

INDEPENDENT ENVIRONMENTAL AUDIT 2015-2018

CAMDEN GAS PROJECT

20 December 2018

Prepared for:
AGL Upstream Investments Pty Ltd

J0067/201218 (Rev1)



Treo Environment Pty Ltd

78 Denison Street
Bondi Junction NSW 2022
Australia
T: 0448 039 552

20 December 2018

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Project Director



.....
Denise Corish
Director

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Abbreviations

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

1. Executive Summary

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

The development of the CGP has occurred in a staged manner with exploration activities commencing in 1998 under Sydney Gas (Camden) Operations. Since that time, the ownership of the project has changed and now operates as AGL Upstream Investments Pty Limited (AGL). A total of ten development approvals and project approvals have been granted to the project by the now Department of Planning and Environment (DPE). DA 171-7-2005 was not part of the audit scope as no works were enacted and the approval has expired.

The scope of the Independent Environmental Audit (IEA) was limited to an assessment of construction and operational activities of the CGP. The audit period is 2016-2018 for development approvals, licences and other approvals and 2015-2018 for project approvals. Nominated development approvals, licences and leases formed the reference point against which performance was measured (Appendices A & B).

The findings of this report reflect conditions and documentation presented during the period 7 November 2018 to 7 December 2018, including a site inspection on 8 November 2018.

The requirement to conduct an IEA is reflected in the conditions of each of the active development approvals and project approvals. The key requirements of the conditions are detailed below (bold italics) together with a summary of the audit findings.

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

This audit comprised the eighth IEA for the project and was commissioned within 2 years of completion of the previous audit.

The Independent Environmental Audit shall:

a. be conducted by a suitably qualified, experienced, and independent person(s) whose appointment has been approved by the Director-General;

The audit was conducted by Denise Corish, a Director of Treo Environment and a registered Environmental Lead Auditor with Exemplar Global. Ms Corish was approved to conduct the independent audit by the Secretary on 4 October 2018.

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

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

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

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

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

- Rosalind Park Gas Plant (RPGP) – The audit identified that the RPGP is largely compliant with development consents, licences and leases. Following extensive upgrade works in the previous audit period to address produced water storage, significant environmental risks are limited to air quality. Previous independent environmental audits have identified a non-compliance for failing to continuously monitor air emissions at Monitoring Points 2 and 3 as required by EPL Condition M2.3. This non-conformance continued for more than half of the audit period and was reported voluntarily by AGL in both the 2016 and 2017 EPL Annual Returns. It is noted that these non-conformances occurred while a Pollution Reduction Plan (PRP) was undertaken by AGL with the approval of the EPA. On completion, the requirement to continually monitor Points 2 and 3 was replaced with a Predictive Emissions Monitoring System (PEMS).
- An observation was identified in regards to nitrogen oxide emissions. While AGL demonstrated compliance with emission limits, it was noted that the maximum allowable concentration of nitrogen oxides (110 mg/m³ at Point 4) was recorded at a monitoring event on the 05 June 2018. Given the potential non-compliance, an observation was identified against EPL Condition L3.1.
- Plug and Abandonment – The audit identified that plug and abandonment works completed during the audit period were generally conducted in accordance with development consents, licence conditions and documented plans. One matter of non-compliance was identified with respect to the recording of gas and water ‘makes and compositions’ within Plug and Abandonment (P&A) reports.
- Workover Maintenance – The audit determined that adequate operational and environmental controls have been established by AGL to manage workover maintenance risks. One matter of non-compliance was identified relating to community notification of workover activities.
- Rehabilitation – The audit determined that rehabilitation works undertaken during the audit period were conducted in accordance with the Rehabilitation and Landscape Management Sub Plan (June 2018). There were no matters of non-compliance identified with respect to rehabilitation conditions.

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

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

Within the defined scope, the audit determined that AGL is largely compliant with relevant approvals and licences. A total of 11 non-conformances and three observations were recorded against the suite of approvals and licences attached to the project. Given that the total number of requirements were in the order of 1,800, project compliance is estimated to be greater than 99%.

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

The auditor sighted sufficient evidence to demonstrate that the EMS is adequately implemented and appropriate for the nature and scale of the development. The control environment established through the EMS is generally mature and embedded into the operation.

While the scope of the audit did not include a management system audit, it is noted that there were no material deficiencies identified during the system review.

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

Recognising the sustained and positive performance that occurred during the audit period, there were no further measures or actions identified for the consideration of AGL.

2. Introduction

2.1 Camden Gas Project

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

The development of the CGP has occurred in a staged manner with exploration activities commencing in 1998 under Sydney Gas (Camden) Operations. Since that time, the ownership of the project has changed and now operates as AGL Upstream Investments Pty Limited (AGL). A total of ten development approvals and project approvals have been granted to the project by the now Department of Planning and Environment (**DPE**). One development approval (DA 171-7-2005) has since expired and as such was not included in the scope of the audit.

2.2 Independent Environmental Audit Requirement

The requirement to conduct an Independent Environmental Audit (**IEA**) is reflected in the conditions of the active development approvals (**Appendix A**). The key requirements of the conditions are detailed below and provide the basis for this audit:

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

- 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 findings of this report reflect conditions and documentation presented during the period 7 November 2018 to 20 December 2018, including a site inspection on 8 November 2018.

2.3 Objectives

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

- Provide reasonable assurance of compliance against development consents, licences and leases;
- Evaluate the capability of the Environmental Management Plan to achieve legislative requirements and drive performance improvements; and

- Identify opportunities to strengthen environment controls and reduce risk.

2.4 Scope and Criteria

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

- DA 15-1-2002-I (Apap, Joe Stanley, Johndilo, Loganbrae, Lipscombe and Mahon);
- DA 246-8-2002-I (Kay Park);
- DA 282-6-2003-I (RPGP, Rosalind Park, Wandinong, EMAI (EM01-20, 40));
- DA 183-8-2004-I (Mt Taurus and Menangle Park);
- DA 9-1-2005 (Glenlee Wells);
- DA 75-4-2005 (Sugarloaf Farm);
- PA No. 06_0137 (Razorback);
- PA No. 06_0138 (Elizabeth Macarthur);
- PA No. 06_0291 (Spring Farm and Menangle Park);
- Environment Protection Licence (**EPL**) 12003;
- Water Access Licences (**WAL**) (2);
- Works and Usage Approvals (**WUA**) (2);
- Industrial bore licences (8); and
- Petroleum Production Leases (**PPL**) (5).

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

It is noted that the audit period, as defined in the relevant conditions of approval, varies between two years for the development approvals and three years for the project approvals. As such, the previous independent audit which captured the development approvals was conducted for the period 2014-2016 while the last audit of the project approvals captured the period 2012-2015 (Table 2.1).

This audit includes both the development approvals and the project approvals (in addition to other licences and approvals). The audit period is 2016-2018 for development approvals, licences and other approvals and 2015-2018 for project approvals.

Table 2.1 Independent Audits

Audit	Audit Period	Scope
Independent Environmental Audit 2015-2018 (this audit)	2016 – 2018	Development Approvals Environment Protection Licence Water Access Licences Works and Usage Approvals Industrial Bore Licences Petroleum Production Leases
	2015 – 2018	Project Approvals

Audit	Audit Period	Scope
Independent Environmental Audit 2014-2016, Treo Environment (8 February 2017)	2014 – 2016	Development Approvals Environment Protection Licence Water Access Licences Works and Usage Approvals Industrial Bore Licences Petroleum Production Leases
Independent Environmental Audit 2012-2015, Golder Associates (4 December 2015)	2012 – 2015	Project Approvals

2.5 Methodology

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

2. **Opening meeting** – An opening meeting was held at the commencement of the audit to:
 - a. Confirm the audit objectives, scope, and criteria;
 - b. Confirm the audit schedule; and
 - c. Establish methods and procedures for conducting the audit, including testing methods.
3. **Compliance register** – Reflecting the audit criteria, a register of compliance obligations was developed.
4. **Agency and community consultation** – The following agencies were contacted by the auditor to obtain feedback and identify issues within the audit scope: DPE, Environment Protection Authority (**EPA**), Department of Industry (**DoI**), Camden Council, Campbelltown City Council and Wollondilly Shire Council. The Chair of the Community Consultative Committee was similarly contacted. A summary of feedback is provided in **Section 2.6**.
5. **Site Inspection** – A site inspection was conducted on 8 November 2018. The purpose of the site inspection was to assess implementation of environmental controls, determine the status of the operations and assess overall environmental performance. Key aspects of the CGP were included in the inspection including the RPGP and nominated well sites (EM31, EM32, EM16, JS01, LP01, MT09, MT10, MP16 AND MP25).
6. **Interviews** – The following employees with responsibility for environmental management and site operations were interviewed:
 - a. Aaron Clifton (Environment Business Partner NSW, Gas Operations);
 - b. Tyler Ogle (Instrumentation Technician); and
 - c. Corey Walker (Gas Plant Operator).
7. **Document review** – Relevant documents, records and systems were reviewed for accuracy and completeness.
8. **Compliance assessment** – The compliance status was determined for all relevant conditions in accordance with the Independent Audit Guideline definitions (**Table 2.2**). Matters of non-compliance were risk ranked as per the levels detailed in **Table 2.3**.

9. **Reporting** – Draft and final reports were prepared detailing the outcomes of the audit and compliance assessment. Revisions to the draft report were undertaken to reflect additional information or correct errors in fact.

Table 2.2 Compliance Status Definitions

Compliance Status	Description
Compliant	The auditor has collected sufficient verifiable evidence to demonstrate all elements of the requirement have been complied with within the scope of the audit.
Not Verified	Where the auditor has not been able to collect sufficient verifiable evidence to demonstrate that the intent and all elements of the requirement of the regulatory approval have been complied with within the scope of the audit. In the absence of sufficient verifiable evidence the auditor may in some instances be able to verify by other means (visual inspection, personal communication, etc.) that a requirement has been met. In such a situation, the requirement should still be assessed as not verified. However, the auditor could note in the report that they have no reasons to believe that the operation is non-compliant with that requirement.
Non-Compliant	The auditor has determined that one or more specific elements of the conditions or requirements have not been complied with within the scope of the audit.
Not Triggered	A requirement has an activation or timing trigger that had not been met at the time when the audit is undertaken, therefore an assessment of compliance is not relevant.
Observation	Observations are recorded where the audit identified issues of concern which do not strictly relate to the scope of the audit or assessment of compliance. Further observations are considered to be indicators of potential non-compliances or areas where performance may be improved.
Note	A statement or fact, where no assessment of compliance is required.

Table 2.3 Risk Levels for Non-Compliances

Risk Level	Description
High	Non-compliance with potential for significant environmental consequences, regardless of the likelihood of occurrence.
Medium	Non-compliance with: <ul style="list-style-type: none"> - Potential for serious environmental consequences, but is unlikely to occur; or - Potential for moderate environmental consequences, but is likely to occur.
Low	Non-compliance with: <ul style="list-style-type: none"> - Potential for moderate environmental consequences, but is unlikely to occur; or - Potential for low environmental consequences, but is likely to occur.

2.5.1 Audit Team

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

With over 20 years' experience in environmental management, Denise has held senior positions in consulting firms and corporations in Australia, Singapore and the UK. Ms Corish has extensive audit experience and previously completed the 2010-2012 and 2014-2016 Independent Environmental Audit of the CGP.

In carrying out the duties of an environmental auditor, the judgement of Ms. Corish was not impaired by reason of any relationship with or interest in AGL or any of its subsidiaries. Ms. Corish is

independent of AGL with respect to employment relationships, financial relationships and the provision of non-audit services.

Ms Corish was approved to conduct the independent audit by the Secretary on 4 October 2018.

2.6 Agency and Community Consultation

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

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

It is noted that the former Division of Resources and Energy has joined the DPE and as such, separate consultation was not undertaken. Similarly, the former Department of Industry – Water, has migrated to the Resources Access Regulator within the DPE.

The outcomes of the consultation are detailed in **Table 2.4**.

Table 2.4 Agency and Community Consultation

Agency	Matters Raised	Action Taken
DPE	Consider the Department’s recently released Independent Audit Post-Approval Requirements, June 2018, while undertaking the audit and while drafting the audit report. Please note that as an existing project AGL may voluntarily choose to adopt the IAPAR but must still comply with the existing conditions of the development approvals relevant to the project.	The audit was generally undertaken in accordance with the requirements of the Independent Audit Post-Approval Requirements (June 2018).
	Provide a compliance table for all conditions of all the development approvals issued by the Department that apply to the project.	A compliance assessment was conducted against all conditions of approval that apply to the project. Refer to Appendix B .
	Include a detailed summary of all regulatory action(s), along with ongoing and completed corrective actions, relating to the breaches during the reporting period.	A summary was prepared of all regulatory action(s), along with ongoing and completed corrective actions, relating to the breaches during the reporting period. Refer to Section 3.4 .

Agency	Matters Raised	Action Taken
EPA	<p>Assess compliance with conditions of Water Access Licences and Approvals – to include all wells (operational and non-operational) with associated approvals issued under the Water Management Act 2000 and/or the Water Act 1912. At a minimum, the following details are to be included:</p> <ul style="list-style-type: none"> - Well name and Approvals with reference numbers including approval expiry date. - If any of the wells are claimed to be exempt from these 2 Acts, then details of the exemption and applicable Act is to be provided for the specific wells. 	<p>An assessment of compliance with conditions of Water Access Licences and Approvals was conducted.</p> <p>Refer to Section 4.2.1, Appendix C2 (Water Access Licences), Appendix C3 (Works and Usage Approval), Appendix C4 (Industrial Bore Licences) and Appendix D (Water Access Review).</p>
	<p>Conduct an assessment of Petroleum Title Conditions against environmental as well as construction and operational activities. Consider the following systems/reports in the assessment of compliance against approval conditions:</p> <ul style="list-style-type: none"> - Petroleum Operating Plan (POP) - AGL compliance management system (CMO compliance) - Environmental Management System (EMS) - assess for adequacy of strategies, plans, programs, performance and compliance - Annual Environmental Performance Report (AEPR) - Flood Management Protocols - Produced Water Storage and Handling 	<p>The scope of the audit included an assessment of compliance against relevant conditions of the Petroleum Title conditions for PPL1, PPL2, PPL4, PPL5 and PPL6.</p> <p>Refer to Section 4.2.2 and Appendix C, Table C5.</p>
	<p>Evaluate the workover maintenance and well decommissioning programs to assess operational and environmental effectiveness as well as performance.</p>	<p>Workover maintenance and well decommissioning works completed during the audit period (within the defined scope) were assessed against relevant requirements of the Environmental Management Plan and Sub Plans and conditions of approval. This assessment included operational, environmental and overall performance matters.</p> <p>Refer to Section 3.3.2 and Section 3.3.3.</p>
	<p>Review various Project and Development Approvals for well specific conditions and the assessment of the rehabilitated sites against the conditions.</p>	<p>A compliance assessment was conducted against all conditions of approval that apply to the project.</p> <p>Refer to Appendix B.</p>
Natural Resources Access Regulator (DPE)	<p>Conduct an assessment of compliance with conditions of relevant water access licenses and Works and Use Approvals under the Water Management Act.</p>	<p>An assessment of compliance with conditions of Water Access Licences and Approvals was conducted.</p> <p>Refer to Section 4.2.1, Appendix C2 (Water Access Licences), Appendix C3 (Works and Usage Approval), Appendix C4 (Industrial Bore Licences) and Appendix D (Water Access Review).</p>

Agency	Matters Raised	Action Taken
Camden Council	No specific issues raised.	Noted.
Campbelltown City Council	No specific issues raised.	Noted.
Wollondilly Shire Council	Monitor compliance of the decommissioning process of the gas wells with relevant guidelines/procedures and legislation.	Well decommissioning works completed during the audit period (within the defined scope) were assessed against relevant requirements of the Environmental Management Plan and Sub Plans and conditions of approval. Refer to Section 3.3.2 and Section 3.3.3
Community Consultative Committee	No specific issues raised.	Noted.

3. Environmental Performance

3.1 Introduction

Reflecting the scope of the audit, this section presents an assessment of the environmental systems of the CGP and a review of environmental performance including compliance.

3.2 Systems

3.2.1 Environmental Management System

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

The auditor sighted sufficient evidence to demonstrate that the EMS is adequately implemented and appropriate for the nature and scale of the development. The control environment established through the EMS is generally mature and embedded into the operation.

While the scope of the audit did not include a management system audit, it is noted that there were no material deficiencies identified during the system review. However, the audit did identify number the following positive controls that have enhanced the system during the audit period:

- AGL Health Safety and Environment Management System (HSEMS) – The AGL HSEMS defines the standards and requirements that apply to all AGL projects. A progressive redevelopment of the HSEMS has occurred during the audit period and the CGP EMS has been reviewed annually to maintain alignment.
- Training - The EMP (March 2018) details the training framework including induction programs and role-specific training. Commencing in 2017, monthly awareness training was delivered during the HSE meeting. Training programs sighted by the auditor include air quality, noise management, rehabilitation works and flora and fauna.
- Environmental Controls – Implementation of the Sub Plans continues to be demonstrated through environmental inspections and the Minimum Environmental Controls Form. Commencing prior to the audit period, this process includes the documentation of site specific controls as relevant to workover and plug and abandonment works.

3.2.2 Compliance Management

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

The audit determined that CMO Compliance effectively manages compliance obligations. The system was reviewed extensively in conducting the audit and evidence of compliance was generally adequate for assessed conditions. Further, it was noted that the system has matured over the previous two years and provides an effective compliance control.

3.3 Environmental Performance

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

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

3.3.1 Rosalind Park Gas Plant

The audit identified that the RPGP is largely compliant with development consents, licences and leases. Environmental risks are adequately addressed and the control environment is effective. Following extensive upgrade works in the previous audit period to address produced water storage, environmental risks are primarily focussed, but not limited to air quality.

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

Previous independent environmental audits have identified a non-compliance for failing to continuously monitor air emissions at Monitoring Points 2 and 3 as required by EPL Condition M2.3. This non-conformance continued for more than half of this audit period and was reported voluntarily by AGL in both the 2016 and 2017 EPL Annual Returns

As a result of the non-compliance with EPL Condition M2.3, a further non-compliance was reported against EPL Condition O2 and M2.1 for failing to operate in a proper and efficient manner and failing to monitor pollutants using the specific sampling method.

Previous audits have noted that AGL entered into a Pollution Reduction Plan (PRP) to conduct a 6-month trial of a Predictive Emissions System. On completion, a Pollution Study and Reduction Program was established with the approval of the EPA to refine the PEMS.

The non-compliances associated with continuous emissions monitoring were resolved in 2017 following completion of the pollution reduction program trials. The EPA subsequently issued a variation to EPL 12003 on 14 December 2017 in relation to the following conditions:

- Condition M2.2 – removed the requirement to operate a Continuous Emissions Monitoring System (CEMS) on Monitoring Point 2 and Monitoring Point 3
- Condition L3.2 – varied lower the nitrogen oxides concentration limit from 461mg/m³ to 220mg/m³ on Monitoring Point 2 and Monitoring Point 3.

At the time of the audit, AGL were in compliance with the EPL with respect to air emissions. However, it was noted that the maximum allowable concentration of nitrogen oxides (110 mg/m³ at Point 4) was recorded at a monitoring event on the 05 June 2018. Given the possibility for non-compliance, an observation was identified against EPL Condition L3.1. AGL advised that external boiler specialists were engaged after the audit period, during the September 2018 and December 2018 quarterly stack testing, to assess NO_x emissions and investigate means of NO_x reductions from Point 4.

3.3.2 Plug and Abandonment

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

As detailed in the EMP (March 2018), gas wells are suspended on cessation of gas production (typically within 15 years of construction). Following suspension, plug and abandonment works are undertaken and sites are rehabilitated.

During the audit period, plug and abandonment works were commenced and/or completed for 14 well sites. A sample of well sites was selected by the auditor and inspected to assess compliance against the latest version of the POP (Version 11.1 August 2018) and the Rehabilitation and Landscape Management Plan (June 2018) (rows shaded in **Table 3.1**). The rehabilitation works were noted to be adequate and in compliance with consents, licences and plans.

The auditor also noted that there was an increase in the number of sites as compared to the previous audit period. This is in line with a commitment to progressively undertake plug and abandonment works to enable closure of the facility in 2023.

During the site inspection, the auditor inspected well sites EM31 and EM32 where decommissioning works were in progress. Adequate environmental controls were established on the site, including double bunded tanks, waste separation, and bunded pallets for re-fuelling. The crew demonstrated awareness of environmental controls and reporting requirements.

AGL are required to complete a number of tasks as part of abandonment works and provide a report to the Secretary within two weeks of completion (PPL1 Condition 10d). The auditor noted that activities were generally compliant with the reporting requirements including prompt and timely submission. One matter of non-compliance was identified in relation to the recording of gas and water 'makes and compositions' which was not documented for well site MT10. Additional information on this non-compliance is provided in Section 4.2.4.

3.3.3 Workover Maintenance

Workover maintenance is conducted as required during the production or operational phases of well sites to maintain gas production efficiency. The works are undertaken over a period of one to five days and require a workover rig to run or remove a pipe to clear the bore of fill or obstructions. Potential environmental issues, as identified in the EMP (March 2018), include erosion, groundwater impacts, waste and noise.

During the audit period, workover maintenance was conducted on the following nominated well sites: MT05, MP02, MP08, MP10, MP22, MP23, MP30, RP09, EM39, SF02, SF05 and SF09. There was no workover maintenance in progress at the time of the site inspection.

As part of the audit, an assessment was conducted of workover activities against the requirements of relevant approvals, licences and plans. The audit determined that compliance was demonstrated against relevant requirements. Implementation of plans was demonstrated through the following key controls:

- Induction Training – A site-specific and role-specific induction program is delivered to all AGL employees and contractors (refer to **Section 3.2.1**).
- Daily Completion/Workover Report – A daily report is completed by the workover crew detailing the plan of works, operations completed, weather conditions, safety reports and waste disposed. The auditor sighted a number of examples and noted records to be complete and legible.

- Preventative Maintenance – The preventative maintenance of plant and equipment continues to be managed through the MEX system. The system effectively monitors maintenance requirements based on the use of plant and equipment. The auditor sighted the Weekly Maintenance Progress Dashboard and the Monthly Maintenance Planning Dashboard and noted a high level of compliance to program requirements.
- Pre-Site Hazard Inspection – Prior to commencement of workover activities, an inspection is conducted to identify environmental risks and establish appropriate controls.

The audit identified one matter of non-compliance relating to community notification of workover activities. Project Approval PA06_291 (Condition 3.24) specifies that written notification of planned maintenance activities must be provided to landowners and potentially affected stakeholders at least 14 days prior to work commencing. Adequate community notification records were sighted by the auditor for all workovers with the exception of MP02. Additional details are provided in **Section 4.2.1**.

3.3.4 Rehabilitation

The audit determined that rehabilitation works undertaken during the audit period were conducted in accordance with the Rehabilitation and Landscape Management Sub Plan (June 2018). There were no matters of non-compliance identified with respect to rehabilitation conditions.

A number of sites were inspected by the auditor and rehabilitation works were adequately progressed throughout the reporting period.

In the event that re-seeding was unsuccessful, additional actions were taken by AGL to rectify the matter. By way of example, the seeding of EM16 suffered from die-back during a dry summer. The site was then re-seeded and water tanks were installed on site to enable regular watering.

Site Specific Rehabilitation Completion Criteria was achieved at LB07 and MH01 wells during the reporting period.

3.4 Environmental Compliance

3.4.1 Notices, Orders, Penalty Notices and Prosecutions

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

The EPA issued two penalty infringements notices to AGL Upstream Investments Pty Limited on 4 May 2018 in response to alleged breaches of Petroleum Production Lease 4. Specifically, the notices related to an alleged failure to run cement bond logs on wells EM02 and EM04. The notices were subsequently withdrawn by the EPA on the basis that they were invalidly issued.

It is noted that the EPA commenced proceedings in June 2017 against AGL Upstream Investments Pty Limited alleging a contravention of a condition of EPL 12003. The matter is currently ongoing and relates to a flood event that occurred prior to the audit period on 5 June 2016 at the Nepean River, Menangle Park. As a result of overland flow, produced water tanks associated with MP15, MP16/MP25 and EM21 were adversely effected. There is no allegation that environmental harm occurred.

3.4.2 Environmental Incidents

There were seven environmental incidents reported internally by AGL within the audit period. The incidents were minor in nature and predominately associated with leaks and spills. It was determined by AGL that there were no pollution incidents that caused or threatened material harm to the environment.

Corrective actions taken in response to the incidents were assessed as appropriate. Appropriate preventive actions were identified, monitored and closed in a timely manner.

3.4.3 Environmental Complaints

There were no complaints in relation to environmental matters reported by AGL during the audit period.

4. Audit Findings

4.1 Previous Audits (2012-2015 and 2014-2016)

As noted in Section 2.4, the previous independent audit which captured the development approvals was conducted for the period 2014-2016 while the last audit of the project approvals captured the period 2012-2015. The findings of each audit and progress toward completion is detailed below.

The 2012-2015 IEA was conducted by Golder Associates (4 December 2015). The audit identified two 'Non-Compliances Level 2'¹ and four 'Compliance – Improvement Recommended'².

The recommended actions were recorded in CMO Compliance and adequately addressed by AGL with the exception of an improvement opportunity related to the surrender of approvals (PA06_0137 Schedule 2 Condition 7 and PA06_0291 Schedule 4 Condition 10). The auditor recommended that AGL confirm the process for surrendering approvals with the DPE. While correspondence was sighted from AGL to the DPE with respect to the surrender of wells for PA06_0138, similar correspondence was not available for PA06_0137 and PA06_0291. It is noted that the matter is low risk as there were no wells drilled during the audit period.

The 2014 – 2016 IEA was conducted by Treo Environment (8 February 2017). The audit identified five matters of non-compliance. Suitable evidence was provided by AGL during the current audit period to demonstrate closure of all recommended actions.

4.2 Current Audit (2015-2018)

Within the defined scope, the audit determined that AGL is largely compliant with relevant approvals and licences. A total of 11 non-conformances and three observations were recorded against the suite of approvals and licences attached to the project. Given that the total number of requirements were in the order of 1,800, project compliance is estimated to be greater than 99%.

The non-conformances were all identified as 'low risk', meaning they had a low environmental consequence. Additional details on each matter are provided in the sections that follow.

4.2.1 Development Consents and Project Approvals

A compliance assessment was undertaken against the conditions of each development consent and project approval (**Appendix B**). The assessment identified four matters of non-conformance (low risk) as detailed in **Table 4.1**.

¹ A 'Level 2 Non-Compliance' was defined in the 2012-2015 Independent Environmental Audit as an isolated lapse or absence of control in the implementation of an operations element which may not be of significant risk.

² A 'Compliance – Improvement Recommended' was described in the 2012-2014 Independent Environmental Audit a condition where the intent was met. However, it is considered that either the issue has the potential to deteriorate to a non-compliance if not further addressed or further improvement is recommended.

Table 4.1 Development Consent and Project Approval Non Compliances

Item	Requirement	Assessment and Recommendation	Risk
DA282-6-2003 Schedule 4 11(f)	(f) comparison of the frequency, night-time frequency, duration and estimated light level of each type of flare event with the flare events predicted in Table 2 of the following report: URS (2003) Sydney Gas Proposal Stage 2 Coal Seam Methane Project Visual Assessment of Lighting and Flare prepared by URS for Sydney Gas dated 6 November 2003.	The information required by Condition 11(f) is not entirely included in AEPR 2016-2017. While the frequency of use compared to previous reporting periods is provided, the estimated light levels are not discussed and there is no comparison to Table 2 of URS (2003).	Low
DA282-6-2003 Schedule 4 14	The results and recommendations of the monitoring program must be submitted to the Secretary at the conclusion of each stage of monitoring.	The auditor sighted correspondence from the DPE (02/08/18) confirming that the 2018 independent audit was not required. However, the correspondence noted that the monitoring program must continue to be undertaken. The Rehabilitation and Landscape Management Sub-Plan (July 2018) specifies that monitoring must be carried out every two years by an independent arborist.	Low
PA06-0291 Condition 3.7	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>The Noise Management Sub Plan (June 2017) notes that monitoring should be carried out within the first week of production, after three months of production and if the well status changes.</p> <p>Noise monitoring conducted during the audit period was limited to production phase wells; noise monitoring was not performed during workover activities.</p> <p>Based on the monitoring requirements of the Noise Management Sub Plan, monitoring was warranted during workover activities.</p>	Low
PA06-0291 Condition 3.24	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: <ul style="list-style-type: none"> a. Information explaining the maintenance procedures to be undertaken. b. An estimate of the length of works at each site. c. Contact details for a representative of the Proponent. d. Information regarding a 24 hour telephone contact number. 	<p>During the audit period, workover activities were completed of a number well sites within PA06_291.</p> <p>Adequate community notification records were sighted by the auditor for all workovers with the exception of MP02.</p> <p>It is recommended that written notification of planned maintenance activities is provided to landowners and affected stakeholders at least 14 days prior to commencement of works.</p>	Low

4.2.2 Environment Protection Licence

An assessment was conducted against the conditions of EPL 12003 (21 December 2017) (**Appendix C, Table C1**). Of the five non-compliances identified, four were previously reported by AGL in the 2016 and 2017 Annual Returns and are associated with continuous emissions monitoring requirements (**Table 4.2**). Each of these non-compliances took place until 14 December 2017, when the EPA issued a variation to EPL 12003.

In addition to the licence non-compliances, a legislative non-compliance was identified in regards to public reporting of monitoring data. The *Protection of the Environment Operations Act 1997*, Section 66(6) specifies that licence holders must, within 14 business days of obtaining monitoring data as specified under the licence, make the data publicly available on the company website. The Rosalind Park Gas Plant Flare Pit Water Analysis Report for December 2016 was not uploaded to the AGL website within 14 business days; the report was received on 12 December 2016 and uploaded three business days late on 9 January 2017. This matter was similarly previously reported by AGL.

In response to the above matter, AGL advised that the compliance management system was updated with a new action to trigger the report to be uploaded to the AGL website by the due date.

Table 4.2 – EPL Non Compliances

Item	Requirement	Assessment and Recommendation	Risk																								
O2.1	All plant and equipment installed at the premises or used in connection with the licensed activity: <ul style="list-style-type: none"> a. must be maintained in a proper and efficient condition; and b. must be operated in a proper and efficient manner. 	As a result of an equipment failure and non-compliance for the continuous emissions monitoring system, Condition O2 could not be met. The non-compliance took place until 14 December 2017, when the EPA issued a variation to EPL 12003 Condition M2.2, removing the requirement to operate a CEMS on Monitoring Point 2 and Monitoring Point 3.	Low																								
M2.1	For each monitoring/discharge point or utilisation area specified below (by a point number), the licensee must monitor (by sampling and obtaining results by analysis) the concentration of each pollutant specified in Column 1. The licensee must use the sampling method, units of measure, and sample at the frequency, specified opposite in the other columns:	Due to the non-compliance with EPL Licence Condition M2.3, AGL was unable to comply with Condition M2.1 (requirement to monitor pollutants using the specific sampling method) until the condition was varied on 14 December 2017.	Low																								
M2.3	Point 1 <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Pollutant</th> <th>Units of Measure</th> <th>Frequency</th> <th>Sampling Method</th> </tr> </thead> <tbody> <tr> <td>Nitrogen Oxides</td> <td>milligrams per cubic metre</td> <td>Continuous</td> <td>CEM-2</td> </tr> <tr> <td>Temperature</td> <td>degrees Celsius</td> <td>Continuous</td> <td>TM-2</td> </tr> <tr> <td>Misture</td> <td>percent</td> <td>Continuous</td> <td>Method approved by EPA in writing</td> </tr> <tr> <td>Volumetric flow rate</td> <td>cubic metres per second</td> <td>Continuous</td> <td>CEM-6</td> </tr> <tr> <td>Oxygen</td> <td>percent</td> <td>Continuous</td> <td>CEM-3</td> </tr> </tbody> </table>	Pollutant	Units of Measure	Frequency	Sampling Method	Nitrogen Oxides	milligrams per cubic metre	Continuous	CEM-2	Temperature	degrees Celsius	Continuous	TM-2	Misture	percent	Continuous	Method approved by EPA in writing	Volumetric flow rate	cubic metres per second	Continuous	CEM-6	Oxygen	percent	Continuous	CEM-3	As noted in condition O2.1, due to continuous emissions monitoring equipment failure, AGL remained non-compliant with Condition M2.3 until 14 December 2017.	Low
Pollutant	Units of Measure	Frequency	Sampling Method																								
Nitrogen Oxides	milligrams per cubic metre	Continuous	CEM-2																								
Temperature	degrees Celsius	Continuous	TM-2																								
Misture	percent	Continuous	Method approved by EPA in writing																								
Volumetric flow rate	cubic metres per second	Continuous	CEM-6																								
Oxygen	percent	Continuous	CEM-3																								

Item	Requirement	Assessment and Recommendation	Risk
M2.4	<p>Continuous emissions monitoring results for moisture, as required by Condition M2.3, must be calibrated by reference to sampling method TM-22 as specified in EPA Approved Methods for the Sampling and Analysis of Air Pollutants in NSW, as in force from time to time.</p> <p>Note: The requirement for quarterly monitoring at point 6 may be reviewed based on odour emission performance after 12 months from commissioning of the treatment plant.</p>	Due to continuous emissions monitoring equipment failure, AGL remained non-compliant with this condition until 14 December 2017.	Low

4.2.3 Groundwater Approvals

A compliance assessment was undertaken against the conditions of relevant WALs, WUAs and industrial bore licences (**Appendix C, Table C2, C3 and C4**). In addition, a review was conducted to determine if well sites are appropriately licensed (**Appendix D**). The review was informed in part by a Works Approval Review conducted by EMM Consulting (16 August 2017).

The compliance assessment identified no matters of non-compliance.

4.2.4 Petroleum Production Licences

A compliance assessment was undertaken against the conditions of the PPLs (**Appendix C, Table C5**). While AGL demonstrated substantial compliance against the licence conditions, the assessment identified two non-compliances, both of which were assessed as low risk (**Table 4.3**).

It is noted that adequate and appropriate evidence was not consistently captured within CMO with respect to PPL conditions. While evidence was subsequently provided, it is recommended that AGL conduct a review of PPL conditions within CMO and ensure evidence is adequately captured.

Table 4.3 PPL Non-Compliances

Item	Requirement	Assessment and Recommendation	Risk
8	The Lease Holder must provide reasonable notice of disturbing activities to potentially affected parties prior to the commencement of activities on each site. The Lease Holder must accommodate reasonable requests for limited rescheduling of activities.	<p>During the audit period, workover activities were completed of a number well sites within PA06_291.</p> <p>Adequate community notification records were sighted by the auditor for all workovers with the exception of MP02.</p> <p>It is recommended that written notification of planned maintenance activities is provided to landowners and affected stakeholders at least 14 days prior to commencement of works.</p>	Low

Item	Requirement	Assessment and Recommendation	Risk
10d iv	<p>The Lease Holder must, within 2 weeks of the abandonment of any well, submit to the Director-General a report providing details on the following items:</p> <p>iv) Gas and water makes and composition during the drilling and production test phases. The commencement and completion date of each phase of the operation and the date of any other significant events.</p>	<p>The gas and water 'makes and compositions' were routinely recorded in P&A reports. However, the P&A report for well site MT10 did not contain the required descriptions.</p> <p>It is noted that AGL have recently revised the P&A report format to ensure that this matter is adequately captured in going forward. As such, there are no further recommended actions.</p>	Low

Appendix A Approvals and Licences

A1. Development Approvals

Approval	Issue Date	Description	Audit Period Works
DA 15-1-2002-I (Apap, Joe Stanley, Johndilo, Loganbrae, Lipscombe and Mahon)	23/07/2002	Project approval granted for the continued operation of the Camden Coalbed Methane project, including: <ul style="list-style-type: none"> • Operation of the existing 20 wells and 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 and production of up to 93,000 GJ/month; • Sale and distribution of gas to the AGL gas network; and • Operation of the existing site office and pipe yard depot. 	<ul style="list-style-type: none"> • Operated selected wells and gas gathering line. • Completed plug and abandonment of LP01, JS01, JS03 and JS04. • Conducted rehabilitation of LP01, JS15, JS03, JS04.
MOD 53-4-2006	16/05/2006	Modification of DA 15-1-2002-i granted for construction, drilling and operation of a directional well from LB09.	
	9/02/2007	Modification granted for re-drilling of wells Apap 01 and Mahon 01.	
MOD24-3-2007	4/07/2007	Modification of DA 15-1-2002-i granted for construction, drilling and operation of two surface to in-seam wells (AP02/AP03) at AP01.	
MOD3	1/07/2008	Modification of DA 15-1-2002-i granted for 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.	
DA 246-8-2002-I (Kay Park)	20/09/2002	Project approval granted for: <ul style="list-style-type: none"> • Connection of 3 existing wells (KP1, KP2, and KP3) to the Ray Beddoe Treatment Plant (in accordance with the attached plan); and • Continued production and sale of methane gas from the 3 wells. 	<ul style="list-style-type: none"> • Operated wells and gas gathering line.
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. 	
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. 	
	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. 	
	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). 	

