of raptor species nesting in the EMAI's raptor zones.	A non-conformance was reported against this condition in the 2008-2010 Independent Environmental Audit (24 August 2011) in relation to the conduct of fracking works during the raptor breeding season. It was reported by AGL that this condition was included at the request of EMAI and as such, approval for the works was obtained from EMAI prior to commencing works. This condition was not activated during the audit period.	No Finding
3.15	ABORIGINAL HERITAGE The Proponent shall prepare and implement an Aboriginal Heritage Management Plan for the project, in consultation with the DEC and relevant Aboriginal communities, and to the satisfaction of the Director-General. The plan shall be submitted to the Director-General prior to commencing construction (or as otherwise agreed by the Director-General) and shall include:	The auditor sighted the Aboriginal Cultural Heritage Management Plan (2008) and noted the inclusion of high-level principles for consultation, mapping, salvage or relocation of known and unknown relics. There were no reported construction works associated with this development consent undertaken during the audit period.	Conformance
3.15 (a)	A description of the measures that would be implemented for the mapping, and salvage or relocation of the archaeological relics on EMAI Sites 1, 2 4, 5, 6, and 7; CP OS 3; and IF 1 and IF 2.		Conformance

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No.	Consent Condition	Evidence	Finding
3.15 (b)	A description of the measures that would be implemented if any new Aboriginal objects are discovered during the project.		Conformance
3.15 (c)	A protocol for the ongoing consultation and involvement of the Aboriginal communities in the conservation and management of Aboriginal cultural heritage on the site. Note: The archaeological site references in condition 15 are the same as those in the "Aboriginal Cultural Heritage Survey and Assessment Report for Fifteen New Proposed Gas Production Well Sites, Gathering Systems & Access Routes Camden Gas Project Stage 2 The Elizabeth Macarthur Agricultural Institute Property" prepared by Dominic Steele Consulting Archaeology, and dated December 2005.		Conformance
3.16	ONGOING OPERATIONS Redrilling and Re-fracing The Proponent shall obtain the approval of the Director-General prior to undertaking work involving the redrilling and/or re-fracing of wells approved under this approval. <i>Note: For the purposes of this approval the redrilling and/or re-fracing of a well does not constitute wellhead maintenance.</i>	It was reported that there were no re-drilling or fracing activities during the audit period.	No Finding
3.17	Gas Gathering System The Proponent shall, to the satisfaction of the Director-General, ensure that:	The auditor sighted the EMP and relevant sub-plans and noted conformance with the requirements of this condition.	Conformance
3.17 (a)	Pipelines are designed, constructed and operated in accordance with the Australian Standard for the Installation and Maintenance of Plastic Pipe Systems for Gas AS 3723-1989 (or its latest version).	It is noted that there were no construction works undertaken during the audit period.	Conformance
3.17 (b)	The route of gas gathering and water transport systems and access roads follow previously or currently disturbed areas wherever possible.		Conformance
3.17 (c)	Trenches are not left open overnight, unless adequately covered.		Conformance
3.17 (d)	Works within 20 metres of watercourses are only undertaken during dry weather conditions.		Conformance
3.17 (e)	The pipeline crossing of Remembrance Drive is located at a depth of at least 1.2 metres below the road surface.		Conformance
3.17 (f)	Construction activities do not impede lateral water flows.		Conformance
3.17 (g)	No crown or camber remains along any gas gathering system line, following rehabilitation.		Conformance

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No.	Consent Condition	Evidence	Finding
3.17 (h)	Signs are erected at intervals along all gas gathering system lines indicating the presence of a buried gas pipeline.		Conformance
3.18	REHABILITATION The Proponent shall progressively rehabilitate the site to the satisfaction of the Director-General, in a manner that is generally consistent with the landform of the surrounding land.	The auditor sighted the Rehabilitation and Landscape Management Sub-Plan (July 2012) and noted conformance with the requirements of this condition. It was reported that rehabilitation works during the audit period were limited to the pond located at the EM26 site. The auditor inspected the EM26 site and rehabilitation was consistent with the landform of the surrounding area.	Conformance
3.19	The Proponent shall prepare and implement a Rehabilitation Management Plan to the satisfaction of the Director-General. The Plan shall be submitted to the Director-General within 6 months of the date of this approval and shall:	The auditor sighted the Rehabilitation and Landscape Management Sub-Plan (July 2012) and noted conformance with the requirements of this condition.	No Finding
3.19 (a)	Identify the areas likely to be disturbed by the project.	It is noted that this condition was not activated during the audit period.	No Finding
3.19 (b)	Describe the measures that would be implemented to rehabilitate the site.		No Finding
4	SCHEDULE 4 ENVIRONMENTAL MANAGEMENT AND MONITORING CONDITIONS	N/A	N/A
4.1	OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN (OEMP) The Proponent shall prepare and implement an Operational Environmental Management Plan (OEMP) for the project to the satisfaction of the Director-General. The OEMP shall be submitted to the Director-General prior to commissioning of the project and shall:	The auditor sighted the Environmental Management Plan (July 2012) and noted that the content conforms to the requirements of this condition.	Conformance
4.1(a)	Incorporate the various environmental management plans, monitoring programs and other requirements set out in Schedule 3 of this approval.		Conformance
4.1(b)	Identify statutory and other obligations that the Proponent is required to fulfil during the operation of the project.		Conformance
4.1(c)	Describe the environmental policies and principles to be applied to the operation of the project.		Conformance

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No.	Consent Condition	Evidence	Finding
4.1(d)	Describe in general how the environmental performance of the project would be monitored and managed.	An improvement opportunity was noted in relation to objectives and targets. The EMP includes an extensive number of objectives and targets for each environmental aspect. Although performance is considered at a high level within the AEPR, it was reported that performance against targets is not currently measured. It is recommended that objectives and targets be established for significant environmental aspects only. Performance against the targets should then be measured to drive continual improvement of performance.	Conformance-Improvement Opportunity
4.1(e)	Describe the procedures that would be implemented to: <ul style="list-style-type: none"> • keep the local community and relevant agencies informed about the environmental performance of the project; • receive, handle, respond to, and record complaints; • resolve any disputes that may arise during the course of the project; • respond to any non-compliance; • manage cumulative impacts; and • respond to emergencies (including bushfires); 	The auditor sighted the Environmental Management Plan (July 2012) and noted that the content conforms to the requirements of this condition.	Conformance
4.1(f)	Describe the role, responsibility, authority, and accountability of all the key personnel involved in environmental management of the project. Note: To fulfil this condition, the Proponent may prepare and implement an updated version of the OEMP prepared under Schedule 5 condition 2 of development consent DA-282-6-2003-i, dated 16 June 2004.		Conformance
4.2	INCIDENT REPORTING Within 7 days of detecting an exceedance of the goals/limits/performance criteria in this approval or an incident causing (or threatening to cause) material harm to the environment; the Proponent shall report the exceedance/incident to the Department (and any relevant agency). The report shall:	Condition was not activated during the audit period.	No Finding
4.2(a)	Describe the date, time, and nature of the exceedance/incident.		No Finding
4.2(b)	Identify the cause (or likely cause) of the exceedance/incident.		No Finding
4.2(c)	Describe what action has been taken to date.		No Finding
4.2(d)	Describe the proposed measures to address the exceedance/incident.		No Finding

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No.	Consent Condition	Evidence	Finding
4.3	ANNUAL REPORTING Within 12 months of the date of this approval, and annually thereafter during the life of the project, the Proponent shall prepare an Annual Environmental Performance Report (AEPR) for the project to the satisfaction of the Director-General. The AEPR shall:	The auditor sighted the Annual Environmental Performance Reports for July 2011 and July 2012 and noted conformance to the requirements of this condition.	Conformance
4.3(a)	Identify the standards, performance measures and statutory requirements that apply to the project.		Conformance
4.3(b)	Assess the environmental performance of the project to determine whether it is complying with these standards, performance measures, and statutory requirements.		Conformance
4.3(c)	Identify any non-compliance during the year with the conditions of this approval or any standard, performance measure or statutory requirement that applies to the project.		Conformance
4.3(d)	Describe, if any non-compliance is identified, the actions and measures carried out or being carried out to ensure compliance, clearly indicating who would carry out these actions and measures, when they would be carried out, and how the effectiveness of these measures would be monitored over time.		Conformance
4.3(e)	Include a copy of complaints for the year and a description of actions taken or being taken to address registered complaints.		Conformance
4.3(f)	Include a discussion of issues or recommendations raised by the Camden Gas Project's Community Consultative Committee and a description of actions taken or being taken to address these issues or recommendations.	The 2011 AEPR does not provide details of actions taken to address any issues and/or recommendation raised by the Community Consultative Committee. The report only notes that all issues were closed. This matter was rectified in the 2012 AEPR.	Non-Conformance 2
4.3(g)	Include a detailed summary of results of all monitoring required by this approval and a discussion of any significant results, trends or exceptions in these results, Note: The Proponent may include this report in the Annual Environmental Performance Report required under Schedule 5 condition 5 of development consent DA-282-6-2003-i, dated 16 June 2004. The due date for a combined report shall be the earlier of the due dates for the separate reports.	The auditor sighted the Annual Environmental Performance Reports for July 2011 and July 2012 and noted conformance to the requirements of this condition.	Conformance
4.4	The Proponent shall submit a copy of the AEPR to the DPI, DEC and Council.	The auditor sighted evidence of submission of the AEPR to relevant authorities and verified that the AEPR is publicly available via the AGL Camden website.	Conformance

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No.	Consent Condition	Evidence	Finding
4.5	INDEPENDENT ENVIRONMENTAL AUDIT Within 2 years of the date of this approval, and every 3 years thereafter, unless the Director-General directs otherwise, the Proponent shall commission and pay the full costs of an Independent Environmental Audit. The Independent Environmental Audit shall:	The scope of this 2010-2012 Independent Environmental Audit satisfies this condition.	Conformance
4.5(a)	Be conducted by a suitably qualified, experienced, and independent person(s) whose appointment has been approved by the Director-General.		Conformance
4.5(b)	Be consistent with ISO 19011:2002 - Guidelines for Quality and/or Environmental Management Systems Auditing, or updated versions of these guidelines/manuals.		Conformance
4.5(c)	Assess the environmental performance of the project, and its effects on the surrounding environment.		Conformance
4.5(d)	Include a hazard audit of the project in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 5, "Hazard Audit Guidelines".	The auditor sighted the 'Hazard Audit Report for Sydney Gas Operations, (3 March 2006) and a draft report of the 2012 audit. The audits were not conducted every three years as required by this condition. Furthermore, the 2012 audit has not been finalised and submitted to the Director-General.	Non-Conformance 1
4.5(e)	Assess whether the project is complying with the relevant standards, performance measures and statutory requirements.	The scope of this 2010-2012 Independent Environmental Audit satisfies this condition.	Conformance
4.5(f)	Review the adequacy of the OEMP.		Conformance
4.5(g)	Recommend measures or actions to improve the environmental performance of the project, and/or its environmental management and monitoring systems. Note: The Proponent may include this audit in the Independent Environmental Audit required under Schedule 5 condition 10 of development consent DA-282-6-2003-i, dated 16 June 2004. The due date for a combined audit shall be the earlier of the due dates for the separate audits.		Conformance
4.6	Within 1 month of completion of each Independent Environmental Audit, the Proponent shall submit a copy of the audit report to the Director-General, DPI and DEC, with a response to any of the recommendations contained in the audit report.	The auditor sighted correspondence confirming that the 2010-2012 Independent Environmental Audit (24 August 2011) was submitted to relevant authorities within one month of completion.	Conformance