Approval	Issue Date	Description	Audit Period Works
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; Production of up to 14.5 petajoules per annum from the gas treatment plant. 	<ul style="list-style-type: none"> Operated wells, gas gathering line and RPGP. Conducted workover maintenance of EM39 and RP09. Completed plug and abandonment of RP03, RP04, RP05, RP06, RP11, EM16 and WG06.
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"> Commenced plug and abandonment of RP10 and RP12. Conducted rehabilitation of RP03, RP04, RP05, RP06, RP11, EM16, and WG06.
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). 	
MOD42-3-2005	1/06/2005	Modification of DA 282-6-2003-i granted for 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.	
MOD52-4-2006	16/05/2006	Modification of DA 282-6-2003-i granted for construction, drilling and operation of 1 directional well from GL07 and two directional wells from GL10.	
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. 	
MOD124-10-2006	1/11/2006	Modification of DA 282-6-2003-i granted for construction, drilling and operation of 1 directional well (GL16) from GL7, and 2 Surface to in-seam wells (GL14 and GL15) from GL10.	
MOD11-2-2007	2/05/2007	Modification of DA 282-6-2003-i granted for relocation of an Existing Internal Road at Rosalind Park Gas Plant (RPGP) off Medhurst Road, Menangle, dated February 2007.	

Approval	Issue Date	Description	Audit Period Works
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. 	
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. 	
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 RGP. 	
MOD11	18/09/2009	Modification of DA 282-6-2003-i granted for rerouting damaged gas gathering line at Glenlee-06.	
MOD12	25/11/2010	Modification of DA 282-6-2003-i granted for: <ul style="list-style-type: none"> Modification of RGP noise monitoring requirements, air emission concentration limits and waste storage and generation volumes. 	
MOD13	27/03/2017	Modification of DA 282-6-2003-i granted for: <ul style="list-style-type: none"> Deletion of nominated conditions that are replicated in EPL 12003. 	
DA 183-8-2004-I (Mt Taurus and Menangle Park)	16/12/2004	Project approval granted for: <ul style="list-style-type: none"> Connection of 15 existing coal seam methane wells to the Rosalind Park Gas Plant from the Mount Taurus and Menangle Park properties, for the production of methane gas; and Construction of a dam at the MT1 gas well site. 	<ul style="list-style-type: none"> Operated wells and gas gathering line. Conducted workover maintenance of MT05, MP25 and MP30.
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"> Completed plug and abandonment of MT05, MT09, and MT10. Conducted rehabilitation of MT05, MT09, MT10.

Approval	Issue Date	Description	Audit Period Works
DA 9-1-2005 (Glenlee Wells)	26/05/2005	Project approval granted for: <ul style="list-style-type: none"> Construction and drilling of well GL11; Construction of a gas gathering system between four wells at Glenlee and two wells at EMA1; Connection of 6 coal seam methane wells to the previously approved Stage 2 Camden Gas Project – Gas Treatment Plant, for the production of methane gas. 	<ul style="list-style-type: none"> Operated gas gathering line. Operated wells.
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. 	
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. 	
	16/11/2010	Modification of DA 9-1-2005 granted for: <ul style="list-style-type: none"> Modification of Schedule 2, Condition 26 	
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.
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. 	
MOD2	10/01/2010	Modification of DA 75-4-2005 granted for: <ul style="list-style-type: none"> Twinning of a gas gathering line from well surface locations SL03 and SL09 to the RPPG. 	
PA No. 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. 	
PA No. 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. Conducted rehabilitation of EM23.
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 	

Approval	Issue Date	Description	Audit Period Works
PA No. 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. • Well surface location SF04 is not permitted to be drilled. • 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"> • Operated wells and gas gathering line. • Conducted workover maintenance of SF02, SF05, SF09, MP02, MP08, MP10, MP22 and MP23.
MOD1	7/01/2011	Modification of PA06_0291 was granted for the construction and operation of gas gathering lines MP06-11 and MP11-MP23 (Via MP19).	
MOD2	20/04/2012	Modification of PA06_0291 was granted for the construction and operation of gas gathering lines MP03-05 and MP22-SL02.	

A2. Licences

Approval	No.	Issue Date	Authority	Compliance Assessment
Environment Protection Licence	12003	21/12/17	EPA	Appendix C, Table C1
Water Access Licence	24856	02/12/15	DPI Water	Appendix C, Table C2
Water Access Licence	24736	02/12/15	DPI Water	Appendix C, Table C2
Works and Use Approval	10WA112288	01/07/11	DPI Water	Appendix C, Table C3
Works and Use Approval	10WA112294	01/07/11	DPI Water	Appendix C, Table C3
Water Monitoring Bore No.	10BL604888	13/07/11	DPI Water	Appendix C, Table C4
Water Monitoring Bore No.	10BL604884	13/07/11	DPI Water	Appendix C, Table C4
Water Monitoring Bore No.	10BL604885	13/07/11	DPI Water	Appendix C, Table C4
Water Monitoring Bore No.	10BL604886	13/07/11	DPI Water	Appendix C, Table C4
Water Monitoring Bore No.	10BL604887	13/07/11	DPI Water	Appendix C, Table C4
Water Monitoring Bore No.	10BL604878	13/07/11	DPI Water	Appendix C, Table C4
Water Monitoring Bore No.	10BL604879	13/07/11	DPI Water	Appendix C, Table C4
Water Monitoring Bore No.	10BL604880	13/07/11	DPI Water	Appendix C, Table C4
Petroleum Production Lease	1	04/09/02	DRE	Appendix C, Table C5
Petroleum Production Lease	2	16/10/02	DRE	Appendix C, Table C5
Petroleum Production Lease	4	06/10/04	DRE	Appendix C, Table C5
Petroleum Production Lease	5	28/02/07	DRE	Appendix C, Table C5
Petroleum Production Lease	6	29/05/08	DRE	Appendix C, Table C5

Appendix B Development Approvals

B1. DA 15-1-2002-i

No.	Consent Condition	Compliance Assessment	Finding
	Schedule 3		
	Obligation to Minimise Harm to the Environment		
1	The Applicant shall implement all practicable measures to prevent or minimise any harm to the environment that may result from the construction or operation of the development.	<p>An EMS has been developed and implemented to manage environmental risks and achieve performance improvements. The EMS consists of an EMP, Sub Plans and a compliance management system.</p> <p>A number of controls are in place to monitor and measure implementation of the EMS including Environmental Management Sub Plan Compliance Audits, Daily Workover Reports, air quality monitoring and noise monitoring. The auditor sighted a sample of monitoring controls and noted compliance with the requirements of the EMP.</p> <p>Compliance obligations arising from licences, leases, environmental/ planning approvals and legislation are monitored through a web-based database compliance management system (CMO Compliance). The auditor sighted CMO Compliance and determined that the tool effectively monitors compliance against obligations.</p>	Compliant
	Terms of Approval		
2	The Applicant shall carry out the development generally in accordance with the:	<p>It was reported by AGL that the development is undertaken in accordance with the EMP and Sub Plans which reflect the requirements of the Consent Conditions. On receipt of an approved consent or modification, the EMP is reported to be revised to reflect the new requirements. This was evidenced by the frequent revision history of the document.</p> <p>The DA and subsequent modifications were submitted by Sydney Gas and as such were not available for the purpose of this assessment.</p>	Not Verified
	(a) DA submitted to the Department on 31 January 2002;		Not Verified
	(b) Camden Coalbed Methane Project Petroleum Production Operations – Environmental Impact Statement for the Sydney Gas Company (four volumes), dated December 2001 and prepared by Harvest Scientific Services;		Not Verified
	(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;		Not Verified
	(d) Letter from Sydney Gas Company dated 8 April 2002 to the EPA in relation to background noise level monitoring;		Not Verified
	(e) Letter from Sydney Gas Company dated 11 April 2002 to the EPA in relation to achievable noise levels, operational flaring noise, and ongoing maintenance issues;		Not Verified

B1. DA 15-1-2002-i

No.	Consent Condition	Compliance Assessment	Finding
	(f) Letter from Sydney Gas Company dated 11 April 2002 to the EPA in relation to nitrogen dioxide impact assessment and odour issues;		Not Verified
	(g) Letter from Sydney Gas Company dated 12 April 2002 to the EPA in relation to the 3 additional wells, and maintenance activities;		Not Verified
	(h) Letter from Sydney Gas Company dated 16 April 2002 to the EPA in relation to noise monitoring, noise levels, operational flaring noise, construction and maintenance activities, nitrogen dioxide assessment, and odour impact assessment;		Not Verified
	(i) Letter from Sydney Gas Company dated 29 May 2002 to Planning NSW in relation to the risk assessments and drawings for the Westbrook Road to Camden Pipeline;		Not Verified
	(j) The Modification Application submitted to the Department on 11 April 2006 and the accompanying document "Camden Gas Project Joint Venture Proposed Multiple Gas Well Modifications" prepared by AGL Gas Production (Camden) Pty Ltd and Sydney Gas (Camden) Operations Pty Ltd, dated April 2006;		Not Verified
	(k) Modification Application MOD 24-3-2007 and "Camden Gas Project Joint Venture Gas Well and Gathering Line Modification Project Statement of Environmental Effects" dated March 2007; and		Not Verified
	(l) Conditions of this consent	Refer to relevant conditions for an assessment of compliance.	Note
	If there is any inconsistency between the above documents, the latter document shall prevail over the former to the extent of the inconsistency. However, the conditions of this consent shall prevail over all other documents to the extent of any inconsistency.	Condition noted.	Note
	Period of Approval		N/A
3	This approval is for a period of twenty one (21) years from the date of granting of the production lease.	Condition not triggered during the audit period.	Not Triggered
	Special Conditions of Approval		N/A
4	The Applicant shall submit a development application for a new treatment plant within two (2) years of the date of this consent. Upon the commissioning of the new treatment plant the Applicant shall cease production from the Ray Beddoe Treatment Plant and proceed to rehabilitate the site in accordance with the Site Rehabilitation Management Plan.	Condition closed in a previous audit.	Not Triggered
5	If after five (5) years of the date of this consent any well that is the subject of this consent has not yet been drilled or completed, then the Applicant shall surrender the approval for that well.	Condition not triggered during the audit period.	Not Triggered

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No.	Consent Condition	Compliance Assessment	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. The report shall be prepared by an independent petroleum expert in accordance with relevant definitions approved by the Society of Petroleum Engineers and/or the World Petroleum Congress. In the absence of a proven reserve, the Applicant shall make a further submission to the Director-General justifying why production should continue. After reviewing this report, the Director-General may direct the Applicant to carry out certain actions (including the closure and rehabilitation of certain wells).</p> <p>Note: The Production Lease to be granted by the DOPE will apply to the PAL 1 area, which is a much larger area than that which the development consent applies to. This consent applies to the land and structures identified in Schedule 1, being the wells, treatment plant, site depot, gas gathering system and pipeline. To minimize the impact of the development on the area, the Production Lease will include a condition which requires the Applicant to relinquish areas that have not been tested for gas production within 10 years of the granting of the lease. The Production Lease would include a condition which requires the Applicant to submit a development application for development of the Stage II production area within 3 years of the date of the production lease.</p>	Condition closed in a previous audit.	Not Triggered
	Further Approvals		
7	<p>Nothing in this consent permits the drilling and operation of any additional wells (beyond the approved 26 wells) or a new treatment plant. These shall be the subject of another development consent or development consents.</p> <p>Note: The drilling of new gas wells within the production lease area and the production of gas from them, and a new treatment plant would require development consent under the Environmental Planning and Assessment Act, 1979.</p>	The auditor reviewed the gas wells reported in the 2016-2017 AEPR and 2017-2018 AEPR against the development consents and confirmed that no additional wells have been drilled or operated.	Compliant
	Redrilling and Refracting Management Plan		
	For the purposes of this consent the redrilling and/or additional fraccing of a well does not constitute wellhead maintenance.	<p>Condition not triggered during the audit period.</p> <p>It was reported by AGL (AEPR 2016-2017 and AEPR 2017-2018) that there were no drilling or fraccing works undertaken during the audit period.</p>	Not Triggered

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No.	Consent Condition	Compliance Assessment	Finding
9	The Applicant shall obtain the approval of the Director-General for the redrilling and/or additional fracing of a well.	Condition not triggered during the audit period. It was reported by AGL (AEPR 2016-2017 and AEPR 2017-2018) that there were no drilling or fracing works undertaken during the audit period.	Not Triggered
10	The Applicant shall prepare a Redrilling and Refracing Management Plan in consultation with the DOPE for redrilling and/or refracing of an existing well. The Plan shall be submitted to the Director-General no later than one month prior to the commencement of the work or within such period as agreed by the Director-General. The Plan shall include, but not necessarily be limited to:	Condition not triggered during the audit period. It was reported by AGL (AEPR 2016-2017 and AEPR 2017-2018) that there were no drilling or fracing works undertaken during the audit period.	Not Triggered
	(a) A description of all the activities to be undertaken on the well site during the redrilling and/or refracing work;		Not Triggered
	(b) Details of how the environmental performance of the work will be monitored and what actions will be taken to address identified adverse environmental impacts;		Not Triggered
	(c) reference to the relevant parts of the Environmental Management Plan required under condition 15 of this consent;		Not Triggered
	(d) compliance with all the relevant environmental performance requirements of this consent; and arrangements for complaints handling procedures during the redrilling/refracing work. The Applicant shall give written notification of the proposed redrilling/refracing work to potentially affected residences and other noise sensitive receivers at least fourteen days prior to work commencing.		Not Triggered
	Compliance		
11	Throughout the life of the development, the Applicant shall secure, renew, maintain, and comply with all the relevant statutory approvals applying to the development.	The auditor sighted the EMP and noted the inclusion of legislative requirements, including reporting requirements, approvals, licenses, permits and leases. Compliance obligations arising from licences, leases, environmental/ planning approvals and legislation are monitored through a web-based database compliance management system (CMO Compliance). The auditor sighted CMO Compliance and determined that the tool effectively monitors compliance against obligations.	Compliant

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No.	Consent Condition	Compliance Assessment	Finding
12	The Applicant shall take all reasonable steps to ensure that all of its employees, contractors and subcontractors are made aware of, and comply with, the conditions of this consent relevant to their respective activities.	<p>The auditor sighted the EMP (March 2018) 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 (Rapid Induct), includes relevant risks and controls as detailed in the EMP. Relevant records and competency assessments are maintained within Rapid Induct and the system includes adequate controls to ensure induction currency is maintained for relevant contractors.</p> <p>Commencing in 2017, monthly awareness training was delivered during the HSE meeting. Training programs sighted by the auditor include air quality, noise management, rehabilitation works and flora and fauna.</p>	Compliant
13	The Applicant must, in the opinion of the EPA, be a fit and proper person to hold a licence under the Protection of the Environment Operations Act, 1997, having regard to the matters in section 83 of that Act.	AGL has not had a licence suspended or revoked during the audit period and as such would be considered to be a fit and proper person.	Compliant
	PRODUCTION OPERATIONS PLAN		
14	The Applicant shall prepare a Production Operations Plan (POP) for the approval of the DOPE. The POP shall have regard to the conditions of this consent and the licence under the POEO Act. The POP will form the basis for the:	Condition closed in previous audit.	Compliant
	(a) ongoing operations and environmental management; and		Compliant
	(b) ongoing monitoring of the development.		Compliant
	A copy of the POP shall be forwarded to the Department within fourteen days of the DMR's acceptance.		Compliant
	ENVIRONMENTAL MANAGEMENT		
	Environmental Management Plan		

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No.	Consent Condition	Compliance Assessment	Finding
15	The Applicant shall prepare and implement an Environmental Management Plan (EMP) to provide an environmental management framework, practices and procedures to be followed during the drilling and operation of the development. The EMP shall be prepared in consultation with the relevant authorities (EPA, DMR, DLWC). The EMP shall include, but not necessarily be limited to:	The auditor sighted the EMP (March 2018) and noted compliance with the requirements of this condition.	Compliant
	(a) identification of all statutory and other obligations that the Applicant is required to fulfil in relation to operation of the development, including all consents, licences, approvals and consultations;	A number of controls are in place to monitor and measure implementation of the EMS including Environmental Management Sub Plan Compliance Audits, Daily Workover Reports, air quality monitoring and noise monitoring. The auditor sighted a sample of monitoring controls and noted compliance with the requirements of the EMP.	Compliant
	(b) a description of the roles and responsibilities for all key personnel involved in the drilling and operation of the development;	It was reported by AGL that the EMP was developed by Sydney Gas in consultation with the nominated agencies in 2002. However, documented evidence of the consultation was not available.	Compliant
	(c) the overall environmental policies and principles to be applied to the operation of the development;		Compliant
	(d) standards and performance measures to be applied to the development, and a means by which environmental performance can be periodically reviewed and improved;		Compliant
	(e) management policies to ensure that environmental performance goals are met and to comply with conditions of this consent; and		Compliant
	(f) include the following detailed plans:		Compliant
	i Noise Management Plan;		Compliant
	i Soil and Water Management Plan;		Compliant
	i Water Quality Management Plan;		Compliant
	i Traffic Management Plan;	Compliant	
	i Vegetation and Landscape Management Plan;	Compliant	
	i Waste Management Plan; and	Compliant	
	i Site Rehabilitation Management Plan	Compliant	
16	The EMP shall be submitted for the approval of the Director-General within three months of the date of this consent, or within such period otherwise agreed by the Director-General.	Condition closed in a previous audit.	Not Triggered
	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.	Compliant

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No.	Consent Condition	Compliance Assessment	Finding
18	<p>The Applicant shall review and update the EMP regularly, or as directed by the Director-General.</p> <p>Note: Submission of a copy of the approved Plan to other Government agencies does not mean that their approval is required. The Plan is for the information of the agency.</p>	<p>During the audit period, the EMP was reviewed March 2017 and March 2018 as evidenced by the revision history of the document.</p>	Compliant
	Noise Management Plan		
19	<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>	<p>The auditor sighted the Noise Management Sub Plan (June 2017) and noted compliance with the requirements of this condition.</p>	Compliant
	(a) identification of the potential sources of noise during drilling and operation;	<p>Implementation of the Sub Plan was demonstrated through the Environmental Management Sub Plan Compliance Audits and the induction program.</p> <p>There were no reported noise complaints during the audit period.</p>	Compliant
	(b) the noise criteria for these activities;		Compliant
	(c) details of what actions and measures would be implemented to ensure that these operations would comply with the relevant noise criteria;		Compliant
	(d) describe how the effectiveness of these actions and measures would be monitored during the life of the development, clearly indicating who would conduct the monitoring, how often this monitoring would be conducted, how the results of this monitoring would be recorded and reported to the Director-General, and if any non-compliance is detected; And		Compliant
	(e) describe what procedures would be followed to ensure compliance.		Compliant
	Soil and Water Management Plan		
	<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>	<p>The auditor sighted the Soil and Water Management Sub Plan (June 2018) and noted compliance with the requirements of this condition.</p>	Compliant
	(a) the measures to be implemented to minimise the potential for soil erosion and the discharge of sediment and other pollutants to lands and/or waters during drilling activities;	<p>Implementation of the Sub Plan was demonstrated through the Environmental Management Sub Plan Compliance Audits. Periodic inspections are also undertaken to assess implementation and identify performance improvements.</p>	Compliant
	(b) the measures to be implemented to mitigate the impacts of stormwater run-off from and within the site following the completion of drilling activities;		Compliant
	(c) demonstrate that erosion and sedimentation control measures will conform with, or exceed, the relevant requirements and guidelines contained in the Department of Housing’s Managing Urban Stormwater: Soils and Construction;		Compliant

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No.	Consent Condition	Compliance Assessment	Finding
	(d) consistency with the stormwater management plan for the catchment, should one exist, or with the EPA's Managing Urban Stormwater: Council Handbook should a stormwater management plan for the catchment not exist;		Compliant
	(e) measures to rehabilitate erosion-affected areas and areas the subject of excavation, including tree, shrub and/or cover crop species and implementation; and		Compliant
	(f) management procedures for all surface and groundwater collection and storage structures on the site, including a maintenance program for associated infrastructure (e.g. pipes, pumps, dam walls, etc.) and a program for desilting of those structures, where relevant.		Compliant
	Water Quality Management Plan		
21	The Applicant shall prepare and implement a Water Quality Management Plan for the whole site. This plan shall include, but not necessarily be limited to:	The auditor sighted the Soil and Water Management Sub Plan (June 2018) and the Groundwater Management Plan for the Camden Gas Project (June 2018). The Plans comply with the requirements of this condition. Implementation of the Sub Plan was demonstrated through the Environmental Management Sub Plan Compliance Audits. Periodic inspections are also undertaken to assess implementation and identify performance improvements.	Compliant
	(a) provide details of an appropriate soil sampling and monitoring program to ensure that areas used for waste water application do not lead to an unacceptable build-up of salts within the soil profile;		Compliant
	(b) implement a program of regular testing of waste water quality for compounds, nutrients and metals, as outlined in Table 7.8 of the EIS; and		Compliant
	(c) details of the well maintenance procedures to ensure the integrity of the well isolation components to prevent the cross contamination of groundwater aquifers.		Compliant
	Traffic Management Plan		
22	The Applicant shall prepare and implement a Traffic Management Plan for the whole site. This plan shall include, but not necessarily be limited to:	The auditor sighted the Traffic Management Sub Plan (June 2018) and noted compliance with the requirements of this condition. This condition is also reflected in the induction program. Note: as at July 2013, PAL 1 no longer exists.	Compliant
	(a) Identification of the potential traffic and transport impacts associated with the development and measures to limit traffic movements in the PAL 1 area;		Compliant
	(b) restrictions on the movement of heavy vehicles during school pick-up/drop-off times;		Compliant
	(c) details of traffic management measures associated with the construction of pipelines within public roads; and		Compliant
	(d) measures to reduce the transportation of plant material and/or dirt off site.		Compliant
	Vegetation and Landscape Management Plan		Compliant

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No.	Consent Condition	Compliance Assessment	Finding
23	The Applicant shall prepare and implement a Vegetation and Landscape Management Plan for the whole site. This plan shall include, but not necessarily be limited to:	The auditor sighted the Rehabilitation and Landscape Management Plan (June 2018) and the Flora and Fauna Management Plan (June 2018). The plans comply with the requirements of this condition.	Compliant
	(a) measures to protect mature trees as part of the well drilling or gas gathering pipeline construction activities;		Compliant
	(b) details of all landscaping to be undertaken on the site;		Compliant
	(c) ensure that tree and shrub species used for landscaping of the site are indigenous to the locality; and		Compliant
	(d) details of a program to ensure that all landscaped areas are maintained in a tidy, healthy state.		Compliant
	Waste Management Plan		
24	The Applicant shall prepare and implement a Waste Management Plan for the whole site. This plan shall include, but not necessarily be limited to:	The auditor sighted the Waste Management Sub Plan (June 2018) and noted compliance with the requirements of this condition.	Compliant
	(a) Measures to minimise the production and impact of waste produced at the site during drilling and operation;	Implementation of the Sub Plan was demonstrated through the waste separation practices (observed on site) and the induction program.	Compliant
	(b) implementation of waste reduction, reuse and recycling principles;		Compliant
	(c) details of the reuse and recycling of waste water produced/collected on the site, including collection and handling procedures;		Compliant
	(d) details of appropriate disposal methods in the event that reuse and recycling are not available or are not practicable; and		Compliant
	(e) programs for involving and encouraging employees and contractors to minimise domestic waste production on the site and reuse/recycle where appropriate.		Compliant
	Site Rehabilitation Management Plan		
25	The Applicant shall prepare and implement a Site Rehabilitation Management Plan for the whole site. This plan shall include, but not necessarily be limited to:	The auditor sighted the Rehabilitation and Landscape Management Sub Plan (June 2018 and previous versions) and noted compliance with the requirements of this condition.	Compliant
	(a) details of the staging and timing for rehabilitation works;	The auditor inspected sites JS01 and LP01 that had been subject to recent plug and abandonment and rehabilitation works. Rehabilitation works were conducted in compliance with the Sub Plan.	Compliant
	(b) ongoing management strategies to ensure the success of rehabilitation works;		Compliant
	(c) details of the establishment of vegetation and all landscaping to be undertaken including flora species, location of grassed areas, garden beds and other vegetated areas, and mature height and width measurements of all flora species; and		Compliant

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No.	Consent Condition	Compliance Assessment	Finding
	(d) the measures to remediate sites following the decommissioning of the wells, pipelines and treatment plant.		Compliant
	PERFORMANCE REPORTING		
	Condition Report		
26	The Applicant shall prepare a Condition Report on residences and structures that may be potentially affected by drilling/fracking work, including the redrilling and refracking of an existing well. The Applicant shall undertake an inspection of the residence and/or structure prior to work commencing, and a follow up inspection within one month of the completion of the work. The Applicant shall take immediate action for repair of any damage to the residence or structure as a result of the work and to avoid any further damage. A copy of the Condition Report shall be submitted to the Director-General and the DMR after completion of the work.	Condition closed in a previous audit.	Not Triggered
	Incident Reporting		
27	The Applicant shall notify the EPA, DMR and the Director-General of any incident with significant off-site impacts on people or the biosphere environment as soon as practicable after the occurrence of the incident. The Applicant shall provide written details of the incident to the Director-General, the EPA, DMR, Wollondilly Council and Camden Council within seven days of the date on which the incident occurred.	The auditor sighted the Pollution Incident Response Management Plan (PIRMP) for the project. There were no reportable environmental incidents associated with this Development Consent during the audit period.	Not Triggered
28	The Applicant shall meet the requirements of the Director-General to address the cause or impact of any incident, as it relates to this consent, reported in accordance with condition 27 of this consent, within such period as the Director-General may agree.	Condition not triggered during the audit period.	Not Triggered
	Complaints Register		
29	The Applicant shall record details of all complaints received in an up-to-date Complaints Register. The Register shall record, but not necessarily be limited to:	The auditor sighted complaints records and noted compliance with the requirements of this condition.	Compliant
	(a) the date and time, where relevant of the complaint;	There were no reported environmental complaints associated with this Development Consent during the audit period.	Compliant
	(b) the means by which the complaint was made;		Compliant
	(c) any personal details of the complainant that were provided, or if no details were provided, a note to that effect;		Compliant
	(d) the nature of the complaints;		Compliant

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No.	Consent Condition	Compliance Assessment	Finding
	(e) any action(s) taken by the Applicant in relation to the complaint, including any follow-up contact with the complainant; and		Compliant
	(f) if no action was taken by the Applicant in relation to the complaint, the reason(s) why no action was taken.		Compliant
	The Complaints Register shall be made available for inspection by the EPA or the Director-General upon request. The Applicant shall also make summaries of the register, without details of the complainants, available for public inspection.	Condition not triggered during the audit period.	Not Triggered
	Risk Assessment		
30	Within six months from the date of this consent, the Applicant shall submit a compliance report to the Director-General confirming that the recommendations (1 to 17) made in the Quantified Risk Assessment dated September 2000 by McCracken Consulting have been satisfactorily implemented. Where a recommendation has not been implemented or completed, justification must be provided in the compliance report.	Condition closed in a previous audit.	Not Triggered
31	Within six months from the date of this consent, the Applicant shall submit a compliance report to the Director-General confirming that the actions (1 to 66 and A to SS) arising from the HAZOP study report dated May 2001 by McCracken Consulting have been satisfactorily implemented. Where an action has not been implemented or completed, justification must be provided in the compliance report.	Condition closed in a previous audit.	Not Triggered
32	Within six months from the date of this consent, the Applicant shall submit for approval by the Director-General, a document setting out a comprehensive Safety Management System, covering all operations on site and associated transport activities involving hazardous materials. The document shall clearly specify all safety related procedures, responsibilities and policies, along with details of mechanisms for ensuring adherence to procedures. Records shall be kept on site and shall be available for inspection by the Director-General on request. The Safety Management System shall be developed in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 9 Guidelines for the Development of Safety Management Systems.	The Auditor sighted the Safety Management Plan, Camden Project NSW (May 2018) and noted compliance with the requirements of this condition. Implementation was demonstrated through inductions and pre mobilisation hazard forms (sighted 7 August 2017 example).	Compliant
	EPA Annual Return		

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No.	Consent Condition	Compliance Assessment	Finding
33	The applicant shall provide an Annual Return to the EPA in relation to the development as required by any licence under the POEO Act. In the return the Applicant shall report on the annual monitoring undertaken (where the activity results in pollutant discharges), provide a summary of complaints relating to the development, report on compliance with licence conditions and provide a calculation of fees (administrative fees and where relevant, load based fees) that are payable. If load based fees apply to the activity the Applicant will be required to submit load based fee calculation worksheets with the return.	The auditor sighted the December 2016 and December 2017 Annual Returns and noted compliance against the relevant requirements of this condition.	Compliant
Annual Environmental Performance Reporting			
34	Within twelve months of the date of this consent, and annually thereafter during the life of the development, the Applicant shall submit an Annual Environmental Performance Report to the Director-General. This report shall include, but not be limited to:	The auditor sighted the AEPR 2016-2017 and the AEPR 2017-2018 and noted compliance with the requirements of this condition.	Compliant
	(a) the standards, performance measures and statutory requirements the development is required to comply with;		Compliant
	(b) an assessment of the environmental performance of the development to determine whether it is complying with these standards, performance measures, and statutory requirements;		Compliant
	(c) copy of the Complaints Register for the preceding twelve month period and indicating what actions were (or are being) taken to address these complaints;		Compliant
	(d) indication of what actions were taken to address any issue and/or recommendation raised by the Community Consultative Committee;		Compliant
	(e) provision of the detailed results of all the monitoring required by this consent; and		Compliant
	(f) review of the results of this monitoring, identifying any non-compliance and any significant trends in the data and if any non-compliance is detected, describe what actions and measures would be carried out to ensure compliance, clearly indicating who would carry out these actions and measures, when they would be carried out, and how the effectiveness of these measures would be monitored over time.		Compliant

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No.	Consent Condition	Compliance Assessment	Finding
35	The Director-General may require the Applicant to address certain matters identified in the Annual Environmental Performance Report. Any action required to be undertaken shall be completed within such period as the Director-General may agree.	The auditor sighted correspondence from the DPE to AGL (18/01/2016) requesting a status update of actions taken in response to recommendations or non-compliances identified in the IEA. The auditor sighted the 2017/18 Annual Environmental Performance Report and noted that this matter was adequately addressed. The DPE also requested that all subsequent Independent Environmental Audits include the status of non-compliances arising from the previous audit in the body of the report. This IEA satisfies this request.	Compliant
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 (2016/2017 and 2017/2018) to the following agencies: DPE, EPA, DPI, Campbelltown City Council, Camden Council and Wollondilly Council. A copy of each AEPR is available on the CGP website.	Compliant
	Independent Environmental Audit		
37	Within two years of the date of this consent and every two years thereafter, unless the Director-General directs otherwise, the Applicant shall commission and pay the full costs of an Independent Environmental Audit. The Independent Environmental Audit shall:	The scope of this 2016-2018 IEA complies with the requirements of this condition.	Compliant
	(a) be conducted by a suitably qualified, experienced, and independent person(s) whose appointment has been approved by the Director-General;		Compliant
	(b) be consistent with <i>ISO 14010 – Guidelines and General Principles for Environmental Auditing</i> , and <i>ISO 14011 – Procedures for Environmental Auditing</i> , or updated versions of these guidelines/manuals;		Compliant
	(c) assess the environmental performance of the development, and its effects on the surrounding environment;		Compliant
	(d) assess whether the development is complying with the relevant standards, performance measures, and statutory requirements;		Compliant
	(e) review the adequacy of the Applicant’s Environmental Management Plan; and		Compliant

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No.	Consent Condition	Compliance Assessment	Finding																				
	(f) recommend measures or actions to improve the environmental performance of the development, and/or its environmental management and monitoring systems.		Compliant																				
	Within two months of commissioning the audit, the Applicant must submit a copy of the audit report to the Director-General and the EPA and the DMR. The Director-General may require the Applicant to address certain matters identified in the report and any comments received from the EPA and DMR. Any action required to be undertaken shall be completed within such period as the Director-General may agree.	The 2016-2018 Independent Environmental Audit was commissioned on 7 November 2018 and finalised in a timely manner. It was reported by AGL that the report would be submitted to the nominated agencies within two months of commissioning.	Not verified																				
	ENVIRONMENTAL PERFORMANCE																						
	Noise Limits																						
38	<p>The Applicant shall comply with the noise criteria specified in the table below. Table 1 – Noise Limits (dB(A))</p> <table border="1"> <thead> <tr> <th>Location (Identified in Fig. 10.1 of the EIS)</th> <th>Day L_{AEO15min}</th> <th>Evening L_{AEO15min}</th> <th>Night L_{AEO15min}</th> </tr> </thead> <tbody> <tr> <td>Receiver Location A</td> <td>40</td> <td>40</td> <td>40</td> </tr> <tr> <td>Receiver Locations B, C and F</td> <td>37</td> <td>37</td> <td>37</td> </tr> <tr> <td>Receiver Locations D, E and G to M</td> <td>37</td> <td>37</td> <td>35</td> </tr> <tr> <td>Any other residential receiver</td> <td>35</td> <td>35</td> <td>35</td> </tr> </tbody> </table>	Location (Identified in Fig. 10.1 of the EIS)	Day L _{AEO15min}	Evening L _{AEO15min}	Night L _{AEO15min}	Receiver Location A	40	40	40	Receiver Locations B, C and F	37	37	37	Receiver Locations D, E and G to M	37	37	35	Any other residential receiver	35	35	35	The noise monitoring locations identified in this condition are associated with the former Ray Beddoe Treatment Plant site. AGL did not conduct any activity within this area during the audit period.	Not Triggered
Location (Identified in Fig. 10.1 of the EIS)	Day L _{AEO15min}	Evening L _{AEO15min}	Night L _{AEO15min}																				
Receiver Location A	40	40	40																				
Receiver Locations B, C and F	37	37	37																				
Receiver Locations D, E and G to M	37	37	35																				
Any other residential receiver	35	35	35																				
39	For the purposes of assessment of noise levels specified in this consent, noise from the development shall be: more than 30m from the boundary, at the most affected point within 30m of the dwelling to determine compliance with the LAeq15min, LAeq day, LAeq evening and LAeq night noise limits;	Condition closed in a previous audit.	Not Triggered																				
	(a) measured at the most affected point on or within the residential boundary or, where the dwelling is		Not Triggered																				
	(b) subject to the modification factors provided in Section 4 of the <i>NSW Industrial Noise Policy</i> ; and		Not Triggered																				
	(c) measured using the FAST response on the sound level meter.		Not Triggered																				

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No.	Consent Condition	Compliance Assessment	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 <i>NSW Industrial Noise Policy</i>). Details of such an alternative noise assessment method accepted by the EPA shall be submitted to the Director-General prior to the implementation of the assessment method.	Condition closed in a previous audit.	Not Triggered
41	All noise limits specified as part of this consent apply under:	Condition closed in a previous audit.	Not Triggered
	(a) wind speeds up to 3m/s at 10 metres above ground level; and		Not Triggered
	(b) temperature inversion conditions of up to 30C/100m.		Not Triggered
	Noise – Well Maintenance		
42	The Applicant shall apply all feasible and reasonable noise mitigation measures to planned well maintenance activities in order to achieve the noise limits specified by this consent. Where the noise limits are not achievable the Applicant shall implement management practices as necessary to minimise the potential noise impacts. These management practices are to include, but not be limited to:	The auditor sighted the Noise Management Sub Plan (June 2017) and noted compliance with the requirements of this condition. Implementation was evidenced by the induction program (construction hours), Environmental Management Sub Plan Compliance Audits and notification letters provided to landowners in advance of workover and plug and abandonment works. There were no reported noise complaints during the audit period.	Compliant
	(a) appropriately informing affected residences and other relevant parties at least two weeks in advance of any planned well maintenance activities and updating the information as required;		Compliant
	(b) documenting and implementing any specific work practices the Applicant will employ to limit noise;		Compliant
	(c) documenting the feasible and reasonable noise mitigation measures that will be undertaken to reduce noise impacts from planned well maintenance activities; and		Compliant
	(d) conducting noise monitoring where appropriate.		Compliant
	Noise – Drilling Impacts		
43	The Applicant shall implement management practices as necessary to minimise the potential noise impacts from drilling work at wells LB-1, LB-2 and LB-3. These management practices are to include, but not be limited to:	The auditor sighted the Noise Management Sub Plan (June 2018) and noted compliance with the requirements of this condition. AGL reported that no drilling works were undertaken during the audit period.	Not triggered
	(a) identifying all potentially affected noise sensitive receivers (including residences, schools, commercial premises and noise sensitive equipment) that may be affected by drilling work at these wells;		Not triggered
	(b) predicting potential noise levels from the proposed well drilling methods where appropriate;		Not triggered

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No.	Consent Condition	Compliance Assessment	Finding
	(c) identifying and implementing all reasonable and feasible noise mitigation measures to reduce any drilling noise impacts;		Not triggered
	(d) documenting and implementing any specific work practices the Applicant will employ to limit noise; conducting noise monitoring where appropriate; and		Not triggered
	(e) appropriately informing affected residences and other relevant parties at least two weeks in advance of any drilling work at wells LB-1, LB-2 and LB-3 and updating the information as required.		Not triggered
	Hours of Operation		
44	The Applicant shall ensure that all construction work, except:	The auditor sighted the Noise Management Sub Plan (June 2017) and noted the inclusion of the requirements of this condition. It was reported by AGL (AEPR 2016-2017 and AEPR 2017-2018) that there were no construction activities undertaken during the audit period with respect to DA15-1-2002.	Not triggered
	a) for the drilling (including well casing and grouting) of SIS wells; or		Not triggered
	b) where the Applicant has reached an agreement with all potentially affected residences and other noise sensitive receivers to conduct drilling works outside these hours.		Not triggered
	c) Shall only be conducted between 7.00 am and 6.00 pm Monday to Friday and between 8.00am and 1.00pm Saturdays, unless inaudible at any residential receiver.		Not triggered
	Note: Inaudible means that the construction activity cannot be heard by the human ear at the nearest affected residential receiver.		Not triggered
45	Notwithstanding condition 44 of this consent, the specified hours of operation also apply to:	The auditor sighted the Noise Management Sub Plan (June 2017) and noted the inclusion of the requirements of this condition.	Not Triggered
	(a) planned maintenance activities at any of the wells;		Not Triggered
	(b) planned deliveries to the treatment plant; and		Not Triggered
	(c) planned maintenance activities at the treatment plant; except where the Applicant has reached an agreement with all potentially affected residences and other noise sensitive receivers, to conduct maintenance works outside these hours.		Not Triggered
46	Condition 44 of this consent does not apply to the delivery of materials outside the specified hours of operation if that delivery is required by, the police or other authorities for safety reasons, and/or the operation or personnel or equipment are endangered. In such circumstances, prior notification is provided to the EPA and affected residences as soon as possible, or within a reasonable period in the case of an emergency.	Condition noted.	Note

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No.	Consent Condition	Compliance Assessment	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 triggered during the audit period.	Not Triggered								
47A.	Noise from the drilling and construction of AP02 and AP03 shall not exceed the sound pressure (noise) limits in the table below:	Condition not triggered during the audit period.	Not Triggered								
	<p>Table 1A – Construction Noise Limits in dB(A) L_{Aeq}</p> <table border="1"> <thead> <tr> <th>Receiver Location</th> <th>Weekday (7.00am- 6.00pm) Saturday (7.00am- 1.00pm)</th> <th>Saturday (1.00pm- 6.00pm) Sunday (7.00am- 6.00pm)</th> <th>Evening (6.00pm- 10.00pm)</th> <th>Night (10.00pm- 7.00am)</th> </tr> </thead> <tbody> <tr> <td>Receiver A1, A2, A3, A4</td> <td>45</td> <td>40</td> <td>40</td> <td>35</td> </tr> </tbody> </table>		Receiver Location	Weekday (7.00am- 6.00pm) Saturday (7.00am- 1.00pm)	Saturday (1.00pm- 6.00pm) Sunday (7.00am- 6.00pm)	Evening (6.00pm- 10.00pm)	Night (10.00pm- 7.00am)	Receiver A1, A2, A3, A4	45	40	40
Receiver Location	Weekday (7.00am- 6.00pm) Saturday (7.00am- 1.00pm)	Saturday (1.00pm- 6.00pm) Sunday (7.00am- 6.00pm)	Evening (6.00pm- 10.00pm)	Night (10.00pm- 7.00am)							
Receiver A1, A2, A3, A4	45	40	40	35							
Ray Beddoe Treatment Plant – Reduction of Noise											
48	The Applicant shall prepare and submit to the Department and the EPA a Pollution Reduction Program (PRP) for noise designed to meet the following levels at receiver Locations A to M (identified in Fig. 10.1 of the EIS)	Condition closed in a previous audit.	Not Triggered								
	(a) an L _{Aeq} 15min level of 37 dB(A) for the day time period;		Not Triggered								
	(b) an L _{Aeq} 15min level of 37 dB(A) for the evening period; and		Not Triggered								
	(c) an L _{Aeq} 15min level of 35 dB(A) for the night time period.		Not Triggered								
	These levels are to apply at the most affected point on or within the residential boundary of each nominated receiver or, where the dwelling is more than 30m from the boundary, at the most affected point within 30m of the dwelling.		Not Triggered								
49	If the Applicant determines that the levels set out in condition 48 of this consent cannot be achieved after all feasible and reasonable mitigation measures have been implemented, then the Applicant is to advise the Department and EPA of the levels that can be feasibly and reasonably achieved.	Condition closed in a previous audit.	Not Triggered								
50	The PRP is to be submitted to the Department and the EPA within six months of the date of the consent for the development. PRP implementation is to be undertaken in the period from six months to eighteen months from the date of development consent.	Condition closed in a previous audit.	Not Triggered								

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No.	Consent Condition	Compliance Assessment	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.	Not Triggered
	Odour		
52	In accordance with section 129 of the <i>Protection of the Environment Operations Act 1997</i> , the Applicant shall not cause or permit any offensive odours to be emitted from the site. For the purposes of this condition, offensive odour has the same meaning as provided for by the <i>Protection of the Environment Operations Act 1997</i> .	Condition closed in a previous audit. The Ray Beddoe Treatment Plant has been decommissioned.	Not Triggered
	Water Quality Impacts		
53	Except as may be expressly provided for by a licence under the <i>Protection of the Environment Operations Act 1997</i> , the Applicant shall comply with section 120 of the <i>Protection of the Environment Operations Act 1997</i> in carrying out the development.	<p>The auditor sighted the Soil and Water Management Sub Plan (June 2018). The plans detail a number of controls to prevent the pollution of water and was reviewed twice in this audit period to reflect operations.</p> <p>Implementation of the Sub Plan was demonstrated through the Environmental Management Sub Plan Compliance Audits. Periodic inspections are also undertaken to assess implementation and identify performance improvements.</p> <p>The auditor also sighted a sample of plug and abandonment works completed during the audit period and noted that there was no evidence of erosion or uncontrolled releases to the environment.</p> <p>Furthermore AGL reported there were no surface water contamination incidents recorded or community complaints received in relation to surface water for the reporting period.</p>	Compliant
	Waste Water		
54	Waste water from the construction, installation and operation of wells and associated infrastructure shall only be applied to the following areas:	The auditor sighted the AGL Environmental Footprint spreadsheet for the financial years 2016/17 and 2017/18 which note that produced water was primarily reused by external industries. The auditor sighted a sample of disposal records generated during the audit period and reconciled against the Environmental Footprint. There were no errors or emissions identified.	Compliant
	(a) dust suppression on any unsealed roads within PAL1;		Compliant
	(b) irrigated onto pastures within PAL 1;		Compliant
	(c) evaporation dam; and		Compliant

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No.	Consent Condition	Compliance Assessment	Finding
	(d) reinjection into gas wells.		Compliant
	The Applicant shall prepare a detailed feasibility study of reinjection of waste water into a gas well if this method of disposal of waste water is proposed. The approval of the Director-General shall be obtained for reinjection of waste water into a gas well. Note: Section 120 of the <i>Protection of the Environment Operations Act 1997</i> applies to the disposal of waste water. This section refers to the pollution of waters.		Compliant
55	Spray from waste water application shall not drift beyond the boundary of the waste water utilisation area to which it is applied.	Condition closed in a previous audit.	Not Triggered
56	The Applicant shall ensure that areas proposed to be used for waste water application can effectively utilise the waste water. This includes the use for pasture or crop production, as well as ensuring the soil is able to absorb the nutrients, salts, hydraulic load and organic materials in the liquids. The Applicant may be required to undertake monitoring of land and receiving waters to determine the impact of waste water application.	Condition closed in a previous audit.	Not Triggered
57	The Applicant shall ensure that all waste water that is used for dust suppression and/or irrigation has a salinity measure that does not exceed 800 iS/cm.	Condition closed in a previous audit.	Not Triggered
	Dust		
58	The Applicant shall ensure that activities are carried out in a manner that will minimise the emission of dust from the site, including traffic generated dust from the site access roads.	The auditor sighted the Air Quality Management Sub Plan (June 2018) and noted the inclusion of reasonable dust management controls. The auditor sighted the environmental complaints register and noted that there were no dust related complaints during the audit period in relation to this Development Consent.	Compliant
59	The Applicant shall take all practicable measures to ensure that all vehicles entering or leaving a site, carrying a load that may generate dust, are covered at all times, except during loading and unloading. Any such vehicles shall be covered or enclosed in a manner that will prevent emissions of dust from the vehicle at all times.	The auditor sighted the Air Quality Management Sub Plan (June 2018) and noted the inclusion of reasonable dust management controls. The auditor sighted the environmental complaints register and noted that there were no dust related complaints during the audit period in relation to this Development Consent.	Compliant
60	The Applicant shall take all practicable measures to minimise the generation of wind-blown dust from soil stockpiles.	Condition not triggered during the audit period.	Not triggered
	Threatened Species		

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No.	Consent Condition	Compliance Assessment	Finding
60A	The Applicant shall ensure that, during the drilling and construction of AP02 and AP03, impacts on threatened species are minimized by implementing actions including, but not limited, to the following:	The works referred to in this condition were not undertaken during the audit period.	Not triggered
	a) The recommendations outlined in Sections 6 and 7 of the Ecosearch Environmental Consultants Pty Ltd report titled "Flora and Fauna Assessment, AGL – Gas Well and Gathering Line Project Modifications", and		Not triggered
	b) Marking the boundaries of endangered ecological communities (EECs) and locations of other known threatened species and, where possible, avoiding construction activities within these areas.		Not triggered
	Waste		
61	The Applicant shall not cause, permit or allow any waste generated outside the site to be received at the site for storage, treatment, processing, reprocessing or disposal or any waste generated at the site, to be disposed of at the site, except as expressly permitted by a licence under the <i>Protection of the Environment Operations Act 1997</i> . This condition only applies to the storage, treatment, processing, reprocessing or disposal of waste at the site, if it requires a licence under the <i>Protection of the Environment Operations Act 1997</i> .	The auditor sighted the AGL Environmental Footprint spreadsheet for the financial years 2016/17 and 2017/18 and noted compliance with the requirements of this condition. The Environmental Footprint provides a detailed record of waste streams generated, recycled/reused and disposed, including water, hazardous waste and non-hazardous waste. AGL reported that no wastes are received, or disposed, at the premises. The auditor sighted a sample of disposal records and reconciled against the Environmental Footprint. There were no errors or emissions identified.	Compliant
62	Notwithstanding condition 61 of this consent, the Applicant may dispose of waste water generated on the site in accordance with condition 54 of this consent.	The auditor sighted the AGL Environmental Footprint spreadsheet for the financial years 2016/2017 and 2017/2018. The spreadsheets note that produced water was primarily collected by Cleanaway for recycling. The auditor sighted a sample of disposal records generated during the audit period and reconciled against the Environmental Footprint. There were no errors or emissions identified.	Compliant
	Lighting		
63	The Applicant shall ensure that all external lighting associated with the development is mounted, screened and directed in such a manner so as to not create a nuisance to surrounding land uses. The lighting must be the minimum level of illumination necessary, and in general accordance with the <i>Australian Standard 4282 – 1997 Control of the Obtrusive Effects of Outdoor Lighting</i> .	Condition closed in a previous audit.	Not Triggered
	Gas Flare		

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No.	Consent Condition	Compliance Assessment	Finding
64	The gas flare located at the treatment plant shall be ground-level (i.e. Less than 6.1 metres in height), shrouded, provided with automatic combustion air control, automatic shut-off gas valve and automatic restart system. Note: This condition confirms the existing gas flare structure and specifications.	Condition closed in a previous audit.	Not Triggered
	Activated Carbon Filter		
65	The activated carbon filter on the odour control system shall be replaced prior to breakthrough occurring.	Condition closed in a previous audit.	Not Triggered
	Steel Pipeline		
66	The 200 mm steel pipeline shall not be operated above a pressure of 1.05 MPa.	Condition closed in a previous audit.	Not Triggered
67	The Director-General's approval shall be obtained to operate the steel pipeline pressure above 1.05 MPa. An application to operate the steel pipeline at a higher pressure shall be accompanied by:	Condition closed in a previous audit.	Not Triggered
	(a) a Final Hazard Analysis of the proposal including the entire steel pipeline and those sections of the plant where the operating pressure will be increased. The analysis shall be prepared in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 6 Guidelines for Hazard Analysis. The existing land use and compliance with NSW criteria shall be clearly demonstrated. Where further risk reduction could be required as a result of changes in land use, additional risk reduction measures shall be outlined; and		Not Triggered
	(b) a Hazard and Operability Study for the proposal, chaired by an independent qualified person approved by the Director-General prior to the commencement of the study. The study shall be carried out in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 8 Hazard and Operability Studies.		Not Triggered
	Gas Gathering System Pipeline		
68	The Applicant shall comply with the following in the construction of the gas gathering system pipeline:	The auditor sighted the AEPR 2016-2017 and the AEPR 2017-2018 and noted that the gas gathering system pipeline was not modified significantly during this audit period.	Not Triggered
	(a) excavated trenches shall not be left uncovered overnight, unless adequate fencing and warning lights are erected;		Not Triggered
	(b) signs stating the presence of a buried gas pipeline shall be erected periodically along the length of the trench once the pipeline has been laid;		Not Triggered

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No.	Consent Condition	Compliance Assessment	Finding
	(c) trenches are to be restored and reseeded with local grass seeds on completion of the work;		Not Triggered
	(d) local council traffic guidelines in respect of work carried out on road verges and underneath roads shall be implemented;		Not Triggered
	(e) the pipeline shall be constructed in accordance with the AS 3723-1989; and		Not Triggered
	(f) the Department shall be notified on the completion of any trenching works.		Not Triggered
	LPG Storage		
69	The LPG storage and handling system and procedures shall be in accordance with AS 1596-2002 and industry guidelines.	Condition closed in a previous audit.	Not Triggered
	Indigenous Heritage		
70	Prior to the commencement of site preparation works for the three (3) additional wellheads and the associated gas gathering system, the Applicant shall clearly indicate the locations of known aboriginal relics on the site, and ensure that all employees and contractors are aware of these locations, to prevent the known relics being impacted upon during site preparation and construction.	Condition closed in a previous audit.	Not Triggered
	Cultural Heritage		
71	If, during the site preparation and/or drilling phases of the development, an unexpected archaeological relic is uncovered, excavation shall cease and an excavation permit under the <i>Heritage Act 1977</i> , shall be obtained from the NSW Heritage Office. Note: a relic is defined under the Heritage Act as any deposit, object or material evidence:	Condition closed in a previous audit.	Not Triggered
	(a) which relates to the settlement of the area that comprises NSW, not being Aboriginal settlement; and		Not Triggered
	(b) which are more than 50 years old.		Not Triggered
	Site Rehabilitation		

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No.	Consent Condition	Compliance Assessment	Finding
	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 (June 2018). Key obligations are also reflected in the 'Environmental Management Plan Sub-Plan Compliance Audit - Rehabilitation'. The completed audit for well sites RP03, RP04, RP05, RP06, RP11, MT10 and EM16 (10/10/2017) was sighted by the auditor. The auditor also inspected well sites EM16, JS01, LP01, MT09/MT10 and noted compliance to the requirements of this condition.	Compliant
73	The Applicant shall carry out rehabilitation of the site in accordance with the requirements of the DMR and the Site Rehabilitation Management Plan.	The auditor sighted the Rehabilitation and Landscape Management Sub Plan (June 2018). Key obligations are reflected in the 'Environmental Management Plan Sub-Plan Compliance Audit - Rehabilitation'. The completed audit for well sites RP03, RP04, RP05, RP06, RP11, MT10 and EM16 (10/10/2017) was sighted by the auditor. The auditor also inspected well sites EM16 and JS01 and noted compliance to the requirements of this condition.	Compliant
	ENVIRONMENTAL MONITORING		
	Land Subsidence		
74	The Applicant shall implement a program to monitor any potential land subsidence effects of long term extraction of gas (and water) on the groundwater resource in the PAL 1 area. The Applicant shall consult with the DLWC over the implementation of the monitoring program. The monitoring program shall be submitted for the Director-General's approval.	Condition closed in a previous audit.	Not Triggered
	Vibration Impacts		
75	The Applicant shall carry out monitoring of ground vibrations from well drilling activities (including percussion drilling, casing perforation, hydrofracturing operations and air blasts), as recommended by Coffey Geosciences report titled Camden Coalbed Methane Project Geotechnical Impact Assessment and dated 5 December 2001. The results of the monitoring shall be submitted to the Director-General.	It was reported by AGL that there were no drilling activities undertaken during the audit period.	Not verified
	Air Emissions		

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No.	Consent Condition	Compliance Assessment	Finding																				
76	<p>For the purposes of this consent air discharge monitoring points, shall be identified as provided in Table 2 below.</p> <p>Table 2 – Identification of Air Discharge Monitoring Points</p> <table border="1" data-bbox="315 483 987 1046"> <thead> <tr> <th data-bbox="315 483 472 560">Discharge Monitoring Point Identification Number</th> <th data-bbox="472 483 629 560">Type of Monitoring Point</th> <th data-bbox="629 483 786 560">Type of Discharge</th> <th data-bbox="786 483 987 560">Description of Location</th> </tr> </thead> <tbody> <tr> <td data-bbox="315 560 472 675">1</td> <td data-bbox="472 560 629 675">Air emissions monitoring</td> <td data-bbox="629 560 786 675">Discharge to air</td> <td data-bbox="786 560 987 675">TEG reboiler exhaust <i>(located on the dehydrator unit as shown in Fig. 3.9 of the EIS)</i></td> </tr> <tr> <td data-bbox="315 675 472 790">2</td> <td data-bbox="472 675 629 790">Air emissions monitoring</td> <td data-bbox="629 675 786 790">Discharge to air</td> <td data-bbox="786 675 987 790">Flare <i>(located on the southern corner of the Treatment Plant as shown in Fig. 3.9 of the EIS)</i></td> </tr> <tr> <td data-bbox="315 790 472 927">3</td> <td data-bbox="472 790 629 927">Air emissions monitoring</td> <td data-bbox="629 790 786 927">Air</td> <td data-bbox="786 790 987 927">Coal seam methane gas supply to TEG reboiler <i>(located on the dehydrator unit as shown in Fig 3.9. of the EIS)</i></td> </tr> <tr> <td data-bbox="315 927 472 1046">4</td> <td data-bbox="472 927 629 1046">Air emissions monitoring</td> <td data-bbox="629 927 786 1046">Discharge to air</td> <td data-bbox="786 927 987 1046">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>	<p>Condition closed in a previous audit. The nominated monitoring locations were at the former Ray Beddoe Treatment Plant.</p>	<p>Not Triggered</p>
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>																				
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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>																				
	<p>Load Limits</p>																						

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No.	Consent Condition	Compliance Assessment	Finding																
77	<p>The Applicant will be required to pay load based licensing fees once a licence under the POEO Act has been issued. The licence will identify the assessable pollutants and load limits for each fee-based activity classification. These assessable pollutants will be required to be monitored and pollutant loads calculated in accordance with the EPA’s Load Calculation Protocol. The assessable pollutants and load limits applicable to this development are given in Table 3 below.</p> <p>Table 3 – Assessable Pollutant Load Limit</p> <table border="1" data-bbox="315 579 987 1050"> <thead> <tr> <th>Assessable Pollutant</th> <th>Load Limit (kg)</th> </tr> </thead> <tbody> <tr> <td>Benzene</td> <td>Applicant to negotiate with the EPA prior to issue of the licence</td> </tr> <tr> <td>Benzo (a) pyrene</td> <td>Applicant to negotiate with the EPA prior to issue of the licence</td> </tr> <tr> <td>Fine particles</td> <td>Applicant to negotiate with the EPA prior to issue of the licence</td> </tr> <tr> <td>Hydrogen sulfide</td> <td>Applicant to negotiate with the EPA prior to issue of the licence</td> </tr> <tr> <td>Nitrogen oxides</td> <td>Applicant to negotiate with the EPA prior to issue of the licence</td> </tr> <tr> <td>Sulfur oxides</td> <td>Applicant to negotiate with the EPA prior to issue of the licence</td> </tr> <tr> <td>VOC’s</td> <td>Applicant to negotiate with the EPA prior to issue of the licence</td> </tr> </tbody> </table>	Assessable Pollutant	Load Limit (kg)	Benzene	Applicant to negotiate with the EPA prior to issue of the licence	Benzo (a) pyrene	Applicant to negotiate with the EPA prior to issue of the licence	Fine particles	Applicant to negotiate with the EPA prior to issue of the licence	Hydrogen sulfide	Applicant to negotiate with the EPA prior to issue of the licence	Nitrogen oxides	Applicant to negotiate with the EPA prior to issue of the licence	Sulfur oxides	Applicant to negotiate with the EPA prior to issue of the licence	VOC’s	Applicant to negotiate with the EPA prior to issue of the licence	<p>Condition closed in a previous audit.</p> <p>The nominated monitoring locations were at the former Ray Beddoe Treatment Plant.</p>	Not Triggered
Assessable Pollutant	Load Limit (kg)																		
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VOC’s	Applicant to negotiate with the EPA prior to issue of the licence																		
	<p>Note – An assessable pollutant is a pollutant which affects the licence fee payable for the licence. The actual load of an assessable pollutant discharged from the premises during the reporting period must not exceed the load limit specified for the assessable pollutants in Table 3.</p>	<p>Condition closed in a previous audit.</p> <p>The nominated monitoring locations were at the former Ray Beddoe Treatment Plant.</p>	Not Triggered																
	<p>Testing Method – Load Limits</p>																		
78	<p>Clause 17(1) and (2) of the <i>Protection of the Environment Operations (General) Regulation 1998</i> requires that monitoring of actual loads of assessable pollutants listed in Table 3 of condition 78 of this consent shall be carried out in accordance with the testing method set out in the relevant load calculation protocol for the fee-based activity classification.</p>	<p>Condition closed in a previous audit.</p> <p>The nominated monitoring locations were at the former Ray Beddoe Treatment Plant.</p>	Not Triggered																

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No.	Consent Condition	Compliance Assessment	Finding												
	Concentration Limits														
79	<p>The Applicant shall ensure that the concentration of each pollutant listed in Table 4 below does not exceed the concentration limits specified for that pollutant at discharge monitoring point 1. This condition does not authorise the discharge or emission of any other pollutants.</p> <p>Table 4 – Point 1 : Concentration Limits</p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Units of measure</th> <th>100 percentile limit</th> <th>Reference conditions</th> </tr> </thead> <tbody> <tr> <td>Nitrogen oxides</td> <td>g/m³</td> <td>0.35</td> <td>Dry, 273 K, 101.3 kPa, 7% O₂</td> </tr> <tr> <td>Sulphuric acid mist and/or sulphur trioxide</td> <td>g/m³</td> <td>0.1</td> <td>Dry, 273 K, 101.3 kPa</td> </tr> </tbody> </table>	Pollutant	Units of measure	100 percentile limit	Reference conditions	Nitrogen oxides	g/m ³	0.35	Dry, 273 K, 101.3 kPa, 7% O ₂	Sulphuric acid mist and/or sulphur trioxide	g/m ³	0.1	Dry, 273 K, 101.3 kPa	<p>Condition closed in a previous audit.</p> <p>The nominated monitoring locations were at the former Ray Beddoe Treatment Plant.</p>	Not Triggered
Pollutant	Units of measure	100 percentile limit	Reference conditions												
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Sulphuric acid mist and/or sulphur trioxide	g/m ³	0.1	Dry, 273 K, 101.3 kPa												
	Destruction Efficiency														
80	<p>30. The Applicant shall ensure that each parameter listed in Table 5 below are equal to or greater than the lower limits specified for that parameter at discharge monitoring point 1.</p> <p>Table 5 – Discharge Monitoring Point 1: Destruction Efficiency</p> <table border="1"> <thead> <tr> <th>Parameter</th> <th>Units of measure</th> <th>Lower limit</th> <th>Reference conditions</th> </tr> </thead> <tbody> <tr> <td>Volatile organic compound (VOC) destruction efficiency</td> <td>%</td> <td>98</td> <td>N/A</td> </tr> </tbody> </table>	Parameter	Units of measure	Lower limit	Reference conditions	Volatile organic compound (VOC) destruction efficiency	%	98	N/A	<p>Condition closed in a previous audit.</p> <p>The nominated monitoring locations were at the former Ray Beddoe Treatment Plant.</p>	Not Triggered				
Parameter	Units of measure	Lower limit	Reference conditions												
Volatile organic compound (VOC) destruction efficiency	%	98	N/A												
	Combustion Parameters														

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No.	Consent Condition	Compliance Assessment	Finding															
81	<p>The Applicant shall ensure that each parameter listed in Table 6 below (over the averaging period) is equal to or greater than the lower limit specified for that parameter at discharge monitoring point 2.</p> <p>Table 6 – Discharge Monitoring Point 2 : Combustion Parameter</p> <table border="1"> <thead> <tr> <th>Parameter</th> <th>Units of measure</th> <th>Lower limit</th> <th>Averaging period</th> </tr> </thead> <tbody> <tr> <td>Residence time</td> <td>s</td> <td>0.6</td> <td>Instantaneous</td> </tr> <tr> <td>Temperature</td> <td>°C</td> <td>760</td> <td>Instantaneous</td> </tr> </tbody> </table>	Parameter	Units of measure	Lower limit	Averaging period	Residence time	s	0.6	Instantaneous	Temperature	°C	760	Instantaneous	<p>Condition closed in a previous audit.</p> <p>The nominated monitoring locations were at the former Ray Beddoe Treatment Plant.</p>	Not Triggered			
Parameter	Units of measure	Lower limit	Averaging period															
Residence time	s	0.6	Instantaneous															
Temperature	°C	760	Instantaneous															
	Site Specific Emission Concentration Limit																	
82	<p>The Applicant shall submit a report to the EPA, which includes a site specific emission concentration limit for sulfuric acid mist and/or sulfur trioxide (as SO₃) and sulfur dioxide for discharge monitoring point 1. The date of submission of the report shall be negotiated with the EPA prior to the issue of the licence.</p>	Condition closed in a previous audit.	Not Triggered															
83	<p>The emission concentration limits shall be developed in accordance with the <i>Approved Methods and Guidance for the Modelling and Assessment of Air Pollutants in NSW</i> and utilise the ground-level concentration criteria specified in Table 7 below.</p> <p>Table 7 – Site Specific Emission Concentration Limit</p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Design Ground-Level Concentration Criteria (ug/m³)</th> <th>Averaging Time</th> <th>Percentile</th> </tr> </thead> <tbody> <tr> <td>Sulfuric acid mist and/or sulfur trioxide (as SO₃)</td> <td>27</td> <td>3 minutes</td> <td>99.9</td> </tr> <tr> <td rowspan="2">Sulfur dioxide</td> <td>712</td> <td>10 minutes</td> <td>100</td> </tr> <tr> <td>570</td> <td>1 hour</td> <td>100</td> </tr> </tbody> </table>	Pollutant	Design Ground-Level Concentration Criteria (ug/m ³)	Averaging Time	Percentile	Sulfuric acid mist and/or sulfur trioxide (as SO ₃)	27	3 minutes	99.9	Sulfur dioxide	712	10 minutes	100	570	1 hour	100	Condition closed in a previous audit.	Not Triggered
Pollutant	Design Ground-Level Concentration Criteria (ug/m ³)	Averaging Time	Percentile															
Sulfuric acid mist and/or sulfur trioxide (as SO ₃)	27	3 minutes	99.9															
Sulfur dioxide	712	10 minutes	100															
	570	1 hour	100															
	Monitoring Records																	

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No.	Consent Condition	Compliance Assessment	Finding
84	The Applicant shall record and retain the details of any monitoring required as a condition of this consent or a licence under the POEO Act, in relation to the development or in order to comply with the load calculation protocol.	Monitoring requirements were limited to the Leak Detection and Repair Program undertaken to address Environment Protection Licence 12003. The auditor sighted the Annual Leak Detection and Repair Summary Report for 22 December 2015 - 21 December 2016 (report dated 17 January 2017) and 22 December 2016 - 21 December 2017 (report date 16 January 2018) and noted recording of the monitoring results in accordance to this condition.	Compliant
85	<p>The monitoring required under this consent for the concentration of a pollutant emitted to the air, shall be carried out in accordance with:</p> <p>(a) any methodology which is required under the POEO Act to be used for the testing of the concentration of the pollutant; or</p> <p>(b) if no such requirement is imposed by or under the POEO Act or by the consent or a condition of the licence or the protocol (as the case may be) requires to be used for that testing; or</p> <p>(c) if no such requirement is imposed by or under the POEO Act or by the consent or a condition of the licence or the protocol (as the case may be), any methodology approved in writing by the EPA for the purposes of that testing prior to the testing taking place. Note: The Clean Air (Plant and Equipment) Regulation 1997 requires testing for certain purposes to be conducted in accordance with test methods contained in the publication Approved Methods for the Sampling and Analysis of Air Pollutants in NSW.</p>	Leak detection monitoring was undertaken in accordance with US EPA Method 21 - Determination of Volatile Organic Compound Leaks (40 CFR Part 60, Appendix A, Method 21).	Compliant Compliant Compliant Compliant
86	<p>All records required to be kept by the licence shall be:</p> <p>(a) in a legible form, or in a form that can readily be reduced to a legible form;</p> <p>(b) kept for at least four years after the monitoring or event to which they relate took place; and</p> <p>(c) produced in a legible form to any authorised officer of the EPA who asks to see them.</p>	Monitoring requirements were limited to the Leak Detection and Repair Program undertaken to address Conditions R4.1-4.3 of Environment Protection Licence 12003. The auditor sighted the Annual Leak Detection and Repair Summary Report for the following reporting periods and noted compliance with the requirements of this condition: 1. 22 December 2015 - 21 December 2016 (report dated 17 January 2017); and 2. 22 December 2016 - 21 December 2017 (report date 16 January 2018).	Compliant Compliant Compliant
87	The following records shall be kept in respect of any samples required to be collected:	Monitoring requirements were limited to the Leak Detection and Repair Program undertaken to address Conditions R4.1-4.3 of Environment	Compliant

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No.	Consent Condition	Compliance Assessment	Finding
	(a) the date(s) on which the sample was taken;	Protection Licence 12003. The auditor sighted the Annual Leak Detection and Repair Summary Report for the following reporting periods and noted compliance with the requirements of this condition: 1. 22 December 2015 - 21 December 2016 (report dated 17 January 2017); and 2. 22 December 2016 - 21 December 2017 (report date 16 January 2018).	Compliant
	(b) the time(s) at which the sample was taken;		Compliant
	(c) the point at which the sample was taken; and		Compliant
	(d) the name of the person who collected the sample.		Compliant
	Requirement to Monitor Concentrations of Pollutants Discharged		

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No.	Consent Condition	Compliance Assessment	Finding																																																																																					
88	<p>The Applicant shall determine the relevant pollutant concentrations and emission parameters specified in Table 8 below, at the discharge monitoring points indicated and employing the sampling and analysis method specified. All relevant pollutant concentrations and emission parameters for each discharge monitoring point shall be determined concurrently and at the frequency specified in the table. The discharge monitoring points are specified in condition 76 of this consent.</p> <p>Table 8 – Discharge Monitoring Point Pollutant and Parameter Monitoring</p> <table border="1" data-bbox="309 563 880 1098"> <thead> <tr> <th>Pollutant</th> <th>Discharge Monitoring Point</th> <th>Unit of Measure</th> <th>Frequency</th> <th>Sampling Method</th> </tr> </thead> <tbody> <tr> <td>carbon dioxide in stack gases</td> <td>1 and 3</td> <td>%</td> <td>Annual</td> <td>TM-24</td> </tr> <tr> <td>carbon monoxide</td> <td>1</td> <td>ppm</td> <td>Annual</td> <td>OM-1</td> </tr> <tr> <td>dry gas density</td> <td>1 and 3</td> <td>kg/m³</td> <td>Annual</td> <td>TM-23</td> </tr> <tr> <td>moisture content in stack gases</td> <td>1 and 3</td> <td>%</td> <td>Annual</td> <td>TM-22</td> </tr> <tr> <td>molecular weight of stack gases</td> <td>1 and 3</td> <td>g/gmole</td> <td>Annual</td> <td>TM-23</td> </tr> <tr> <td>nitrogen oxides</td> <td>1</td> <td>g/m³</td> <td>Annual</td> <td>TM-11</td> </tr> <tr> <td>oxygen in stack gases</td> <td>1 and 3</td> <td>%</td> <td>Annual</td> <td>TM-25</td> </tr> <tr> <td>sulfur dioxide</td> <td>1</td> <td>g/m³</td> <td>Annual</td> <td>TM-4</td> </tr> <tr> <td>sulfuric acid mist and/or sulfur trioxide</td> <td>1</td> <td>g/m³</td> <td>Annual</td> <td>TM-3</td> </tr> <tr> <td>temperature</td> <td>1 and 3</td> <td>°C</td> <td>Annual</td> <td>TM-2</td> </tr> <tr> <td></td> <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>volumetric flow rate</td> <td>1 and 3</td> <td>m³/s</td> <td>Annual</td> <td>TM-2</td> </tr> <tr> <td></td> <td>2</td> <td>m²/s</td> <td>Continuous</td> <td>CEM-6</td> </tr> </tbody> </table> <p>Note: Units of measure, frequency and sampling method to be approved by the EPA in writing.</p>	Pollutant	Discharge Monitoring Point	Unit of Measure	Frequency	Sampling Method	carbon dioxide in stack gases	1 and 3	%	Annual	TM-24	carbon monoxide	1	ppm	Annual	OM-1	dry gas density	1 and 3	kg/m ³	Annual	TM-23	moisture content in stack gases	1 and 3	%	Annual	TM-22	molecular weight of stack gases	1 and 3	g/gmole	Annual	TM-23	nitrogen oxides	1	g/m ³	Annual	TM-11	oxygen in stack gases	1 and 3	%	Annual	TM-25	sulfur dioxide	1	g/m ³	Annual	TM-4	sulfuric acid mist and/or sulfur trioxide	1	g/m ³	Annual	TM-3	temperature	1 and 3	°C	Annual	TM-2		2	°C	Continuous	TM-2	tertiary butyl mercaptan	4	Note ¹	Note ¹	Note ¹	velocity	1 and 3	m/s	Annual	TM-2	volatile organic compounds (VOC)	1 and 3	ppm	Annual	OM-2	volumetric flow rate	1 and 3	m ³ /s	Annual	TM-2		2	m ² /s	Continuous	CEM-6	<p>Condition closed in a previous audit. The nominated monitoring locations were at the former Ray Beddoe Treatment Plant.</p>	<p>Not Triggered</p>
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89	<p>The selection of sampling positions is to be carried out in accordance with test method TM-1.</p>	<p>Condition closed in a previous audit. The nominated monitoring locations were at the former Ray Beddoe Treatment Plant.</p>	<p>Not Triggered</p>																																																																																					
	<p>Community Consultative Committee</p>																																																																																							
90	<p>The Applicant shall establish a Community Consultative Committee to oversee the environmental performance of the development. This Committee shall:</p>		<p>Compliant</p>																																																																																					

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No.	Consent Condition	Compliance Assessment	Finding
	(a) be chaired by an independent chairperson approved by the Director-General in consultation with the Applicant, Wollondilly Council and Camden Council;	The auditor sighted the minutes of the Community Consultative Committee and noted compliance with the requirements of this condition.	Compliant
	(b) have four community representatives residing in the PAL 1 area;	It is noted that PAL 1 did not exist during the audit period.	Not Triggered
	(c) have one representative from each council;	The auditor sighted the minutes of the Community Consultative Committee and noted compliance with the requirements of this condition.	Compliant
	(d) two representatives appointed by the Applicant (including the environmental officer);		Compliant
	(e) two (2) representatives from a recognized environmental group;		Compliant
	(f) meet at least quarterly;		Compliant
	(g) take minutes of the meeting; and		Compliant
	(h) make comments and recommendations about the implementation of the development and environmental management plans, monitor compliance with conditions of this consent and other matters relevant to the operation of the development during the term of the consent.		Compliant
	Representatives from relevant government agencies or other individuals may be invited to attend meetings as required by the Chairperson.		Compliant
91	The Applicant shall:		The auditor sighted the minutes of the Community Consultative Committee and presentations to the committee and noted compliance with the requirements of this condition.
	(a) provide the Committee with regular information on the environmental performance and management of the development;	Compliant	
	(b) ensure that the Committee has reasonable access to the necessary plans to carry out its functions;	Compliant	
	(c) consider the recommendations and comments of the Committee and provide a response to the Committee and Director-General;	Compliant	
	(d) provide access for site inspections by the Committee;	Compliant	
	(e) make the minutes available for public inspection at Camden and Wollondilly Councils within fourteen days of the Committee meeting, or as agreed by the Committee; and	Compliant	
	(f) forward a copy of the minutes of each Committee meeting, and any responses to the Committee's recommendations to the Director-General and the DMR within a month of the Committee meeting.	Compliant	

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No.	Consent Condition	Compliance Assessment	Finding
92	If required by the Committee, the Applicant shall establish a trust fund or other funding arrangement that may be agreed between the Applicant and Committee, to be managed by the Chair of the Committee to facilitate the functioning of the Committee, and pay \$5000 per annum to the fund or other arrangement, for the duration of operation in the PAL 1 area, or as otherwise directed by the Director-General. The monies are to be used only if required for the engagement of consultants to interpret technical information and the like. The annual payment shall be indexed according to the Consumer Price Index (CPI) at the time of payment. The first payment shall be made by the date of the first Committee meeting. A record of the finances of the trust fund during each year shall be provided to the Director-General and Applicant by the Chair on each anniversary of the first payment. Any unspent monies shall be returned to the Applicant each year.	Condition not triggered during the audit period.	Not triggered
	SCHEDULE 4		
	MANDATORY CONDITIONS FOR ALL EPA LICENCES		
	ADMINISTRATIVE CONDITIONS		
	Other activities		
	(To be used on licences with ancillary activities) This licence applies to all other activities carried on at the premises, including:	The auditor inspected the RPGP and a sample of well sites and noted the activities undertaken to be consistent with this condition.	Compliant
	i Gas wells and gathering system.		Compliant
	OPERATING CONDITIONS		
	Activities must be carried out in a competent manner		
	Licensed activities must be carried out in a competent manner. This includes: activity; and	Competence is demonstrated through defined roles and responsibilities, training, and assurance, as detailed below: 1. Roles and responsibilities - Defined in the EMP (March 2018) and position descriptions. The position description of the Gas Plant	Compliant
	(a) the processing, handling, movement and storage of materials and substances used to carry out the		Compliant