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No.	Consent Condition	Evidence	Finding
4.7	Following each Independent Environmental Audit, the Proponent shall review and if necessary revise the OEMP (and any documents contained in the plan), to the satisfaction of the Director-General. The revised OEMP shall be submitted to the Director-General within 6 months of completing the audit.	<p>A non-conformance was reported against this condition in the 2008-2010 Independent Environmental Audit (24 August 2011) due to failure to provide evidence of submission of the EMP to the Director-General.</p> <p>Following the 2008-2010 Independent Audit (24 August 2011), the EMP, Soil and Water Management Sub-Plan (July 2012), and Rehabilitation and Landscape Management Plan (July 2012) were revised and submitted to the DoPI.</p> <p>The Noise Management Sub-Plan required amendments in response to the 2008-2010 Independent Environmental Audit. The Plan was revised, but not submitted to the DoPI.</p>	Non-Conformance 2
4.8	COMMUNITY CONSULTATIVE COMMITTEE The Proponent shall ensure that the construction and operation of the project is subject to the consideration of the Camden Gas Project Community Consultative Committee, as established under Schedule 5 condition 17 of development consent DA No. 282-6-2003-I, dated 16 June 2004.	The auditor reviewed relevant documentation including committee meeting minutes and presentations and verified conformance with the requirements of this condition. The committee minutes are publicly available on the Camden Gas Project website and it was reported that they are emailed to committee members and the DoPI.	Conformance
4.9	ACCESS TO INFORMATION From 31 March 2007, and during the life of the project thereafter, the Proponent shall place a copy of the following documents and information (and any subsequent revisions) required under this approval on its website:	The auditor sighted the AGL website and verified conformance with the requirements of this condition.	Conformance
4.9(a)	OEMP.		Conformance
4.9(a)	All Independent Environmental Audits.		Conformance
4.9(a)	All AEPRs.		Conformance
4.9(a)	A summary of all environmental monitoring results required under this consent (to be updated at least every 6 months).		Conformance

B.10 PA 06-0291 (Spring Farm and Menangle Park)

No.	Consent Condition	Evidence	Finding
2	SCHEDULE 2 Administrative Conditions	N/A	N/A
2.1	Obligation to Minimise Harm to the Environment The Proponent shall implement all practicable measures to prevent or minimise any harm to the environment that may result from the construction or operation of the project.	<p>An Environmental Management System has been established to manage environmental risks and achieve performance improvements. This framework consists of an Environmental Management Plan (EMP), relevant sub-plans and a Compliance Register.</p> <p>A number of tools are reported to be in place to monitor and measure implementation of the EMS including the Drilling Operations Compliance Checklist, the Gas Gathering System Construction Checklist and the Rehabilitation Checklist (among others).</p> <p>The Environmental Compliance Register (Mipela) was sighted and found to be an effective tool for monitoring compliance against project approval deliverables.</p> <p>It is noted that there were no reported environmental incidents or non-compliances during the audit period. There was one dust complaint (MP1) and several noise complaints (MP22) associated with drilling activities.</p>	Conformance
2.2	Terms of Approval The Proponent shall carry out the project generally in accordance with the:	It was reported that the development is undertaken in accordance with the EMP and sub-plans. On receipt of an approved consent or modification, it was reported that the EMP is revised to reflect the new requirements. This was evidenced by the revision history of the document.	Conformance
2.2(a)	Project Application 06-0291.		Conformance
2.2(b)	EA titled " <i>Environmental Assessment - Expansion of Stage 2 of the Camden Gas Project Stage 2 Concept Area Spring Farm Project Area Menagle Park Project Area</i> ", Volume 1 and 2 prepared by ENSR Australia Pty Ltd and dated December 2007.		Non-Conformance 2
2.2(c)	Submissions Report prepared by ENSR Australia Pty Ltd, and dated December 2007.	It was reported that the development is undertaken in accordance with the EMP and sub-plans. On receipt of an approved consent or	Conformance
2.2(d)	Statement of Commitments.		Conformance

B.10 PA 06-0291 (Spring Farm and Menangle Park)

No.	Consent Condition	Evidence	Finding
2.2(e)	EA titled "Spring Farm and Menangle Park Gas Gathering System Modifications - Gas gathering line MP06 to MP11 and MP11 to MP23 (via MP19) prepared by AGL Gas Production (Camden) Pty Ltd, and dated December 2010.	modification, it was reported that the EMP is revised to reflect the new requirements. This was evidenced by the revision history of the document.	Conformance
2.2(f)	EA titled, "Spring Farm and Menangle Park Gas Gathering System Modifications - Gas gathering line MP03 to MP05" prepared by AGL Gas Production (Camden) Pty Ltd, and dated 24 November 2010.		Conformance
2.2(g)	EA titled "Sprig 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.		Conformance
2.2(h)	Modification Application MP 06_0291 MOD 3 and supporting letter/report headed "Proposed Modification to Project Approval 06_0291", dated 17 January 2011.		Conformance
2.2(i)	Conditions of this approval.		Conformance
2.3	If there is any inconsistency between the above documents, the latter document shall prevail over the former to the extent of the inconsistency. However, the conditions of this consent shall prevail over all other documents to the extent of any inconsistency.	Condition is noted.	No Finding
2.3a	Within 3 months of any modification to this approval, the Proponent shall review and if necessary revise all management and monitoring strategies, plans and programs required under this approval which are relevant to the modification to the satisfaction of the Director-General.	During the audit period, a modification was received (1 January 2011) for the construction and operation of gas gathering lines and under boring under freeway and railway. It was reported that there were no revisions of the EMP and Sub-Plans warranted as a result of this modification.	Conformance
2.4	The Proponent shall comply with any reasonable requirements of the Director-General arising from the Department's assessment of:	Condition is noted.	No Finding
2.4(a)	Any reports, plans, programs or correspondence that are submitted in accordance with this approval.		No Finding
2.4(b)	The implementation of any actions or measures contained in these reports, plans, programs or correspondence.		No Finding
2.5	Limits on Approval This approval shall lapse 21 years after the date of this approval or on the expiry date of petroleum production lease No.4 or Petroleum Lease No. 5 whichever is the sooner.	Condition was not activated during the audit period.	No Finding
2.6	Nothing in this approval permits the drilling and operation of more than four well surface locations in Spring Farm and more than 12 in Menangle Park.	The auditor reviewed the gas wells against the development consent and confirmed that no additional wells have been drilled or operated during the audit period.	Conformance

B.10 PA 06-0291 (Spring Farm and Menangle Park)

No.	Consent Condition	Evidence	Finding
2.7	This approval permits the drilling of well surface locations SF04A, SF10, SF17, and SF20 in Spring Farm. The Proponent shall not drill well surface location SF04.	The auditor sighted the list of wells constructed during the audit period and noted that well surface locations SF04, SF4A and SF10 were not drilled.	Conformance
2.8	This approval permits the drilling of well surface locations MP02, MP03, MP04, MP05, MP06, MP11, MP19, MP21, MP22, MP23, MP24, and MP33 in Menangle Park.	During the audit period, it was reported that the following production wells were drilled: MP01, MP02, MP03, MP05A, MP09, MP10, MP11, MP12, MP22, and MP23. It is noted that well MP01, MP02, MP03, MP09 and MP10 are located at the surface location of MP03. The well MP05A is located at the surface location of MP05. The MP11 and MP22 wells are located at the MP22 well surface location and the MP12 and MP23 wells are at the MP23 well surface location. As such, AGL has achieved conformance against the requirements of this condition.	Conformance
2.9	The Proponent shall not drill more than 6 co-located wells within each well surface location.	The auditor reviewed the gas well map and noted conformance against the requirement of this condition.	Conformance
2.10	The Proponent shall surrender the approval for any well surface location where work has not been commenced within 5 years of the date of this approval.	Condition was not activated during the audit period.	No Finding
2.11	The Proponent shall not construct well surface locations MP04, MP19 and MP21 without the written approval of the Director-General. In seeking the Director-General's approval, the Proponent shall:	Condition was not activated during the audit period.	No Finding
2.11 (a)	In relation to MP04, submit evidence that the Proponent has consulted with Trans grid and/or Integral Energy on the design and location of MP04 and considered the safety issues of the location of gas well(s) adjacent to the Macarthur Substation and its earthing system.		No Finding
2.11 (b)	In relation to MP19 and MP21, submit evidence that the Proponent has consulted with Landcom and Campbelltown City Council on the design and location of MP19 and MP21 in relation to the proposed Spring Farm arterial road and the relevant Menangle Park draft urban layout.		No Finding
2.11 (c)	Provide a detailed site layout plan(s) of the well surface location (condition 1 of Schedule 3); to the satisfaction of the Director-General.		No Finding

B.10 PA 06-0291 (Spring Farm and Menangle Park)

No.	Consent Condition	Evidence	Finding
2.12	The Proponent shall not produce gas from any well unless a Production Lease under the Petroleum (Onshore) Act 1991 has been obtained for the full length of the well.	The auditor sighted the maps of the well sites and the current PPLs and noted that all well surface locations are located a minimum of 4km from the PPL boundaries. As evidenced by the drilling programs of directional wells, the deflection distance of the wells does not extend beyond 3km. As such, it was determined that conformance was achieved against the requirements of this condition.	Conformance
2.13	Within three months of commissioning the wells, the Proponent shall provide Camden Council and Campbelltown City Council with:	A non-conformance was reported against this condition in the 2008-2010 Independent Environmental Audit (24 August 2011).	Non-Conformance 2
2.13 (a)	The Geographical Positioning System (GPS) co-ordinates and digital survey data for the well surface locations and gas gathering system, in a format suitable to the councils.	The auditor sighted correspondence dated 1 November 2011 from AGL to the respective Councils that included the GPS co-ordinates and digital survey data for nominated assets. It is noted that this information was not provided within three months of commissioning of the gas wells and gas gathering system.	Non-Conformance 2
2.13 (b)	The wellhead configuration of each well. The Proponent shall provide a copy of this information to the landowner on request.	Correspondence was sighted on 16 June 2013 from AGL to the respective Councils, which included the wellhead configurations for nominated assets. It is noted that this information was not provided within three months of commissioning of the wells.	Non-Conformance 2
2.14	The Proponent shall:	It was reported that there was no damage to public infrastructure as a result of operations during the audit period.	Conformance
2.14 (a)	Repair, or pay all reasonable costs associated with repairing public infrastructure that is damaged by the project.		Conformance
2.14 (b)	Relocate, or pay all reasonable cost associated with relocating public infrastructure that needs to be relocated as a result of the project.		Conformance
	Where agreement is not reached with the owner on the cost of repairs, the Director-General shall determine the amount considered reasonable.		
2.15	Operation of Plant and Equipment The Proponent shall ensure that all plant and equipment used at the site is:	Preventative maintenance of plant and equipment is controlled through the MEX system. The auditor sighted the MEX system and it was noted that maintenance schedules are defined by usage and manufacturers requirements. It was reported that the MEX system has been operating for eight months but is not fully functional. A back-up system is being maintained until the MEX system achieves the required outcomes.	Conformance
2.15 (a)	Maintained in a proper and efficient condition.		Conformance
2.15 (b)	Operated in a proper and efficient condition.		Conformance

B.10 PA 06-0291 (Spring Farm and Menangle Park)

No.	Consent Condition	Evidence	Finding																	
3	SCHEDULE 3 Environmental Performance	N/A	N/A																	
3.1	Prior to construction commencing at an individual well surface location, the proponent shall submit a Site Layout Plan of the well surface location to the satisfaction of the Director-General. The Site Layout Plan must be prepared in consultation with the Landowner and include details of:	The auditor sighted correspondence from the Department of Planning (now the DoPI) to AGL noting the receipt of site layout plans for all well surface locations constructed during the audit period.	Conformance																	
3.1(a)	The site construction layout and construction footprint.		Conformance																	
3.1(b)	The wellheads and production compound layout.		Conformance																	
3.1(c)	The route of the gas gathering lines and access roads.		Conformance																	
3.1(d)	Initial rehabilitation works following construction.		Conformance																	
3.2	<p>NOISE Construction and Maintenance Hours Except for the drilling (including well casing and grouting) of wells, the Proponent shall comply with the construction and maintenance hours in Table 1:</p> <table border="1"> <thead> <tr> <th>Activity</th> <th>Day</th> <th>Time</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Construction</td> <td>Monday – Friday</td> <td>7:00am to 6:00pm</td> </tr> <tr> <td>Saturday</td> <td>8:00am to 1:00pm</td> </tr> <tr> <td>Sunday and Public Holidays</td> <td>Nil</td> </tr> <tr> <td rowspan="3">Planned maintenance activities (includes well workover)</td> <td>Monday – Friday</td> <td>7:00am to 6:00pm</td> </tr> <tr> <td>Saturday</td> <td>8:00am to 1:00pm</td> </tr> <tr> <td>Sunday and Public Holidays</td> <td>Nil (unless inaudible at any residential receiver)</td> </tr> </tbody> </table>	Activity	Day	Time	Construction	Monday – Friday	7:00am to 6:00pm	Saturday	8:00am to 1:00pm	Sunday and Public Holidays	Nil	Planned maintenance activities (includes well workover)	Monday – Friday	7:00am to 6:00pm	Saturday	8:00am to 1:00pm	Sunday and Public Holidays	Nil (unless inaudible at any residential receiver)	The auditor sighted the Noise Management Sub-Plan (August 2008) and noted conformance with the requirements of this condition. It was reported that this condition is communicated to employees and contractors through the role-specific induction program.	Conformance
Activity	Day	Time																		
Construction	Monday – Friday	7:00am to 6:00pm																		
	Saturday	8:00am to 1:00pm																		
	Sunday and Public Holidays	Nil																		
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B.10 PA 06-0291 (Spring Farm and Menangle Park)

No.	Consent Condition	Evidence	Finding																																												
3.3	<p>Construction Noise Goals</p> <p>The Proponent shall use its best endeavours to undertake construction activities to comply with the construction noise goals specified in Table 2:</p> <p>Table 2: Construction Noise Goals dB(A) Laeq(15min).</p> <table border="1"> <thead> <tr> <th>Location (nearest residential dwelling)</th> <th>Day</th> <th>Evening</th> <th>Night</th> <th>Saturday 1pm-6pm Sunday 7am-6pm</th> </tr> </thead> <tbody> <tr> <td>MP02, MP03, MP04</td> <td>49</td> <td>47</td> <td>41</td> <td>47</td> </tr> <tr> <td>MP05, MP06</td> <td>40</td> <td>40</td> <td>40</td> <td>40</td> </tr> <tr> <td>MP11, MP24, MP33</td> <td>42</td> <td>42</td> <td>40</td> <td>42</td> </tr> <tr> <td rowspan="2">MP19</td> <td>R3</td> <td>40</td> <td>40</td> <td>40</td> </tr> <tr> <td>R25</td> <td>49</td> <td>47</td> <td>41</td> </tr> <tr> <td>MP21, MP22, MP23</td> <td>49</td> <td>47</td> <td>41</td> <td>47</td> </tr> <tr> <td>SF04A</td> <td>43</td> <td>42</td> <td>37</td> <td>42</td> </tr> <tr> <td>SF10, SF17, SF20</td> <td>43</td> <td>41</td> <td>36</td> <td>43</td> </tr> </tbody> </table>	Location (nearest residential dwelling)	Day	Evening	Night	Saturday 1pm-6pm Sunday 7am-6pm	MP02, MP03, MP04	49	47	41	47	MP05, MP06	40	40	40	40	MP11, MP24, MP33	42	42	40	42	MP19	R3	40	40	40	R25	49	47	41	MP21, MP22, MP23	49	47	41	47	SF04A	43	42	37	42	SF10, SF17, SF20	43	41	36	43	<p>The auditor sighted the Noise Management Sub-Plan (August 2008) and noted the inclusion of the construction noise goals as detailed in this condition.</p> <p>Noise monitoring reports prepared by SLR Consulting Pty Ltd during the audit period were sighted in relation to the construction of MP03, MP12, MP22 and MP27. The noise goals specified in this condition were exceeded by 1dBA to 6dBA at well sites MP03 and MP22 on a number of occasions.</p> <p>The auditor sighted reports of actions taken to mitigate noise impacts and determined that AGL applied 'best endeavours' to comply with the specified noise controls. Control measures included noise barriers, monitoring and engineered modifications to the drilling rig.</p>	Conformance
Location (nearest residential dwelling)	Day	Evening	Night	Saturday 1pm-6pm Sunday 7am-6pm																																											
MP02, MP03, MP04	49	47	41	47																																											
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3.4	<p>Construction Noise Management Plan</p> <p>The Proponent shall prepare and implement a Construction Noise Management Plan of the project to the satisfaction of the Director-General. The plan shall be submitted to the Director-General prior to construction commencing and shall include:</p>	<p>The auditor sighted the Noise Management Sub-Plan (August 2008) and noted that the plan conforms to the requirements of this condition.</p>	Conformance																																												
3.4(a)	A detailed description of the measure that would be implemented to achieve the construction noise goals in condition 3.	<p>The auditor sighted correspondence from AGL to the DoPI (10 September 2008 and 1 October 2008) verifying submission of the EMS prior to commencement of construction.</p>	Conformance																																												
3.4(b)	A community notification protocol for the proposed construction activates (including any redrilling or re-fracing of wells).		Conformance																																												
3.4(c)	A description of the measures that would be implemented where the construction noise goals in condition 3 are likely to be achieved or are not being achieved.		Conformance																																												
3.4(d)	Details of who would be responsible for monitoring, reviewing and implementing the plan.		Conformance																																												

B.10 PA 06-0291 (Spring Farm and Menangle Park)

No.	Consent Condition	Evidence	Finding																								
3.5	<p>Operational Noise Criteria The proponent shall ensure that the noise generated by the project does not exceed the noise impact assessment criteria in Table 3:</p> <table border="1"> <thead> <tr> <th>Location (nearest residential dwelling)</th> <th>Day <i>L_{Aeq}(15 minute)</i></th> <th>Evening <i>L_{Aeq}(15 minute)</i></th> <th>Night <i>L_{Aeq}(15 minute)</i></th> </tr> </thead> <tbody> <tr> <td>SF10</td> <td>43</td> <td>42</td> <td>37</td> </tr> <tr> <td>SF04A, SF17, SF20</td> <td>43</td> <td>41</td> <td>36</td> </tr> <tr> <td>MP05, MP06, MP11</td> <td>40</td> <td>40</td> <td>40</td> </tr> <tr> <td>MP19, MP21, MP24, MP33</td> <td>42</td> <td>42</td> <td>40</td> </tr> <tr> <td>MP02, MP03, MP04, MP22, MP23</td> <td>49</td> <td>45</td> <td>40</td> </tr> </tbody> </table>	Location (nearest residential dwelling)	Day <i>L_{Aeq}(15 minute)</i>	Evening <i>L_{Aeq}(15 minute)</i>	Night <i>L_{Aeq}(15 minute)</i>	SF10	43	42	37	SF04A, SF17, SF20	43	41	36	MP05, MP06, MP11	40	40	40	MP19, MP21, MP24, MP33	42	42	40	MP02, MP03, MP04, MP22, MP23	49	45	40	<p>The auditor sighted the Noise Management Sub-Plan (August 2008) and noted the inclusion of the operational noise criteria as detailed in this condition.</p> <p>Wilkinson Murray undertook noise monitoring on 30 September 2011 (MP12/MP23, MP05/MP05A/MP07/MP08, SF01/SF02/SF03, and SF05/SF07/SF08/SF09), 22 May 2012 (MP11 and MP22) and 8 June 2012 (MP02, MP03, MP09 and MP10). Assessment reports sighted by the auditor conform to the noise goals defined by this condition.</p> <p>There were no reported noise complaints associated with operations during the audit period.</p>	Conformance
Location (nearest residential dwelling)	Day <i>L_{Aeq}(15 minute)</i>	Evening <i>L_{Aeq}(15 minute)</i>	Night <i>L_{Aeq}(15 minute)</i>																								
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3.6	<p>Continuous Improvement The Proponent shall, to the satisfaction of the Director-General:</p>	<p>The auditor sighted the Noise Management Plan (August 2008) and noted the inclusion of noise mitigation measures. It was also reported in the 2010/11 AEPR that AGL has been actively working with drilling companies to attenuate noise from drill rigs.</p>	Conformance																								
3.6(a)	Implement all reasonable and feasible best practice noise mitigation measures.		Conformance																								
3.6(b)	Investigate ways to reduce the noise generated by the project.		Conformance																								
3.6(c)	Report on these investigations and the implementation and effectiveness of these measures in the AEMR.		Conformance																								

B.10 PA 06-0291 (Spring Farm and Menangle Park)

No.	Consent Condition	Evidence	Finding
3.7	<p>Noise Monitoring Program</p> <p>The Proponent shall prepare and implement a Noise Monitoring Program for the construction and operation of the project to the satisfaction of the Director-General. The Program shall be submitted to the Director-General prior to construction commencing and shall include a noise monitoring protocol for evaluating compliance with the construction noise goals and the operational noise impact assessment criteria in this approval.</p>	<p>A non-conformance was reported against this condition in the 2008-2010 Independent Environmental Audit (24 August 2011) due to inconsistent implementation of the noise monitoring program.</p> <p>The auditor sighted the Noise Management Plan (August 2008) and noted that monitoring is required during the initial stage of production and once a well has reached steady state production.</p> <p>As evidenced by noise monitoring reports, monitoring during the initial stage of production was undertaken during the audit period for MP01, MP02, MP03, MP09, MP10, MP11 and MP22. Monitoring during the steady stage of production was completed for SF 1, SF2, SF3, SF5 and SF6.</p> <p>The monitoring records for steady state of production were not complete for all wells that achieved steady state production during the audit period.</p> <p>Further, the Noise Management Plan (August 2008) was revised during the audit period but not submitted to the Director-General.</p>	Non-Conformance 2
3.8	<p>Air Quality</p> <p>The Proponent shall implement all practicable measures to minimise dust emissions generated by the construction and operation of the project to the satisfaction of the Director-General.</p>	<p>It was noted by the auditor that a number of dust mitigation measures are detailed in the Air Quality Management Sub-Plan (August 2008).</p> <p>There were four reported dust complaints received during the audit period in relation to vehicles travelling on the access road to MP03 and the access road to MP12/MP22. The complaints were received between October 2010 and August 2011. In each case, a water cart was deployed to the site and speed limits were communicated to relevant AGL employees and contractors. Road upgrades were also undertaken at MP12/ MP23 to minimise dust.</p>	Conformance
3.9	<p>WATER</p> <p>Soil and Water Management Plan</p> <p>The proponent shall prepare and implement a Soil and Water Management Plan for the project to the satisfaction of the Director-General. The plan shall be submitted to the Director-General prior to construction commencing and shall:</p>	<p>The auditor sighted the Soil and Water Management Sub-Plan (July 2012) and noted that conformance against the requirements of this condition.</p> <p>The auditor sighted correspondence between AGL and the DoPI (10</p>	Conformance

B.10 PA 06-0291 (Spring Farm and Menangle Park)

No.	Consent Condition	Evidence	Finding
3.9(a)	Be consistent with the requirements in <i>Managing Urban Stormwater: Soils and Construction, Volume 1, 4th Edition, 2004</i> (Landcom).	September 2008 and 1 October 2008) verifying submission of the EMS (EMP and Sub-Plans) prior to commencement of operations.	Conformance
3.9(b)	Identify construction and operation activities that could cause soil erosion and generate sediment.		Conformance
3.9(c)	Describe measure to minimise soil erosion and the potential for the transport of sediment to downstream waters.		Conformance
3.9(d)	Describe the location, function, and capacity of erosion and sediment control structures for both construction and operation.		Conformance
3.9(e)	Describe what measures would be implemented to maintain the structures over time.		Conformance
3.9(f)	Describe the procedures that would be followed for planned and unplanned water discharges from the site.		Conformance
3.9A	The Proponent shall ensure that, in respect of any underboring of the Upper Canal, the underbore works shall be undertaken and monitored to the satisfaction of the Sydney Catchment Authority, and:	Condition was not activated during the audit period.	No Finding
3.9A (a)	Must proceed at a reduced force or load if vibration levels exceed 2.4 millimetres per second (mm/s).		No Finding
3.9A (b)	Must halt if vibration levels exceed 3mm/s, except with the prior agreement of the Sydney Catchment Authority.		No Finding
3.9B	The Proponent shall ensure that the design and construction of any watercourse crossing must be undertaken by a suitably qualified person in accordance with the Guidelines for Watercourse Crossings (NOW, 2010)	The auditor sighted correspondence from the consultancy EMM (24 June 2013) confirming that the design and construction of watercourse crossings occurred in accordance with relevant guidelines.	Conformance
3.10	Gas Gathering System The Proponent shall, to the satisfaction of the Director-General, ensure that:	The auditor sighted the EMP and relevant sub-plans and noted conformance with the requirements of this condition.	Conformance
3.10 (a)	Pipelines are designed, constructed and operated in accordance with the Australian Standard for the Installation and Maintenance of Plastic Pipe Systems for Gas AS 3723-1989 (or its latest version).		Conformance
3.10 (b)	The route of gas gathering and water transport systems and access roads follow previously or currently disturbed areas wherever possible.		Conformance
3.10 (c)	Trenches are not left open overnight, unless adequately covered.		Conformance
3.10 (d)	Works within 20 metres of watercourses are only undertaken during dry weather conditions.		Conformance