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No.	Consent Condition	Compliance Assessment	Finding
	(b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.	Operator was sighted by the auditor and noted to include a requirement to achieve regulatory compliance and adhere to the EMP. 2. Training - The auditor sighted the induction program that is delivered to all AGL employees and contractors (Rapid Induct). Commencing in 2017, monthly awareness training was delivered during the HSE meeting. Training programs sighted by the auditor include air quality, noise management, rehabilitation works and flora and fauna. 3. Audit and inspection - Environmental Management Sub Plan Compliance Audits and periodic inspections were undertaken to assess implementation of control measures. The auditor sighted over 20 examples including for waste (3 March 2017), noise (22 December 2016), European heritage (28 April 2017), and flora/fauna (20 May 2018)	Compliant
	Maintenance of plant and equipment		
	All plant and equipment installed at the premises or used in connection with the licensed activity:	The auditor sighted the following systems and documents demonstrating compliance with the requirements of this condition: 1. Preventative Maintenance - The preventative maintenance of plant and equipment is managed through the MEX system. The system effectively monitors maintenance requirements based on the use of plant and equipment. The auditor sighted the Weekly Maintenance Progress Dashboard and the Monthly Maintenance Planning Dashboard and noted a high level of compliance to program requirements.	Compliant
	(a) must be maintained in a proper and efficient condition; and	2. Monitoring - Daily and weekly documented checks are undertaken of vehicles.	Compliant
	(b) must be operated in a proper and efficient manner.	3. Procedures - Standard Operating Procedures have been developed to guide commonly undertaken activities. 4. Leak Detection and Repair Program - Refer to EPL 12003.	Compliant
	MONITORING AND RECORDING CONDITIONS		
	Recording of pollution complaints		
	The licensee must keep a legible record of all complaints made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this licence applies.	The auditor sighted Consultation Manager, a software program used for managing stakeholder engagement, including complaints. Records retained within Consultation Manager comply with the requirements of this condition.	Compliant
	The record must include details of the following:		Compliant

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	(a) the date and time of the complaint;	There were no complaints associated with this Development Consent during the audit period.	Compliant
	(b) the method by which the complaint was made;		Compliant
	(c) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect;		Compliant
	(d) the nature of the complaint;		Compliant
	(e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and		Compliant
	(f) if no action was taken by the licensee, the reasons why no action was taken.		Compliant
	The record of a complaint must be kept for at least 4 years after the complaint was made.	The auditor sighted complaint records within Consultation Manager (a software program used for managing stakeholder engagement, including complaints) and noted compliance with the requirements of this condition.	Compliant
	The record must be produced to any authorised officer of the EPA who asks to see them.	Condition not triggered during the audit period.	Not Triggered
	Telephone complaints line		
	The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted at the premises or by the vehicle or mobile plant, unless otherwise specified in the licence.	The auditor sighted the Camden Gas Project website and noted the inclusion of a telephone line, contact and feedback form. The website notes that the purpose of the telephone line is for complaints and enquiries. The auditor contacted the telephone line during the audit and was satisfied with the handling process.	Compliant
	The licensee must notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint.		Compliant
	This condition does not apply until 3 months after this condition takes effect.		Compliant
	REPORTING CONDITIONS		
	Annual Return documents		
	What documents must an Annual Return contain?		
	The licensee must complete and supply to the EPA an Annual Return in the approved form comprising:	The auditor sighted the December 2016 and December 2017 Annual Returns and noted compliance against the requirements of this condition.	Compliant
	(a) a Statement of Compliance; and		Compliant

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No.	Consent Condition	Compliance Assessment	Finding
	(b) a Monitoring and Complaints Summary.		Compliant
	A copy of the form in which the Annual Return must be supplied to the EPA accompanies this licence. Before the end of each reporting period, the EPA will provide to the licensee a copy of the form that must be completed and returned to the EPA.		Compliant
	Period covered by Annual Return		
	An Annual Return must be prepared in respect of each reporting period, except as provided below. Note: The term reporting period is defined in the dictionary at the end of this licence. Do not complete the Annual Return until after the end of the reporting period.	The auditor sighted the December 2016 and December 2017 Annual Returns and noted compliance against the requirements of this condition.	Compliant
	Where this licence is transferred from the licensee to a new licensee, (a) the transferring licensee must prepare an annual return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted; and (b) the new licensee must prepare an annual return for the period commencing on the date the application for the transfer of the licence is granted and ending on the last day of the reporting period. Note: An application to transfer a licence must be made in the approved form for this purpose.	The auditor sighted the public register under section 308 of the <i>Protection of the Environment Operations Act 1997</i> and noted that no licences were surrendered by AGL or revoked by the EPA or the Minister during the audit period.	Not Triggered
	Where this licence is surrendered by the licensee or revoked by the EPA or Minister, the licensee must prepare an annual return in respect of the period commencing on the first day of the reporting period and ending on (a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or (b) in relation to the revocation of the licence – the date from which notice revoking the licence operates.	The auditor sighted the public register under section 308 of the <i>Protection of the Environment Operations Act 1997</i> and noted that no licences were surrendered by AGL or revoked by the EPA or the Minister during the audit period.	Not Triggered
	Deadline for Annual Return		
	The Annual Return for the reporting period must be supplied to the EPA by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date').	The auditor sighted the December 2016 and December 2017 Annual Returns and noted compliance against the requirements of this condition.	Compliant
	Notification where actual load cannot be calculated		

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No.	Consent Condition	Compliance Assessment	Finding
	(Licences with assessable pollutants) Where the licensee is unable to complete a part of the Annual Return by the due date because the licensee was unable to calculate the actual load of a pollutant due to circumstances beyond the licensee's control, the licensee must notify the EPA in writing as soon as practicable, and in any event not later than the due date.	Condition not triggered during the audit period.	Not Triggered
	The notification must specify:		Not Triggered
	(a) the assessable pollutants for which the actual load could not be calculated; and		Not Triggered
	(b) the relevant circumstances that were beyond the control of the licensee.		Not Triggered
	Licensee must retain copy of Annual Return		
	The licensee must retain a copy of the annual return supplied to the EPA for a period of at least 4 years after the annual return was due to be supplied to the EPA.	The auditor sighted Annual Returns submitted in the previous four years and noted compliance with the requirements of this condition.	Compliant
	Certifying of Statement of Compliance and Signing of Monitoring and Complaints Summary		
	Within the Annual Return, the Statement of Compliance must be certified and the Monitoring and Complaints Summary must be signed by:	The auditor sighted the December 2016 and December 2017 Annual Returns and noted compliance against the relevant requirements of this condition.	Compliant
	(a) the licence holder; or		Compliant
	(b) by a person approved in writing by the EPA to sign on behalf of the licence holder. A person who has been given written approval to certify a Statement of Compliance under a licence issued under the Pollution Control Act 1970 is taken to be approved for the purpose of this condition until the date of first review this licence.		Compliant
	Notification of environmental harm		
	Note: The licensee or its employees must notify the EPA of incidents causing or threatening material harm to the environment as soon as practicable after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act	The auditor sighted the Environmental Incidents Report for the audit period and noted that there were no incidents of material environmental harm.	Compliant
	Notifications must be made by telephoning the EPA's Pollution Line service on 131 555.		Compliant
	The licensee must provide written details of the notification to the EPA within 7 days of the date on which the incident occurred.		Compliant
	Written report		

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No.	Consent Condition	Compliance Assessment	Finding
	Where an authorised officer of the EPA suspects on reasonable grounds that:	It was reported by AGL that the EPA did not request any written reports during the audit period with respect to this development consent triggered by Parts a and b of this condition.	Not Triggered
	(a) where this licence applies to premises, an event has occurred at the premises; or		Not Triggered
	(b) where this licence applies to vehicles or mobile plant, an event has occurred in connection with the carrying out of the activities authorised by this licence, and the event has caused, is causing or is likely to cause material harm to the environment (whether the harm occurs on or off premises to which the licence applies), the authorised officer may request a written report of the event.		Not Triggered
	The licensee must make all reasonable inquiries in relation to the event and supply the report to the EPA within such time as may be specified in the request.		Not Triggered
	The request may require a report which includes any or all of the following information:		Not Triggered
	(a) the cause, time and duration of the event;		Not Triggered
	(b) the type, volume and concentration of every pollutant discharged as a result of the event;		Not Triggered
	(c) the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event; and		Not Triggered
	(d) the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort;		Not Triggered
	(e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants;		Not Triggered
	(f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and		Not Triggered
	(g) any other relevant matters.		Not Triggered
	The EPA may make a written request for further details in relation to any of the above matters if it is not satisfied with the report provided by the licensee. The licensee must provide such further details to the EPA within the time specified in the request.		
	GENERAL CONDITIONS		
	Copy of licence kept at the premises or on the vehicle or mobile plant		
	A copy of this licence must be kept at the premises or on the vehicle or mobile plant to which the licence applies.	The auditor sighted a copy of the licence at the premises.	Compliant

B1. DA 15-1-2002-i

No.	Consent Condition	Compliance Assessment	Finding
	The licence must be produced to any authorised officer of the EPA who asks to see it.		Compliant
	The licence must be available for inspection by any employee or agent of the licensee working at the premises or operating the vehicle or mobile plant.		Compliant

B2. DA 246-8-2002

No.	Consent Condition	Compliance Assessment	Finding
	Schedule 3		
	Conditions of Consent		
	Obligation to Minimise Harm to the Environment		
1	The Applicant shall implement all practicable measures to prevent or minimise any harm to the environment that may result from the construction or operation of the development.	<p>An EMS has been developed and implemented to manage environmental risks and achieve performance improvements. The EMS consists of an EMP, Sub Plans and a compliance management system.</p> <p>A number of controls are in place to monitor and measure implementation of the EMS including Environmental Management Sub Plan Compliance Audits, Daily Workover Reports, air quality monitoring and noise monitoring. The auditor sighted a sample of monitoring controls and noted compliance with the requirements of the EMP.</p> <p>Compliance obligations arising from licences, leases, environmental/ planning approvals and legislation are monitored through a web-based database compliance management system (CMO Compliance). The auditor sighted CMO Compliance and determined that the tool effectively monitors compliance against obligations.</p>	Compliant
	Terms of Approval		
2	The Applicant shall carry out the development generally in accordance with the:	<p>It was reported by AGL that the development is undertaken in accordance with the EMP and Sub Plans which reflect the requirements of the Consent Conditions. On receipt of an approved consent or modification, the EMP is reported to be revised to reflect the new requirements. This was evidenced by the frequent revision history of the document.</p> <p>The DA and subsequent modifications were submitted by Sydney Gas and as such were not available for the purpose of this assessment.</p> <p>Refer to DA15-1-2002 for an assessment of compliance.</p> <p>It was reported by AGL that the development is undertaken in accordance with the EMP and Sub Plans which reflect the requirements of the Consent Conditions. On receipt of an approved consent or</p>	Not Verified
	(a) DA submitted to the Department on 2 August 2002; and		Not Verified
	(b) Sydney Gas Operations Pty Ltd Kay Park CBM Project Prospecting Exploration Licence 2 Statement of Environmental Effects Exploration Drilling & Gas Gathering Operations, dated 15/4/02 and prepared by Harvest Scientific Services;		Not Verified
	(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;		Not Verified
	(d) Conditions of the consent for DA No. 15-1-2002-I dated 23 July 2002;		Note
	(e) Modification Application MOD 25-3-2007 and Camden Gas Project Joint Venture Gas Well and Gathering Line Modification Project Statement of Environmental Effects, dated March 2007; and	Not Verified	

B2. DA 246-8-2002

No.	Consent Condition	Compliance Assessment	Finding
	(f) Modification Application DA246-8-2002-I MOD2 and "Camden Gas Project: Kay Park and Loganbrae Gas Gathering Line Modification Project Statement of Environmental Effects", dated July 2008; and	modification, the EMP is reported to be revised to reflect the new requirements. This was evidenced by the frequent revision history of the document.	Not Verified
	(g) Modification Application DA 246-8-2002i MOD 3 titled "Camden Gas Project – Modification KP06 SIS to Directional", dated October 2008; and	The DA and subsequent modifications were submitted by Sydney Gas and as such were not available for the purpose of this assessment.	Not Verified
	(h) Modification Application DA 246-8-2002-I MOD 4 titled "Camden Gas Project: Proposed modification for Development Consent 246-8-2002-i-KP06 SIS well", dated February 2011.		Not Verified
	(i) Conditions of this consent. 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.		Refer to relevant conditions for an assessment of compliance.
	Period of Approval		
3	This approval is for a period of twenty one (21) years from the date of granting of the production lease.	Condition noted.	Not Triggered
	Special Condition of Approval		
3A.	The Applicant shall not produce gas from any well until a Production Lease under the Petroleum (Onshore) Act 1991 has been obtained for the full length of the well.	Condition closed in a previous audit.	Not Triggered
	Redrilling and Refracting Management Plan		
4	For the purposes of this consent the redrilling and/or additional fraccing of a well does not constitute wellhead maintenance.	Condition not triggered during the audit period. It was reported by AGL (AEPR 2016-2017 and AEPR 2017-2018) that there were no re-drilling or fraccing activities undertaken during the audit period.	Not Triggered
5	The Applicant shall obtain the approval of the Director-General for the redrilling and/or additional fraccing of a well.	Condition not triggered during the audit period. It was reported by AGL (AEPR 2016-2017 and AEPR 2017-2018) that there were no re-drilling or fraccing activities undertaken during the audit period.	Not Triggered
6	The Applicant shall prepare and submit to the Director-General a Redrilling and Refracting Management Plan (in accordance with Condition 10 of the consent for DA No. 15-1-2002-i dated 23 July 2002) for the redrilling and refracting of an existing well.	Condition not triggered during the audit period. It was reported by AGL (AEPR 2016-2017 and AEPR 2017-2018) that there were no re-drilling or fraccing activities undertaken during the audit period.	Not Triggered

B2. DA 246-8-2002

No.	Consent Condition	Compliance Assessment	Finding
7	The Applicant shall give written notification of the proposed re-drilling/refracking work to potentially affected residences and other noise sensitive receivers at least fourteen days prior to work commencing.	Condition not triggered during the audit period. It was reported by AGL (AEPR 2014-2015, 15/10/15 and AEPR 2015-2016, 31/10/16) that there were no re-drilling or fracking activities undertaken during the audit period.	Not Triggered
Compliance			
8	Throughout the life of the development, the Applicant shall secure, renew, maintain, and comply with all the relevant statutory approvals applying to the development.	The auditor sighted the EMP and noted the inclusion of legislative requirements, including reporting requirements, approvals, licenses, permits and leases. Compliance obligations arising from licences, leases, environmental/ planning approvals and legislation are monitored through a web-based database compliance management system (CMO Compliance). The auditor sighted CMO Compliance and determined that the tool effectively monitors compliance against obligations.	Compliant
9	The Applicant shall take all reasonable steps to ensure that all of its employees, contractors and subcontractors are made aware of, and comply with, the conditions of this consent relevant to their respective activities.	The auditor sighted the EMP (March 2018) 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. The auditor sighted the site specific and role-specific induction program that is delivered to all AGL employees and contractors. The online system (Rapid Induct), includes relevant risks and controls as detailed in the EMP. Relevant records and competency assessments are maintained within Rapid Induct and the system includes adequate controls to ensure induction currency is maintained for relevant contractors. Commencing in 2017, monthly awareness training was delivered during the HSE meeting. Training programs sighted by the auditor include air quality, noise management, rehabilitation works and flora and fauna.	Compliant
Production Operations Plan			
10	The Applicant shall prepare a Production Operations Plan (POP) for the approval of the DOPE. The POP shall have regard to the conditions of this consent and the Environment Protection Licence under the Protection of the Environment Operations Act 1997. The POP will form the basis for the:	The POP is reviewed annually, and subsequent versions are provided to the DPE for approval. Version 11 of the POP was drafted during the reporting period and sent to the DPE for review. On 28 June 2018, the DPE granted an extension	Compliant
	(a) ongoing operations and environmental management; and		Compliant

B2. DA 246-8-2002

No.	Consent Condition	Compliance Assessment	Finding
	(b) ongoing monitoring of the development. A copy of the POP shall be forwarded to the Department within fourteen days of the DOPE's acceptance.	to Version 10 of the POP until 31 August 2018, to enable sufficient time for the assessment and approval of Version 11 of the POP. Version 11.1 of the POP was approved by the DPE after the reporting period and applies through until 30 June 2019.	Compliant
	Environmental Management Plan		
11	The Applicant shall amend the Environmental Management Plan required under Condition 15 of the consent for DA No. 15-1-2002-i dated 23 July 2002, to include the operation of KP1, KP2, KP3 KP05 and KP06 and the associated gas gathering system.	Condition closed in a previous audit.	Not Triggered
	Condition Report		
12	The Applicant shall prepare a Condition Report on residences and structures that may be potentially affected by drilling/fracking work, including the re-drilling and refracking of an existing well. The Applicant shall undertake an inspection of the residence and/or structure prior to work commencing, and a follow up inspection within one month of the completion of the work. The Applicant shall take immediate action for repair of any damage to the residence or structure as a result of the work and to avoid any further damage. A copy of the Condition Report shall be submitted to the Director-General and the DOPE after completion of the work.	Condition was not triggered during the audit period. It was reported by AGL (AEPR 2016-2017 and AEPR 2017-2018) that there were no drilling or fracking activities undertaken during the audit period.	Not Triggered
	Incident Reporting		
13	The Applicant shall notify the DECC, DOPE and the Director- General of any incident with significant off-site impacts on people or the biosphere environment as soon as practicable after the occurrence of the incident.	The auditor sighted the Pollution Incident Response Management Plan (PIRMP) for the Camden Gas Project. Notification numbers for these agencies (or current titles of these agencies) are included as per the condition. There were no externally reported environmental incidents associated with this Development Consent during the audit period.	Compliant
	The Applicant shall provide written details of the incident to the Director-General, the DECC, DOPE, and Wollondilly Council within seven days of the date on which the incident occurred.		Compliant
14	The Applicant shall meet the requirements of the Director- General to address the cause or impact of any incident, as it relates to this consent, reported in accordance with Condition 13 of this consent, within such period as the Director-General may agree.	Condition not triggered during the audit period.	Not Triggered
	Complaints Register		
15	The Applicant shall record details of all complaints received in an up-to-date Complaints Register. The Register shall record, but not necessarily be limited to:	The auditor sighted Consultation Manager, a software program used for managing stakeholder engagement, including complaints. Records retained within Consultation Manager comply with the requirements of	Compliant
	(a) the date and time, where relevant of the complaint;		Compliant

B2. DA 246-8-2002

No.	Consent Condition	Compliance Assessment	Finding
	(b) the means by which the complaint was made;	this condition.	Compliant
	(c) any personal details of the complainant that were provided, or if no details were provided, a note to that effect;	There were no complaints associated with this Development Consent during the audit period.	Compliant
	(d) the nature of the complaints;		Compliant
	(e) any action(s) taken by the Applicant in relation to the complaint, including any follow-up contact with the complainant; and		Compliant
	(f) if no action was taken by the Applicant in relation to the complaint, the reason(s) why no action was taken.		Compliant
	The Complaints Register shall be made available for inspection by the DECC or the Director-General upon request. The Applicant shall also make summaries of the register, without details of the complainants, available for public inspection.		Compliant
	Annual Environmental Performance Reporting		
16	The Applicant shall include the operation of KP 1, KP2, KP3, KP05 and KP06 and the associated gas gathering system, and the conditions of this consent, in the Annual Environmental Performance Report required under Condition 34 of the consent for DA No. 15-1-2002-i dated 23 July 2002.	Condition closed in a previous audit.	Not Triggered
	Independent Environmental Audit		
17	The Applicant shall include the operation of KP 1, KP2, KP3, KP05 and KP06 and the associated gas gathering system, and the conditions of this consent, in the Independent Environmental Audit required under Condition 35 of the consent for DA No. 15-1-2002-i dated 23 July 2002.	The scope of this IEA satisfies this condition.	Compliant
	Noise – Well Maintenance		
18	The Applicant shall apply all feasible and reasonable noise mitigation measures to planned well maintenance activities Department of Planning DA No. 246-8-2002-I Page 7 of 11 in order to achieve the noise limits specified by Condition 38 of the consent for DA No. 15-1-2002-i dated 23 July 2002. Where the noise limits are not achievable the Applicant shall implement management practices as necessary to minimise the potential noise impacts. These management practices are to include, but not be limited to:	The auditor sighted the Noise Management Sub Plan (June 2017) and noted procedures reflecting these requirements. It was reported by AGL that there were no well maintenance activities undertaken during the audit period with respect to DA246-8-2002.	Not Triggered
	(a) appropriately informing affected residences and other relevant parties at least two weeks in advance of any planned well maintenance activities and updating the information as required;		Not Triggered

B2. DA 246-8-2002

No.	Consent Condition	Compliance Assessment	Finding
	(b) documenting and implementing any specific work practices the Applicant will employ to limit noise;		Not Triggered
	(c) documenting the feasible and reasonable noise mitigation measures that will be undertaken to reduce noise impacts from planned well maintenance activities; and		Not Triggered
	(d) conducting noise monitoring where appropriate.		Not Triggered
	Noise and Fracture Stimulation Impacts		
19	The Applicant shall implement management practices as necessary to minimise the potential noise impacts from any drilling and fracture stimulation works. These management practices are to include, but not be limited to:	The auditor sighted the Noise Management Sub Plan (June 2017) and noted the inclusion of management measures largely in accordance with the requirements of this condition. It was reported by AGL that there were no drilling or fracture stimulation works undertaken during the audit period.	Not Triggered
	(a) identifying all potentially affected noise sensitive receivers (including residences, schools, commercial premises and noise sensitive equipment) that may be affected by drilling work at these wells;		Not Triggered
	(b) predicting potential noise levels from the proposed well drilling and fracture stimulation methods where appropriate;		Not Triggered
	(a) identifying and implementing all reasonable and feasible noise mitigation measures to reduce any drilling noise impacts;		Not Triggered
	(b) documenting and implementing any specific work practices the Applicant will employ to limit noise;		Not Triggered
	(c) conducting noise monitoring where appropriate; and		Not Triggered
	(d) appropriately informing affected residences and other relevant parties at least two weeks in advance of any drilling and fracture stimulation works with a view to negotiating a mutually beneficial time to schedule fracture stimulation works.		Not Triggered
	Construction Hours		
19A.	The Applicant shall ensure that all construction work (except for the drilling (including well casing and grouting) of SIS wells), shall only be conducted between 7.00am and 6.00pm Monday to Friday and between 8.00am and 1.00pm Saturdays, unless inaudible at any residential receiver.	The auditor sighted the Noise Management Sub Plan (June 2017) and noted compliance with the requirements of this condition. It was reported by AGL that there were no construction works undertaken during the audit period with respect to DA246-8-2002 (excluding well maintenance and decommissioning).	Not Triggered
	Note: Inaudible means that the construction activity cannot be heard by the human ear at the nearest affected residential receiver.		Not Triggered
	Construction Noise Criteria for SIS and Directional Wells		

B2. DA 246-8-2002

No.	Consent Condition	Compliance Assessment	Finding										
19B.	<p>Noise from the drilling and construction of KP05 and KP06 shall not exceed the sound pressure level (noise) limits in the table below:</p> <table border="1"> <thead> <tr> <th>Receiver Location</th> <th>Weekday (7.00am-6.00pm) Saturday (7.00am-1.00pm)</th> <th>Saturday (1.00pm-6.00pm) Sunday (7.00am-6.00pm)</th> <th>Evening (6.00pm-10.00pm)</th> <th>Night (10.00pm-7.00am)</th> </tr> </thead> <tbody> <tr> <td>Nearest Receiver</td> <td>53</td> <td>48</td> <td>41</td> <td>35</td> </tr> </tbody> </table>	Receiver Location	Weekday (7.00am-6.00pm) Saturday (7.00am-1.00pm)	Saturday (1.00pm-6.00pm) Sunday (7.00am-6.00pm)	Evening (6.00pm-10.00pm)	Night (10.00pm-7.00am)	Nearest Receiver	53	48	41	35	Condition not triggered in this reporting period.	Not Triggered
Receiver Location	Weekday (7.00am-6.00pm) Saturday (7.00am-1.00pm)	Saturday (1.00pm-6.00pm) Sunday (7.00am-6.00pm)	Evening (6.00pm-10.00pm)	Night (10.00pm-7.00am)									
Nearest Receiver	53	48	41	35									
	Water Quality Impacts												
20	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 (March 2018) and Soil and Water Management Sub Plan (June 2018). The plans detail a number of controls to prevent the pollution of water.</p> <p>There were no reportable water pollution incidents during the audit period.</p>	Compliant										
	Waste Water												
21	Waste water from the construction, installation and operation of wells and associated infrastructure shall only be applied to the following areas:	The auditor sighted the AGL Environmental Footprint spreadsheet for the financial years 2016/17 and 2017/18 which notes that produced water was primarily reused by external industries. The auditor sighted a sample of disposal records generated during the audit period and reconciled against the Environmental Footprint. There were no errors or emissions identified.	Compliant										
	(a) dust suppression on any unsealed roads within the site;		Compliant										
	(b) irrigated onto pastures within the site;		Compliant										
	(c) evaporation dam; and		Compliant										
	(d) reinjection into gas wells.		Compliant										
	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.	Condition not triggered during the audit period.	Not Triggered										
22	Spray from waste water application shall not drift beyond the boundary of the waste water utilisation area to which it is applied.	Condition not triggered during the audit period.	Not Triggered										

B2. DA 246-8-2002

No.	Consent Condition	Compliance Assessment	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 not triggered during the audit period.	Not Triggered
24	The Applicant shall ensure that all waste water that is used for dust suppression and/or irrigation has a salinity measure that does not exceed 800 $\mu\text{S}/\text{cm}$.	Condition not triggered during the audit period.	Not Triggered
	Dust		
25	The Applicant shall ensure that activities are carried out in a manner that will minimise the emission of dust from the site, including traffic generated dust from the site access roads.	<p>The auditor sighted the Air Quality Management Sub Plan (June 2018) and noted the inclusion of adequate dust management controls.</p> <p>The auditor sighted the environmental complaints register and noted that there were no dust related complaints during the audit period in relation to this Development Consent.</p> <p>There were no excavation works undertaken during the audit period that were associated with this Development Consent.</p>	Compliant
26	The Applicant shall take all practicable measures to ensure that all vehicles entering or leaving a site, carrying a load that may generate dust, are covered at all times, except during loading and unloading. Any such vehicles shall be covered or enclosed in a manner that will prevent emissions of dust from the vehicle at all times.	<p>The auditor sighted the Air Quality Management Sub Plan (June 2018) and noted the inclusion of adequate dust management controls.</p> <p>The auditor sighted the environmental complaints register and noted that there were no dust related complaints during the audit period in relation to this Development Consent.</p> <p>There were no excavation works undertaken during the audit period that were associated with this Development Consent.</p>	Compliant
27	The Applicant shall take all practicable measures to minimise the generation of wind-blown dust from soil stockpiles.	Condition not triggered during the audit period.	Not triggered
	Gas Gathering System Pipeline		
28	The Applicant shall comply with the following in the construction of the gas gathering system pipeline:	It was reported by AGL (AEPR 2016-2017 and AEPR 2017-2018) that there were no gas gathering system construction works undertaken during the audit period with respect to DA246-8-2002.	Not Triggered
	(a) excavated trenches shall not be left uncovered overnight, unless adequate fencing and warning lights are erected;		Not Triggered

B2. DA 246-8-2002

No.	Consent Condition	Compliance Assessment	Finding
	(b) signs stating the presence of a buried gas pipeline shall be erected periodically along the length of the trench once the pipeline has been laid;		Not Triggered
	(c) trenches are to be restored and reseeded with local grass seeds on completion of the work;		Not Triggered
	(d) local council traffic guidelines in respect of work carried out on road verges and underneath roads shall be implemented;		Not Triggered
	(e) the pipeline shall be constructed in accordance with the AS 3723-1989; and		Not Triggered
	(f) the Department shall be notified on the completion of any trenching works.		Not Triggered
	Threatened Species		
28A.	The Applicant shall ensure that, during the drilling and construction of KP05 and KP06, impacts on threatened species are minimised by implementing actions including, but not limited, to the following:	Condition not triggered during the audit period.	Not Triggered
	(a) The recommendations outlined in Sections 6 and 7 of the Ecosearch Environmental Consultants Pty Ltd report titled Flora and Fauna Assessment, AGL –Gas Well and Gathering Line Project Modifications ; and		Not Triggered
	(b) Marking the boundaries of endangered ecological communities (EECs) and locations of other known threatened species and, where possible, avoiding construction activities within these areas.		Not Triggered
	Heritage		
28B.	The Applicant shall ensure that, if any historical archaeological relics within the meaning of the Heritage Act 1977 are disturbed, the Heritage Council of NSW shall be notified in accordance with section 146 of the Heritage Act 1977.	Condition not triggered during the audit period.	Not Triggered
	Site Rehabilitation		
29	The Applicant shall ensure the prompt and effective rehabilitation of all disturbed areas of the site following the completion of construction, operations and associated activities and/or the decommissioning of plant, to minimize the generation of wind erosion dust.	Condition not triggered during the audit period.	Not Triggered
30	The Applicant shall carry out rehabilitation of the site in accordance with the requirements of the DOPE and the Site Rehabilitation Management Plan.	Condition not triggered during the audit period.	Not Triggered
	Community Consultative Committee		

B2. DA 246-8-2002

No.	Consent Condition	Compliance Assessment	Finding
31	The Applicant shall include the operation of KP1, KP2, KP3, KP05 and KP06 and the associated gas gathering system, and the conditions of this consent, as a matter for the consideration of the Community Consultative Committee (established under Condition 90 of the consent for DA No. 15-1-2002-i dated 23 July 2002).	The auditor sighted the minutes of the Community Consultative Committee and noted discussion points appear comprehensive and inclusive of all AGL activities.	Compliant
Environment Protection Licence			
32	The Applicant shall seek a variation to the Environment Protection Licence issued by the DECC for the Petroleum Production Lease No.1 area, to include the operation of the Kay Park wells (KP1, KP2, KP3, KP05 and KP06) and associated gas gathering system.	Condition closed in a previous audit.	Not Triggered

B3. DA 282-6-2003

No.	Consent Condition	Compliance Assessment	Finding
	Schedule 3		
	Administrative Conditions		
	Obligation to Minimise Harm to the Environment		
1	The Applicant shall implement all practicable measures to prevent or minimise any harm to the environment that may result from the construction or operation of the development.	<p>An EMS has been developed and implemented to manage environmental risks and achieve performance improvements. The EMS consists of an EMP, Sub Plans and a compliance management system.</p> <p>A number of controls are in place to monitor and measure implementation of the EMS including Environmental Management Sub Plan Compliance Audits, Daily Workover Reports, air quality monitoring and noise monitoring. The auditor sighted a sample of monitoring controls and noted compliance with the requirements of the EMP.</p> <p>Compliance obligations arising from licences, leases, environmental/ planning approvals and legislation are monitored through a web-based database compliance management system (CMO Compliance). The auditor sighted CMO Compliance and determined that the tool effectively monitors compliance against obligations.</p>	Compliant
	Terms of Approval		
2	The Applicant shall carry out the development generally in accordance with the:	<p>It was reported by AGL that the development is undertaken in accordance with the EMP and Sub Plans which reflect the requirements of the Consent Conditions. On receipt of an approved consent or modification, the EMP is reported to be revised to reflect the new requirements. This was evidenced by the frequent revision history of the document.</p> <p>The DA and subsequent modifications were submitted by Sydney Gas and as such were not available for the purpose of this assessment.</p>	Not Verified
	(a) DA submitted to the Department on 20 June 2003;		Not Verified
	(b) <i>Camden Gas Project Stage II – Environmental Impact Statement for the Sydney Gas Company</i> (four volumes), dated 19 June 2003;		Not Verified
	(c) All other documents listed in Appendix C;		Not Verified
	(d) Drawings No. 32339 SK010 Issue 17 and SK014 Issue 1 ; and URS Plan LC-0100 Revision G dated 16 June 2004;		Not Verified
	(e) Modification Application 42-3-2005 and the letter from Sydney Gas Operations Pty Ltd to the Department dated 14 March 2005 titled <i>Camden Gas Project Stage II – Modification Application</i> , and the accompanying attachments;		Not Verified
	(f) The modification application submitted to the Department on 11 April 2006 and the accompanying document <i>Camden Gas Project Joint Venture Proposed Multiple Gas Well Modifications</i> prepared by AGL Gas Production (Camden) Pty Ltd and Sydney Gas (Camden) Operations Pty Ltd, dated April 2006;	Not Verified	

B3. DA 282-6-2003

No.	Consent Condition	Compliance Assessment	Finding
	(g) The modification application submitted to the Department on 29 September 2006 and the accompanying document <i>Camden Gas Project Joint Venture Statement of Environmental Effects Proposed SIS Well Project</i> prepared by AGL Gas Production (Camden) Pty Ltd and Sydney Gas (Camden) Operations Pty Ltd, and dated September 2006;		Not Verified
	(h) The modification application submitted to the Department on 16 October 2006 and the accompanying document <i>Camden Gas Project Joint Venture Statement of Environmental Effects Proposed SIS Well Project (GL15)</i> prepared by AGL Gas Production (Camden) Pty Ltd and Sydney Gas (Camden) Operations Pty Ltd, and dated October 2006;		Not Verified
	(i) Modification Application MOD 11-2-2007 and <i>Statement of Environmental Effects Section 96AA Modification of DA No 282-6-2003-I Relocation of an Existing Internal Road at Rosalind Park Gas Plant (RPGP) off Medhurst Road, Menangle</i> , dated February 2007;		Not Verified
	(j) Modification Application MOD 26-3-2007 and <i>Camden Gas Project Joint Venture Gas Well and Gathering Line Modification Project Statement of Environmental Effects</i> , dated March 2007;		Not Verified
	(k) Modification Application 282-6-2003 MOD 9, the Statement of Environmental Effects titled <i>Camden Gas Project Joint Venture – EM39 and GL17 Modification Project</i> dated February 2008, letter from AGL Gas Production (Camden) Pty Limited to the Department, dated 19 March 2008, and letter from Wilkinson Murray Pty Limited to AGL Gas Production (Camden) Pty Limited, dated 31 March 2008;		Not Verified
	(l) Modification Application 282-6-2003 MOD 10, the Statement of Environmental Effects titled, <i>Camden Gas Project: Rosalind Park Access Road and Gas Gathering Line Modification</i> dated December 2008 and letter from Cubbitch Barta Native Title Claimants Aboriginal Corporation to Biosis Research Pty Ltd, dated 22 October, 2008; and		Not Verified
	(m) Modification Application 282-6-2003 MOD 11, the letter titled, <i>Camden Gas Project – AGL Modification to Gas Gathering Line</i> dated September 2009 and letter from Biosis Research Pty Ltd, dated 12 June, 2009;		Not Verified
	(n) the modification application DA 282-6-2003i MOD 12 and accompanying letter prepared by AGL Energy Limited, dated 31 May 2010; and		Not Verified

B3. DA 282-6-2003

No.	Consent Condition	Compliance Assessment	Finding
	(o) modification application DA 282-6-2003-i MOD 13 and accompanying Environmental Assessment prepared by AGL Upstream Investments Pty Limited dated 18 November 2016; and Note - Inserted by Mod 13 - 27 May 2017	Refer to relevant conditions for an assessment of compliance.	Note
	(p) conditions of this consent	Refer to relevant conditions for an assessment of compliance.	Note
3	If there is any inconsistency between the above documents, the most recent document shall prevail to the extent of the inconsistency. However, the conditions of this consent shall prevail to the extent of any inconsistency.	Condition noted.	Note
4	The Applicant shall comply with any reasonable requirement/s of the Secretary arising from the Department's assessment of:	Condition not triggered during the audit period.	Not Triggered
	(a) Any reports, plans or correspondence that are submitted in accordance with this consent; and		Not Triggered
	(b) The implementation of any actions or measures contained in these reports, plans or correspondence		Not Triggered
	Limits of Approval		
5	This approval shall lapse twenty one (21) years from the granting of the production lease.	Condition not triggered during the audit period.	Not Triggered
6	The Applicant shall not exceed the maximum production capacity of 14.5 petajoules per annum, from the gas treatment plant.	The auditor sighted the Jemena Production spreadsheets for 2016-2017 and 2017-2018 which demonstrated production capacity of less than 14.5 PJ per annum.	Compliant
6A.	The Applicant shall not produce gas from GL14 until a Production Lease under the <i>Petroleum (Onshore) Act 1991</i> has been obtained for the entirety of the well.	Condition closed in a previous audit.	Not Triggered
	Special Conditions of Approval		
7	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 s83 of that Act.	AGL has not had EPL12003 suspended or revoked during the audit period and as such would be considered to be a fit and proper person.	Compliant
8	Within one month of consent being issued and in any case before the commencement of any construction works causing the Gas Treatment Plant to become scheduled under the Protection of the Environment Operations Act 1997, the Applicant must submit, to the EPA's Manager Sydney Industry PO Box 668 Parramatta NSW 2124, a written report containing actual dates for submission of reports where specified in Conditions 126, 56, 62, 63, 43, 60, 85, 86, 71 and 61 of Schedule 4.	Condition not triggered during the audit period.	Not Triggered

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No.	Consent Condition	Compliance Assessment	Finding
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 approved modifications, it is noted that there are no wells that are not yet drilled and currently due to be surrendered.	Compliant
10	<p>At the expiration of ten (10) years from the date of this consent, the Applicant shall submit to the Secretary 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.</p> <p>In the absence of a proven reserve, the Applicant shall make a further submission to the Secretary justifying why production should continue.</p> <p>After reviewing this report, the Secretary may direct the Applicant to carry out certain actions (including the closure and rehabilitation of certain wells).</p>	Condition closed in a previous audit.	Not Triggered
11	<p>The Applicant shall run verticality logs for new gas wells located within coal exploration titles.</p> <p>Note: The Petroleum Production Lease that may be granted by the DRE will apply to the PEL 2 area, which is a much larger area than that which the development consent applies to. This consent applies to the land and structures identified in Schedule 1, being the gas wells, gas treatment plant, associated workshop and office facilities and gas gathering system.</p>	Condition not triggered during the audit period.	Not Triggered
	Further Approvals		
12	Nothing in this consent permits the drilling and operation of any additional wells (beyond the approved 49 wells for gas production) or gas gathering lines.	<p>As part of a previous Independent Environmental Audit, the auditor reviewed the list of gas wells provided by AGL against the development consent and modifications and determined that the development was compliant against the requirements of this condition.</p> <p>It was reported by AGL (AEPR 2016-2017 and AEPR 2017-2018) that there were no wells drilled during the audit period.</p>	Compliant
	Structural Adequacy		
13	The Applicant shall ensure that all new buildings and structures, and any alterations or additions to existing buildings and structures, are constructed in accordance with the relevant requirements of the BCA.	Condition not triggered during the audit period.	Not Triggered

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No.	Consent Condition	Compliance Assessment	Finding
	(a) Under Part 4A of the EP&A Act, the Applicant is required to obtain construction and occupation certificates for the proposed building works.		Not Triggered
	(b) Part 8 of the EP&A Regulation sets out the detailed requirements for the certification of development.		Not Triggered
	(c) The development is located in the South Campbelltown and Wilton Mine Subsidence Districts. Under Section 15 of the Mine Subsidence Compensation Act 1961, the Applicant is required to obtain the Mine Subsidence Board's approval before constructing or relocating any improvements on the site.		Not Triggered
	Public Infrastructure		
14	The Applicant shall:	AGL reported that there was no damage to public infrastructure as a result of operations during the audit period. The auditor inspected a number of well sites and did not identify any damage to public infrastructure.	Not Triggered
	(a) Repair, or pay the full costs associated with repairing any existing public infrastructure that is damaged by the development;		Not Triggered
	(b) Relocate or pay the full costs associated with relocating any existing public infrastructure that needs to be relocated as part of the development; and		Not Triggered
	(c) Meet the reasonable requirements of Sydney Water and Macarthur Water regarding the construction and operation of the proposed development adjacent to the water mains operated by Sydney Water and Macarthur Water respectively.		Not Triggered
	Note: The Applicant may be required to apply to Sydney Water for a Section 73 Compliance Certificate under the <i>Sydney Water Act 1994</i> and to meet Sydney Water's reasonable requirements.		Not Triggered
	Location of Gas Wells and Gas Gathering Systems		
15	The Applicant shall provide Camden Council, Campbelltown City Council and Wollondilly Shire Council with the Geographical Positioning System (GPS) co-ordinates and digital survey data for gas well sites and gas gathering systems within their respective Local Government Area, in a format suitable to each of these Councils, within two months of the completion of the gas wells and gas gathering system.	Condition closed in a previous audit.	Not Triggered
16	The Applicant shall provide Camden Council, Campbelltown City Council and Wollondilly Shire Council with the wellhead configurations of each gas well within two months of the gas well being completed or two months from the date of this consent, whichever is the later.	Condition closed in a previous audit.	Not Triggered

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No.	Consent Condition	Compliance Assessment	Finding
17	The Applicant shall provide written notification to the Secretary that it has fulfilled the requirements of Conditions 15 and 16, within two weeks of the information being provided to the Councils.	Condition closed in a previous audit.	Not Triggered
	Compliance		
18	The Applicant shall prepare a Project Commitments Register (PCR) within six months of the date of this consent. The Project Commitments Register shall be submitted to the Secretary for approval. The PCR shall include all commitments and initiatives referred to in the documents listed in Condition 2(c) (Appendix C) and all other documents and supplementary information provided to the Department from the time of DA lodgement to the date of this consent. The PCR shall include, but not necessarily be limited to:	Condition closed in a previous audit.	Not Triggered
	(a) All commitments and initiatives (environmental, social, economic or project related) that the Applicant has agreed or suggested to implement for this development;		Not Triggered
	(b) Timeframe for implementation of the commitment or initiative;		Not Triggered
	(c) The responsibility for ensuring that the commitment or initiative is implemented in the manner and timeframe provided by the Applicant; and		Not Triggered
	(d) A reference to the document or correspondence that the commitment or initiative was stated by the Applicant.		Not Triggered
19	The Applicant shall prior to the commencement of substantial construction certify in writing to the Secretary that all the relevant conditions applicable to construction have been complied with.	Condition closed in a previous audit.	Not Triggered
20	The Applicant shall submit for the approval of the Secretary two weeks prior to the commissioning of the development or within such other period that the Secretary may agree, a compliance report detailing compliance with all the relevant conditions that apply prior to the commissioning of the development.	Condition closed in a previous audit.	Not Triggered
	SCHEDULE 4		
	SPECIFIC ENVIRONMENTAL CONDITIONS		
	VISUAL AMENITY		
	Visual Performance		

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No.	Consent Condition	Compliance Assessment	Finding
1	The Applicant shall implement visual mitigation measures as depicted on the plan Camden Gas Project Stage 2: Vegetation and Landscape Management Plan Drawing No LC-0100 Revision G prepared by URS for Sydney Gas dated 16 June 2004 (the Landscape Design).	The auditor sighted the plan “Camden Gas Project Stage 2: Vegetation and Landscape Management Plan” Drawing No LC-0100 Revision G (16 June 2004) prepared by URS for Sydney Gas. An inspection was conducted of the RPGP and it was noted that vegetation is largely being maintained in accordance with the plan.	Compliant
2	<p>Prior to the commencement of construction of the workshop, office, plant and associated facilities at Rosalind Park, the Applicant shall submit for the approval of the Secretary, a colour scheme (paint colour specifications) for all proposed buildings, fences and associated structures. Colours selected for the facilities (in particular the Workshop and Offices) shall aim to minimise the visual impact of the facility on surrounding land uses and maximise the ability of the facilities to blend into the local landscape.</p> <p>Note: The Applicant where practicable should aim to use darker paint colours on the facilities (such as a dark grey colour). Wherever practical, the Applicant shall ensure that ground surfaces and stabilisation materials for the facilities at Rosalind Park utilise material in dark shades of colour (such as blue metal and dark coloured mulch).</p>	Condition closed in a previous audit.	Not Triggered
3	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 Secretary.	Condition closed in a previous audit.	Not Triggered
	Lighting Performance		
4	The Applicant shall take all practicable measures to minimise any off-site lighting impacts from the development.	Condition closed in a previous audit.	Not Triggered
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 <i>Australian Standard 4282 – 1997 Control of the Obtrusive Effects of Outdoor Lighting</i> .	Condition closed in a previous audit.	Not Triggered
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):	Condition closed in a previous audit.	Not Triggered

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No.	Consent Condition	Compliance Assessment	Finding
	(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;		Not Triggered
	(b) Report titled Camden Gas Plant Stage 2 – Lighting Review with Respect to Obtrusive Effects prepared by Bassett Consulting Engineers Pty Ltd for Sydney Gas dated 14 October 2003;		Not Triggered
	(c) Plan titled Lighting Review to Minimise Obtrusive Light to Mount Gilead Homestead – Drawing No. S5397-E001 prepared by Bassett dated October 2003;		Not Triggered
	(d) Plan titled Camden Gas Plant Phase II proposed Area and Perimeter Lighting Layout-Drawing No. 03-1212-84-301 Revision 2 prepared by Simon Engineering and dated 15 October 2003;		Not Triggered
	(e) Report titled Lighting Scope Camden Gas Phase II prepared by Simon Engineering, Document Reference No 03 1212 LS-02 dated 13 October 2003; and		Not Triggered
	(f) Report titled Sydney Gas Proposal Stage 2 Coal Seam Methane Project Visual Assessment of Lighting and Flare prepared by URS for Sydney Gas dated 6 November 2003.		Not Triggered
7	Prior to the commencement of construction of the Gas Treatment Plant, the Applicant must submit to the Secretary or the certifying authority a revised area and perimeter lighting layout and electrical services lighting review to replace the two plans of this name in the document referred to in condition 6(b) above, taking into account the revisions to the development plans for the Gas Treatment Plant as approved in this consent. The lighting design under these revised plans shall be designed to minimise the effect of obtrusive light on the Mount Gilead Homestead from the Gas Treatment Plant.	Condition closed in a previous audit.	Not Triggered
8	The Applicant must ensure that wherever possible, any scheduled use of the flare occurs during daylight hours.	The auditor sighted the flare log in the 2016-2017 and 2017-2018 AEPRs and verified that there was no scheduled use of the flare at night during the audit period.	Compliant
9	The design of the flare pit must be amended by installing an opaque barrier to a height of 7.5m above the flare tip as depicted on the Landscape Design. The Applicant may remove this barrier with the consent of the owner of Lot 1 DP 807555.	Condition closed in a previous audit.	Compliant

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No.	Consent Condition	Compliance Assessment	Finding
10	The Applicant shall report on the effectiveness of the lighting controls in the AEPR.	<p>The auditor sighted the AEPR 2016-2017 and AEPR 2017-2018 reports and noted that there were no lighting complaints. It can be assumed the controls are operating effectively.</p> <p>It is noted the DPE granted an exemption to the Independent Landscape and Lighting Audit in 2016 and 2018 and the next is due in September 2020.</p>	Compliant
11	The Applicant shall record the frequency of the operation of the flare and shall make this information available for inspection by the Secretary on request. The records shall include but not be limited to the following:	The auditor sighted AEPR 2016-2017 and AEPR 2017-2018 reports, and noted the inclusion of most relevant information on the operation of the flare.	Compliant
	(a) date and time of each flare event;	The auditor sighted the SCADA system records and verified the recording of the information required by this condition.	Compliant
	(b) duration of each flare event;		Compliant
	(c) whether the flare operated during daylight or night-time hours;		Compliant
	(d) the cause for the operation of the flare;		Compliant
	(e) the number of compressor engines that have been commissioned and operating during the period; and		Compliant
	(f) comparison of the frequency, night-time frequency, duration and estimated light level of each type of flare event with the flare events predicted in Table 2 of the following report: URS (2003) Sydney Gas Proposal Stage 2 Coal Seam Methane Project Visual Assessment of Lighting and Flare prepared by URS for Sydney Gas dated 6 November 2003.	The information required by Condition 11(f) is not entirely included in AEPR 2016-2017. While the frequency of use compared to previous reporting periods is provided, the estimated light levels are not discussed and there is no comparison to Table 2 of URS (2003).	Non-Compliant
	Landscaping design		
12	The site shall be landscaped as shown on the Landscape Design and this landscaping shall be maintained for the life of the development.	<p>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.</p> <p>The DPE confirmed that the next audit is due in September 2020. A more detailed assessment of compliance will occur within the scope of that audit.</p>	Compliant
	Vegetation and Landscape Management Plan		

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No.	Consent Condition	Compliance Assessment	Finding
13	The Applicant shall prepare and implement a Vegetation and Landscape Management Plan for the Gas Treatment Plant site and the gas well sites. The plan shall include, but not necessarily be limited to:	<p>Previous audits have noted the existence of the <i>Vegetation and Landscape Management Plan, Proposed Gas Treatment Plan</i>, URS (28 June 2004) and confirmed that the Plan conforms to the requirements of this condition. Implementation of the Plan occurred prior to the current audit period. The auditor also notes the Rehabilitation and Landscape Management Plan (June 2018), which is updated regularly and provided to the DPE.</p> <p>Following an independent audit in 2014 (Distinctive Living Design) which determined that the RPGP landscaping measures were adequate, the DPE confirmed that the 2016 audit was not required (04/08/16). The DPE noted that the next audit is due in September 2018. A more detailed assessment of compliance will occur within the scope of that audit.</p> <p>There were no drilling or significant construction activities conducted during the audit period.</p>	Compliant
	(a) reasonable measures to protect mature trees as part of the well drilling, gas gathering system and Treatment Plant Site construction activities;		Compliant
	(b) a landscape strategy detailing the design and proposed planting of trees and shrubs to be undertaken;		Compliant
	(c) ensuring that tree and shrub species used for landscaping of the site are indigenous to the locality;		Compliant
	(d) details of a program to ensure that all landscaped areas are maintained in a tidy, healthy state;		Compliant
	(e) measures intended to maximise the screening of infrastructure from views from the Mt Gilead property through planting and other measures;		Compliant
	(f) details of the visual appearance of all new buildings, structures and facilities (including paint colours and specifications). New buildings shall be constructed so as to present a neat and orderly appearance and to blend as far as practicable with the surrounding landscape;		Compliant
	(g) Details of any necessary irrigation system to ensure that adequate supplies of water are made available to all landscaping on site, the trees between the site and Menangle Creek and the trees located on the southern boundary of the Gas Treatment Plant site;		Compliant
	(h) Details of any necessary methods to be employed in the establishment of trees on cut batters in the event that the excavated surface is not conducive to the planting of vegetation of the type displayed in the Landscape Design;		Compliant
	(i) provision for assessing and regularly monitoring the health of the trees in the Menangle Creek riparian zone adjacent to the Gas Treatment Plant site. The objective of the monitoring is to determine the health of the trees and to recommend measures (if required) to improve the health of the trees;		Compliant
	(j) reasonable measures to ensure that mature trees within the riparian corridor along Menangle Creek are retained and protected;		Compliant
	(k) details of proposed screening works including supplementary planting along the border of the site with Menangle Creek;		Compliant

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No.	Consent Condition	Compliance Assessment	Finding
	(l) reasonable measures to minimise the impacts of the gas wells on the cultural heritage landscape of the EMAI;		Compliant
	(m) details of a monitoring program to assess the effectiveness of all visual impact mitigation measures, particularly the measures used to minimise the visual impacts on the Mount Gilead Homestead; and		Compliant
	(n) reporting the results of the visual impact monitoring in the Annual Environmental Performance Report. The monitoring results will specifically identify any remedial measures required.		Compliant
	The Vegetation and Landscape Management Plan must be submitted and approved by the Secretary prior to commencement of construction on the Gas Treatment Plant site.		Compliant
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 Secretary. The monitoring program must include the following features:	The auditor sighted correspondence from the DPE (02/08/18) confirming that the 2018 independent audit was not required as the findings of the 2014 audit are likely to be representative of the current conditions.	Not Triggered
	(a) identification of mature trees surrounding the site which afford screening of the Gas Treatment Plant from Mt Gilead Homestead;		Not Triggered
	(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;		Not Triggered
	(c) Description of the health of each tree identified under condition (a);		Not Triggered
	(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;		Not Triggered
	(e) Recommendation of any watering or fertilising that needs to be implemented to maintain the landscaping and surrounding trees;		Not Triggered

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No.	Consent Condition	Compliance Assessment	Finding
	(f) Recommendation of how to manage the landscaping to promote the maximisation of growth to maturity.		Not Triggered
	The results and recommendations of the monitoring program must be submitted to the Secretary at the conclusion of each stage of monitoring.	The auditor sighted correspondence from the DPE (02/08/18) confirming that the 2018 independent audit was not required. However, the correspondence noted that the monitoring program must continue to be undertaken. The Rehabilitation and Landscape Management Sub-Plan (July 2018) specifies that monitoring shall be carried out every two years by an independent arborist.	Non-Compliant
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 Secretary that the proposed work is reasonably necessary for safety reasons. The trees must be maintained in a healthy condition.	The auditor sighted the trees adjacent to the southern boundary of the RPGP which screen the premises from the Mt Gilead Homestead and noted that trees have been adequately maintained.	Compliant
	(b) If any of the trees described in this condition ceases to provide screening of the quarry from the Mount Gilead Homestead, as a result of the Applicant's activities (other than trimming or lopping undertaken on the advice of the arborist), the Applicant must provide alternative screening to the satisfaction of the Secretary.		Compliant
16	Prior to the commencement of construction on the Gas Treatment Plant site the Applicant must secure the right to implement on land outside the Gas Treatment Plant site for the life of the development any necessary mitigative or screening measures proposed for the Gas Treatment Plant as part of the Vegetation and Landscape Management Plan or as required by this Consent.	Condition closed in a previous audit.	Not Triggered
17	For the purpose of avoiding possible detrimental impact on vegetation screening of the Gas Treatment Plant from the Mt Gilead Homestead due to any clear felling of trees in the area marked A on the Applicant's Plan Map Ref M240212 dated 16 June 2004 (Applicant's Plan) by the holder of the electricity transmission line easement over Lot 1 DP 807555 (Holder), the Applicant shall carry out any reasonable and necessary trimming and lopping of those trees provided the Holder requests the Applicant in writing to carry out this trimming and lopping and undertakes in return to refrain from the clear felling of those trees within 5 years of the date of this Consent.	The auditor sighted the trees adjacent to the southern boundary of the RPGP which screen the premises from the Mt Gilead Homestead and noted that trees have been adequately maintained.	Compliant
	Raptor Breeding Zones at EMAI		

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No.	Consent Condition	Compliance Assessment	Finding
20	The Applicant shall ensure that the drilling of gas wells and the construction of the gas gathering system and any related activities do not occur within 100 metres of the Raptor Breeding zones.	<p>The Raptor Breeding Zones are located on the EMAI property which is approximately 2km from the gas gathering line works.</p> <p>During the reporting period no construction related activities were undertaken within 100m of the Raptor Breed Zones (AEPR 2016-2017 and AEPR 2017-2018).</p>	Not Triggered
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 Secretary.	<p>Condition not triggered during the audit period.</p> <p>It was reported by AGL (AEPR 2016-2017 and AEPR 2017-2018) that there were no drilling or fracking works undertaken during the audit period.</p>	Not Triggered
Flora and Fauna Protection Measures			
23	The Applicant shall implement best practice flora and fauna management.	<p>The auditor sighted the Flora and Fauna Management Sub Plan (June 2018) and Rehabilitation and Landscape Management Sub Plan (June 2018). The plans comply with the requirements of this condition.</p> <p>It was noted that no drilling or well construction works were undertaken under this Development Consent during the audit period.</p>	Compliant
24	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 (June 2018) and Rehabilitation and Landscape Management Sub Plan (June 2018). The plans comply with the requirements of this condition.</p> <p>It was noted that no drilling or well construction works were undertaken under this Development Consent during the audit period.</p>	Compliant
25	The Applicant shall ensure that trenches constructed during the construction of gas gathering lines are not left open overnight unless otherwise agreed by the Secretary.	Not triggered in this period.	Not Triggered
26	The Applicant shall not remove mature trees as part of this development unless otherwise agreed by the Secretary.	<p>The auditor sighted the Flora and Fauna Management Sub Plan (June 2018) and noted the inclusion of procedures consistent with the requirements of this condition.</p> <p>According to the AEPR 2016-2017 and AEPR 2017-2018, there were no trees removed in this audit period.</p>	Compliant

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No.	Consent Condition	Compliance Assessment	Finding
27	The Applicant shall employ a suitably qualified ecologist with specific experience in identifying the Cumberland Plain Snail, during the construction period of the development. The ecologist shall monitor and examine areas for the presence of the threatened Cumberland Plain Snail, during the clearing for the proposed development.	Condition not triggered during the audit period.	Not Triggered
28	The Applicant shall prepare a translocation strategy for the threatened Cumberland Plain Snail which will be submitted for the Secretary's approval prior to construction. The Translocation strategy shall be implemented should any individuals or populations of the Cumberland Plain Snail be identified.	Condition closed in a previous audit.	Not Triggered
Threatened Species			
28A.	The Applicant shall ensure that, during the drilling and construction of EM38 and upgrading of the gas gathering lines, impacts on threatened species are minimised by implementing actions including, but not limited, to the following:	Condition not triggered during the audit period.	Not Triggered
	(a) The recommendations outlined in Ecosearch Environmental Consultants Pty Ltd's reports titled: Flora and Fauna Assessment, AGL –Gas Well and Gathering Line Project Modifications (Sections 6 and 7); and Flora and Fauna Assessment, Executive Summary for Rosalind Park Gas Field (page 9); and		Not Triggered
	(b) Marking the boundaries of endangered ecological communities (EECs) and locations of other known threatened species and, where possible, avoiding construction activities within these areas.		Not Triggered
28B.	The Applicant shall ensure that, during the drilling and construction of EM39 and GL17 and upgrading of the gas gathering lines, impacts on threatened species are minimised by implementing actions including, but not limited to the following:	The auditor sighted the AEPR 2016-2017 and the AEPR 2017-2018 and noted that there were no drilling or construction works undertaken during the audit period.	Not Triggered
	(a) the recommendations outlined in the flora and fauna assessment carried out by Biosis Research Pty Ltd in Appendix A of the Statement of Environmental Effects titled Camden Gas Project Joint Venture – EM39 and GL17 Modification Project; and		Not Triggered
	(b) marking the boundaries of endangered ecological communities (EECs) and locations of other known threatened species and, where possible, avoiding construction activities within these areas.		Not Triggered
NOISE			
Noise Impact Assessment Criteria			

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No.	Consent Condition	Compliance Assessment	Finding																				
29	<p>The Applicant shall ensure that noise from the normal operation of the premises, excluding flaring events, must not exceed the noise limits in the table below:</p> <table border="1" data-bbox="331 411 1115 592"> <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 the following noise assessment reports prepared by Wilkinson Murray for the RGP which demonstrate compliance with the requirements of this condition:</p> <ol style="list-style-type: none"> 30 September 2016 (monitoring conducted 20 September 2016) 30 December 2016 (monitoring conducted 8, 19, 20 December 2016) 19 April 2017 (monitoring conducted 27 March 2017) 25 June 2017 (monitoring conducted 14 June 2017) 19 September 2017 (monitoring conducted 11 September 2017) 29 December 2017 (monitoring conducted 11 and 15 June 2017) 30 March 2018 (monitoring conducted 11 March 2018) 19 June 2018 (monitoring conducted 14 June 2018) <p>Note: In some instances Wilkinson Murray noted "non-significant weather conditions" present during the evening and night time measurements. Notwithstanding, "the evening and night time measurement results would have shown full compliance with the relevant operational noise limits set by the EPA's Environment Protection Licence Conditions..."</p>	Compliant
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																			
29A.	<p>Noise from the operation of EM39 and GL17 shall not exceed the noise limits in the table below:</p> <table border="1" data-bbox="331 954 1084 1094"> <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>It was reported by AGL that there was no noise monitoring undertaken during the audit period of EM39 and GL17. However, there were no workover activities conducted and no change in operations or sensitive receivers from the previous audit period.</p>	Not Verified		
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																			
30	<p>For the purposes of condition 29, 29A and 31:</p>	<p>The monitoring reports sighted by the auditor (listed against Condition 28) with respect to conditions 29, 29A and 31 comply with the requirements of this condition.</p>	Compliant																				
	<p>(a) Day is defined as the period from 7am to 6pm Monday to Saturday and 8am to 6pm Sundays and Public holidays;</p>		Compliant																				
	<p>(b) Evening is defined as the period 6pm to 10pm;</p>		Compliant																				
	<p>(c) Night is defined as the period from 10pm to 7am Monday to Saturday and 10pm to 8am Sundays and Public Holidays; and</p>		Compliant																				

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No.	Consent Condition	Compliance Assessment	Finding																																						
	(d) The receiver locations R1 and R7 are as shown in Figure 5.1 of the Environmental Noise and Vibration Study by Environmental Resources Management Australia Pty Ltd dated June 2003 which accompanied the Environmental Impact Statement for the project.		Compliant																																						
31	<p>Noise from flaring events, must not exceed the noise limits in the table below:</p> <table border="1" data-bbox="338 491 1032 826"> <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>	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>Flaring events did not coincide with monitoring undertaken by external consultants and as such there were no measurements obtained.</p> <p>It was reported by AGL that noise from flaring events was monitored following commissioning of the plant. The results were reportedly compliant with this condition and as such, no further monitoring was undertaken.</p>	Not Verified
Location	Duration of each Event	Expected Type Of Event (2)	Daytime L _{Aeq,15min}	Evening L _{Aeq,15min}	Night L _{Aeq,15min}																																				
R1 Medhurst Street	> 2.5 hours	Spill Valve	35	35	35																																				
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32	Noise from the premises is to be measured at the most affected point on or within the residential boundary or at the most affected point within 30m of the dwelling (rural situations) where the dwelling is more than 30m from the boundary to determine compliance with the LAeq(15 minute) and LAeq(period) noise limits in Conditions 29, 29A and 31. Where it can be demonstrated that direct measurement of noise from the premises is impractical, the EPA may accept alternative means of determining compliance. See Chapter 11 of the NSW Industrial Noise Policy. The modification factors presented in Section 4 of the NSW Industrial Noise Policy shall also be applied to the measured noise levels where applicable.	The monitoring reports sighted by the auditor (detailed against Condition 28) with respect to conditions 29, 29A and 31 comply with the requirements of this condition.	Compliant																																						
33	<p>The noise emission limits identified in Conditions 29, 29A and 31 apply under meteorological conditions of:</p> <ul style="list-style-type: none"> i Wind speed up to 3m/s at 10 metres above ground level; or i Temperature inversion conditions of up to 3°C/100m and wind speed up to 2m/s at 10 metres above the ground. 	The monitoring reports sighted by the auditor (detailed against Condition 28) with respect to conditions 29, 29A and 31 comply with the requirements of this condition.	Compliant Compliant Compliant																																						
	Noise – Construction and Well Maintenance																																								

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No.	Consent Condition	Compliance Assessment	Finding															
34	The Applicant shall prepare and implement a Construction and Well Maintenance Noise Management Protocol to be used for the duration of the project. The Protocol must include, but is not necessarily limited to:	The auditor sighted the Noise Management Sub Plan (June 2017) and noted compliance with the requirements of this condition.	Compliant															
	(a) noise compliance standards;	Implementation was evidenced by the induction program (construction hours) and notification letters. There were no noise complaints reported during the audit period in relation to this development consent.	Compliant															
	(b) community consultation;		Compliant															
	(c) advance notice to affected members of the community for planned well maintenance activities;		Compliant															
	(d) complaints handling monitoring/system;		Compliant															
	(e) site contact person to follow up complaints;		Compliant															
	(f) mitigation measures;		Compliant															
	(g) the design/orientation of the proposed mitigation methods demonstrating best practice;		Compliant															
	(h) construction times;		Compliant															
	(i) contingency measures where noise complaints are received; and		Compliant															
	(j) monitoring methods and program.		Compliant															
34A.	Noise from the drilling and construction of GL14 and GL15 shall not exceed the sound pressure level (noise) limits presented in the table below: <table border="1" data-bbox="340 901 1102 1018"> <thead> <tr> <th>Receiver Location</th> <th>Weekday (7.00am-6.00pm) Saturday (7.00am-1.00pm)</th> <th>Saturday (1.00pm-6.00pm) Sunday (7.00am-6.00pm)</th> <th>Evening (6.00pm- 10.00pm)</th> <th>Night (10.00pm- 7.00am)</th> </tr> </thead> <tbody> <tr> <td>EM39 – R3</td> <td>40</td> <td>40</td> <td>40</td> <td>38</td> </tr> <tr> <td>GL17 – R3</td> <td>40</td> <td>40</td> <td>40</td> <td>38</td> </tr> </tbody> </table>	Receiver Location	Weekday (7.00am-6.00pm) Saturday (7.00am-1.00pm)	Saturday (1.00pm-6.00pm) Sunday (7.00am-6.00pm)	Evening (6.00pm- 10.00pm)	Night (10.00pm- 7.00am)	EM39 – R3	40	40	40	38	GL17 – R3	40	40	40	38	Condition not triggered during the audit period.	Not Triggered
Receiver Location	Weekday (7.00am-6.00pm) Saturday (7.00am-1.00pm)	Saturday (1.00pm-6.00pm) Sunday (7.00am-6.00pm)	Evening (6.00pm- 10.00pm)	Night (10.00pm- 7.00am)														
EM39 – R3	40	40	40	38														
GL17 – R3	40	40	40	38														
34B.	Noise from the drilling and construction of EM38 shall not exceed the sound pressure level (noise) limits in the table below: <table border="1" data-bbox="327 1114 900 1204"> <thead> <tr> <th>Receiver Location</th> <th>Night Time Noise Limit dB(A) L_{Aeq}</th> </tr> </thead> <tbody> <tr> <td>Glenlee House</td> <td>35</td> </tr> <tr> <td>Menangle Park</td> <td>35</td> </tr> </tbody> </table>	Receiver Location	Night Time Noise Limit dB(A) L _{Aeq}	Glenlee House	35	Menangle Park	35	Condition not triggered during the audit period.	Not Triggered									
Receiver Location	Night Time Noise Limit dB(A) L _{Aeq}																	
Glenlee House	35																	
Menangle Park	35																	

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No.	Consent Condition	Compliance Assessment	Finding										
34C.	<p>Noise from the drilling and construction of EM39 and GL17 shall not exceed the sound pressure level (noise) limits in the table below:</p> <table border="1" data-bbox="331 403 1064 515"> <thead> <tr> <th data-bbox="331 403 479 475">Receiver Location</th> <th data-bbox="479 403 642 475">Weekday (7.00am-6.00pm) Saturday (7.00am-1.00pm)</th> <th data-bbox="642 403 822 475">Saturday (1.00pm-6.00pm) Sunday (7.00am-6.00pm)</th> <th data-bbox="822 403 943 475">Evening (6.00pm-10.00pm)</th> <th data-bbox="943 403 1064 475">Night (10.00pm-7.00am)</th> </tr> </thead> <tbody> <tr> <td data-bbox="331 475 479 515">EM38 – nearest residential receiver</td> <td data-bbox="479 475 642 515">54</td> <td data-bbox="642 475 822 515">39</td> <td data-bbox="822 475 943 515">39</td> <td data-bbox="943 475 1064 515">35</td> </tr> </tbody> </table>	Receiver Location	Weekday (7.00am-6.00pm) Saturday (7.00am-1.00pm)	Saturday (1.00pm-6.00pm) Sunday (7.00am-6.00pm)	Evening (6.00pm-10.00pm)	Night (10.00pm-7.00am)	EM38 – nearest residential receiver	54	39	39	35	Condition not triggered during the audit period.	Not Triggered
Receiver Location	Weekday (7.00am-6.00pm) Saturday (7.00am-1.00pm)	Saturday (1.00pm-6.00pm) Sunday (7.00am-6.00pm)	Evening (6.00pm-10.00pm)	Night (10.00pm-7.00am)									
EM38 – nearest residential receiver	54	39	39	35									
Noise – Drilling Impacts													
35	<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 (June 2017) and noted compliance with the requirements of this condition.</p>	Not Triggered										
	(a) identifying all potentially affected noise sensitive receivers (including residences of EMAI staff) that may be affected by drilling work at these wells;	<p>It was reported by AGL (AEPR 2016-2017 and AEPR 2017-2018) that there were no re-drilling activities undertaken during the audit period.</p>	Not Triggered										
	(b) predicting potential noise levels from the proposed well drilling methods where appropriate;		Not Triggered										
	(c) identifying and implementing all reasonable and feasible noise mitigation measures to reduce any drilling noise impacts;		Not Triggered										
	(d) documenting and implementing any specific work practices the Applicant will employ to limit noise; conducting noise monitoring where appropriate; and		Not Triggered										
	(e) appropriately informing affected residences and other relevant parties at least two weeks in advance of any drilling work at the gas wells and updating the information as required.		Not Triggered										
Hours of Operation													
36	<p>Planned maintenance activities at any of the wells must only be conducted between:</p>	<p>The auditor sighted the Noise Management Sub Plan (June 2017) and noted inclusion of this condition.</p>	Compliant										
	i 7am and 6pm on weekdays; and	<p>Implementation was evidenced by the induction program (construction hours), Daily Completion/Workover Reports and notification letters.</p>	Compliant										
	i 8am and 1pm on Saturdays (excluding Public Holidays).		Compliant										

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	This condition does not apply to the delivery of material outside the hours of operation permitted by the EPA’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 EPA and affected residents as soon as possible, or within a reasonable period in the case of emergency.		Compliant
	Construction Hours		
36A.	Except for the drilling (including well casing and grouting) of SIS wells, all construction work shall be conducted between 7.00am and 6.00pm Monday to Friday and between 8.00am and 1.00pm Saturdays and at no time on Sundays and Public Holidays, unless inaudible at any residential receiver. Note: Inaudible means that the construction activity cannot be heard by the human ear at the nearest affected residential receiver.	The auditor sighted the Noise Management Sub Plan (June 2017) and induction program and noted the inclusion of measures to ensure compliance with the requirements of this condition. AGL reported that there were no construction activities undertaken during the audit period with respect to DA282-6-2003.	Not Triggered
	Flare – Measures to Reduce Noise		
37	The Applicant must implement the following noise mitigation options to prevent noise impacts from flare operation:	ERM (2004) noted compliance against this condition following commissioning. It was reported that there were no changes to flare noise mitigation measures during the audit period. The use of the flare has decreased since commencement of operations and there were no noise complaints associated with the flare during the audit period.	Compliant
	Noise mitigation options 1 through to 9 (exclusive of option 8) must be implemented to prevent undue noise impacts at Receiver Location R7 (Mount Gilead residence) as referred to in Table B.1 titled Flare Mitigation Options – Mt. Gilead (R7) in the Letter Report titled ‘Stage 2 Coal Bed Methane Project – Response to the EPA’s Request for Flare Noise Details’ from Environmental Resources Management Australia to Sydney Gas Ltd dated 22 October 2003.		Compliant
	Measures identified in the report Amendment to Statement of Evidence – Compressor Blow Down Systems by Gary Scott dated 11 June 2004.		Compliant
	Operational Noise Management Plan		
38	The Applicant shall prepare and implement a Noise Management Plan for the whole site. The Plan shall be submitted to the Secretary for approval within six months of the date of this consent. The Plan shall include, but not necessarily be limited to:	The auditor sighted the Noise Management Sub Plan (June 2017) and noted compliance with the requirements of this condition. The submission of the Sub Plan to the Secretary was closed out in previous audits.	Compliant
	(a) identification of the potential sources of noise during drilling and operation;		Compliant
	(b) the noise criteria for these activities;		Compliant
	(c) details of what actions and measures would be implemented to ensure that these operations would comply with the relevant noise criteria;		Compliant

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No.	Consent Condition	Compliance Assessment	Finding
	(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 Secretary, and if any non-compliance is detected; and		Compliant
	(e) describe what procedures would be followed to ensure compliance.		Compliant
	Operating Conditions		
39	The Applicant shall undertake the development in a way that minimises the noise generated by the development.	The auditor sighted the Noise Management Sub Plan (June 2017) and noted compliance with the requirements of this condition. Implementation was detailed in AEPR 2016-2017 and AEPR 2017-2018 and demonstrated through quarterly noise monitoring.	Compliant
	Monitoring		
40	The Applicant must submit a noise compliance report to the EPA 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 EPA's licence to assess the project's compliance with the noise limits in Conditions 29 and 31. The noise monitoring must be conducted in accordance with Condition 42.	The auditor sighted the December 2016 and December 2017 Annual Returns and noted compliance against the requirements of this condition.	Compliant

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No.	Consent Condition	Compliance Assessment	Finding
41	Following the first 12 months of continuous noise monitoring, during the life of the Development or as otherwise agreed by the Secretary, the Applicant shall undertake quarterly attended monitoring at the Mt Gilead Homestead to the satisfaction of the Secretary, in accordance with the NSW Industrial Noise Policy and AS 1055: Acoustics – Description and Measurement of Environmental Noise .	<p>The auditor sighted the following noise assessment reports prepared by Wilkinson Murray for the RGP and noted compliance with the requirements of this condition:</p> <ol style="list-style-type: none"> 1. 30 September 2016 (monitoring conducted 20 September) 2. 30 December 2016 (monitoring conducted 8, 19, 20 December) 3. 19 April 2017 (monitoring conducted 27 March 2017) 4. 25 June 2017 (monitoring conducted 14 June 2017) 5. 19 September 2017 (monitoring conducted 11 September 2017) 6. 29 December 2017 (monitoring conducted 11 and 15 June 2017) 7. 30 March 2018 (monitoring conducted 11 March 2018) 8. 19 June 2018 (monitoring conducted 14 June 2018) <p>Note: In some instances Wilkinson Murray indicated due to "non-significant weather conditions" present during the evening and night time measurements... Notwithstanding, the evening and night time measurement results would have shown full compliance with the relevant operational noise limits set by the EPA's Environment Protection Licence Conditions..."</p>	Compliant
42	The Applicant shall, by 31 January 2011, submit for the Secretary'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 EPA. Following approval, the plan must be implemented to the satisfaction of the Secretary. This Plan must:	The auditor sighted the Noise Management Sub Plan (June 2017) and noted compliance with the requirements of this condition.	Compliant
	(a) fully reflect the requirements of conditions of this consent and all other development consents and project approvals for Stage 1 and Stage 2 of the Camden Gas Project which apply to the management and monitoring of noise emissions; and	Implementation of the Sub Plan was demonstrated through quarterly noise monitoring (RGP), induction training, and community notification of maintenance works.	Compliant
	(b) include a detailed noise monitoring protocol for evaluating compliance with the limits in conditions 29 and 31, which includes consideration of monitoring under meteorological conditions as required by condition 33 and recording of meteorological conditions during monitoring (including wind speed, wind direction and data suitable for quantifying the presence or otherwise of temperature inversions).		Compliant
	Noise Monitoring Report - Flare		