B.10 PA 06-0291 (Spring Farm and Menangle Park)

No.	Consent Condition	Evidence	Finding
3.10 (e)	Construction activities do not impede lateral water flows.		Conformance
3.10 (f)	No crown or camber remains along any gas gathering system line, following rehabilitation.		Conformance
3.10 (g)	Signs are erected at intervals along all gas gathering system lines indicating the presence of a buried gas pipeline.		Conformance
3.10 (h)	Impacts to riparian vegetation and endangered ecological communities are minimised.		Conformance
3.10 (i)	Impacts to the Cumberland Land Snail (<i>Meridolum corneovirens</i>) are negligible.		Conformance
3.11	Should the future urban development of the Spring Farm and Menangle Park urban release areas identify the need to relocate any gas gathering lines the subject of this approval, that infrastructure shall be relocated by, and at the cost of the Proponent to the satisfaction of the Director-General, following consultation with the relevant council and/or landowner. The requirement to relocate at the cost of the Proponent shall be limited to one occasion.	Condition was not activated during the audit period.	No Finding
3.12	FLOOD MANAGEMENT The Proponent shall prepare and implement a Flood Management Plan for well surface location within the 1 in 100 year flood level, to the satisfaction of the Director-General. The plan shall be submitted to the Director-General prior to the commissioning of the wells and shall include measure to minimise and mitigate flooding impacts associated to one occasion.	The auditor sighted the Emergency Response Plan (August 2008) and noted the inclusion of controls to minimise and mitigate flooding impacts. Correspondence was sighted from AGL to the DoPI (10 September 2008 and 1 October 2008) verifying submission of the EMS (including the Emergency Response Plan) prior to commencement of operations.	Conformance

B.10 PA 06-0291 (Spring Farm and Menangle Park)

No.	Consent Condition	Evidence	Finding
3.13	<p>WASTE MANAGEMENT</p> <p>The Proponent shall ensure that any waste or wastewater (including drill pits and drill/formation waters) is assessed and classified in accordance with the OEH's Environmental Guidelines: "<i>Assessment Classification and Management of Liquid and Non-Liquid Wastes</i>", and disposed of at a licensed waste disposal facility or as otherwise agreed with the OEH.</p>	<p>The auditor sighted the EMP for the CGP, including the Soil and Water Management Sub-Plan (July 2012) and the Waste Management Sub-Plan (August 2008).</p> <p>It was noted that details of the reuse and recycling of wastewater produced on site, including collection and handling procedures, were not provided. It was reported by site personnel that produced water is reused in drilling works and workovers at other sites within the Camden Gas Project. The reuse process is guided by supply and demand. The produced water is reportedly analysed in-house and the level of suspended (coal fines) solids are assessed to determine if water is suitable for reuse.</p>	Non-Conformance 2
3.14	<p>HAZARD AND RISK</p> <p>Safety and Risk Management</p> <p>The Proponent shall prepare and implement an Emergency Plan for the project to the satisfaction of the Director-General. The plan shall be submitted to the Director-General prior to commissioning of the project and shall be prepared in accordance with the Department's <i>Hazardous Industry Planning Advisory paper No. 1 - Industry Emergency Planning Guidelines</i>.</p>	<p>The auditor sighted the Emergency Response Plan (August 2008) and noted conformance with the requirements of this condition.</p> <p>The auditor sighted correspondence from AGL and the DoPI (10 September 2008 and 1 October 2008) verifying submission of the EMS prior to commencement of operations.</p>	Conformance
3.15	The Proponent shall prepare and implement a Safety Management System (SMS) for the project, to the satisfaction of the Director-General	The auditor sighted the Health and Safety Management Plan, Camden Project NSW (3 August 2011) and noted conformance with the requirements of this condition.	Conformance
3.16	<p>Compliance Report</p> <p>Within 3 months of commissioning of the project, the Proponent shall prepare a compliance report to the satisfaction of the Director-General. The report shall be prepared by a suitably qualified, experienced, and independent expert whose appointment has been endorsed by the Director-General and shall include:</p>	A non-conformance was reported against this condition in the 2008-2010 Independent Environmental Audit (24 August 2011) due to failure to prepare and submit a compliance report within three months of commencement of operation of the development.	Non-Conformance 1
3.16 (a)	Dates of commencement of construction and commissioning.	The Compliance Report was commissioned in 2012 following DoPI approval on 17 August 2012 of an independent expert. To date, the Compliance Report has not been submitted to the Director-General.	Non-Conformance 1
3.16 (b)	Actions taken (or proposed to be taken) to implement conditions 10 and 11.		Non-Conformance 1

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No.	Consent Condition	Evidence	Finding
3.16 (c)	<p>A signed statement that:</p> <ul style="list-style-type: none"> the Emergency Plan required under condition 14 is effectively in place and that at least one emergency exercise has been conducted; the SMS required under condition 15 has been fully implemented and that records required by the system are being kept; the Emergency Plan and SMS have been prepared in accordance with the relevant Hazardous Industry Planning Advisory Paper; all recommendations of the QRA, Emergency Plan and SMS have been implemented and are being maintained; and all safety management systems and their associated risk controls have been implemented and are being maintained. 		Non-Conformance 1
3.17	<p>LANDSCAPE AND REHABILITATION</p> <p>The Proponent shall progressively rehabilitate the site to the satisfaction of the Director-General, in a manner that is generally consistent with the landform of the surrounding land.</p>	<p>The auditor sighted a number of well sites that were being progressively rehabilitated, including MP03, EM26, KP06, SF01/SF02/SF03 and SF05/SF07/SF08/SF09. With the exception of MP03, rehabilitation works were deemed to be effective and consistent with the surrounding landform.</p> <p>Rehabilitation of MP03 has been of limited success and areas of the site were unsealed and eroding. It is recommended that additional landscape works be undertaken to reduce erosion and promote vegetation establishment.</p>	Conformance-Improvement Opportunity
3.18	The Proponent shall prepare and implement a Landscape and Rehabilitation Management Plan for each well surface location, to the satisfaction of the Director-General. This Plan must:	Rehabilitation is undertaken in accordance with the Rehabilitation and Landscape Management Sub-Plan (July 2012). Numerous examples of site-specific plans were sighted by the auditor, including correspondence to verify landowner consultation (e.g. SF01/02/03, SF05/07/08/09 and MP01/02/03/09/10, MP22, MP23, SF17, SF20).	Conformance
3.18 (a)	Be prepared in consultation with the landowner by suitably qualified experts.		Conformance
3.18 (b)	Be submitted to the Director-General for approval prior to commissioning.		Conformance
3.18 (c)	<p>Describe in detail the short, medium and long term measures that would be implemented to:</p> <ul style="list-style-type: none"> rehabilitate the site implement planting of native vegetation; manage the remnant vegetation and habitat on the site; and landscape the site to mitigate visual impacts of the project. 		Conformance

B.10 PA 06-0291 (Spring Farm and Menangle Park)

No.	Consent Condition	Evidence	Finding
3.18 (d)	Include a description of what measures would be implemented to rehabilitate the site.		Conformance
3.18 (e)	Provide details on who is responsible for monitoring, reviewing and implementing the plan.		Conformance
3.19	The Proponent shall consult with the landowner in the selection of fencing and other material to be used for landscaping, to the satisfaction of the Director-General.	The auditor sighted the Rehabilitation and Landscape Management Sub-Plan (July 2012) and noted the inclusion of this condition. It was reported that there were no rehabilitation works undertaken during the audit period.	Conformance
3.20	ABORIGINAL HERITAGE The Proponent shall prepare and implement an Aboriginal Heritage Management Plan for the project, in consultation with the DEC and relevant Aboriginal communities, and to the satisfaction of the Director-General. The plan shall be submitted to the Director-General prior to commencing construction (or as otherwise agreed by the Director-General) and shall include:	The auditor sighted the Aboriginal Cultural Heritage Management Plan (2008) and noted the inclusion of high level principles for consultation, mapping, salvage or relocation of known and unknown relics. There was no reported construction works associated with the sites nominated in condition 3.20a.	Conformance
3.20 (a)	A description of the measures that would be implemented for the mapping, and salvage or relocation of the archaeological relics on EMAI Sites 1, 2 4, 5, 6, and 7; CP OS 3; and IF 1 and IF 2.		Conformance
3.20 (b)	A description of the measures that would be implemented if any new Aboriginal objects are discovered during the project.		Conformance
3.20 (c)	A protocol for the ongoing consultation and involvement of the Aboriginal communities in the conservation and management of Aboriginal cultural heritage on the site.		Conformance
3.21	HERITAGE The Proponent shall ensure that the location of wells or other infrastructure avoid or minimise any impacts on the heritage significance of any state heritage register listed items in the project area.	Condition was not activated during the audit period.	No Finding
3.22	TRAFFIC AND TRANSPORT The Proponent shall prepare and implement a Construction Traffic Management Plan for the project, in consultation with the RTA, Camden Council and Campbelltown City Council, and to the satisfaction of the Director-General. The Plan shall be submitted to the Director-General prior to construction commencing (or as otherwise agreed by the Director-General) and shall include:	The auditor sighted the Traffic Management Sub-Plan (August 2008) and noted that the Plan conforms to the requirements of this condition. The auditor sighted correspondence from AGL to the DoPI (10	Conformance

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No.	Consent Condition	Evidence	Finding
3.22 (a)	A description of the measures that would be implemented to: <ul style="list-style-type: none"> - maintain access; - minimise the potential noise and safety impacts associated with the construction of the gas gathering lines and construction traffic; and - keep the community informed of any traffic disruptions that would be caused by the project. 	September 2008 and 1 October 2008) verifying submission of the EMS (including the Traffic Management Sub-Plan) prior to commencement of operations. Correspondence was also sighted from AGL to the RTA (1 October 2008) to demonstrate consultation prior to commencement of works.	Conformance
3.22 (b)	Traffic control plans where appropriate.		Conformance
3.23	Prior to under-boring the South Western (F5) Freeway or Menangle Road, the Proponent shall consult with the RTA to obtain its requirements for construction, and shall ensure that under-boring of the Freeway, Menangle Road, is conducted to the satisfaction of the RTA.	The auditor sighted correspondence from the Roads and Traffic Authority (30 May 2011) verifying the request for comment from AGL.	Conformance
3.23A	Prior to under-boring the Main Southern Railway Line, the Proponent shall submit detailed design plans to the ARTC for review, and obtain its requirements for construction. The Proponent shall ensure that under-boring of the Railway Line is conducted to the satisfaction of the ARTC.	The auditor sighted a licence issued by the ARTC on 2 May 2011 detailing controls for undertaking the proposed works.	Conformance
3.23B	The Proponent shall ensure that the design, location and construction of any road underboring in the vicinity of the Jim Affleck Bridge and underboring of the proposed link road between Menangle Road and the F5 must be undertaken in consultation with, and to the satisfaction of the RTA.	The auditor sighted correspondence from the Roads and Traffic Authority (30 May 2011) verifying the request for comment from AGL.	Conformance
3.23C	The Australian Botanic Garden, Mount Annan The Proponent shall ensure that the design, location and construction of any underboring within the Australian Botanic Garden, Mount Annan, must be undertaken in consultation with, and to the satisfaction of, the Botanic Gardens Trust, and must take into consideration the "Guidelines for developments adjoining land and water managed by the DECCW" (DECCW, 2010).	Condition was not activated during the audit period.	No Finding
3.24	ONGOING OPERATIONS Community Notification The Proponent shall give written notification of planned maintenance activities (including well workover) to landowners, potentially affected residences and identified noise sensitive receivers at least 14 days prior to work commencing. The notification is to include:	The auditor sighted the Noise Management Sub-Plan (August 2008) and noted a requirement to notify affected receivers five days prior to planned maintenance activities. It is noted that this does not conform to the condition, which requires two weeks advance notification.	Non-Conformance 2
3.24 (a)	Information explaining the maintenance procedures to be undertaken.	It was reported by AGL that notification of workovers have not been undertaken in the past as this was not deemed to be warranted. However, it was acknowledged that changes in surrounding land uses may trigger this requirement in the future.	Non-Conformance 2

B.10 PA 06-0291 (Spring Farm and Menangle Park)

No.	Consent Condition	Evidence	Finding
3.24 (b)	An estimate of the length of works at each site.		Non-Conformance 2
3.24 (c)	Contact details for a representative of the Proponent.		Non-Conformance 2
3.24 (d)	Information regarding a 24 hour telephone contact number.		Non-Conformance 2
3.25	Redrilling and Refracking The Proponent shall obtain the approval of the Director-General prior to undertaking work involving the redrilling and/or re-fracking of wells approved under this approval.	It was reported that there was no redrilling or fracking undertaken during the audit period.	No Finding
3.26	Reporting The Proponent may satisfy conditions 4, 7, 9, 12, 15, 18, 20 and 22 in schedule 3 of this approval by demonstrating to the satisfaction of the Director-General that existing equivalent documentation has been appropriately updated to reflect the expansion of stage 2 of the Camden Gas Project.	The auditor sighted correspondence from AGL to the DoPI (10 September 2008 and 1 October 2008) verifying submission of the EMS (including Sub-Plans) prior to commencement of operations.	Conformance
4.1	SCHEDULE 4 ENVIRONMENTAL MANAGEMENT AND MONITORING Environmental Management Plan The Proponent shall prepare and implement an Environmental Management Plan (EMP) for the construction and operation of the project to the satisfaction of the Director-General. The EMP shall be submitted to the Director-General prior to the construction of the project and shall:	The auditor sighted the Environmental Management Plan (July 2012) and noted that the content conforms to the requirements of this condition.	Conformance
4.1(a)	Incorporate the various environmental management plans, monitoring programs and other requirements set out in schedule 3 of this approval.		Conformance
4.1(b)	Identify statutory and other obligations that the Proponent is required to fulfil during the construction and operation of the project.		Conformance
4.1(c)	Describe the environmental policies and principles to be applied to the project.		Conformance

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No.	Consent Condition	Evidence	Finding
4.1(d)	Describe in general how the environmental performance of the project would be monitored and managed.	An improvement opportunity was noted in relation to objectives and targets. The EMP includes an extensive number of objectives and targets for each environmental aspect. It was reported that performance against targets is not currently measured. It is recommended that objectives and targets be established for significant environmental aspects only. Performance against the targets should then be measured to drive continual improvement of performance.	Conformance-Improvement Opportunity
4.1(e)	Describe the procedure that would be implemented to: <ul style="list-style-type: none"> - keep the local community and relevant agencies informed about the environmental performance of the project; - receive, handle and respond to, and record complaints - resolve disputes that may arise during the course of the project; - respond to any non-conformance; - manage cumulative impacts; and - respond to emergencies (including bushfires). 	The auditor sighted the Environmental Management Plan (July 2012) and noted that the content conforms to the requirements of this condition.	Conformance
4.1(f)	Describe the role, responsibility, authority and accountability of all the key personnel involved in the environmental management of the project.		Conformance
4.2	INCIDENT REPORTING Within 7 days of detecting an exceedance of the goals/limits/performance criteria in this approval or an incident causing (or threatening to cause) material harm to the environment; the Proponent shall report the exceedance/incident to the Department (and any relevant agency). The report shall:	The auditor sighted the Emergency Response Plan (October 2008) and noted conformance to the requirements of this condition. There were no reported environmental incidents associated with this development consent during the audit period.	Conformance
4.2(a)	Describe the date, time, and nature of the exceedance/incident.		Conformance
4.2(b)	Identify the cause (or likely cause) of the exceedance/incident.		Conformance
4.2(c)	Describe what action has been taken to date.		Conformance
4.2(d)	Describe the proposed measures to address the exceedance/incident.		Conformance
4.3	ANNUAL REPORTING Within 12 months of the date of this approval, and annually thereafter during the life of the project, the Proponent shall prepare an Annual Environmental Performance Report (AEPR) for the project to the satisfaction of the Director-General. The AEPR shall:	The auditor sighted the Annual Environmental Performance Reports for July 2011 and July 2012 and noted conformance to the requirements of this condition.	Conformance
4.3(a)	Identify the standards, performance measures and statutory requirements that apply to the project.		Conformance

B.10 PA 06-0291 (Spring Farm and Menangle Park)

No.	Consent Condition	Evidence	Finding
4.3(b)	Assess the environmental performance of the project to determine whether it is complying with these standards, performance measures, and statutory requirements.		Conformance
4.3(c)	Identify any non-compliance during the year with the conditions of this approval or any standard, performance measure or statutory requirement that applies to the project.		Conformance
4.3(d)	Describe, if any non-compliance is identified, the actions and measures carried out or being carried out to ensure compliance, clearly indicating who would carry out these actions and measures, when they would be carried out, and how the effectiveness of these measures would be monitored over time.		Conformance
4.3(e)	Include a copy of complaints for the year and a description of actions taken or being taken to address registered complaints.		Conformance
4.3(f)	Include a discussion of issues or recommendations raised by the Camden Gas Project's Community Consultative Committee and a description of actions taken or being taken to address these issues or recommendations.	The 2011 AEPR does not provide details of actions taken to address any issues and/or recommendation raised by the Community Consultative Committee. The report only notes that all issues were closed. This matter was rectified in the 2012 AEPR.	Non-Conformance 2
4.3(g)	Include a detailed summary of results of all monitoring required by this approval and a discussion of any significant results, trends or exceptions in these results, Note: The Proponent may include this report in the Annual Environmental Performance Report required under Schedule 5 condition 5 of development consent DA-282-6-2003-i, dated 16 June 2004. The due date for a combined report shall be the earlier of the due dates for the separate reports.	The auditor sighted the Annual Environmental Performance Reports for July 2011 and July 2012 and noted conformance to the requirements of this condition.	Conformance
4.4	The Proponent shall submit a copy of the AEPR to the OER, OEH and Council.	The auditor sighted evidence of submission of the AEPR to relevant authorities and verified that the AEPR is publicly available via the AGL Camden website.	Conformance
4.5	INDEPENDENT ENVIRONMENTAL AUDIT Within 2 years of the date of this approval, and every 3 years thereafter, unless the Director-General directs otherwise, the Proponent shall commission and pay the full costs of an Independent Environmental Audit. The Independent Environmental Audit shall:	The scope of this 2010-2012 Independent Environmental Audit satisfies this condition.	Conformance
4.5(a)	Be conducted by a suitably qualified, experienced, and independent person(s) whose appointment has been approved by the Director-General.		Conformance
4.5(b)	Be consistent with ISO 19011:2002 - Guidelines for Quality and/or Environmental Management Systems Auditing, or updated versions of these guidelines/manuals.		Conformance

B.10 PA 06-0291 (Spring Farm and Menangle Park)

No.	Consent Condition	Evidence	Finding
4.5(c)	Assess the environmental performance of the project, and its effects on the surrounding environment.		Conformance
4.5(d)	Include a hazard audit of the project in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 5, "Hazard Audit Guidelines".	<p>The auditor sighted the 'Hazard Audit Report for Sydney Gas Operations, (3 March 2006) and a draft report of the 2012 audit.</p> <p>The audits were not conducted every three years as required by this condition. Furthermore, the 2012 audit has not been finalised and submitted to the Director-General.</p>	Non-Conformance 1
4.5(e)	Assess whether the project is complying with the relevant standards, performance measures and statutory requirements.	The scope of this 2010-2012 Independent Environmental Audit satisfies this condition.	Conformance
4.5(f)	Review the adequacy of the OEMP.		Conformance
4.5(g)	Recommend measures or actions to improve the environmental performance of the project, and/or its environmental management and monitoring systems.		Conformance
4.6	Within 3 month of completion of each Independent Environmental Audit, the Proponent shall submit a copy of the audit report to the Director-General, OER and OEH, with a response to any of the recommendations contained in the audit report.	The auditor sighted correspondence confirming that the 2010-2012 Independent Environmental Audit (24 August 2011) was submitted to relevant authorities within one month of completion.	Conformance
4.7	Following each Independent Environmental Audit, the Proponent shall review and if necessary revise the EMP (and any documents contained in the plan), to the satisfaction of the Director-General. The revised EMP shall be submitted to the Director-General within 6 months of completing the audit.	<p>A non-conformance was reported against this condition in the 2008-2010 Independent Environmental Audit (24 August 2011) due to failure to provide evidence of submission of the EMP to the Director-General.</p> <p>Following the 2008-2010 Independent Audit (24 August 2011), the EMP, Soil and Water Management Sub-Plan (July 2012), and Rehabilitation and Landscape Management Plan (July 2012) were revised and submitted to the DoPI.</p> <p>The Noise Management Sub-Plan required amendments in response to the 2008-2010 Independent Environmental Audit. The Plan was revised, but not submitted to the DoPI.</p>	Non-Conformance 2
4.8	<p>COMMUNITY CONSULTATIVE COMMITTEE</p> <p>The Proponent shall ensure that the construction and operation of the project is subject to the consideration of the Camden Gas Project Community Consultative Committee, as established under Schedule 5 condition 17 of development consent DA No. 282-6-2003-I, dated 16 June 2004.</p>	The auditor sighted relevant documentation including meeting minutes and verified conformance with the requirements of this condition.	Conformance

B.10 PA 06-0291 (Spring Farm and Menangle Park)

No.	Consent Condition	Evidence	Finding
4.9	ACCESS TO INFORMATION Within 1 month of the approval of any plan/strategy/program required under this approval (or any subsequent revision of these plans/strategies/programs), or the completion of the audits or AEMR required under this approval, the Proponent shall:	The auditor sighted correspondence to verify distribution of the AEMR and independent audit to relevant agencies and the CCC. It was noted that all plans, programs, audits and the AEMR are available on the AGL Camden website.	Conformance
4.9(a)	Provide a copy of the relevant document(s) to the relevant agencies and the CCC.		Conformance
4.9(b)	Ensure that a copy of the relevant document(s) is made publicly available on its website.		Conformance
4.10 (a)	During the project, the Proponent shall: Make a summary of all environmental monitoring results required under this approval publicly available on the website.	Environmental monitoring results required under this approval are available on the AGL website.	Conformance
4.10 (b)	Update these results on a regular basis (at least every 6 months) or as required.	A non-conformance was reported against this condition in the 2008-2010 Independent Environmental Audit (24 August 2011) due to the AGL website being out of date. Noise monitoring results are only communicated through the AEPR (available on the website on an annual basis) and not updated every six months.	Non-Conformance 2
4.11	Reporting The Proponent may satisfy conditions 1, 3 and 5 in schedule 4 of this approval by demonstrating to the satisfaction of the Director-General that existing equivalent documentation has been appropriately updated to reflect the expansion of Stage 2 of the Camden Gas Project.	A non-conformance was reported with respect to elements of conditions 4-3 and 4-5. As such, all required documentation has not been updated to reflect the expansion of Stage 2 of the Camden Gas Project.	Non-Conformance 2