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No.	Consent Condition	Compliance Assessment	Finding
43	<p>The Applicant must submit to the EPA’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"> i A listing of each incident when the flare operated including the duration, gas discharge rate and cause of the incident; i The temperature and volume data for each flare event, as required by Condition 59; i The results of noise measurements for flare operation for each flare type event, as required by Condition 31, i The results of noise measurements for flare operation for each flare event for receivers at location R7; and i An assessment of compliance with noise limits provided in Condition 31. The noise monitoring must be undertaken in accordance with Condition 42. i 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.	<p>Not Triggered</p> <p>Not Triggered</p> <p>Not Triggered</p> <p>Not Triggered</p> <p>Not Triggered</p> <p>Not Triggered</p> <p>Not Triggered</p> <p>Not Triggered</p> <p>Not Triggered</p>
	Redrilling and Refracking Management Plan		
	Note: For the purposes of this consent the redrilling and/or additional fracing of a well does not constitute wellhead maintenance.	Condition noted.	Not Triggered
44	The Applicant shall obtain the prior approval of the Secretary for the redrilling and/or additional fracing of a gas well.	Condition not triggered during the audit period. It was reported by AGL (AEPR 2016-2017 and AEPR 2017-2018) that there were no re-drilling or fracing activities undertaken during the audit period with respect to DA282-6-2003.	Not Triggered

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No.	Consent Condition	Compliance Assessment	Finding
45	The Applicant shall prepare a Redrilling and Refracing Management Plan in consultation with the DRE for the redrilling and/or refracing of an existing well. The Plan shall be submitted to the Secretary no later than one month prior to the commencement of the work or within such period as agreed by the Secretary. The Plan shall include, but not necessarily be limited to:	Condition not triggered during the audit period. It was reported by AGL (AEPR 2016-2017 and AEPR 2017-2018) that there were no re-drilling or fracing activities undertaken during the audit period with respect to DA282-6-2003.	Not Triggered
	(a) a description of all the activities to be undertaken on the well site during the redrilling and/or refracing work;		Not Triggered
	(b) details of how the environmental performance of the work will be monitored and what actions will be taken to address identified adverse environmental impacts;		Not Triggered
	(c) reference to the relevant parts of the Environmental Management Plan required under conditions 1 and 2 (Schedule 5) of this consent;		Not Triggered
	(d) compliance with all the relevant environmental performance requirements of this consent; and		Not Triggered
	(e) arrangements for complaints handling procedures during the redrilling/refracing work.		Not Triggered
	The Applicant shall give written notification of the proposed redrilling/refracing work to potentially affected residences and other noise sensitive receivers at least fourteen days prior to work commencing.		Not Triggered
	VIBRATION		
	Condition Report		
46	The Applicant shall prepare a Condition Report for all residences or structures (including structures on EMAI) within 25 metres of a wellhead.	Condition not triggered during the audit period. It was reported by AGL (AEPR 2016-2017 and AEPR 2017-2018) that there were no re-drilling or fracing activities undertaken during the audit period with respect to DA282-6-2003.	Not Triggered
	The Applicant shall undertake an inspection of the residence and/or structure prior to work commencing, and a follow up inspection within one month of the completion of the work. The Applicant shall take immediate action for repair of any damage to the residence or structure as a result of the work and to avoid any further damage.		Not Triggered
	A copy of the Condition Report shall be submitted to the Secretary and the DRE after completion of the work.		Not Triggered
	AIR QUALITY		
	Air Emission Criteria		

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No.	Consent Condition	Compliance Assessment	Finding																					
47	<p>The Applicant shall ensure that air pollutant emissions from the development do not exceed the following criteria at any privately owned residence.</p> <table border="1" data-bbox="327 395 1084 561"> <thead> <tr> <th>Pollutant</th> <th>Averaging Period</th> <th>Criterion</th> </tr> </thead> <tbody> <tr> <td>Nitrogen Dioxide</td> <td>1 Hour</td> <td>246 µg/m³</td> </tr> <tr> <td>Nitrogen Dioxide</td> <td>Annual</td> <td>62 µg/m³</td> </tr> <tr> <td>Sulphur Dioxide</td> <td>1 Hour</td> <td>570 µg/m³</td> </tr> <tr> <td>Sulphur Dioxide</td> <td>Annual</td> <td>60 µg/m³</td> </tr> <tr> <td>Sulphuric acid mist</td> <td>3 minute</td> <td>33 µg/m³</td> </tr> <tr> <td>Methyl mercaptan</td> <td>3 minute</td> <td>0.84 µg/m³</td> </tr> </tbody> </table>	Pollutant	Averaging Period	Criterion	Nitrogen Dioxide	1 Hour	246 µg/m ³	Nitrogen Dioxide	Annual	62 µg/m ³	Sulphur Dioxide	1 Hour	570 µg/m ³	Sulphur Dioxide	Annual	60 µg/m ³	Sulphuric acid mist	3 minute	33 µg/m ³	Methyl mercaptan	3 minute	0.84 µg/m ³	<p>The auditor sighted the AGL spreadsheet, 'RPGP Emissions at Residence.xls'. The spreadsheet compares quarterly monitoring results against the EIS predicted emissions rates (Sydney Gas Air Quality Assessment, June 2003). It was reported by AGL that the EIS predicted emission rates comply with the NSW Impact Assessment Criteria detailed in this condition. The auditor noted that emission rates for NO2 and SO2 were either listed as non-detect or less than the EIS emission predictions and as such demonstrate compliance.</p>	Compliance
Pollutant	Averaging Period	Criterion																						
Nitrogen Dioxide	1 Hour	246 µg/m ³																						
Nitrogen Dioxide	Annual	62 µg/m ³																						
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Sulphuric acid mist	3 minute	33 µg/m ³																						
Methyl mercaptan	3 minute	0.84 µg/m ³																						
48	Condition deleted.		Note																					
49	Condition deleted.		Note																					
	Combustion Parameters																							
50	<p>For each monitoring/discharge point or utilisation area specified in the table below (by point number), the Applicant shall ensure that the parameter is equal to or greater than the lower limits specified for that parameter in the table.</p> <p>Point 7</p> <table border="1" data-bbox="327 874 1084 1002"> <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>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.</p>	Parameter	Units of measure	Lower limit	Averaging period	Residence time	S	*TBD	Instantaneous	Temperature	°C	*TBD	Instantaneous	Condition noted.	<p>Note</p> <p>Note</p> <p>Note</p>									
Parameter	Units of measure	Lower limit	Averaging period																					
Residence time	S	*TBD	Instantaneous																					
Temperature	°C	*TBD	Instantaneous																					
	Operating Conditions																							
51	Condition deleted.		Note																					

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No.	Consent Condition	Compliance Assessment	Finding
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 the emissions of dust from the vehicles at all times.	The auditor sighted the Air Quality Management Sub-Plan (June 2018) and noted the inclusion of load covering requirements (Page 16). There were no dust complaints associated with this development consent during the audit period (as evidenced by the complaints register).	Compliant
53	The Applicant shall take all practicable measures to minimize the generation of wind-blown dust from soil stockpiles.	The auditor sighted the Air Quality Management Sub-Plan (June 2018) and noted compliance with the requirements of this condition. It was reported by AGL that there were no stockpiles generated during the audit period with respect to DA282-6-2003.	Compliant
54	Condition deleted.		Note
55	Condition deleted.		Note
Manufacturers Design Specification			
56	At least 1 month prior to the commissioning of the Gas Treatment Plant, the Applicant shall submit to the EPA's Manager Sydney Industry PO Box 668 Parramatta NSW 2124, a report containing Manufacturers Design Specifications for air emissions from each of the following:	Condition closed in a previous audit.	Not Triggered
	i compressor engine;		Not Triggered
	i TEG Fire tube; and		Not Triggered
	i Reboiler still column.		Not Triggered
	The report must compare the Design Specifications with the limits specified in Condition 48 and 50 to demonstrate that compliance can be achieved.		Not Triggered
	Note: The objective of this condition is to verify that the equipment installed is designed to comply with the air emissions limits specified in Condition 48.		Not Triggered
Monitoring			
57	Within 6 months of the date of this consent, the Applicant shall submit a detailed Air Quality Monitoring Program for the development to the Secretary, which has been prepared in consultation with the EPA 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 EPA Guideline Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales: 20 July 2001 or its latest version.	Condition closed in a previous audit.	Not Triggered

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No.	Consent Condition	Compliance Assessment	Finding
58	Deleted.		Note
59	Deleted.		Note
	Installation of Air Monitoring Points Report		
60	The Applicant must submit to the EPA’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.	Not Triggered
	(a) the compressor engines;		Not Triggered
	(b) TEG Fire Tube;		Not Triggered
	(c) Reboiler Still Column; and		Not Triggered
	(d) Carbon scrubber vent stack.		Not Triggered
	The report must contain the opinion of a qualified air emissions monitoring consultant advising whether the monitoring points comply with TM-1.		Not Triggered
	Monitoring Program for Air Based Assessable Pollutants		
61	The Applicant must submit to the EPA’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.	Not Triggered
	Requirement to Monitor Concentrations of Pollutants Discharged		
62	The Applicant must submit to the EPA’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 48 and Condition 59. The report must assess compliance with the limit conditions specified in Condition 48 and 50. The report must also include an assessment of flare operations and report on the results of continuous temperature monitoring and flaring incidents. Note: The objective of this condition is to demonstrate that the actual emissions are consistent with the design and the air emission limits specified in Condition 48.	Condition closed in a previous audit.	Not Triggered
	Quarterly Reporting of Air Emissions		

B3. DA 282-6-2003

No.	Consent Condition	Compliance Assessment	Finding
63	The applicant must submit the results of quarterly air emissions monitoring as required by Condition 58 on a quarterly basis for the first 12 months of the operation of the Gas Treatment Plant to the EPA's Manager Sydney Industry at PO Box 668 Parramatta NSW 2124. The results must be received by the EPA within one month of the date on which the sampling was undertaken for that quarter.	Condition not triggered during the audit period.	Not Triggered
	Odour		
64	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>The auditor sighted quarterly monitoring reports prepared by Ektimo and Emission Testing Consultant and noted that the quarterly monitoring of odour is undertaken from Point 6 (odourised carbon vent). There are no emissions limits set on odour through EPL12003 or this development consent.</p> <p>A review of the site complaints register demonstrated that there were no complaints relating to odour in this reporting period.</p> <p>It is noted that mercaptan is stored in a negative pressure building with three stage charcoal air filtration, closed floor drain systems and self-closing doors. The building is entered daily to assess operations. In the event that the mercaptan bottle is changed, it was reported that the fire control central and local residents are notified of this activity.</p>	Compliant
65	The Applicant must not cause the emission of detectable mercaptan odour from the premises. Note. Should odour emissions become an issue, the EPA will consider requiring investigation and implementation of further odour control measures.	A review of the EPL annual returns for 2016 and 2017, and the site complaints register demonstrated there were no complaints relating to air quality during the audit period.	Compliant
	SURFACE WATER TREATMENT		
	Pollution of Waters		

B3. DA 282-6-2003

No.	Consent Condition	Compliance Assessment	Finding
66	Except as may be expressly provided for by a licence under the Protection of the Environment Operations Act 1997 in relation to the development, the Applicant shall comply with section 120 of the Protection of the Environment Operations Act 1997 in carrying out the development.	<p>The auditor sighted the following documents:</p> <ul style="list-style-type: none"> - Groundwater Management Plan for the Camden Gas Project (June 2018); - Waste Management Sub plan (June 2018); and - Soil and Water Management Sub plan (June 2018). <p>Implementation of the sub plans were demonstrated through the Environmental Management Sub Plan Compliance Audits.</p> <p>There were no reportable water pollution incidents during the audit period.</p>	Compliant
	Management of Waste Water		
	Note. Section 120 of the Protection of the Environment Operations Act 1997 applies to the disposal of waste water. This section refers to the pollution of waters.	Condition noted.	Note
	Operating Conditions		
67	The applicant shall undertake the development in a way that minimises the potential surface water impacts of the development.	<p>The auditor sighted the following documents:</p> <ul style="list-style-type: none"> - Groundwater Management Plan for the Camden Gas Project (June 2018); - Waste Management Sub Plan (June 2018); and - Soil and Water Management Sub Plan (June 2018). <p>Implementation of the sub plans were demonstrated through the Environmental Management Sub Plan Compliance Audits.</p> <p>There were no reportable water pollution incidents during the audit period.</p>	Compliant
68	Deleted.		Note
	Monitoring of Effluent Parameters		
69	Deleted.		Note
70	The Applicant must install a measurement device in the Evaporation Pond at the Gas Treatment Plant Site for recording the depth of effluent in the storage for the life of the Evaporation Pond.	Condition closed in a previous audit.	Not Triggered
	Monitoring Program for Water Based Assessable Pollutants		

B3. DA 282-6-2003

No.	Consent Condition	Compliance Assessment	Finding
71	The Applicant must at least one month prior to the completion of construction of the Gas Treatment Plant, submit to the EPA's Manager Sydney Industry PO Box 668 Parramatta NSW 2128, a written report containing a program for monitoring assessable pollutants contained within the following waste streams:	Condition closed in a previous audit.	Not Triggered
	(a) oily water wastes proposed to be transported to the waste management facilities at Unanderra or Camellia or any other facility which can legally receive such wastes; and		Not Triggered
	(b) sewage waste proposed to be transported to the Bargo Ponds or any other facility which can legally receive such wastes.		Not Triggered
	Note: Monitoring of non-controlled aqueous wastes is required by Condition 69.		Not Triggered
72	Deleted.		Note
Gas Gathering System – Stream Crossings			
73	Note: The Rivers and Foreshore Improvement Act 1948 applies to the proposed development and therefore any excavation, removal of material from the bank, shore or bed of any stream, estuary or lake, or land within 40 metres from the top of the bank will require a Part 3A permit.	Condition not triggered during the audit period. It was reported by AGL (AEPR 2016-2017 and AEPR 2017-2018) that there were no stream crossings constructed during the audit period with respect to DA282-6-2003.	Not Triggered
	The Applicant shall ensure that stream crossings B and F, as shown on the plan Camden Gas Project Stage 2 – RFI Act 3A Permit Areas by Sydney Gas (Figure 2, Appendix B) are under-bored. The gas pipe is to be at least 2 metres below the bed of the watercourses. The bed and banks of the watercourses are not to be disturbed.		Not Triggered
74	The Applicant is permitted to trench stream crossings A, C, D, E, J, J, L, M, N, O, X, Y, Z, as shown on plan Camden Gas Project Stage 2 – RFI Act 3A Permit Areas by Sydney Gas (Figure 2, Appendix B). The Applicant shall prepare and implement a representative trenched crossing design. The design shall be prepared and implemented by a person(s) with relevant knowledge, qualifications and experience, in consultation with the Secretary. The Applicant shall submit the plan for approval by the Department prior to the issue of the Part 3A Permit. The final crossing design is to be presented in plan view and cross section. The cross section is to be at right angles to the direction of flow, is to extend for a minimum distance of 10 metres from the top of both banks and is to include the location of all structures associated with the proposed crossing.	Condition not triggered during the audit period. It was reported by AGL (AEPR 2016-2017 and AEPR 2017-2018) that there were no stream crossings constructed during the audit period with respect to DA282-6-2003.	Not Triggered

B3. DA 282-6-2003

No.	Consent Condition	Compliance Assessment	Finding
75	The Applicant shall ensure that stream crossing I is shown on plan Camden Gas Project Stage 2 – RFI Act 3A Permit Areas by Sydney Gas (Figure 2, Appendix B) is strapped to the Menangle Bridge.	Condition not triggered during the audit period. It was reported by AGL (AEPR 2016-2017 and AEPR 2017-2018) that there were no stream crossings constructed during the audit period with respect to DA282-6-2003.	Not Triggered
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 DPI-Water. The Applicant shall submit the plan for approval by the Secretary 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. Note. A Part 3A Permit may be required for a road crossing upgrade.	Condition not triggered during the audit period. It was reported by AGL (AEPR 2016-2017 and AEPR 2017-2018) that there were no stream crossings constructed during the audit period with respect to DA282-6-2003.	Not Triggered
77	The Applicant shall advise the Secretary of the proposed stream crossing methods located on EMAI, which are to be assessed and approved by the DPI-Water prior to the issue of the Part 3A Permit.	Condition not triggered during the audit period. It was reported by AGL (AEPR 2016-2017 and AEPR 2017-2018) that there were no stream crossings constructed during the audit period with respect to DA282-6-2003.	Not Triggered
78	The Applicant shall ensure that works within 20 m of watercourses are to be undertaken during dry weather conditions.	Condition not triggered during the audit period. It was reported by AGL (AEPR 2016-2017 and AEPR 2017-2018) that there were no stream crossings constructed during the audit period with respect to DA282-6-2003.	Not Triggered
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.	Condition not triggered during the audit period. It was reported by AGL (AEPR 2016-2017 and AEPR 2017-2018) that there were no stream crossings constructed during the audit period with respect to DA282-6-2003.	Not Triggered
	Management of Site Water and Sediment Runoff		

B3. DA 282-6-2003

No.	Consent Condition	Compliance Assessment	Finding
80	The Applicant shall implement all practicable measures to minimise soil erosion and the discharge of sediments and water pollutants from the site.	<p>The auditor sighted the following sub plans:</p> <ul style="list-style-type: none"> - Groundwater Management Plan for the Camden Gas Project (June 2018); - Waste Management Sub Plan (June 2018); and - Soil and Water Management Sub Plan (June 2018). <p>The plans detail a number of controls to minimise soil erosion and the discharge of sediments and water pollutants from the site.</p> <p>Implementation of the Sub Plan was demonstrated through the Environmental Management Sub Plan Compliance Audits. Periodic inspections are then undertaken to assess implementation and identify performance improvements.</p> <p>The auditor also sighted a sample of plug and abandonment works completed during the audit period and noted that there was no evidence of erosion.</p> <p>There were no reportable water pollution incidents during the audit period.</p>	Compliant

B3. DA 282-6-2003

No.	Consent Condition	Compliance Assessment	Finding
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 Secretary.</p>	<p>The auditor sighted the following sub plans:</p> <ul style="list-style-type: none"> - Groundwater Management Plan for the Camden Gas Project (June 2018); - Waste Management Sub Plan (June 2018); and - Soil and Water Management Sub Plan (June 2018) <p>The plans detail a number of controls to minimise soil erosion and the discharge of sediments and water pollutants from the site.</p> <p>Implementation of the Sub Plan was demonstrated through the Environmental Management Sub Plan Compliance Audits. Periodic inspections are then undertaken to assess implementation and identify performance improvements.</p> <p>The auditor also sighted a sample of plug and abandonment works completed during the audit period and noted that there was no evidence of erosion.</p> <p>There were no reportable water pollution incidents during the audit period.</p>	Compliant

B3. DA 282-6-2003

No.	Consent Condition	Compliance Assessment	Finding
82	The Applicant shall implement all relevant site drainage and sediment and erosion control works and measures and any other pollution controls as required by these conditions, prior to the commencement of any other works at the site.	<p>The auditor sighted the following sub plans:</p> <ul style="list-style-type: none"> - Groundwater Management Plan for the Camden Gas Project (June 2018); - Waste Management Sub Plan (June 2018); and - Soil and Water Management Sub Plan (June 2018) <p>The plans detail a number of controls to minimise soil erosion and the discharge of sediments and water pollutants from the site.</p> <p>Implementation of the Sub Plan was demonstrated through the Environmental Management Sub Plan Compliance Audits. Periodic inspections are then undertaken to assess implementation and identify performance improvements.</p> <p>The auditor also sighted a sample of plug and abandonment works completed during the audit period and noted that there was no evidence of erosion.</p> <p>There were no reportable water pollution incidents during the audit period.</p>	Compliant
83	The Applicant shall document in detail the decommissioning of all sediment and erosion controls and any other water diversion structures to the satisfaction of the Secretary. 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).	The auditor sighted the Sediment Control and Removal Form (24 July 2018) for RP03 and noted compliance with the requirements of this condition.	Compliant
	Soil and Water Management Plan		
84	The Applicant shall prepare and implement a Soil and Water Management Plan (SWMP) for the development. A person, with professional qualifications, knowledge and experience to industry standards, must prepare the SWMP. The Applicant shall seek the Secretary's prior approval of the person to prepare the Plan. The SWMP shall be prepared to the satisfaction of the Secretary prior to the issue of the Part 3A permit. This plan shall include, but not necessarily be limited to:	<p>The auditor sighted the Soil and Water Management Sub Plan (June 2018). The plans detail a number of controls to minimise soil erosion and the discharge of sediments and water pollutants from the site.</p> <p>The latest version of the Sub Plan was updated by WSP. Although no specific name provided, the Auditor accepts the plan was prepared and reviewed by a suitably qualified person given WSP's civil engineering</p>	Compliant

B3. DA 282-6-2003

No.	Consent Condition	Compliance Assessment	Finding
	(a) all works on protected land and in protected waters, and staging and maintenance requirements; (b) the measures to be implemented to minimise the potential for soil erosion and the discharge of sediment and other pollutants to lands and/or waters during drilling and construction activities;	expertise and experience. Table 2.1 of the Soil and Water Management Sub Plan demonstrates that the plan adequately addresses the requirements of this condition.	Compliant
	(c) the measures to be implemented to mitigate the impacts of stormwater run-off from and within the site following the completion of drilling and construction activities;		Compliant
	d) demonstrate that erosion and sedimentation control measures will conform with, or exceed, the relevant requirements and guidelines contained in the Department of Housing’s publication <i>Managing Urban Stormwater: Soils and Construction</i> (3 rd Edition 1998) or its latest version;		Compliant
	(e) consistency with the stormwater management plan for the catchment, should one exist, or with the EPA’s Managing Urban Stormwater: Council Handbook should a stormwater management plan for the catchment not exist;		Compliant
	(f) any EPA licence requirements;		Compliant
	(g) measures to rehabilitate erosion-affected areas and areas the subject of excavation, including the planting of local native tree, shrub and/or cover crop species;		Compliant
	(h) measures to maintain the soil quality, soil integrity and soil structure of land on the EMAI during the construction and operation of the proposal;		Compliant
	(h) measures to maintain the soil quality, soil integrity and soil structure of land on the EMAI during the construction and operation of the proposal;		Compliant
	(i) implement a program of regular testing of waste water quality for compounds, nutrients and metals, as outlined in the EIS;		Compliant
	(j) provide details of an appropriate soil sampling and monitoring program to ensure that areas used for waste water application do not lead to an unacceptable build-up of salts within the soil profile;		It was reported by AGL that wastewater is not applied to land. As such, a sampling program is not warranted.
	(k) management procedures for all surface and groundwater collection and storage structures on the site, including a maintenance program for associated infrastructure (e.g. pipes, pumps, dam walls, etc) and a program for desilting of those structures, where relevant;	The auditor sighted the Soil and Water Management Sub Plan (June 2018) and noted compliance with the requirements of this condition.	Compliant

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No.	Consent Condition	Compliance Assessment	Finding
	(l) details of the well maintenance procedures to ensure the integrity of the well isolation components to prevent the cross contamination of groundwater aquifers; and	There were no reportable water pollution incidents during the audit period.	Compliant
	(m) ensuring that saline groundwater which would exceed the ANZECC guidelines for the protection of aquatic ecosystems and irrigation application purposes is contained in lined holding evaporation ponds and dilutes with fresh water prior to any application of the water to the land surface.		Compliant
	Soil and Water Management Plan – Rosalind Park Access Road		
84A.	The Applicant shall prepare and implement a Soil and Water Management Plan for the relocated Rosalind Park access road, to the satisfaction of the Secretary. This plan must be submitted to the Director General for approval prior to the commencement of construction, and:	Condition closed in a previous audit.	Not Triggered
	(a) be consistent with the requirements in Management Urban Stormwater: Soils and Construction, Volume 1 4 th Edition, 2004 (Landcom).		Not Triggered
	(b) identify activities that could cause soil erosion and generate sediment;		Not Triggered
	(c) describe measures to minimize soil erosion and the potential for the transport of sediment to downstream waters;		Not Triggered
	(d) describe the location, function, and capacity of erosion and sediment control structures; and		Not Triggered
	(e) describe what measures would be implemented to maintain (and if necessary, decommission) the structures over time.		Not Triggered
	Piping and Filling of Watercourse		
84B.	The Applicant shall obtain a Controlled Activity Approval under the Water Management Act 2000 from DPI-Water 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 DPI-Water and the Secretary.	Condition not triggered during the audit period.	Not Triggered
	Evaporation Pond Liner Integrity Evaluation Program		

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No.	Consent Condition	Compliance Assessment	Finding
85	The Applicant must submit at least 1 month prior to completion of construction of the Treatment Plant, to the EPA'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 on an on-going program for review of the integrity of the liner.	Condition closed in a previous audit.	Not Triggered
86	Within one month of the report above being provided to the licensee, the licensee must submit, to the EPA'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 EPA as required by Condition 85.	Condition closed in a previous audit.	Not Triggered
INDIGENOUS HERITAGE			
Protection of Indigenous Heritage			
87	Prior to the commencement of site preparation works for the gas wells, gas gathering system and the Gas Treatment Plant Site, the Applicant shall clearly indicate the locations of known aboriginal relics on the site, and ensure that all employees and contractors are aware of these locations, to prevent the known relics being impacted upon during site preparation and construction.	Condition not triggered during the audit period.	Not Triggered
88	The Applicant shall provide a report to the Indigenous Heritage Monitoring undertaken for the Stage II project to EPA and the Secretary within two months of the Heritage Monitoring being completed. Note: Under Section 86 of the National Parks and Wildlife Act 1974, it is an offence to disturb or excavate any land with the purpose of discovering an Aboriginal object without first obtaining a Section 87 permit.	Condition not triggered during the audit period.	Not Triggered
Aboriginal Heritage – EM38			
88A.	The Applicant shall ensure that development of EM38 and upgrade of the gas gathering lines are undertaken in accordance with the recommendations in the reports titled Aboriginal Cultural Heritage Survey and Assessment Report – Camden Gas Joint Venture Project – Proposed Gas Well Location and Gas Gathering System Modifications, Camden, NSW dated February 2007, and Aboriginal Heritage Assessment – Sugarloaf Twin Gathering Line, Rosalind Park dated 8 September 2006.	Condition not triggered during the audit period.	Not Triggered
Aboriginal Heritage – EM39 and GL17			

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No.	Consent Condition	Compliance Assessment	Finding
88B.	The Applicant shall ensure that development of EM39 and GL17 and upgrade of the gas gathering lines are undertaken in accordance with the recommendations outlined in the cultural heritage assessment carried out by Biosis Research Pty Ltd in Appendix B of the Statement of Environmental Effects titled <i>Camden Gas Project Joint Venture – EM39 and GL17 Modification Project</i> .	Condition not triggered during the audit period.	Not Triggered
	NON-INDIGENOUS HERITAGE		
	Protection of the Heritage Landscape of EMAI		
89	The Applicant shall implement all mitigatory measures listed in Sections 7.1, 7.2 and 7.3 of the report titled <i>Statement of Heritage Impact for Land within the Elizabeth Macarthur Agricultural Institute NSW Agriculture, Menangle</i> by Geoffrey Britton dated September 2003.	Condition not triggered during the audit period.	Not Triggered
90	The Applicant shall ensure roadside plantings for sites EM 16, EM 18, EM 19 and EM 20 are strengthened using the species outline provided in the report titled <i>Statement of Heritage Impact for Land within the Elizabeth Macarthur Agricultural Institute NSW Agriculture, Menangle</i> by Geoffrey Britton dated September 2003.	Condition not triggered during the audit period.	Not Triggered
	Note: a relic is defined under the Heritage Act as any deposit, object or material evidence:		Not Triggered
	i which relates to the settlement of the area that comprises NSW, not being Aboriginal settlement; and		Not Triggered
	i which is more than 50 years old.		Not Triggered
90A.	The Applicant shall ensure that, if any historical archaeological relics within the meaning of the <i>Heritage Act 1977</i> are disturbed, the Heritage Council of NSW shall be notified in accordance with section 146 of the <i>Heritage Act 1977</i> .	Condition not triggered during the audit period.	Not Triggered
	SAFETY AND RISK MANAGEMENT		
	Risk Assessment		
	Pre-Construction Studies		

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No.	Consent Condition	Compliance Assessment	Finding
91	<p>The Applicant shall prepare and submit for the approval of the Secretary 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 Secretary 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 Secretary 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.	Not Triggered
	<p>(a) Fire Safety Study A fire safety study for the gas treatment plant of the proposed development. This study shall cover relevant aspects of the Department's Hazardous Industry Planning Advisory Paper No. 2, Fire Safety Study Guidelines. The study shall also be submitted for approval, to the NSW Fire Brigade.</p>		Not Triggered
	<p>(b) Hazard and Operability Study Updated Hazard and Operability (HAZOP) Studies for the development, chaired by an independent qualified person approved by the Secretary 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>		Not Triggered
	<p>(c) Final Hazard Analysis A final hazard analysis of the development, focusing on design changes since preparation of the preliminary hazard analysis, which significantly affect the risk results. The analysis should be prepared in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 6, Guidelines for Hazard Analysis.</p>		Not Triggered
	Pre-commissioning Studies		

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No.	Consent Condition	Compliance Assessment	Finding
92	The Applicant shall develop and submit for the approval of the Secretary, 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 Secretary. The Applicant shall implement the plans and systems set out under subsections (a) and (b) (the pre-commissioning studies).	The Auditor sighted the Emergency Response Plan (June 2018) and the Safety Management Plan, Camden Project NSW (May 2018) and noted compliance with the requirements of this condition.	Compliant
	(a) Emergency Plan A comprehensive emergency plan and detailed emergency procedures for the development, including the gas wells and gas treatment plant. This plan shall include detailed procedures for the safety of all people outside of the development who may be at risk from the development. The plan shall be in accordance with the Department’s Hazardous Industry Planning Advisory Paper No. 1, Industry Emergency Planning Guidelines.	The Auditor sighted the Emergency Response Plan (June 2018) and noted compliance with the requirements of this condition.	Compliant
	(b) Safety Management System A document setting out a comprehensive safety management system, covering all operations on the gas wells, gathering system and gas treatment plant. The document shall clearly specify all safety related procedures, responsibilities and policies, along with details of mechanisms for ensuring adherence to procedures. Records shall be kept on-site and shall be available for inspection by the Secretary upon request. The Safety Management System shall be developed in accordance with the Department’s Hazardous Industry Planning Advisory Paper No. 9, Safety Management.	The Auditor sighted the Safety Management Plan, Camden Project NSW (May 2018) and noted compliance with the requirements of this condition. Implementation was demonstrated through the following documents/systems: 1. Induction program (Rapid Induct); 2. Audit program; 3. Audit Actions Tracker; and 4. Standard methodologies for common works (e.g. confined space).	Compliant
	Compliance Report		
93	The Applicant shall submit to the Secretary one month prior to the commissioning of the plant, or within such period approved by the Secretary, a compliance report detailing compliance with Conditions 91 and 92, including:	Condition closed in a previous audit.	Not Triggered
	(a) dates of study submission, approval, commencement of construction and commissioning;		Not Triggered
	(b) actions taken or proposed, to implement recommendations made in the studies; and		Not Triggered
	(c) responses to any requirement imposed by the Secretary.		Not Triggered
	Incident Report		

B3. DA 282-6-2003

No.	Consent Condition	Compliance Assessment	Finding
94	<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 auditor sighted the Pollution Incident Response Management Plan (PIRMP) and Emergency Response Plan for the Camden Gas Project and noted compliance with the requirements of this condition.</p> <p>There were no reported environmental incidents associated with this Development Consent during the audit period.</p>	Compliant
	<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 Secretary.</p>	<p>The auditor sighted the incidents register for the audit period and noted compliance with the requirements of this condition.</p>	Compliant
	<p>Hazard Audit</p>		
95	<p>Twelve months after the commencement of operations of the proposed development or within such further period as the Secretary 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 Secretary. The audit shall be carried out at the Applicant's expense by a duly qualified independent person or team approved by the Secretary prior to commencement of the audit. Further audits shall be carried out every three years or as determined by the Secretary and a report of each audit shall within a month of the audit be submitted to the Secretary. 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 auditor sighted the following documents demonstrating compliance with the requirements of this condition:</p> <ol style="list-style-type: none"> 1. 'Report of the 2016 Hazard Audit of the Camden Gas Project Operated by AGL Upstream Investments Pty Ltd', Planager, 10/06/16. 2. Correspondence from the DPE noting approval of Ms Karin Nilsson of Planager Pty Ltd to undertake the independent hazard audit. 3. Correspondence from AGL to the DPE enclosing the independent hazard audit (22/06/16). <p>AGL have advised that Pinnacle Risk Management has been engaged to conduct the 2019 hazard audit and work commenced on 12/11/2018.</p>	Compliant
	<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>		Compliant
	<p>Note: The Applicant must comply with the requirements of the most recent version of the 'Schedule of Onshore Exploration and production Safety Requirements' published by the DRE in August 1992 where equipment and/or pipeline are on a Production Lease.</p>		Compliant
	<p>Crime Risk Performance</p>		
96	<p>Crime Risk Performance The Applicant is required to implement measures to minimise the risk of crime from the proposed development. The Applicant shall implement the following measures prior to the operation of the proposed development.</p>	<p>Condition closed in a previous audit.</p>	Not Triggered
	<p>Gas Treatment Plant</p>		

B3. DA 282-6-2003

No.	Consent Condition	Compliance Assessment	Finding
	The Applicant is required to:	The auditor inspected the RPGP and noted compliance with the requirements of this condition.	Compliant
	(a) ensure the Plant is closed to community access;		Compliant
	(b) fully enclose the Plant with a 3-metre metal framed chain mesh fence with a 3-strand barbed wire head;		Compliant
	(c) ensure the Plant is gated and manned 24 hours per day;		Compliant
	(d) keep vehicular and pedestrian gates closed at all times (when not in immediate use);		Compliant
	(e) use self-closing and self-locking pedestrian gates;		Compliant
	(f) use gate locking mechanisms that facilitate emergency egress; and		Compliant
	(g) ensure plant staff are adequately trained in undertaking security functions.		Compliant
	Gas Wellhead Sites		
	The Applicant is required to:	It was noted in previous audits by both Golder and Treo Environment that the security fencing and gates are 2.4m high around several gas well head sites and the consensus has been that this has not resulted in security issues. Furthermore the powder coated steel fences offer considerably greater visual amenity and more difficult to cut and breach. The auditor determined that compliance was achieved.	Compliant
	(a) install fixed (permanent) perimeter fencing and gates around each well head. The fencing and gates should be 3 metres high (all inclusive) metal framed and topped with a 3-strand barbed wire head; and		
	(b) keep gates securely hinged and permanently locked, unless otherwise agreed by NSW Police.	The auditor inspected a sample of wellhead sites and noted compliance with the requirements of this condition.	Compliant
	Dangerous Goods		
97	The Applicant shall ensure that the storage, handling, and transport of:	The auditor sighted the Dangerous Goods and Hazardous Materials Sub Plan (June 2018) and noted adherence with the requirements of this condition during the site inspection during the site inspection.	Compliant
	(a) Dangerous goods is done in accordance with the relevant Australian Standards, particularly AS1940 and AS1596, and the Dangerous Goods Code; and		Compliant
	(b) Explosives are carried out in accordance with the requirements of DRE.	It was reported that there are no explosives stored on the site and methyl mercaptan is transported via a licenced contractor.	Compliant
	WASTE		
	Operating Conditions		
	Note: These conditions only apply to the storage, treatment, processing, reprocessing or disposal of waste at the premises if it requires an environment protection licence under the Protection of the Environment Operations Act 1997.	Condition noted.	Note

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No.	Consent Condition	Compliance Assessment	Finding
	Incorporates a EPA General Term of Approval		Note
98	The Applicant must not cause, permit or allow any waste generated outside the premises to be received at the premises for storage, treatment, processing, reprocessing or disposal or any waste generated at the premises to be disposed of at the premises, except as expressly permitted by a licence under the Protection of the Environment Operations Act 1997.	The auditor sighted the AGL Environmental Footprint spreadsheet for the financial years 2016/17 and 2017/18. The Environmental Footprint provides a detailed record of waste streams generated, recycled/reused and disposed, including water, hazardous waste and non-hazardous waste. AGL (A Clifton) confirmed that no wastes streams are received from outside the premises.	Compliant
99	Except as provided by any other condition of this consent, only the hazardous and/or industrial and/or Group A waste listed below may be generated and/or stored at the premises: i Waste oil/water, hydrocarbons/water mixtures or emulsions.	The auditor sighted the AGL Environmental Footprint spreadsheet for the financial years 2016/17 and 2017/18 and noted compliance with the requirements of this condition. The Environmental Footprint provides a detailed record of waste streams generated, recycled/reused and disposed, including water, hazardous waste and non-hazardous waste. It assumed that this condition refers to waste streams primarily associated with production and not minor hazardous waste streams such as batteries and empty chemical containers.	Compliant
100	Deleted		Note
101	Deleted		Note
102	Deleted		Note
103	Deleted.		Note
104	Deleted.		Note
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 the Waste Management Sub Plan (June 2018) and noted compliance with the requirements of this condition. The auditor sighted a sample of waste tracking records and reconciled against the AGL Environmental Footprint spreadsheet for the financial years 2016/17 and 2017/18. There were no errors or emissions identified.	Compliant
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 (June 2018) and noted compliance with the requirements of this condition.	Compliant