Appendix C: Environment Protection Licence

C.1 EPL 12003

No.	Consent Condition	Evidence	Finding
1	ADMINISTRATIVE CONDITIONS	N/A	N/A
A1.1	What the Licence authorises and regulates This licence authorises the carrying out of the scheduled activities listed below at the premises: Petroleum and fuel production, > 200,000 - 500,000 T produced.	The auditor sighted the Annual Return spread sheets for the periods ending 21 December 2010 and 21 December 2011 and noted conformance to the requirements of this condition.	Conformance
A2.1	Premises or plant to which this licence applies The licence applies to the following premises: Rosalind Park Gas Plant	Condition noted.	No Finding
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	Condition noted.	No Finding
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.	No Finding
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 evidence of the gas gathering reticulation system register and noted conformance with the requirements of this condition.	Conformance
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 as described in the table above. 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 25m x 25m.	The auditor sighted a number of operations during the course of the audit including: a) Well construction - MP25 b) Workovers - MP03, SF05/SF07/SF08/SF09 An improvement opportunity was noted in relation to housekeeping. During the construction of MP25, it was noted that a number of materials were stored outside of the fenced compound including empty plastic storage tanks, storage containers and equipment not in use. It is recommended that all materials are stored within the fenced compound.	Conformance

C.1 EPL 12003

No.	Consent Condition	Evidence	Finding
A3.1	Information Supplied to the EPA 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. In this condition the reference to "the licence application" includes a reference to:	Condition noted.	No Finding
A3.1(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.		No Finding
A3.1(b)	The licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this licence.		No Finding
2	DISCHARGES TO AIR AND WATER AND APPLICATIONS TO LAND	N/A	N/A
P1	Location of monitoring/discharge points and areas	N/A	N/A
P1.1	The following points referred to in the table (Licence Section P1.1) 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.	Condition noted.	No Finding
3	LIMIT CONDITIONS	N/A	N/A
L1	Pollution of Waters	N/A	N/A
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.	The auditor sighted the EMP for the CGP, including the Soil and Water Management Sub-Plan (July 2012) and the Waste Management Sub-Plan (August 2008). The plans detail a number of controls to prevent the pollution of water.	Conformance
L2	Load Limits	N/A	N/A
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 L2.1 Note: An assessable pollutant is a pollutant which affects the licence fee payable for the licence.	The auditor sighted the AGL spread sheet 'LBL Summary 2010-11 RPGB' 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.	Conformance

C.1 EPL 12003

No.	Consent Condition	Evidence	Finding																										
L2.2	<p>The actual load of an assessable pollutant must be calculated in accordance with the relevant load calculation protocol.</p> <table border="1"> <thead> <tr> <th>Assessable Pollutant</th> <th>Load limit (kg)</th> </tr> </thead> <tbody> <tr> <td>Arsenic (Air)</td> <td></td> </tr> <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>Fine Particulates (Air)</td> <td>460.00</td> </tr> <tr> <td>Hydrogen Sulfide (Air)</td> <td>1.60</td> </tr> <tr> <td>Lead (Air)</td> <td></td> </tr> <tr> <td>Mercury (Air)</td> <td></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>Sulfur Oxides (Air)</td> <td>3000.00</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)	Arsenic (Air)		Benzene (Air)	47.00	Benzo(a)pyrene (equivalent) (Air)	0.27	Fine Particulates (Air)	460.00	Hydrogen Sulfide (Air)	1.60	Lead (Air)		Mercury (Air)		Nitrogen Oxides - Summer (Air)		Nitrogen Oxides (Air)	103000.00	Sulfur Oxides (Air)	3000.00	Volatile organic compounds - Summer (Air)		Volatile organic compounds (Air)	33000.00	<p>The auditor sighted the AGL spread sheet 'LBL Summary 2010-11 RPGB' which details the load calculations based on quarterly or annual monitoring results. It was reported that the spread sheet and methodology for calculating loads was developed by Sydney Gas. The spread sheet was recently reviewed by Pacific Hydro Limited (correspondence dated 13 February 2013) to ensure compliance with licence reporting requirements.</p>	Conformance
Assessable Pollutant	Load limit (kg)																												
Arsenic (Air)																													
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Volatile organic compounds (Air)	33000.00																												
L3	Concentration Limits	N/A	N/A																										

C.1 EPL 12003

No.	Consent Condition	Evidence	Finding																																																																								
L3.1	<p>For each monitoring/discharge point or utilisation area specified in the tables 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>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 SO3)	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 SO3)	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 SO3)	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	<p>The auditor sighted the quarterly air monitoring results for the audit period prepared by EML Air Pty Ltd and noted conformance with concentration limits.</p> <p>It was noted that 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>	Conformance-Improvement Opportunity
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																																																																						
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L3.2	Where a pH quality limit is specified in the table, the specified percentage of samples must be within the specified ranges.	Condition was not activated during the audit period.	No Finding																																																																								
L3.3	To avoid any doubt, this condition does not authorise the pollution of waters by any pollutant other than those specified in the table\\$.	Condition noted.	No Finding																																																																								

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No.	Consent Condition	Evidence	Finding															
L3.4	Air Concentration Limits Note: Should the licensee seek to revise the concentration limits as specified in Condition L3.1 for nitrogen oxides, the licensee must demonstrate that:	Condition was not activated during the audit period.	No Finding															
L3.4(a)	The revised emission limit is representative of the proper and efficient maintenance and operation of the equipment.		No Finding															
L3.4(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.		No Finding															
L3.4(c)	The revised emission limit is supported by Manufacturers Design Specification.		No Finding															
L3.4(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.		No Finding															
L4	Waste	N/A	N/A															
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.</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. This condition does not limit any other conditions in this licence.</p> <table border="1"> <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 spread sheet for the financial years 2010/11 and 2011/12. These spread sheets provide a detailed record of waste streams generated, recycled/reused and disposed, including concrete and steel, water, hazardous waste, non-hazardous waste, and ozone-depleting substances.</p> <p>It was reported that there was no waste received at the premises.</p>	Conformance
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	Evidence	Finding															
L4.2	Asbestos 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.	Condition was not activated during the audit period.	Conformance															
L5	Noise Limits	N/A	N/A															
L5.1	Noise from the premises must not exceed the noise limits in the table below. Note: Pressure safety valve (discharge) and pressure safety valve (suction) flaring events are exempted from the limits in condition L5.1. <table border="1" data-bbox="322 549 1140 707"> <thead> <tr> <th>Receiver Location</th> <th>Day LAeq(15 minute)</th> <th>Evening LAeq(15 minute)</th> <th>Night LAeq(15 minute)</th> <th>Flaring (night) LAeq(15 minute)</th> </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 LAeq(15 minute)	Evening LAeq(15 minute)	Night LAeq(15 minute)	Flaring (night) LAeq(15 minute)	R1 Medhurst Road, Gilead	35	35	35	45	R7 Mt. Gilead, Gilead	37	36	36	45	The auditor sighted quarterly noise reports prepared by Wilkinson Murray in 2010/11 and 2011/12 and noted conformance with the requirements of this condition.	Conformance
Receiver Location	Day LAeq(15 minute)	Evening LAeq(15 minute)	Night LAeq(15 minute)	Flaring (night) LAeq(15 minute)														
R1 Medhurst Road, Gilead	35	35	35	45														
R7 Mt. Gilead, Gilead	37	36	36	45														
L5.2	For the purposes of condition L5.1:	The auditor sighted quarterly noise reports prepared by Wilkinson Murray in 2010/11 and 2011/12 and noted conformance with the requirements of this condition.	Conformance															
L5.2(a)	Day is defined as the period from 7am to 6pm Monday to Saturday and 8am to 6pm Sundays and Public holidays.		Conformance															
L5.2(b)	Evening is defined as the period 6pm to 10pm.		Conformance															
L5.2(c)	Night is defined as the period from 10pm to 7am Monday to Saturday and 10pm to 8am Sundays and Public Holidays.		Conformance															
L5.2(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.		Conformance															
L5.3	Incidence of Flaring Events	N/A	N/A															

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No.	Consent Condition	Evidence	Finding																															
L5.4	<p>Noise for flaring event, must not exceed the noise limits in table below.</p> <table border="1"> <thead> <tr> <th>Receiver Location</th> <th>Type & Duration of Flare event</th> <th>Day LAeq(15 minute)</th> <th>Evening LAeq(15 minute)</th> <th>Night LAeq(15 minute)</th> </tr> </thead> <tbody> <tr> <td rowspan="3">R1 Medhurst Road, Gilead</td> <td>Spill valve >2.5 hours</td> <td>35</td> <td>35</td> <td>35</td> </tr> <tr> <td>Compressor blowdown (ESD) 15-60 minutes</td> <td>40</td> <td>40</td> <td>35</td> </tr> <tr> <td>Compressor blowdown (shut down and unload) 6-15 minutes</td> <td>42</td> <td>42</td> <td>37</td> </tr> <tr> <td rowspan="3">R7 Mt. Gilead, Gilead</td> <td>Spill valve >2.5 hours</td> <td>37</td> <td>36</td> <td>36</td> </tr> <tr> <td>Compressor blowdown (ESD) 15-60 minutes</td> <td>42</td> <td>41</td> <td>40^a</td> </tr> <tr> <td>Compressor blowdown (shut down and unload) 6-15 minutes</td> <td>44</td> <td>43</td> <td>37</td> </tr> </tbody> </table> <p>Note: 1. For the purposes of the table above, ^a is where ESD 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>	Receiver Location	Type & Duration of Flare event	Day LAeq(15 minute)	Evening LAeq(15 minute)	Night 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 ^a	Compressor blowdown (shut down and unload) 6-15 minutes	44	43	37	<p>It was reported 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>	Conformance
Receiver Location	Type & Duration of Flare event	Day LAeq(15 minute)	Evening LAeq(15 minute)	Night LAeq(15 minute)																														
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L5.5	Noise Measurements	N/A	N/A																															

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No.	Consent Condition	Evidence	Finding
L5.6	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. 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. 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.	The auditor sighted all noise assessment reports prepared during the audit period and noted conformance with the requirements of this condition.	Conformance
L5.7	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.	The auditor sighted quarterly noise reports prepared by Wilkinson Murray in 2010/11 and 2011/12. 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. 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 a valid assumption that compliance would be achieved at the dwelling facade.	Conformance
L5.8	The noise emission limits identified in this licence apply under all meteorological conditions except:	The auditor sighted all noise assessment reports completed during the audit period and noted that estimated LAeq (15minute) noise levels are based on Industrial Noise Policy assessable weather conditions only (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).	Conformance
L5.8(a)	During rain and wind speeds (at 10m height) greater than 3m/s.		Conformance
L5.8(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.		Conformance
L5.9	Well, Gathering System and Trunk Line Maintenance noise management protocol	N/A	N/A
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 (August 2008) and noted that the Plan conforms to the requirements of this condition.	Conformance
L5.10(a)	Noise compliance standards.		Conformance
L5.10(b)	Community consultation.		Conformance

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No.	Consent Condition	Evidence	Finding	
L5.10(c)	Advance notice to affected members of the community for planned well maintenance activities.		Conformance	
L5.10(d)	Complaints handling monitoring/system.		Conformance	
L5.10(e)	Site contact person to follow up complaints.		Conformance	
L5.10(f)	Mitigation measures.		Conformance	
L5.10(g)	The design/orientation of the proposed mitigation methods demonstrating best practice.		Conformance	
L5.10(h)	construction times.		Conformance	
L5.10(i)	Contingency measures where noise complaints are received.		Conformance	
L5.10(j)	Monitoring methods and program.		Conformance	
L5.11	Planned maintenance activities at any of the wells must only be conducted between:		The auditor sighted the Noise Management Sub-Plan (August 2008) and noted that the Plan conforms to the requirements of this condition. It was reported that working hours are communicated to employees and contractors through the induction program.	Conformance
L5.11(a)	7am and 6pm on weekdays.			Conformance
L5.11(b)	8am and 1pm on Saturdays (excluding Public Holidays).	Conformance		
L6	Hours of operation	N/A	N/A	
L6.1	Planned maintenance activities at any of the wells must only be conducted between:	The auditor sighted the Noise Management Sub-Plan (August 2008) and noted that the Plan conforms to the requirements of this condition. It was reported that working hours are communicated to employees and contractors through the induction program.	Conformance	
L6.1(a)	7am and 6pm on weekdays.		Conformance	
L6.1(b)	8am and 1pm on Saturdays (excluding Public Holidays).		Conformance	
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 noted.	No Finding	
L7	Potentially Offensive Odour	N/A	N/A	