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No.	Consent Condition	Compliance Assessment	Finding
	a) Measures to minimise the production and impact of waste produced at the site during drilling and operation.	Implementation of the Sub Plan was demonstrated through the waste separation practices (observed on site) and the induction program.	Compliant
	b) Implementation of waste reduction, reuse and recycling principles.		Compliant
	c) Details of the reuse and recycling of waste water produced/collected on the site, including collection and handling procedures.		Compliant
	d) Details of appropriate disposal methods in the event that reuse and recycling are not available or are not practicable.		Compliant
	e) Programs for involving and encouraging employees and contractors to minimise domestic waste production on the site and reuse/recycle where appropriate. Key concepts of the plan and management measures should be submitted and approved by the Secretary prior to substantial construction. The plan shall be fully completed and approved by the Secretary prior to commissioning.		Compliant
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 not triggered during the audit period.	Not Triggered
108	The Applicant shall ensure that the existing access roads marked blue on Figure 3 (Appendix B) (between gas well sites EM 6 and EM 8) are used by light vehicles only.	Condition not triggered during the audit period.	Not Triggered

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No.	Consent Condition	Compliance Assessment	Finding
109	The Applicant shall ensure that all heavy vehicles only travel along access roads designated for such vehicles.	<p>The auditor sighted the Traffic Management Sub Plan (June 2018) and noted compliance with the requirements of this condition. This condition is also reflected in the induction program.</p> <p>Evidence of implementation is demonstrated by:</p> <ul style="list-style-type: none"> - Completion of the Pre Mobilisation Hazard Identification Form (DCS_GN_FM_HSE_003) prior to mobilising the workover rig or civil contractors to any well site location. - Completion of the Environmental Management Sub Plan Compliance Audit – Traffic (DCS_CM_HSE_CK_015) - Site specific inductions; - Toolbox meetings; - Regular site inspections; and - Review of records including the complaints register and incident reports. 	Compliant
110	The Applicant shall ensure that during and immediately following heavy rainfall events, vehicle movements to gas well sites and / or gas gathering systems will cease.	The auditor sighted Table 3.1 of the Traffic Management Sub Plan (June 2018) and evidence of daily toolbox talk meetings (whiteboard sited in meeting room) detailing the daily site conditions and requirements. It is noted that roads are primarily shale and hence this condition is less relevant now than during construction.	Compliant
111	On completion of drilling and fracing activities, the Applicant shall rehabilitate soils affected by compaction. This rehabilitation shall be conducted in consultation with a representative from EMAI.	Condition not triggered during the audit period. It was reported by AGL (AEPR 2016-2017 and AEPR 2017-2018) that there were no new drilling or fracing activities undertaken during the audit period with respect to DA282-6-2003.	Not Triggered
112	<p>Works within the Wollondilly Shire Council Road Reserve</p> <p>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 Secretary for approval one month prior to the construction of the gas gathering line within the Road Reserve or within such period as approved the Secretary. The Road Reserve EMP shall include:</p>	Condition closed in a previous audit.	Not Triggered
112(a)	Proposed construction methods.		Not Triggered

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No.	Consent Condition	Compliance Assessment	Finding
112(b)	Soil erosion and sediment control measures for works undertaken during construction and following completion of the works.		Not Triggered
112(c)	Traffic control plans.		Not Triggered
112(d)	Techniques for construction of the gas gathering line across Menangle Bridge.		Not Triggered
113	The Applicant shall liaise with Wollondilly Shire Council regarding the proposed crossing of the gas gathering line across Menangle Bridge and undertake the proposed works to the satisfaction of Wollondilly Shire Council.	Condition closed in a previous audit.	Not Triggered
114	M5 Underbore – Menangle Park The Applicant shall conduct the underboring of the M5 road to the satisfaction of the RMS. The Applicant shall ensure that the M5 underbore:	Condition closed in a previous audit.	Not Triggered
114(a)	Has a minimum depth of 1.2 metres at the lowest point of the road formation.		Not Triggered
114(b)	Excavation for the thrust pits are outside the Freeway Reserve.		Not Triggered
114(c)	Requires no access from within the Freeway for construction or maintenance purposes; unless otherwise agreed by the RMS.		Not Triggered
	BUSHFIRE	Condition closed in a previous audit.	Not Triggered
115	Bushfire Hazard Measures		
	The Applicant shall implement the following bushfire hazard measures at the site:	Condition closed in a previous audit.	Not Triggered
115(a)	Provision of a two-lane access road to the Treatment Plant area from Menangle Road.	Condition closed in a previous audit.	Not Triggered
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.	Condition closed in a previous audit.	Not Triggered
115(c)	Provision of a dedicated water supply tank of 20,000 Litres for the sole use of fire-fighting.	Condition closed in a previous audit.	Not Triggered
115(d)	Provision of the location of gas wells, access roads to the gas well sites and access roads to the Gas Treatment Plant Site to the NSW Rural Fire Service. Note: The terms Asset Protection Zone and Inner Protection Area as specified in this Condition are defined within the Planning for Bushfire Protection 2001 Guidelines published jointly by the NSW Rural Fire Service and the Department.	Condition closed in a previous audit.	Not Triggered
116	Measures for the Living Quarters Building		

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No.	Consent Condition	Compliance Assessment	Finding
	The Applicant shall consult with the NSW Rural Fire Service and lodge an application to the NSW Rural Fire Service for any approval or authorisation required in respect to the structure identified as Living Quarters.	Condition closed in a previous audit.	Not Triggered
117	The Applicant shall comply with the requirements of any such further approval or authorisation granted by the NSW Rural Fire Service in respect of the structure Living Quarters.	Condition closed in a previous audit.	Not Triggered
118	The Applicant shall construct and maintain the building Living Quarters and the surrounding area in accordance with the requirements of the Planning for Bushfire Protection 2001 Guidelines published jointly by the NSW Rural Fire Service and the Department.	Condition closed in a previous audit.	Not Triggered
	Bushfire Management Plan		
119	The Applicant shall prepare and implement a Bushfire Management Plan for the whole site. This plan shall be prepared prior to the commissioning of the development and be prepared to the satisfaction of the Rural Fire Service having regard to any standard local government bushfire related requirements. The plan shall be submitted to the Secretary prior to commissioning and include, but not necessarily be limited to:	Condition closed in a previous audit.	Not Triggered
119(a)	Adequate fire protection works, fire fighting equipment and hazard reduction measures with particular attention to boundaries of adjoining landholdings.	Condition closed in a previous audit.	Not Triggered
119(b)	An annual report on fire management activities to the Campbelltown Fire Management Committee.	The auditor sighted email correspondence from AGL Campbelltown City Council (Bushland Management) in November 2016 and 2017 including a copy of the most recent AEPR which provides an update on Fire Management.	Compliant
119(c)	The incorporation of relevant bushfire hazard measures and policies of the three Councils.	It was noted in the 2015 IEA that discussions occurred between AGL and the relevant Councils on bushfire hazard measures. The Emergency Response Plan (June 2018) was sighted by the auditor and bushfire response measures were detailed within.	Compliant
120	REHABILITATION		
	Site Rehabilitation Performance		

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No.	Consent Condition	Compliance Assessment	Finding
	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 (June 2018 and previous versions) and inspected site EM16 that had been subject to recent abandonment and rehabilitation works. There was no evidence of dust generation at the inspected sites.	Compliant
121	The Applicant shall carry out rehabilitation of the site in accordance with the requirements of the DOPE.	The auditor sighted the Rehabilitation and Landscape Management Sub Plan (June 2018 and previous versions) which details rehabilitation criteria developed in consultation with the DRE. The auditor inspected sites JS01 and LP01 which had been subject to recent rehabilitation works. Well site JS01 was decommissioned in late 2017 and had been successfully rehabilitated and signed off by the NSW EPA. Well site LP01 was still in progress and subject to quarterly inspections.	Compliant
122		Condition not triggered during the audit period.	Not Triggered
123	Rehabilitation of Gas Gathering System \ Stream Crossings The Applicant shall ensure that for all trenched crossings, the natural bed and bank profiles are restored to their original conditions, with smooth and even surfaces following the installation of the gas pipe.	The auditor sighted the Rehabilitation and Landscape Management Sub Plan (June 2018 and previous versions) and noted compliance with the requirements of this condition. It was reported by AGL (AEPR 2017-2018 and AEPR 2016-2017) that no trenched crossings were undertaken during the audit period.	Compliant
124	The Applicant shall stabilise and rehabilitate as soon as possible all disturbed soil surfaces with sterile exotic cover crops and local native grasses. The Applicant is not permitted to use Kikuyu and other invasive grass species.	The auditor sighted the Rehabilitation and Landscape Management Sub Plan (June 2018 and previous versions) and noted compliance with the requirements of this condition. The auditor inspected EM16 which had been successfully hydro seeded with a seed mix approved by the NSW EPA and local land owner.	Compliant

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No.	Consent Condition	Compliance Assessment	Finding
125	The Applicant shall maintain and monitor all rehabilitated riparian zones for a period of at least two years after final planting. Maintenance must include sediment and erosion control, watering, weed control, replacement of plant losses, disease and insect control, mulching and any other requirements for achieving successful vegetation establishment. Note: The Secretary may require the Applicant to prepare and implement a Vegetation Management Plan and remedial works if disturbance is deemed excessive.	<p>The auditor sighted the Rehabilitation and Landscape Management Sub Plan (June 2018) and noted compliance with the requirements of this condition.</p> <p>The auditor sighted EM16, EM31 and EM32 that had been decommissioned and subject to rehabilitation in accordance to the plan and this condition. Quarterly inspections were undertaken by AGL to assess weeds, plant losses, sediment controls and re-seeding as required (e.g. EM16).</p>	Compliant
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.	Not Triggered
126(a)	Describe best practice flare design and, in particular, identify flare design and operational conditions that minimise emissions of air pollutants (including VOCs and nitrogen oxides), maximise destruction of hydrocarbons and maximise dispersion of air pollutants.		Not Triggered
126(b)	Benchmark the design of the proposed Stage II flare against best practice as identified in subclause (a).		Not Triggered
126(c)	Assess the ability of the proposed Stage II flare to meet a destruction efficiency of 98% for VOCs plus methane.		Not Triggered
126(d)	Identify any changes in the design of the proposed Stage II flare required to meet the best practice requirements identified in a) and the destruction efficiency and nitrogen oxides emission rate specified in subclause (c) and any difficulties in making these changes.		Not Triggered
126(e)	Using the results of subclauses (a) to (d), identify the optimum temperature and residence time to achieve maximum destruction efficiency for the proposed flare design. Note: This condition confirms the gas flare structure and specifications.		Not Triggered
	Gas Gathering System		

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No.	Consent Condition	Compliance Assessment	Finding
127	The Applicant shall comply with the following in the construction of the gas gathering system pipeline:	Condition not triggered in this reporting period. There were no new gas gathering systems constructed in this reporting period.	Not Triggered
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.	The auditor sighted signage indicating the presence of gas lines. Ongoing compliance to this condition was noted.	Compliant
127(b)	Trenches are to be restored and reseeded with local grass seeds on completion of the work.	Condition not triggered in this reporting period.	Not Triggered
127(c)	Local council traffic guidelines in respect of work carried out on road verges and underneath roads shall be implemented.	There were no new gas gathering systems constructed in this reporting period.	Not Triggered
127(d)	The Applicant shall construct the gas gathering system so as not to impeach lateral water flows.		Not Triggered
127(e)	The Applicant shall ensure that no crown or camber remains along the gas gathering systems, following construction.		Not Triggered
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.		Not Triggered
127(g)	The Department shall be notified on the completion of any trenching works.		It was reported by AGL (AEPR 2016-2017 and AEPR 2017-2018), there was no trenching works in this reporting period.
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 Secretary following consultation with Campbelltown City Council.	Condition noted.	Note
	SCHEDULE 5		
	ENVIRONMENTAL MANAGEMENT, MONITORING, AUDITING AND REPORTING		
1	CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN		

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No.	Consent Condition	Compliance Assessment	Finding
	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 Secretary 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 Secretary.	Condition not triggered during the audit period.	Not Triggered
2	OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN		
	The Applicant shall prepare and implement an Operational Environmental Management Plan (OEMP) to provide environmental management practices and procedures to be followed during the operation of the development. The OEMP shall be forwarded to the Secretary for approval one month prior to commissioning. The OEMP shall include, but not necessarily be limited to:	The auditor sighted the EMP (March 2018) and noted inclusion of the requirements of this condition. A number of controls are in place to monitor and measure implementation. The auditor sighted 25 Environmental Management Sub Plan Compliance Audits for 2017 and 2018 and 5 Daily Workover Reports.	Compliant
2(a)	Identification of all statutory and other obligations that the Applicant is required to fulfil in relation to operation of the development, including all consents, licences, approvals and consultations.		Compliant
2(b)	A description of the roles and responsibilities for all key personnel involved in the drilling and operation of the development.		Compliant
2(c)	The overall environmental policies and principles to be applied to the operation of the development.		Compliant
2(d)	Standards and performance measures to be applied to the development, and a means by which environmental performance can be periodically reviewed and improved.		Compliant
2(e)	Management policies to ensure that environmental performance goals are met and to comply with conditions of this consent.		Compliant
3	The Applicant shall supply a copy of the CEMP and OEMP to the DECC, DOPE, Camden Council, Campbelltown City Council and Wollondilly Shire Council within fourteen days of the Secretary's approval. The Applicant shall ensure that a copy of the CEMP and OEMP is publicly available.	It was reported by AGL that the EMP was developed by Sydney Gas in consultation with the nominated agencies in 2002. However, documented evidence of the consultation was not available. The EMP was revised during the audit period and the auditor sighted correspondence demonstrating submission of the document to the DPE (17/04/2018). It is noted that the EMP and Sub Plans are available to other agencies via the AGL website.	Compliant

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No.	Consent Condition	Compliance Assessment	Finding
4	The Applicant shall review and update the OEMP annually, or as directed by the Secretary. Note: Submission of a copy of the approved Plan to other Government agencies does not mean that their approval is required. The Plan is for the information of the agency.	During the audit period, the EMP was reviewed in March 2017 and March 2018 as evidenced by the revision history of the document. The sub plans, which are attached and referenced in the EMP, are also regularly updated, either annually, or as conditions necessitate.	Compliant
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 Secretary. This report shall include, but not be limited to:	The auditor sighted the AEPR 2016-2017 and AEPR 2017-2018 and noted compliance with the requirements of this condition.	Compliant
5(a)	The standards, performance measures and statutory requirements the development is required to comply with.		Compliant
5(b)	An assessment of the environmental performance of the development to determine whether it is complying with these standards, performance measures, and statutory requirements.		Compliant
5(c)	Reporting against the implementation of the Project Commitments Register.		Compliant
5(d)	Copy of the Complaints Register for the preceding twelve month period and indicating what actions were (or are being) taken to address these complaints.		Compliant
5(e)	Indication of what actions were taken to address any issue and/or recommendation raised by the Community Consultative Committee.		Compliant
5(f)	Provision of the detailed results of all the monitoring required by this consent.		Compliant
5(g)	Review of the results of this monitoring against:		Compliant
	i impact assessment criteria;		Compliant
	i monitoring results from previous years; and		Compliant
	i predictions in the EIS		Compliant
5(h)	Identify any non-compliance during the year.		Compliant
5(i)	Identify any significant trends in the data.		Compliant
5(j)	If any non-compliance is detected, describe what actions and measures would be carried out to ensure compliance, clearly indicating who would carry out these actions and measures, when they would be carried out, and how the effectiveness of these measures would be monitored over time.	Compliant	

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No.	Consent Condition	Compliance Assessment	Finding
6	The Secretary 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 Secretary may agree.	Condition not triggered during the audit period.	Not Triggered
7	The Applicant shall also submit a copy of the Annual Environmental Performance Report to the DECC, DOPE, Camden Council, Campbelltown City Council and Wollondilly Shire Council. The Applicant shall make a copy of the Report publicly available.	The auditor sighted evidence of submission of the AEPR (2016/2017 and 2017/2018) to the following agencies: DPE, EPA, DPI, Campbelltown City Council, Camden Council and Wollondilly Council. A copy of each AEPR is available on the CGP website.	Compliant
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 fracing of gas wells on the EMAI. The objective of the audit is to monitor the performance and effect of construction activities on the EMAI.	Condition closed in a previous audit.	Not Triggered
	The Independent Environmental Audit shall:		Not Triggered
	(a) be conducted by a suitably qualified, experienced, and independent person(s) whose appointment has been approved by the Secretary; and		Not Triggered
	(b) be consistent with ISO 19011:2002 - Guidelines for Quality and/ or Environmental Management Systems Auditing, or updated versions of these guidelines/manuals.		Not Triggered
	The Audit shall:		Not Triggered
	(a) assess the environmental performance of the construction of the development on EMAI, and its effects on the surrounding environment;		Not Triggered
	(b) assess whether the development is complying with the relevant standards, performance measures, and statutory requirements;		Not Triggered
	(c) consider the Applicant’s proposed Construction Environmental Management Plan for the EMAI Site; and		Not Triggered
	(d) recommend measures or actions to improve the environmental performance of the construction of the development on EMAI, and/or its environmental management and monitoring systems (if required).		Not Triggered

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No.	Consent Condition	Compliance Assessment	Finding
9	Within one month of completion of the audit, the Applicant must submit a copy of the audit report to the Secretary, the NSW Heritage Office and NSW Agriculture. The Secretary 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 Secretary may agree.	Condition closed in a previous audit.	Not Triggered
10	<p>INDEPENDENT ENVIRONMENTAL AUDIT\OPERATION</p> <p>Within two years of the date of this consent and every two years thereafter, unless the Secretary directs otherwise, the Applicant shall commission and pay the full costs of an Independent Environmental Audit. The Independent Environmental Audit shall:</p> <p>a) Be conducted by a suitably qualified, experienced, and independent person(s) whose appointment has been approved by the Secretary.</p> <p>b) consistent with ISO 19011:2002 - Guidelines for Quality and/ or Environmental Management Systems Auditing, or updated versions of these guidelines/manuals.</p> <p>c) Assess the environmental performance of the development, and its effects on the surrounding environment.</p> <p>d) Assess whether the development is complying with the relevant standards, performance measures, and statutory requirements.</p> <p>e) Review the adequacy of the Applicant’s Environmental Management Plan.</p> <p>f) Recommend measures or actions to improve the environmental performance of the development, and/or its environmental management and monitoring systems.</p>	The scope of this Independent Environmental Audit complies with the requirements of this conditions.	Compliant
11	Within two months of commissioning the audit, the Applicant must submit a copy of the audit report to the Secretary, DECC and the DOPE.	The 2016-2018 Independent Environmental Audit was commissioned on 7 November 2018 and finalised in a timely manner. It was reported by AGL that the report would be submitted to the nominated agencies within two months of commissioning.	Not Verified
12	Deleted.		Note
13	Deleted.		Note
14	Deleted.		Note
15	Deleted.		Note

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No.	Consent Condition	Compliance Assessment	Finding
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>	<p>The auditor sighted the December 2016 and December 2017 Annual Returns and noted compliance against the requirements of this condition.</p>	<p>Compliant</p>
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 Secretary in consultation with the Applicant, Camden Council, Campbelltown City Council and Wollondilly Shire Council. The Committee shall:</p>	<p>The auditor sighted the minutes of the Community Consultative Committee and presentations to the committee and noted compliance with the requirements of this condition.</p> <p>It is noted that the minutes from CCC Meeting in March 2017 reported that the DPE approved changing the meeting frequency from quarterly to twice per year.</p>	<p>Compliant</p>
17(a)	<p>Have four community representatives residing in the PEL 2 area.</p>		<p>Compliant</p>
(b)	<p>Have one representative from each of the following Councils: Camden Council, Campbelltown City Council and Wollondilly Shire Council.</p>		<p>Compliant</p>
(c)	<p>Meet at least quarterly.</p>		<p>Compliant</p>
(d)	<p>Take minutes of the meeting.</p>		<p>Compliant</p>
(e)	<p>Make comments and recommendations about the implementation of the development and environmental management plans, monitor compliance with conditions of this consent and other matters relevant to the operation of the Stage 2 development during the term of the consent.</p>		<p>Compliant</p>
	<p>Representatives from relevant government agencies or other individuals may be invited to attend meetings as required by the Chairperson.</p>		<p>Compliant</p>
18	<p>The Applicant shall:</p>		
(a)	<p>Ensure that two of its representatives attend the Committee's meetings.</p>	<p>The auditor sighted the minutes of the Community Consultative Committee and presentations to the committee and noted compliance with the requirements of this condition.</p>	<p>Compliant</p>
(b)	<p>Provide the Committee with regular information on the environmental performance and management of the development.</p>		<p>Compliant</p>

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No.	Consent Condition	Compliance Assessment	Finding
(c)	Ensure that the Committee has reasonable access to the necessary plans to carry out its functions.	All documentation relating to the CCC is available on the Camden Gas Project website.	Compliant
(d)	Consider the recommendations and comments of the Committee and provide a response to the Committee and Secretary.		Compliant
(e)	Provide access for site inspections by the Committee.		Compliant
(f)	Make the minutes available for public inspection at Camden Council, Campbelltown City Council and Wollondilly Shire Council within fourteen days of the Committee meeting, or as agreed to by the Committee.		Compliant
(g)	Forward a copy of the minutes of each Committee meeting, and any responses to the Committee's recommendations to the Secretary and the D11 within a month of each Committee meeting.		Compliant
19	COMPLAINTS REGISTER	The auditor sighted the complaints register. There were no complaints associated with this Development Consent during the audit period.	
	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:		Compliant
	a) the date and time, where relevant of the complaint;		Compliant
	b) the means by which the complaint was made;		Compliant
	c) any personal details of the complainant that were provided, or if no details were provided, a note to that effect;		Compliant
	d) the nature of the complaints;		Compliant
	e) any action(s) taken by the Applicant in relation to the complainant, including any follow-up contact with the complainant; and		Compliant
	f) if no action was taken by the Applicant in relation to the complaint, the reason(s) why no action was taken.		Compliant
	The Complaints Register shall be made available for inspection by the EPA or the Secretary upon request. The Applicant shall also make summaries of the register, without details of the complainants, available for public inspection.	Compliant	
20	COMMUNITY AWARENESS PROTOCOL		

B3. DA 282-6-2003

No.	Consent Condition	Compliance Assessment	Finding
	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 Secretary for approval one month prior to commissioning of the Gas Treatment Plant.	The auditor sighted the Pollution Incident Response - Community Notification chart for the Camden Gas Project and noted compliance with the requirements of this condition. The requirement to submit the Community Awareness Protocol to the Secretary for approval prior to commissioning of the Gas Treatment Plant was closed in a previous audit.	Compliant
	SCHEDULE 7		
	GENERAL CONDITIONS FOR PART 3A PERMITS		
	DEPARTMENT OF WATER AND ENERGY		
1	Irrespective of the granting of this consent or approval by any other Authority, work is not to commence in, or within a horizontal distance of 40m from the top of the bank of the watercourse/foreshore, without the prior issue of a Part 3A permit by the DPI-Water.	Condition not triggered during the audit period.	Not Triggered
2	Prior to the issue of the Part 3A permit the applicant must provide the DPI-Water with the following: i A copy of the development consent including all conditions of approval; i Plans and/or other documentation (3 copies) that satisfy the DPI-Water's General Terms of Approval and recommendations which are included in the consent conditions; and i The appropriate permit fee paid to the DPI-Water.	Condition not triggered during the audit period.	Not Triggered Not Triggered Not Triggered Not Triggered
3	Work is to be carried out in accordance with drawings and any management plans required by these conditions and approved by the DPI-Water that will accompany the 3A permit.	Condition not triggered during the audit period.	Not Triggered
4	Any Part 3A permit issued is to be renewed on an annual basis until all works and all rehabilitation, including maintenance provisions, have been satisfactorily completed in accordance with the permit conditions. Any application for renewal will be lodged at least 1 month prior to the permit expiry date.	Condition not triggered during the audit period.	Not Triggered
5	Work shall not cause unnecessary damage to, or increase erosion of, the stream bed or banks. The permit holder shall carry out any instructions given by the DPI-Water with a view to preventing degradation of the stream bed or banks.	Condition not triggered during the audit period.	Not Triggered

B3. DA 282-6-2003

No.	Consent Condition	Compliance Assessment	Finding
6	Any vegetation or other material removed from the area of works shall be disposed of so that the material cannot be swept back into the stream during a flood.	Condition not triggered during the audit period.	Not Triggered
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 (June 2018) and noted compliance with the requirements of this condition. The auditor examined abandonment works in progress and noted good compliance to the relevant Sub Plans.	Compliant
8	No plastic netting is to be used, for any purpose, in the stream or within the riparian zone unless such netting is of a rapidly biodegradable variety.	Condition not triggered during the audit period.	Not Triggered
9	Erosion and sediment control measures are required to be implemented prior to any works commencing, and must be maintained for as long as necessary after the completion of works, to prevent sediment and dirty water entering the river system. These measures are to be in accordance with Council's requirements and follow best management practices as outlined in the NSW Department of Housing's Managing Urban Stormwater: Soils and Construction (1998) manual (the Blue Book).	The auditor sighted the Soil and Water Management Sub Plan (June 2018) and noted compliance with the requirements of this condition. It was reported by AGL (AEPR 2017 and AEPR 2018) that there were no works undertaken in a stream or riparian zone.	Not Triggered
10	The excavation of soil/spoil and its removal is the responsibility of the permit holder and the owner or occupier of the land.	Condition noted.	Note
11	The approval of NSW Fisheries is required for all proposed designs of in-stream works prior to the issue of the Part 3A permit.	Condition not triggered during the audit period.	Not Triggered
12	These conditions are issued with the proviso that operations shall be carried-out on freehold land. Should operations be on Crown Land, these conditions are null and void and the occupier of Crown Land should contact the Department of Lands to obtain landowner's consent.	Condition not triggered during the audit period.	Not Triggered
13	Work is to be carried out in accordance with any conditions imposed by other government agencies, provided such conditions do not conflict with these conditions or the conditions on the Part 3A permit.	Condition not triggered during the audit period.	Not Triggered
14	The permit holder and the owner or occupier of the land are responsible for any works undertaken by any other person or company on this site.	Condition not triggered during the audit period.	Not Triggered
15	The rehabilitation of the area in accordance with the Part 3A permit conditions is the responsibility of the permit holder and the owner or occupier of the land.	Condition not triggered during the audit period.	Not Triggered

B3. DA 282-6-2003

No.	Consent Condition	Compliance Assessment	Finding
16	Any Part 3A permit granted is not transferable to any other person or company without the written approval of the DPI-Water and does not authorise works at any other site.	Condition not triggered during the audit period.	Not Triggered
17	Any Part 3A permit granted does not give the holder the right to occupy any land without the owner(s) consent nor does it relieve the holder of any obligation which may exist to also obtain permission from local government and other authorities who may have some form of control over the site and/or the activities proposed.	Condition not triggered during the audit period.	Not Triggered
18	Work as executed survey plans of a professional standard shall be provided to the DPI-Water upon request.	Condition not triggered during the audit period.	Not Triggered
19	If, in the opinion of a the DPI-Water officer, any activity is being carried out in such a manner that it may unnecessarily degrade the riparian zone, stream, lake or foreshore environment, all work shall cease immediately upon oral or written direction of such officer.	Condition not triggered during the audit period.	Not Triggered
20	If the permit conditions have been breached, the permit holder shall restore the site in accordance with the permit conditions and/or as directed by the DPI-Water. If any breach of the permit conditions requires a special site inspection by the DPI-Water, then the permit holder shall pay a fee prescribed by the DPI-Water for this inspection and all subsequent breach inspections.	Condition not triggered during the audit period.	Not Triggered
21	If works are to cease prior to completion the DPI-Water must be notified in writing one month in advance of the cessation of the operation.	Condition not triggered during the audit period.	Not Triggered

B4. DA 183-8-2004

No.	Consent Condition	Compliance Assessment	Finding
	SCHEDULE 2		
	Obligation to Minimise Harm to the Environment		
1	The Applicant shall implement all practicable measures to prevent or minimise any harm to the environment that may result from the construction or operation of the development.	<p>An EMS has been developed and implemented to manage environmental risks and achieve performance improvements. The EMS consists of an EMP, Sub Plans and a compliance management system.</p> <p>A number of controls are in place to monitor and measure implementation of the EMS including Environmental Management Sub Plan Compliance Audits, Daily Workover Reports, air quality monitoring and noise monitoring. The auditor sighted a sample of monitoring controls and noted compliance with the requirements of the EMP.</p> <p>Compliance obligations arising from licences, leases, environmental/ planning approvals and legislation are monitored through a web-based database compliance management system (CMO Compliance). The auditor sighted CMO Compliance and determined that the tool effectively monitors compliance against obligations.</p>	Compliant
	Terms of Approval		
2	The Applicant shall carry out the development generally in accordance with the:	<p>It was reported by AGL that the development is undertaken in accordance with the EMP and Sub Plans which reflect the requirements of the Consent Conditions. On receipt of an approved consent or modification, the EMP is reported to be revised to reflect the new requirements. This was evidenced by the frequent revision history of the document.</p> <p>The DA and subsequent modifications were submitted by Sydney Gas and as such were not available for the purpose of this assessment.</p>	Not Verified
	(a) DA submitted to the Department on 28 July 2004;		Not Verified
	(b) Statement of Environmental Effects - Harness Racing Drilling Program Sydney Gas Company dated 24 June 2003;		Not Verified
	(c) Review of Environmental Effects - Mt Taurus Drilling Program Sydney Gas Company dated March 2004;		Not Verified
	(d) Modification Application MOD 27-3-2007 and Camden Gas Project Joint Venture Gas Well and Gathering Line Modification Project Statement of Environmental Effects, dated March 2007; and		Not Verified
	(e) Modification Application MOD 13-10-2011, Camden Gas Project: MP25 Environmental Assessment dated October 2011, Response to Submissions dated 17 February 2012 and associated Statement of Commitments dated April 2012 (see Appendix 1); and		Not Verified
	(f) Conditions of this consent.		Refer to relevant conditions for an assessment of compliance.

B4. DA 183-8-2004

No.	Consent Condition	Compliance Assessment	Finding
	If there is any inconsistency between the above documents, the latter document shall prevail over the former to the extent of the inconsistency. However, the conditions of this consent shall prevail over all other documents to the extent of any inconsistency.	Condition is noted.	Note
3	The Applicant shall comply with any reasonable requirement/s of the Director-General arising from the Department's assessment of:	Condition is noted.	Note
	(a) Any reports, plans or correspondence that are submitted in accordance with this consent; and		Note
	(b) The implementation of any actions or measures contained in these reports, plans or correspondence.		Note
4	This approval is for a period of twenty one (21) years from the granting of the production lease.		
5	Nothing in this consent permits the drilling and operation of any additional wells (beyond the approved 17 wells for gas production) or gas gathering lines.	In February 2016, AGL announced that it will progressively decommission wells and rehabilitate sites at the CGP prior to ceasing production in 2023. No additional wells have been drilled beyond the approved 17.	Compliant
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.	Given that there were no gas wells or gas gathering lines completed during the audit period with respect to DA183-8-2004, this condition was not triggered.	Not Triggered
7	The Applicant shall provide Campbelltown City Council and Wollondilly Shire Council with the wellhead configurations of each gas well within two months of the gas well being completed or two months from the date of this consent, whichever is the later.	Given that there were no gas wells or gas gathering lines completed during the audit period with respect to DA183-8-2004, this condition was not triggered.	Not Triggered
8	The Applicant shall provide written notification to the Director-General that it has fulfilled the requirements of Conditions 6 and 7, within two weeks of the information being provided to the Councils.	Condition not triggered during the audit period.	Not Triggered
	Environmental Management		

B4. DA 183-8-2004

No.	Consent Condition	Compliance Assessment	Finding
9	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 Soil and Water Management Sub Plan (June 2018). The plan recognises Section 120 obligations and details a number of controls to prevent the pollution of water. There were no reportable water pollution incidents during the audit period. The auditor inspected sample of active rehabilitation sites (MT05, MT09, and MT10) and confirmed no evidence of pollution of waters.	Compliant
	Note: Section 120 of the Protection of the Environment Operations Act 1997 applies to the disposal of wastewater.	The auditor inspected the AGL Environmental Footprint spreadsheet for the financial years 2016/17 and 2017/18 and inspected several operational areas. There was no evidence of inappropriate disposal.	Compliant
10	The Applicant is required to ensure that the Dam at gas well site MT1 is appropriately lined so that waters stored in the dam do not potentially contaminate the surrounding and underlying soils.	Condition closed in a previous audit.	Not Triggered
11	The Applicant is not permitted to spray or discharge water from the earth Dam at gas well site MT 1, onto any land or water surface unless it has prior written approval from the Director-General.	Condition closed in a previous audit.	Not Triggered
12	The Applicant is required to store and manage the use and disposal of water in accordance with the current version of the Office of Environment and Heritage's <i>Environmental Guidelines: Assessment, Classification and Management of Liquid and Non-Liquid Wastes</i>	The auditor sighted the AGL Environmental Footprint spreadsheet for the financial years 2016/17 and 2017/18 which notes that produced water was primarily reused by external industries. The auditor sighted a sample of disposal records generated during the audit period and reconciled against the Environmental Footprint. There were no errors or emissions identified.	Compliant
13	The Applicant shall undertake the development in a way that minimises the noise generated by the development.	The auditor sighted the Noise Management Sub Plan (June 2017). Implementation was evidenced by the induction program (construction hours) and Environmental Management Sub-Plan Compliance Audits. There were no reported noise complaints during the audit period.	Compliant
	Construction Hours		
13A.	The Applicant shall ensure that all construction work (except for the drilling (including well casing and grouting) of surface to in-seam wells), shall only be conducted between 7.00am and 6.00pm Monday to Friday and between 8.00am and 1.00pm Saturdays, unless inaudible at any residential receiver. Note: Inaudible means that the construction activity cannot be heard by the human ear at the nearest affected residential receiver.	The auditor sighted the Noise Management Sub Plan (June 2017) and induction program and noted compliance with the requirements of this condition. AGL reported that there were no construction activities undertaken during the audit period with respect to DA183-8-2004.	Not Triggered

B4. DA 183-8-2004

No.	Consent Condition	Compliance Assessment	Finding										
	Construction Noise Criteria for Surface to in-seam Wells												
13B.	Noise from the drilling and construction of MP30 shall not exceed the sound pressure level (noise) limits in the table below:	Condition not triggered during the audit period.	Not Triggered										
13C.	Noise from the drilling and construction of MP25 shall not exceed the sound pressure level (noise) limits in the table below: <table border="1" data-bbox="331 486 1030 638"> <thead> <tr> <th>Receiver Location</th> <th>Weekday (7.00am- 6.00pm) Saturday (7.00am- 1.00pm)</th> <th>Saturday (1.00pm- 6.00pm) Sunday (7.00am- 6.00pm)</th> <th>Evening (6.00pm- 10.00pm)</th> <th>Night (10.00pm- 7.00am)</th> </tr> </thead> <tbody> <tr> <td>Nearest Receiver</td> <td>47</td> <td>42</td> <td>42</td> <td>40</td> </tr> </tbody> </table>	Receiver Location	Weekday (7.00am- 6.00pm) Saturday (7.00am- 1.00pm)	Saturday (1.00pm- 6.00pm) Sunday (7.00am- 6.00pm)	Evening (6.00pm- 10.00pm)	Night (10.00pm- 7.00am)	Nearest Receiver	47	42	42	40	Condition not triggered during the audit period. It was reported by AGL (AEPR 2016-2017 and AEPR 2017-2018) that there were no re-drilling or construction activities undertaken during the audit period with respect to DA183-8-2004.	Compliant
Receiver Location	Weekday (7.00am- 6.00pm) Saturday (7.00am- 1.00pm)	Saturday (1.00pm- 6.00pm) Sunday (7.00am- 6.00pm)	Evening (6.00pm- 10.00pm)	Night (10.00pm- 7.00am)									
Nearest Receiver	47	42	42	40									
14	The Applicant is required to prepare and implement a Water Management Plan for the sites and the Dam at MT 1 for the life of the development. The Water Management Plan will include (and not be limited to) sediment and erosion control measures to be implemented prior to the construction of the earth Dam at gas well site MT1. The Applicant shall submit the Water Management Plan for the Director-General's approval within one month of the date of this consent.	Condition closed in a previous audit.	Not Triggered										
15	The Applicant is required to prepare and implement a Flood Management Plan for the sites for the life of the development. The Flood Management Plan will include (and not be limited to) measures to minimise and mitigate flooding impacts. The Applicant shall submit the Flood Management Plan for the Director-General's approval within one month of the date of this consent.	It is noted that the EPA commenced proceedings in June 2017 against AGL Upstream Investments Pty Limited alleging a contravention of a condition of EPL 12003. The matter is currently ongoing and relates to a flood event that occurred prior to the audit period on 5 June 2016 at the Nepean River, Menangle Park. As a result of overland flow, produced water tanks associated with MP15, MP16/MP25 and EM21 were adversely effected. There is no allegation that environmental harm occurred. In this reporting period there were no flood-related incidents. The auditor sighted the Field Production Flood Management Procedure (8/05/2017) and noted compliance with the requirements of this condition.	Compliant										
16	The Applicant is required to prepare and implement a Soil and Water Management Plan for the sites for the life of the development. The Applicant shall submit the Soil and Water Management Plan for the Director-General's approval within one month of the date of this consent.	Condition closed in a previous audit.	Not Triggered										