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No.	Consent Condition	Evidence	Finding
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.	No Finding
L8	Other limit conditions	N/A	N/A
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".	It was reported that there were no PCBs present on the premises.	Conformance
L8.2	Hydraulic Fracturing	N/A	N/A
L8.3	The licensee must not use chemicals that contain BTEX compounds (Benzene, Toluene, Ethyl Benzene and Xylene) in the fracturing fluid additives.	It was reported that there were no fracking activities undertaken during the audit period.	No Finding
4	OPERATING CONDITIONS	N/A	N/A
O1	Activities must be carried out in a competent manner	N/A	N/A
O1.1	Licensed activities must be carried out in a competent manner. This includes:	Competence is demonstrated through the following actions:	Conformance
O1.1(a)	The processing, handling, movement and storage of materials and substances used to carry out the activity.	1. Roles and responsibilities - Defined in the EMP (August 2012) and position descriptions. The position description of the Gas Plant	Conformance

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No.	Consent Condition	Evidence	Finding
O1.1(b)	The treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.	Operator (19 October 2011) was sighted by the auditor and noted to include a requirement to implement the AGL Environmental Management Plan and a range of control measures. 2. Training - Employees reported a number of training sessions including environmental compliance and the Empower E-learning modules and refresher program. The auditor sighted training programs and records. 3. Audit and inspection - Assurance of competence is provided through the biannual independent audit, annual Lifeguard Audits (AGL HSE System) and the annual greenhouse and energy use verification program.	Conformance
O2	Maintenance of plant and equipment	N/A	N/A
O2.1	All plant and equipment installed at the premises or used in connection with the licensed activity:	Preventative maintenance of plant and equipment is controlled through the MEX system. The MEX was sighted by the auditor and it was noted that maintenance schedules are defined by usage and manufacturers requirements. It was reported that the MEX system has been operating for 8 months but is not fully functional. A back-up system is being maintained until the MEX system achieves the required outcomes.	Conformance
O2.1(a)	Must be maintained in a proper and efficient condition.		Conformance
O2.1(b)	Must be operated in a proper and efficient manner.		Non-Conformance 1
O3	Dust	N/A	N/A

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No.	Consent Condition	Evidence	Finding
O3.1	The premises must be maintained in a condition which minimises or prevents the emission of dust from the premises.	<p>It was noted by the auditor that a number of dust mitigation measures are detailed in the Air Quality Management Sub-Plan (August 2008).</p> <p>There were four reported dust complaints received during the audit period in relation to vehicles travelling on the access road to MP03 and the access road to MP12/MP22. The complaints were received between October 2010 and August 2011. In each case, a water cart was deployed to the site and speed limits were communicated to relevant AGL employees and contractors. Road upgrades were also undertaken at MP12/ MP23 to minimise dust.</p>	Conformance
O4	Emergency Response	N/A	N/A
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 Emergency Response Plan (October 2008) and noted conformance with the requirements of this condition.	Conformance
O5	Processes and Management	N/A	N/A
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 EMP for the CGP, including the Soil and Water Management Sub-Plan (July 2012) and the Waste Management Sub-Plan (August 2008) and noted conformance against the requirements of this condition.	Conformance

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No.	Consent Condition	Evidence	Finding
O5.2	The licensee must ensure that waste identified for recycling is stored separately from other waste.	<p>It was reported that a number of waste streams are separated for recycling, including cardboard, batteries, oil filters, scrap metal and paper. This was verified through a review of the AGL Environmental Footprint spread sheet for the financial years 2010/11 and 2011/12. These spread sheets provide a detailed record of waste streams generated, recycled/reused and disposed, including concrete and steel, water, hazardous waste, non-hazardous waste, and ozone-depleting substances. The AGL Environmental Footprint is subject to independent audit.</p> <p>The auditor observed the separation of waste identified for recycling, including waste oil, oil filters, batteries, steel, paper, cardboard, plastics and timber.</p>	Conformance
5	MONITORING AND RECORDING CONDITIONS	N/A	N/A
M1	Monitoring Records	N/A	N/A
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 found to be in conformance with this condition.	Conformance
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 found to be in conformance with this condition.	Conformance
M2.1(a)	In a legible form, or in a form that can readily be reduced to a legible form.		Conformance
M2.1(b)	Kept for at least 4 years after the monitoring or event to which they relate took place.		Conformance
M2.1(c)	Produced in a legible form to any authorised officer of the EPA who asks to see them.		Conformance
M1.3	The following records must be kept in respect of any samples required to be collected for the purposes of this licence:		Monitoring records prepared during the audit period were sighted by the auditor and found to be in conformance with this condition.
M1.3(a)	The date(s) on which the sample was taken.	Conformance	
M1.3(b)	The time(s) at which the sample was collected.	Conformance	
M1.3(c)	The point at which the sample was taken.	Conformance	
M1.3(d)	The name of the person who collected the sample.	Conformance	
M2	Requirement to monitor concentration of pollutants discharged	N/A	N/A

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No.	Consent Condition	Evidence	Finding
M2.1 M2.2	<p>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.</p> <p>Note: The requirement for quarterly 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 reviewed based on odour emission performance after 12 months from commissioning of the treatment plant.</p>	<p>The auditor sighted the quarterly air monitoring report prepared by EML Air Pty Ltd for the audit period and noted the following two matters of non-conformance:</p> <ol style="list-style-type: none"> Continuous Emissions Monitoring: The licence specifies that continuous monitoring of sampling points 1, 2 and 3 must be undertaken. Continuous emissions monitoring of sampling points 1, 2 and 3 was not performed during the audit period. This matter was reported to the EPA on discovery by AGL management in July 2012. It is understood that measures are currently being undertaken to address this non-compliance. Quarterly Sampling: The licence specifies that quarterly sampling must be undertaken of sampling points 1, 2 and 3 (compressor engines 1, 2 and 3, respectively). The auditor noted that on average, three samples were obtained for each compressor in a given year. <p>The auditor sighted the 2010 and 2011 annual returns which provide some commentary on the sampling process. By way of example, the following statement is provided in relation to sampling point 3, "Note: the requirement for four samples to be collected and analysed is based on 12 months of continual operations for compressor 3. Only three of the four samples were collected and analysed as compressor 3 was not operating during the third quarter."</p> <p>It was reported that only two of the three compressors are operating at any given time due to limited gas availability. While it is possible for a compressor to be out of service for a full quarter, this is not a common occurrence. More often, all three compressors operate during the quarter at varying times.</p> <p>AGL has engaged with the EPA on this matter and it has been determined that future quarterly sampling events will include all compressors that are in operation during the quarter.</p>	<p>Non-Conformance 1</p>

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No.	Consent Condition	Evidence	Finding																																																																																								
M2.3	<p>Points 1, 2, 3, 4 and 5</p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Units of measure</th> <th>Frequency</th> <th>Sampling Method</th> </tr> </thead> <tbody> <tr> <td>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"> <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	Sampling methods noted.	No Finding
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No.	Consent Condition	Evidence	Finding																								
M2.4	<p>Points 1, 2 and 3</p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Units of measure</th> <th>Frequency</th> <th>Sampling Method</th> </tr> </thead> <tbody> <tr> <td>Oxides of Nitrogen</td> <td>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>TM-22</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> <p>Note: The requirement for quarterly 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 reviewed based on odour emission performance after 12 months from commissioning of the treatment plant.</p>	Pollutant	Units of measure	Frequency	Sampling Method	Oxides of Nitrogen	milligrams per cubic metre	Continuous	CEM-2	Temperature	degrees Celsius	Continuous	TM-2	Moisture	percent	Continuous	TM-22	Volumetric flow rate	cubic metres per second	Continuous	CEM-6	Oxygen	percent	Continuous	CEM-3	Sampling methods noted.	No Finding
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M2.4	For the purposes of the table above, the selection of sampling positions for quarterly monitoring at points 1, 2, 3, 4, 5 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, 2000.	It was reported during the audit that sampling positions were established during the design of the RPGP and compliance with test method TM-1 was not known. Further investigations have since identified that the selection of sampling positions for quarterly monitoring at points 1, 4 and 5 were not carried out in accordance with test method TM-1 as specified in the "Approved Methods for the Sampling and Analysis of Air Pollutants in NSW, 2000". It was reported that AGL have rectified this issue in relation to point 1 and point 4.	Non-Conformance 1																								
M3	Testing methods - concentration limits	N/A	N/A																								
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 the quarterly air monitoring reported prepared by EML Air Pty Ltd for the audit period and noted conformance against the requirements of this condition.	Conformance																								
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.		Conformance																								
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.		Conformance																								

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No.	Consent Condition	Evidence	Finding
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".		Conformance
M4	Recording of pollution complaints	N/A	N/A
M4.1	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 2007-2012 Complaints Register for the CGP was sighted by the auditor and noted to comply with this condition.	Conformance
M4.2	The record must include details of the following:	The 2007-2012 Complaints Register for the CGP was sighted by the auditor and noted to comply with this condition.	Conformance
M4.2(a)	The date and time of the complaint.		Conformance
M4.2(b)	The method by which the complaint was made.		Conformance
M4.2(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.		Conformance
M4.2(d)	The nature of the complaint.		Conformance
M4.2(e)	The action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant.		Conformance
M4.2(f)	If no action was taken by the licensee, the reasons why no action was taken.		Conformance
M4.3	The record of a complaint must be kept for at least 4 years after the complaint was made.	The 2007-2012 Complaints Register for the CGP was sighted by the auditor and noted to comply with this condition.	Conformance
M4.4	The record must be produced to any authorised officer of the EPA who asks to see them.	Condition noted.	No Finding
M5	Telephone Complaints Line	N/A	N/A
M5.1	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 Camden Gas Project website and noted the inclusion of a telephone line, contact and feedback form.	Conformance
M5.2	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.	The auditor sighted the Camden Gas Project website and noted the inclusion of a telephone line, contact and feedback form.	Conformance
M5.3	The preceding two conditions do not apply until 3 months after:	Condition noted.	No Finding

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No.	Consent Condition	Evidence	Finding
M5.3(a)	The date of the issue of this licence, or		No Finding
M5.3(b)	If this licence is a replacement licence within the meaning of the Protection of the Environment Operations (Savings and Transitional) Regulation 1998, the date on which a copy of the licence was served on the licensee under clause 10 of that regulation.		No Finding
6	REPORTING CONDITIONS	N/A	N/A
R1	Annual Return Documents	N/A	N/A
R1.1	The licensee must complete and supply to the EPA an Annual Return in the approved form comprising:	The auditor sighted the December 2010 and December 2011 Annual Returns and noted conformance against this condition.	Conformance
R1.1(a)	A Statement of Compliance.		Conformance
R1.1(b)	A Monitoring and Complaints Summary. 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.		Conformance
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. Note: An application to transfer a licence must be made in the approved form for this purpose.	The auditor sighted the December 2010 and December 2011 Annual Returns and noted conformance against this condition.	Conformance
R1.3	Where this licence is transferred from the licensee to a new licensee:	Condition was not activated during the audit period.	No Finding
R1.3(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.		No Finding
R1.3(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.		No Finding
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 was not activated during the audit period.	No Finding
R1.4(a)	In relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or		No Finding

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No.	Consent Condition	Evidence	Finding
R1.4(b)	In relation to the revocation of the licence - the date from which notice revoking the licence operates.		No Finding
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 Annual Returns for the periods ending 21 December 2010 and 21 December 2011 and correspondence from AGL to the EPA, dated 16 February 2011 and 15 February 2012, respectively, which verify conformance with this condition.	Conformance
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 was not activated during the audit period.	No Finding
R1.6(a)	The assessable pollutants for which the actual load could not be calculated.		No Finding
R1.6(b)	The relevant circumstances that were beyond the control of the licensee.		No Finding
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.	It was reported that Annual Returns are retained for a period in excess of four years.	Conformance
R1.8	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 Annual Returns for the periods ending 21 December 2010 and 21 December 2011 and noted conformance with this condition.	Conformance
R1.8(a)	The licence holder; or		Conformance
R1.8(b)	By a person approved in writing by the EPA to sign on behalf of the licence holder.		Conformance
R1.9	A person who has been given written approval to certify a certificate 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 of this licence.	Condition noted.	No Finding
R1.10	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 L6.1. The noise monitoring must be undertaken in accordance with the NSW Industrial Noise Policy August 2000.	The auditor sighted the Annual Returns for the periods ending 21 December 2010 and 21 December 2011 and noted conformance with this condition.	Conformance
R2	Notification of environmental harm	N/A	N/A

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No.	Consent Condition	Evidence	Finding
R2.1	Notifications must be made by telephoning the Environment Line service on 131 555.	The following environmental incidents were reported to the EPA Environment Line during the audit period: 1. 17 May 2011 - Release of non-toxic, non-hazardous foam into the air during routine maintenance at the Sugarloaf 3 well site. 2. 13 November 2011 - Release of produced water from Spring Farm 09 well. The water was contained to the well site area. 3. 30 January 2012 - A third party struck a gas gathering line in Glenlee.	Conformance
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 the EPA 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.	In each of the three reportable incidents detailed in the response to condition R2.1, written details were provided to the EPA in accordance with defined due dates.	Conformance
R3	Written Report	N/A	N/A
R3.1	Where an authorised officer of the EPA suspects on reasonable grounds that:	Condition noted.	No Finding
R3.1(a)	Where this licence applies to premises, an event has occurred at the premises; or		No Finding
R3.1(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.		No Finding
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 requested a written report in relation to each of the three reportable incidents detailed in the response to condition R2.1. It was reported that the responses were provided by the time specified by the EPA.	Conformance
R3.3	The request may require a report which includes any or all of the following information:	Condition noted.	No Finding
R3.3(a)	The cause, time and duration of the event.		No Finding
R3.3(b)	The type, volume and concentration of every pollutant discharged as a result of the event.		No Finding
R3.3(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.		No Finding

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No.	Consent Condition	Evidence	Finding
R3.3(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.		No Finding
R3.3(e)	Action taken by the licensee in relation to the event, including any follow-up contact with any complainants.		No Finding
R3.3(f)	Details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event.		No Finding
R3.3(g)	Any other relevant matters.		No Finding
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 noted.	No Finding
7	GENERAL CONDITIONS	N/A	N/A
G1	Copy of licence kept at the premises or plant	N/A	N/A
G1.1	A copy of this licence must be kept at the premises to which the licence applies.	It was reported that a copy of the licence is kept at the premises.	Conformance
G1.2	The licence must be produced to any authorised officer of the EPA who asks to see it.	Condition noted.	No Finding
G1.3	The licence must be available for inspection by any employee or agent of the licensee working at the premises.	It was reported that a copy of the licence is kept at the premises.	Conformance
G2	Signage	N/A	N/A
G2.1	The location of EPA point number(s) 1,2,3,4,5,6,7,8,9 and 10 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 sighted evidence of signs that indicate the relevant point identification numbers.	Conformance
8	POLLUTION STUDIES AND REDUCTION PROGRAMS	N/A	N/A
U1	PRP 1 - Groundwater Attributes for EPA Groundwater Assessment	N/A	N/A
U1.1	By 30 May 2012 the licensee must submit to the EPA a report that details all groundwater assessed data for the premises. The report must include (to the extent known), but does not have to be limited to:	The auditor sighted correspondence from AGL to the EPA, dated 25 May 2012, noting submission of the relevant report. This condition is deemed to be closed.	Conformance
U1.1(a)	The depth and thickness of the targeted coal seam.		Conformance
U1.1(b)	Identification of all groundwater sources/aquifers (within Petroleum Production Licences (PPLs) 1, 2, 4, 5 and 6) that are intercepted by drilling or are connected to the coal seam gas water bearing zones.		Conformance

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No.	Consent Condition	Evidence	Finding
U1.1(c)	Identification of the permeabilities, quality, quantity and levels of each groundwater source/aquifer identified from U1.1(b).		Conformance
U1.1(d)	Identification at a regional scale of the natural recharge and discharge processes of each groundwater source/aquifer identified from U1.1(b).		Conformance
U1.1(e)	An assessment of the effectiveness of any aquitards and aquicludes for confining water or liquid movement from or to the groundwater sources/aquifers identified by U1.1(b).		Conformance
U1.1(f)	A description of the water quality of each of the groundwater sources identified from U1.(1b) and of the coal seam gas water bearing zones.		Conformance
U1.1(g)	Identification of all known beneficial uses within PPLs 1, 2, 4, 5 and 6 of groundwater sources identified from U1.1(b), including all registered water bores, expected volumes of use for each bore and intended use of that water, and any groundwater dependent ecosystems.		Conformance
U1.1(h)	Details of the distance from the closest well heads to each of the registered water bores within PPLs 1, 2, 4, 5 and 6 identified from U1.1(g).		Conformance
U1.1(i)	A description of the geology overlying the coal seam gas water bearing zones and identifying any known faults and other geologic features that occur within the regional area (taken as being PPLs 1, 2, 4, 5 and 6).		Conformance
U1.1(j)	Details about the regional directions and flow rates of any groundwater flows identified.		Conformance
U1.1(k)	A conceptual model of the site specific groundwater interactions, including the potential for drilling and hydraulic fracturing fluids to interact with groundwater outside the coal seam gas water bearing zones and the potential migration paths of groundwater out of the target coal seam formations through aquifers, wells, bores, springs, connected watercourses, faults or other geologic features.		Conformance
U1.1(l)	Options available to rectify, to the extent practicable, or manage any potential interactions identified from U1.1(k) so as to ensure that all beneficial uses of any impacted groundwater sources can be maintained.		Conformance
U1.1(m)	Any current proposals for further groundwater monitoring based on the findings of the investigation.		Conformance
U1.1(n)	A map/maps outlining the aquifer extent (known and inferred) relative to the gas extraction infrastructure.		Conformance
U2	PRP 2 - Groundwater Monitoring	N/A	N/A

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No.	Consent Condition	Evidence	Finding
U2.1	The licensee must prepare and submit to the EPA by the 31 July 2012 a Groundwater Management Plan for the premises and any proposed expansion areas.	The auditor sighted the document, 'Groundwater Management Plan - Camden Gas Project' (July 2012) which was prepared in accordance with this condition. The auditor sighted correspondence from AGL to the EPA, dated 31 July 2012 noting submission of the relevant report.	Conformance
U2.2	The Groundwater Management Plan is to include (at a minimum) details regarding:	The auditor sighted the document, 'Groundwater Management Plan - Camden Gas Project' (July 2012) and noted conformance with the requirements of this condition.	Conformance
U2.2(i)	The construction, operation, monitoring and abandonment of gas production wells.		Conformance
U2.2(ii)	The monitoring network and frequency relating to water levels (pressures), water quality, and dewatering volumes.		Conformance
U2.2(iii)	Response triggers for investigation (and if required) remedial action.		Conformance
U2.3	The licensee is to supply evidence that the Plan has been reviewed and endorsed by the NSW Office of Water for monitoring groundwater trends across the regional area (taken as being PPLs 1, 2, 4, 5 and 6). Completion Date: 31 July 2012	The auditor sighted correspondence from AGL to the EPA, dated 31 July 2012 detailing appropriate evidence of review and endorsement.	Conformance
U3	PRP 3 - Spatial Database	N/A	N/A
U3.1	The licensee must provide to the EPA by 30 January 2012 a spatial layer that details all of coal seam gas infrastructure and gas and water gathering lines associated with Rosalind Park Gas Plant. This information must be provided in an ESRI geodatabase or shapefile format or any ESRI compatible dataset in GDA 94. Completion Date: 30 January 2012	The auditor sighted correspondence from AGL to the EPA, dated 31 January 2012 noting submission of the relevant spatial layer.	Conformance
U4	PRP 4 - Leak Detection and Repair Program (LDAR)	N/A	N/A
U4.1	Existing Leak Detection and Repair Program The licensee must prepare and submit to the EPA by 27 February 2012 a report detailing the existing LDAR program currently implemented at the premises. The report must include, but need not be limited to:	The auditor sighted correspondence from AGL to the EPA, dated 27 February 2012 noting submission of the relevant report.	Conformance
U4.1(a)	Identification of the main sources of VOC emissions at the premises including the types of components and a description of the unit where the leaking components are found.		Conformance
U4.1(b)	A description of the monitoring used for the detection and quantification of leaks at the premises in accordance with US EPA Method 21 – Determination of Volatile Organic Compound Leaks (40 CFR Part 60, Appendix A, Method 21).		Conformance

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No.	Consent Condition	Evidence	Finding
U4.1(c)	A description of the methodology used to repair identified leaks including repair priorities and timeframes and any consideration for the use of leakless components in repairing or replacing leaks.		Conformance
U4.1(d)	A description of any recommendations to improve the current LDAR program.		Conformance
U4.2	Investigation of Best Management Practices and Monitoring Techniques The licensee must prepare and submit to the EPA by 30 November 2012 a report investigating best management practices and monitoring techniques for the detection and quantification of VOC emissions from premises. The report must include but need not be limited to:	Condition was not activated during the audit period.	No Finding
U4.2(a)	A review, in consultation with the EPA, of reasonable and feasible scanning techniques for scanning fugitive emissions in the field including continuous sampling of ambient air combined with on-site detection and open path optical remote sensing.		No Finding
U4.2(b)	Identification of a preferred scanning technique that could be applied to the premises and used as a component of the existing LDAR program considering the regulatory framework provided in USEPA Method 21, EUB Directive 060, and CAPP Best Management Practice for Fugitive Emissions Management. Completion Date: 30 November 2012 .		No Finding
U5	PRP 5 - CSG Drilling, Hydraulic Fracturing, Well Workover and Chemical Addition Report		N/A
U5.1	By 27 February 2012 AGL Upstream Investments must carry out an investigation and provide a written report to the EPA. The report must include but not be limited to the following information from the date AGL became operator of PPLs 1, 2, 4, 5 and 6 (01 February 2006):	The auditor sighted correspondence from AGL to the EPA, dated 26 March 2012 noting submission of the relevant report.	Conformance
U5.1.1	A report detailing the Hydraulic Fracturing that has been used at Camden in the past.		Conformance
U5.1.2	A summary report on the number and location of wells that have been Fracture Stimulated, and when.		Conformance
U5.1.3	Details of the concentrations and volumes of the chemicals used and proposed to be used during the hydraulic fracturing process.		Conformance
U5.1.4	A description of how many uncontrolled releases have occurred during drilling, hydraulic fracturing and well workovers at Camden, and how these were managed.		Conformance

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No.	Consent Condition	Evidence	Finding
U5.1.5	A description of fracture monitoring, and geological monitoring used and proposed to be used at Camden to assess fracture and chemical migration from the target coal seam gas water bearing zones into adjacent aquifers.		Conformance
U5.1.6	A detailed description of the procedures and work practices used and proposed to be used during hydraulic fracturing.		Conformance
U5.1.7	A risk assessment on the chemicals used and proposed to be used in Hydraulic Fracturing.		Conformance
U5.1.8	Information on how AGL will monitor the recovery of any chemicals used and proposed to be used during Hydraulic Fracturing.		Conformance
U5.1.9	A summary report of the number and location of Well Workovers carried out at Camden since 01 February 2006, and when the well workovers occurred.		Conformance
U5.1.10	A list of all chemicals and constituents used and proposed to be used during Well Workovers.		Conformance
U5.1.11	Details of the concentrations of the chemicals used and proposed to be used during Well Workovers.		Conformance
U5.1.12	Provide a description of type of Well Workovers operations conducted and proposed to be conducted, including objectives, frequency of work, and duration of activities.		Conformance
U5.1.13	A risk assessment on the use of chemicals used and proposed to be used in Well Workovers.		Conformance
U5.1.14	Information on how AGL monitors and proposes to monitor the recovery of any chemicals used during Well Workovers. Completion Date: 26 March 2012		Conformance

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