B4. DA 183-8-2004

No.	Consent Condition	Compliance Assessment	Finding
	Soil and Water Management Plan at MP25		
16A.	Prior to the commencement of construction of the gas well at MP25, the management plans submitted under conditions 15 and 16 must:	Condition closed in a previous audit.	Not Triggered
	a) be updated by a suitably qualified expert;	Condition closed in a previous audit.	Not Triggered
	b) be re-submitted to the Director-General for approval prior to the commencement of construction activities at the MP25 gas well site;	Condition closed in a previous audit.	Not Triggered
	c) include measures to minimise impacts on surface water and groundwater quality at the MP25 gas well site, including but not limited to:	Condition closed in a previous audit.	Not Triggered
	i. using above-ground baffle tanks to contain all drilling fluids during drilling operations;		Not Triggered
	ii. disposing of all drilling fluids and groundwater collected in the baffle tanks at an authorised wastewater treatment facility;		Not Triggered
	iii. ensuring that adequate spill control equipment and materials will be available at drill sites;		Not Triggered
	iv. a contingency plan to address any groundwater brought to the surface that exceeds the capacity of onsite detention structure, and would avoid discharges from the site (otherwise than in accordance with an environment protection licence); and		Not Triggered
	v. ensuring that no hydraulic fracturing occurs and that no fracking fluids containing Benzene, Toluene, Ethylbenzene and Xylene (BTEXO chemicals are used.		Not Triggered
	Bore Construction at MP25		
16B	The Applicant must ensure that the gas well at MP25:	Condition not triggered during the audit period.	Not Triggered
	(a) is designed in consultation with, and in accordance with the specifications required by, the Division of Resources and Energy (DRE), under the Department of Trade, Investment, Regional Infrastructure and Services (DTIRIS);	Condition not triggered during the audit period.	Not Triggered
	(b) is cased with steel across the uppermost beneficial-use aquifer layer;	Condition not triggered during the audit period.	Not Triggered
	(c) has all casing fully cemented from casing shoe to surface, leaving no open annuluses; and	Condition not triggered during the audit period.	Not Triggered
	(d) has a blow-out prevention device on the wellhead secured to the steel casing.	Condition not triggered during the audit period.	Not Triggered
	In order to protect the integrity of any underground aquifers, prevent gas escape and maintain groundwater quality.	Condition not triggered during the audit period.	Not Triggered

B4. DA 183-8-2004

No.	Consent Condition	Compliance Assessment	Finding
	Gas Gathering Line – MP16 to MP30		
16C.	For the gas gathering line between MP30 and MP15, the Applicant shall, to the satisfaction of the Director-General ensure that:	Condition closed in a previous audit.	Not Triggered
	(a) pipelines are designed, constructed and operated in accordance with the Australian Standard for Installation and Maintenance of Plastic Pipe Systems for Gas AS3723-1989 (or its latest version);		Not Triggered
	(b) the route of the gas gathering and water transport systems and access roads follow previously or currently disturbed areas wherever practicable;		Not Triggered
	(c) trenches are not left open overnight, unless adequately covered;		Not Triggered
	(d) open trenching works within 20 metres of watercourses are only undertaken during dry weather conditions;		Not Triggered
	(e) construction activities do not impede lateral water flows;		Not Triggered
	(f) no crown or camber remains along any gas gathering system line, following rehabilitation;		Not Triggered
	(g) signs are erected at intervals along all gas gathering system lines indicating the presence of a buried gas pipeline; and		Not Triggered
	(h) impacts to riparian vegetation and engendered ecological communities are minimised.		Not Triggered
	Heritage		
16D.	The Applicant shall ensure that, if any historical archaeological relics within the meaning of the Heritage Act 1977 are disturbed, the Heritage Council of NSW shall be notified in accordance with section 146 of the Heritage Act 1977.	The AEPR 2016-2017 and AEPR 2017-2018 noted there were no heritage matters identified and consequently no notifiable incidents in this audit period.	Not Triggered
	Threatened Species		
16E.	The Applicant shall ensure that, during the drilling and construction of MP30 and upgrading of the gas gathering lines, impacts on threatened species are minimised by implementing actions including, but not limited, to the following:	Condition not triggered during the audit period. It was reported by AGL (AEPR 2016-2017 and AEPR 2017-2018) that there were no drilling or construction activities undertaken during the audit period.	Not Triggered
	(a) The recommendations outlined in Sections 6 and 7 of the Ecosearch Environmental Consultants Pty Ltd report titled Flora and Fauna Assessment, AGL –Gas Well and Gathering Line Project Modifications ; and		Not Triggered
	(b) Marking the boundaries of endangered ecological communities (EECs) and locations of other known threatened species and, where possible, avoiding construction activities within these areas.		Not Triggered

B4. DA 183-8-2004

No.	Consent Condition	Compliance Assessment	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.	The auditor sighted the Rehabilitation and Landscape Management Sub Plan (June 2018) and noted weed control measures. It was reported that the original version of the plan was submitted to the DG for review, however these records were not available for inspection. Subsequent revisions are provided to the Secretary.	Compliant
17A.	Prior to the commencement of construction of the gas well at MP25, the management plan under condition 17 must:	Condition closed in a previous audit.	Not Triggered
	(a) be updated by a suitably qualified expert to include gas well MP25; and		Not Triggered
	(b) be re-submitted to the Director-General for approval.		Not Triggered
	Redrilling and Refracking Management Plan		
	<i>Note: For the purposes of this consent the redrilling and/or additional fraccing of a well does not constitute wellhead maintenance.</i>	Condition noted.	Note
18	The Applicant shall obtain the prior approval of the Director-General for the redrilling and/or additional fraccing of a gas well.	Condition was not triggered during the audit period. It was reported by AGL (AEPR 2016-2017 and AEPR 2017-2018), that there were no re-drilling or fraccing activities conducted during the audit period.	Not Triggered
19	The Applicant shall prepare a Redrilling and Refracking Management Plan in consultation with the Department of Primary Industries for the redrilling and/or refracking of an existing well. The Plan shall be submitted to the Director-General no later than one month prior to the commencement of the work or within such period as agreed by the Director-General.	Condition was not triggered during the audit period. It was reported by AGL (AEPR 2016-2017 and AEPR 2017-2018), that there were no re-drilling or fraccing activities conducted during the audit period.	Not Triggered
	The Plan shall include, but not necessarily be limited to:		Not Triggered
	(a) a description of all the activities to be undertaken on the well site during the redrilling and/or refracking work;		Not Triggered
	(b) details of how the environmental performance of the work will be monitored and what actions will be taken to address identified adverse environmental impacts;		Not Triggered
	(c) reference to the relevant parts of the Environmental Management Plan required under condition 21 of this consent;		Not Triggered
	(d) compliance with all the relevant environmental performance requirements of this consent; and		Not Triggered
	(e) arrangements for complaints handling procedures during the redrilling/refracking work.		Not Triggered

B4. DA 183-8-2004

No.	Consent Condition	Compliance Assessment	Finding
20	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 triggered during the audit period. It was reported by AGL (AEPR 2016-2017 and AEPR 2017-2018), that there were no re-drilling or fracking activities conducted during the audit period.	Not Triggered
Operational Environmental Management Plan (OEMP)			
21	The Applicant shall prepare and implement an Operational Environmental Management Plan (OEMP) to provide environmental management practices and procedures to be followed during the operation of the development. The OEMP shall be forwarded to the Director- General for approval within one month of the date of this consent. The OEMP shall include, but not necessarily be limited to:	The auditor sighted the EMP (March 2018) and noted compliance with the requirements of this condition. A number of controls are in place to monitor and measure implementation of the EMS including Environmental Management Sub Plan Compliance Audits, Daily Workover Reports, air quality monitoring and noise monitoring. The auditor sighted a sample of monitoring controls and noted compliance with the requirements of the EMP.	Compliant
	(a) identification of all statutory and other obligations that the Applicant is required to fulfil in relation to operation of the development, including all consents, licences, approvals and consultations;		Compliant
	(b) a description of the roles and responsibilities for all key personnel involved in the operation of the development;	The EMP was revised during the audit period and the auditor sighted correspondence demonstrating submission of the document to the DPE (17/04/2018).	Compliant
	(c) the overall environmental policies and principles to be applied to the operation of the development;		Compliant
	(d) standards and performance measures to be applied to the development, and a means by which environmental performance can be periodically reviewed and improved; and		Compliant
	(e) management policies to ensure that environmental performance goals are met and to comply with conditions of this consent.		Compliant
21A.	Prior to the commencement of construction of the gas well at MP25, the OEMP submitted under condition 22 must:	Condition closed in a previous audit.	Not Triggered
	(a) be updated by a suitably qualified expert to include gas well MP25; and		Not Triggered
	(b) be re-submitted to the Director-General for approval.		Not Triggered
22	The Applicant shall supply a copy of the OEMP to Campbelltown City Council and Wollondilly Shire Council within fourteen days of the Director-General's approval. The Applicant shall ensure that a copy of the OEMP is publicly available.	The updated EMP was provided to stakeholders and made available on the AGL Camden gas website.	Not Triggered
23	The Applicant shall review and update the OEMP annually, or as directed by the Director-General	During the audit period, the EMP was reviewed and reissued annually as evidenced by the revision history recorded within the document. The Sub Plans were also reviewed and updated as necessary.	Compliant
Annual Environmental Performance Reporting			

B4. DA 183-8-2004

No.	Consent Condition	Compliance Assessment	Finding
24	The Applicant shall include the operation of MT1 - MT10 inclusive, MP13 – MP17 inclusive, and MP30, and the associated gas gathering system and the conditions of this consent, in the Annual Environmental Performance Report required under Schedule 5 Condition 5 of development consent DA-282-6-2003-i, dated 16 June 2004.	The auditor sighted the AEPR (2016-2017 and 2017-2018), and noted compliance with the requirements of this condition.	Compliant
Independent Environmental Audit			
25	The Applicant shall include the operation of MT1 - MT10 inclusive, MP13 – MP17 inclusive, and MP30, and the associated gas gathering system, and the conditions of this consent, in the Independent Environmental Audit required under Schedule 5 Condition 8 of development consent DA-282-6-2003-i, dated 16 June 2004.	The scope of this IEA satisfies this condition.	Compliant

B5. DA 9-1-2005

No.	Consent Condition	Compliance Assessment	Finding
	SCHEDULE 2		
	Obligation to Minimise Harm to the Environment		
1	The Applicant shall implement all practicable measures to prevent or minimise any harm to the environment that may result from the construction or operation of the development.	<p>An EMS has been developed and implemented to manage environmental risks and achieve performance improvements. The EMS consists of an EMP, Sub Plans and a compliance management system.</p> <p>A number of controls are in place to monitor and measure implementation of the EMS including Environmental Management Sub Plan Compliance Audits, Daily Workover Reports, air quality monitoring and noise monitoring. The auditor sighted a sample of monitoring controls and noted compliance with the requirements of the EMP.</p> <p>Compliance obligations arising from licences, leases, environmental/ planning approvals and legislation are monitored through a web-based database compliance management system (CMO Compliance). The auditor sighted CMO Compliance and determined that the tool effectively monitors compliance against obligations.</p>	Compliant
	Terms of Approval		
2	The Applicant shall carry out the development generally in accordance with the:	<p>It was reported by AGL that the development is undertaken in accordance with the EMP and Sub Plans which reflect the requirements of the Consent Conditions. On receipt of an approved consent or modification, the EMP is reported to be revised to reflect the new requirements. This was evidenced by the frequent revision history of the document.</p> <p>The DA and subsequent modifications were submitted by Sydney Gas and as such were not available for the purpose of this assessment.</p>	Not Verified
	(a) DA submitted to the Department on 4 January 2005;		Not Verified
	(b) <i>Statement of Environmental Effects – Elizabeth Macarthur Agricultural Institute Horizontal Drilling Project Sydney Gas Company</i> dated July 2002;		Not Verified
	(c) <i>Statement of Environmental Effects – Glenlee Drilling Project Drilling Operations Sydney Gas Company</i> dated September 2002		Not Verified
	(d) Letter from Sydney Gas Operations Pty Ltd to the Department dated 13 May 2005, modifying the application to relocate well GL3;		Not Verified
	(e) The modification application submitted to the Department on 11 April 2006 and the accompanying document <i>Camden Gas Project Joint Venture Proposed Multiple Gas Well Modifications</i> prepared by AGL Gas Production (Camden) Pty Ltd and Sydney Gas (Camden) Operations Pty Ltd, dated April 2006;		Not Verified

B5. DA 9-1-2005

No.	Consent Condition	Compliance Assessment	Finding
	(f) Modification Application MOD 28-3-2007 and <i>Camden Gas Project Joint Venture Gas Well and Gathering Line Modification Project Statement of Environmental Effects</i> , dated March 2007;		Not Verified
	(g) letter from AGL Energy Limited to the Department dated 28th May 2010, modifying the application to revise condition 26 of schedule 2; and		Not Verified
	(h) Conditions of this consent.	Refer to relevant conditions for an assessment of compliance.	Note
	If there is any inconsistency between the above documents, the latter document shall prevail over the former to the extent of the inconsistency. However, the conditions of this consent shall prevail over all other documents to the extent of any inconsistency.	Condition not triggered during the audit period.	Not Triggered
3	This approval is for a period of twenty one (21) years from the granting of the production lease.	Condition not triggered during the audit period.	Not Triggered
4	The Applicant shall not commence the construction of well GL11 until the Director-General has approved the Drilling and Fracing Management Plan required under condition 37.	Condition closed in a previous audit.	Not Triggered
5	The Applicant shall comply with any reasonable requirement/s of the Director-General arising from the Department's assessment of:	Condition noted.	Note
	(a) Any reports, plans or correspondence that are submitted in accordance with this consent; and		Note
	(b) The implementation of any actions or measures contained in these reports, plans or correspondence.		Note
6	Nothing in this consent permits the drilling and operation of any additional wells (beyond the approved 8 wells for gas production).	The auditor reviewed the gas wells reported in the AEPR (2016-2017 and 2017-2018) against the development consents and confirmed that no additional wells have been drilled or operated in this reporting period beyond the eight approved.	Compliant
7	The Applicant shall provide Camden Council and Wollondilly Shire Council with the Geographical Positioning System (GPS) co-ordinates and digital survey data for gas well sites and gas gathering systems within their respective Local Government Area, in a format suitable to each of these Councils, within two months of the completion of the gas wells and gas gathering system.	Condition not triggered during the audit period. It was reported by AGL (AEPR 2016-2017 and AEPR 2017-2018) that there were no new gas wells or gas gathering system constructed during the audit period with respect to DA9-1-2005.	Not Triggered

B5. DA 9-1-2005

No.	Consent Condition	Compliance Assessment	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.	Condition not triggered during the audit period. It was reported by AGL (AEPR 2016-2017 and AEPR 2017-2018) that there were no new gas wells constructed during the audit period.	Not Triggered
9	The Applicant shall provide written notification to the Director-General that it has fulfilled the requirements of Conditions 7 and 8, within two weeks of the information being provided to the Councils.	Condition not triggered during the audit period.	Not Triggered
10	The Applicant shall comply with the following in the construction of the gas gathering system pipeline:	Condition not triggered during the audit period. It was reported by AGL (AEPR 2016-2017 and AEPR 2017-2018) that the gas gathering system pipeline was constructed prior to the audit period.	Not Triggered
	(a) signs stating the presence of a buried gas pipeline shall be erected periodically along the length of the trench once the pipeline has been laid;	The auditor sighted adequate signage indicating the presence of a buried gas pipeline.	Compliant
	(b) trenches are to be restored and reseeded with local grass seeds on completion of the work;	Condition not triggered during the audit period.	Not Triggered
	(c) local council traffic guidelines in respect of work carried out on road verges and underneath roads shall be implemented;	Condition not triggered during the audit period.	Not Triggered
	(d) the Applicant shall construct the gas gathering system so as not to impeach lateral water flows;	Condition not triggered during the audit period.	Not Triggered
	(e) the Applicant shall ensure that no crown or camber remains along the gas gathering systems, following construction;	Condition not triggered during the audit period.	Not Triggered
	(f) the pipeline shall be designed, constructed and operated in accordance with the Australian Standard for the installation and maintenance of Plastic Pipe Systems for Gas AS 3723-1989 (or its latest version); and	Condition not triggered during the audit period.	Not Triggered
	(h) the Department shall be notified on the completion of any trenching works.	Condition not triggered during the audit period.	Not Triggered
11	Should the Spring Farm Master Plan for the Spring Farm urban release area, and development of the Garden Gates subdivision in Mt Annan South, identify the need to relocate any gas gathering lines the subject of this consent to ensure an efficient and environmentally sustainable urban outcome, that infrastructure shall be relocated by, and at the cost of the Applicant to the satisfaction of the Director- General, following consultation with Camden Council and Landcom.	Condition not triggered during the audit period.	Not Triggered
	Hours of Operation		
12	The Applicant may conduct construction activities on land owned by Waste Service NSW, during the following hours:	Condition not triggered during the audit period.	Not Triggered

B5. DA 9-1-2005

No.	Consent Condition	Compliance Assessment	Finding
	Monday to Friday 7.00 am to 6.00 pm;		Not Triggered
	Saturday and Sunday 7.00 am to 6.00 pm. (Excluding Public Holidays)		Not Triggered
13	For development carried out on land not owned by Waste Service NSW, the Applicant is restricted to the following hours of construction:	Condition not triggered during the audit period.	Not Triggered
	Monday to Friday 7.00 am to 6.00 pm;		Not Triggered
	Saturday 8.00 am to 1.00 pm. (Excluding Public Holidays)		Not Triggered
	Environmental Management		
14	The Applicant shall obtain a Part 3A Permit prior to the commencement of construction of any crossing of a stream by the gas gathering line. Note: The Rivers and Foreshore Improvement Act 1948 applies to the proposed development and therefore any excavation, removal of material from the bank, shore or bed of any stream, estuary or lake, or land within 40 metres from the top of the bank will require a Part 3A Permit.	Condition not triggered during the audit period.	Not Triggered
15	Except as may be expressly provided for by a licence under the <i>Protection of the Environment Operations Act 1997</i> in relation to the development, the Applicant shall comply with section 120 of the <i>Protection of the Environment Operations Act 1997</i> , in carrying out this development. Note: Section 120 of the <i>Protection of the Environment Operations Act 1997</i> applies to the disposal of wastewater.	The auditor sighted the Soil and Water Management Sub Plan (June 2018). The plans detail a number of controls to prevent the pollution of water. There were no reportable water pollution incidents during the audit period.	Compliant
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 (June 2018). The plans detail a number of controls to prevent the pollution of water. There were no reportable water pollution incidents during the audit period.	Compliant

B5. DA 9-1-2005

No.	Consent Condition	Compliance Assessment	Finding
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.	<p>The auditor sighted the following sub plans:</p> <ul style="list-style-type: none"> - Groundwater Management Plan for the Camden Gas Project (June 2018); - Waste Management Sub plan (June 2018); and - Soil and Water Management Sub plan (June 2018) <p>The plans detail a number of controls to minimise soil erosion and the discharge of sediments and water pollutants from the site.</p> <p>Implementation of the Sub Plan was demonstrated through Environmental Management Sub Plan Compliance Audits and periodic inspections.</p> <p>The auditor also sighted a sample of rehabilitation works completed during the audit period and noted that there was no evidence of erosion.</p> <p>There were no reportable water pollution incidents during the audit period.</p>	Not Triggered
18	The Applicant shall ensure that the gas gathering system connecting well site EM 1H shall be constructed outside the breeding seasons of raptor species.	Condition not triggered during the audit period.	Not Triggered
19	The Applicant shall undertake the development in a way that minimises the noise generated by the development.	The auditor sighted the Noise Management Sub Plan (June 2017) and noted there were no reported noise complaints during the audit period.	Compliant
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.	<p>It is noted that the EPA commenced proceedings in June 2017 against AGL Upstream Investments Pty Limited alleging a contravention of a condition of EPL 12003. The matter is currently ongoing and relates to a flood event that occurred prior to the audit period on 5 June 2016 at the Nepean River, Menangle Park. As a result of overland flow, produced water tanks associated with MP15, MP16/MP25 and EM21 were adversely effected. There is no allegation that environmental harm occurred.</p> <p>In this reporting period there were no flood-related incidents. The auditor sighted the Field Production Flood Management Procedure (8/05/2017) and noted compliance with the requirements of this condition.</p>	Compliant

B5. DA 9-1-2005

No.	Consent Condition	Compliance Assessment	Finding
21	The Applicant shall ensure that the route of the gas gathering system follows previously or currently disturbed areas wherever possible.	Condition not triggered during the audit period. There were no new gas gathering systems installed in this reporting period.	Not Triggered
22	The Applicant shall ensure that trenches constructed during the construction of gas gathering lines are not left open overnight unless otherwise agreed by the Director-General.	Condition not triggered during the audit period.	Not Triggered
	Threatened Species		
22A.	The Applicant shall ensure that during the upgrading of the gas gathering lines, impacts on threatened species are minimised by implementing actions including, but not limited, to the following:	Condition not triggered during the audit period.	Not Triggered
	(a) The recommendations outlined in Sections 6 and 7 of the Ecosearch Environmental Consultants Pty Ltd report titled <i>Flora and Fauna Assessment, AGL –Gas Well and Gathering Line Project Modifications</i> ; and		Not Triggered
	(b) Marking the boundaries of endangered ecological communities (EECs) and locations of other known threatened species and, where possible, avoiding construction activities within these areas.		Not Triggered
23	The Applicant shall not remove mature trees as part of this development unless otherwise agreed by the Director-General.	It was reported by AGL that there were no mature trees removed during the audit period.	Compliant
24	The Applicant shall implement best practice flora and fauna management.	The auditor sighted the Flora and Fauna Management Sub Plan (June 2018) and noted compliance with the requirements of this condition.	Compliant
25	The Applicant shall take all practicable measures to minimise potential flora and fauna impacts of the proposed development.	The auditor sighted the Flora and Fauna Management Sub Plan (June 2018) and noted the inclusion of measures and controls to comply with this condition.	Compliant
26	The Applicant shall provide landscaping around the well heads using appropriate species in consultation with the land owner.	The auditor sighted the Flora and Fauna Management Sub Plan (June 2018) and noted acknowledgement of this requirement. It was reported by AGL that there were no landscaping works undertaken during the audit period with respect to this development consent, and hence no requirement for consultation.	Compliant
27	The Applicant shall employ a suitably qualified ecologist with specific experience in identifying the Cumberland Plain Snail, during the construction period of the development. The ecologist shall monitor and examine areas for the presence of the threatened Cumberland Plain Snail, during the clearing for the development.	Condition not triggered during the audit period.	Not Triggered

B5. DA 9-1-2005

No.	Consent Condition	Compliance Assessment	Finding
28	The Applicant shall prepare a translocation strategy for the threatened Cumberland Plain Snail, which will be submitted for the Director-General's approval prior to construction. The translocation strategy shall be implemented should any individuals or populations of the Cumberland Plain Snail be identified.	Condition closed in a previous audit.	Not Triggered
29	The Applicant is required to prepare and implement a Weed Management Plan for the sites for the life of the development. The Applicant shall submit the Weed Management Plan for the Director-General's approval within one month of the date of this consent.	The auditor sighted the Rehabilitation and Landscape Management Sub Plan (June 2018) and Flora and Fauna Management Sub plan (June 2018). It is understood the original document(s) were approved by the Director General following the issue of the consent as required and updated versions of the Sub Plans are submitted to the Secretary.	Compliant
30	Prior to the commencement of site preparation works for the gas gathering system, the Applicant shall clearly mark the locations of known Aboriginal relics on the site (using flags, fencing or other appropriate method) and ensure that all employees and contractors are aware of these locations, to prevent the known relics being impacted or disturbed during site preparation and construction.	Condition not triggered during the audit period.	Not Triggered
31	The Applicant shall relocate the section of the gas gathering line east of the Aboriginal relic identified as Clutha 1, to ensure that this the relic is not harmed from installation of the gas gathering line. Details of the relocation of the line shall be submitted to the Director-General for approval.	Condition not triggered during the audit period.	Not Triggered
	Safety and Risk		
32	The Applicant shall develop and implement an Emergency Plan and Safety Management System for the development. The plan/system shall be submitted for the approval of the Director-General, at least one month prior to the commissioning of the development, or within such further period as the Director-General may agree. Commissioning shall not commence until the Director-General has approved the plan/system.	The Auditor sighted the Emergency Response Plan (June 2018) and the Safety Management Plan, Camden Project NSW (May 2018) and noted compliance with the requirements of this condition.	Compliant
	(a) <u>Emergency Plan</u> A comprehensive emergency plan and detailed emergency procedures for the development shall be prepared in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 1, Industry Emergency Planning Guidelines. The plan shall include detailed procedures for the safety of all people outside of the development who may be at risk from the development.	The Auditor sighted the Emergency Response Plan (June 2018) and the Safety Management Plan, Camden Project NSW (May 2018) and noted compliance with the requirements of this condition.	Compliant

B5. DA 9-1-2005

No.	Consent Condition	Compliance Assessment	Finding
	<p>(b) <u>Safety Management System</u> A document setting out a comprehensive safety management system, covering all operations on the gas wells and gathering system shall be developed in accordance with the Department’s Hazardous Industry Planning Advisory Paper No. 9, Safety Management. The document shall clearly specify all safety related procedures, responsibilities and policies, along with details of mechanisms for ensuring adherence to procedures. Records shall be kept on-site and shall be made available for inspection by the Director-General upon request. In particular records shall be maintained to demonstrate that management of change procedures were followed for the connection of the new gas lines to the existing network and for the integration of the new wells into the automatic control system.</p>	<p>The Auditor sighted the Emergency Response Plan (June 2018) and Safety Management Plan (May 2018) noted compliance with the requirements of this condition.</p> <p>Implementation was demonstrated through the following documents/systems: 1. Induction program; 2. Audit program; 3. Audit Actions Tracker; and 4. Standard methodologies for common works (e.g. confined space).</p>	Compliant
	<p>Note: The Applicant may update the current approved version of the relevant study/plan/system prepared to comply with Schedule 4 Condition 92 of development consent DA-282-6-2003-i, dated 16 June 2004. The updated version shall incorporate and adequately address the relevant aspects of the additional wells and related plant.</p>	Condition noted.	Note
	Compliance Report		
33	<p>Three months after commencement of operation of the development, the Applicant shall submit to the Director-General a compliance report detailing compliance with Condition 32, including:</p> <p>(a) dates of study/plan/system completion/submission and commencement of construction and commissioning;</p> <p>(b) actions taken or proposed, to implement recommendations made in the studies/plans/systems; and</p> <p>(c) responses to any requirement imposed by the Director-General under Condition 35.</p> <p>This report shall verify that:</p> <p>(a) The Emergency Plan required under Condition 32(a) is effectively in place and that at least one emergency exercise has been conducted; and</p> <p>(b) The Safety Management System required under Condition 32(b) has been fully implemented and that records required by the system are being kept.</p>	Condition closed in a previous audit.	Not Triggered

B5. DA 9-1-2005

No.	Consent Condition	Compliance Assessment	Finding
	<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>		<p>Not Triggered</p> <p>Not Triggered</p> <p>Not Triggered</p> <p>Not Triggered</p>
	Hazard Audit		
34	<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 auditor sighted the following documents demonstrating compliance with the requirements of this condition:</p> <ol style="list-style-type: none"> 1. 'Report of the 2016 Hazard Audit of the Camden Gas Project Operated by AGL Upstream Investments Pty Ltd', Planager, 10/06/16. 2. Correspondence from the DPE noting approval of Ms Karin Nilsson of Planager Pty Ltd to undertake the independent hazard audit. 3. Correspondence from AGL to the DPE enclosing the independent hazard audit (22/06/16). <p>AGL have advised that Pinnacle Risk Management has been engaged to conduct the 2019 hazard audit and work commenced on 12/11/2018.</p>	Compliant
	<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>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.</p>	<p>AGL have advised that Pinnacle Risk Management has been engaged to conduct the 2019 hazard audit and work commenced on 12/11/2018.</p>	Compliant
35	<p>The Applicant shall comply with all reasonable requirements of the Director-General in respect of the implementation of any measures arising from recommendations of the studies or reports referred to in Conditions 32 to 34 inclusive, within such time as the Director-General may agree.</p>	Condition not triggered in audit period	Not Triggered

B5. DA 9-1-2005

No.	Consent Condition	Compliance Assessment	Finding
	Drilling and Fracing Management Plan		
	Note: For the purposes of this consent the redrilling and/or additional fracing of a well does not constitute wellhead maintenance.	Condition noted.	Note
36	The Applicant shall obtain the prior approval of the Director-General for the drilling, redrilling and/or additional fracing of a gas well.	Condition not triggered during the audit period. It was reported by AGL (AEPR 2016-2017 and AEPR 2017-2018) that there were no re-drilling or fracing activities undertaken during the audit period.	Not Triggered
37	The Applicant shall prepare a Drilling and Fracing Management Plan in consultation with the Department of Primary Industries for the drilling of a well, or redrilling and/or refracing of an existing well. The Plan shall be submitted to the Director-General no later than one month prior to the commencement of the work or within such period as agreed by the Director-General. The Plan shall include, but not necessarily be limited to:	Condition not triggered during the audit period. It was reported by AGL (AEPR 2016-2017 and AEPR 2017-2018) that there were no re-drilling or fracing activities undertaken during the audit period.	Not Triggered
	(a) a description of all the activities to be undertaken on the well site during the drilling, redrilling and/or refracing work;		Not Triggered
	(b) details of how the environmental performance of the work will be monitored and what actions will be taken to address identified adverse environmental impacts;		Not Triggered
	(c) reference to the relevant parts of the Environmental Management Plan required under condition 41;		Not Triggered
	(d) compliance with all the relevant environmental performance requirements of this consent; and		Not Triggered
	(e) arrangements for complaints handling procedures during the drilling, redrilling and/or refracing work.		Not Triggered
38	The Applicant shall give written notification of the proposed drilling, redrilling and/or refracing work to potentially affected residences and other noise sensitive receivers at least fourteen days prior to work commencing.	Condition not triggered during the audit period. It was reported by AGL (AEPR 2016-2017 and AEPR 2017-2018) that there were no re-drilling or fracing activities undertaken during the audit period.	Not Triggered
	Construction Environmental Management Plan (CEMP)		

B5. DA 9-1-2005

No.	Consent Condition	Compliance Assessment	Finding
39	The Applicant shall prepare and implement a Construction Environmental Management Plan (CEMP) to provide environmental management, practices and procedures to be followed during the construction phases of the proposed development. A framework plan outlining key practices, procedures and environmental management practices should be approved by the Director-General prior to the commencement of construction.	Condition not triggered during the audit period. It was reported by AGL (AEPR 2016-2017 and AEPR 2017-2018) that there were no construction activities undertaken during the audit period with respect to DA9-1-2005.	Not Triggered
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. 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.	Condition not triggered during the audit period. It was reported by AGL (AEPR 2016-2017 and AEPR 2017-2018) that there were no construction activities undertaken during the audit period with respect to DA9-1-2005.	Not Triggered
Operational Environmental Management Plan (OEMP)			
41	The Applicant shall prepare and implement an Operational Environmental Management Plan (OEMP) to provide environmental management practices and procedures to be followed during the operation of the development. The OEMP shall be forwarded to the Director-General for approval within one month of the date of this consent. The OEMP shall include, but not necessarily be limited to:	The auditor sighted the EMP (March 2018) and noted compliance with the requirements of this condition.	Compliant
	(a) identification of all statutory and other obligations that the Applicant is required to fulfil in relation to operation of the development, including all consents, licences, approvals and consultations;	A number of controls are in place to monitor and measure implementation of the EMS including Environmental Management Sub Plan Compliance Audits, Daily Workover Reports, air quality monitoring and noise monitoring. The auditor sighted a sample of monitoring controls and noted compliance with the requirements of the EMP.	Compliant
	(b) a description of the roles and responsibilities for all key personnel involved in the operation of the development;	The auditor sighted correspondence demonstrating submission of the document to the DPE (17/04/2018).	Compliant
	(c) the overall environmental policies and principles to be applied to the operation of the development;		Compliant
	(d) standards and performance measures to be applied to the development, and a means by which environmental performance can be periodically reviewed and improved; and		Compliant
	(e) management policies to ensure that environmental performance goals are met and to comply with conditions of this consent.		Compliant

B5. DA 9-1-2005

No.	Consent Condition	Compliance Assessment	Finding
	<p>Note: The Applicant may update the current approved version of the OEMP prepared to comply with Schedule 5 Condition 2 of development consent DA-282-6-2003-i, dated 16 June 2004. The updated version shall incorporate and adequately address the relevant aspects of the additional wells and related plant.</p>		Compliant
	Annual Environmental Performance Reporting		
42	<p>The Applicant shall include the operation of wells GL2 – 4 inclusive, GL 6, EMAI-1H and EMAI-1V and the associated gas gathering system and the conditions of this consent, in the Annual Environmental Performance Report required under Schedule 5 Condition 5 of development consent DA-282-6-2003-i, dated 16 June 2004.</p>	<p>The auditor sighted AEPR 2016-2017 and AEPR 2017-2018 and noted compliance with the requirements of this condition.</p>	Compliant
	Independent Environmental Audit – Construction at EMAI		
43	<p>The Applicant shall commission and pay the full costs of an Independent Environmental Audit of the construction of the gas gathering system, construction of the access roads and drilling and fracing of gas wells on the EMAI. The objective of the audit is to monitor the performance and effect of construction activities on the EMAI.</p>	<p>Condition closed in a previous audit.</p>	Not Triggered
	<p>The Independent Environmental Audit shall:</p>		Not Triggered
	<p>(a) be conducted by a suitably qualified, experienced, and independent person(s) whose appointment has been approved by the Director-General; and</p>		Not Triggered
	<p>(b) be consistent with ISO 19011:2002 - Guidelines for Quality and/ or Environmental Management Systems Auditing, or updated versions of these guidelines/manuals.</p>		Not Triggered
	<p>The Audit shall:</p>		Not Triggered
	<p>a) assess the environmental performance of the construction of the development on EMAI, and its effects on the surrounding environment;</p>		Not Triggered
	<p>b) assess whether the development is complying with the relevant standards, performance measures, and statutory requirements;</p>		Not Triggered
	<p>c) consider the Applicant’s proposed Construction Environmental Management Plan for the EMAI Site; and</p>		Not Triggered
	<p>d) recommend measures or actions to improve the environmental performance of the construction of the development on EMAI, and/or its environmental management and monitoring systems (if required).</p>		Not Triggered

B5. DA 9-1-2005

No.	Consent Condition	Compliance Assessment	Finding
	<p>Within one month of completion of the audit, the Applicant must submit a copy of the audit report to the Director-General, the NSW Heritage Office and Department of Primary Industries-Agriculture. The Director-General may require the Applicant to address certain matters identified in the report and any comments received from the NSW Heritage Office and Department of Primary Industries-Agriculture. Any action required to be undertaken shall be completed within such period as the Director-General may agree.</p>		Not Triggered
	<p>Note: The Applicant may include the construction of the development on the EMAI in the audit prepared to comply with Schedule 5 Condition 8 of development consent DA-282-6-2003-i, dated 16 June 2004.</p>		Not Triggered
	<p>Independent Environmental Audit – Operation</p>		
44	<p>The Applicant shall include the operation of wells GL2 – 4 inclusive, GL 6, EMAI-1H and EMAI-1V and the associated gas gathering system, and the conditions of this consent, in the Independent Environmental Audit required under Schedule 5 Condition 10 of development consent DA-282-6-2003- i, dated 16 June 2004.</p>	<p>The scope of this IEA complies with the requirements of this condition.</p>	Compliant

B6. DA 75-4-2005

No.	Consent Condition	Compliance Assessment	Finding
	SCHEDULE 2		
	Obligation to Minimise Harm to the Environment		
1	The Applicant shall implement all practicable measures to prevent or minimise any harm to the environment that may result from the construction or operation of the development.	<p>An EMS has been developed and implemented to manage environmental risks and achieve performance improvements. The EMS consists of an EMP, Sub Plans and a compliance management system.</p> <p>A number of controls are in place to monitor and measure implementation of the EMS including Environmental Management Sub Plan Compliance Audits, Daily Workover Reports, air quality monitoring and noise monitoring. The auditor sighted a sample of monitoring controls and noted compliance with the requirements of the EMP.</p> <p>Compliance obligations arising from licences, leases, environmental/ planning approvals and legislation are monitored through a web-based database compliance management system (CMO Compliance). The auditor sighted CMO Compliance and determined that the tool effectively monitors compliance against obligations.</p>	Compliant
	Terms of Approval		
2	The Applicant shall carry out the development generally in accordance with the:	<p>It was reported by AGL that the development is undertaken in accordance with the EMP and Sub Plans which reflect the requirements of the Consent Conditions. On receipt of an approved consent or modification, the EMP is reported to be revised to reflect the new requirements. This was evidenced by the frequent revision history of the document.</p> <p>The DA and subsequent modifications were submitted by Sydney Gas and as such were not available for the purpose of this assessment.</p>	Not Verified
	(a) Development Application submitted to the Department on 18 April 2005;		Not Verified
	(b) <i>Statement of Environmental Effects – Camden Gas Project, Sugarloaf Farm Drilling Program, PPL4</i> Sydney Gas (Camden) Operations Pty Ltd, dated March 2005;		Not Verified
	(c) Letter from Sydney Gas (Camden) Operations Pty Ltd to the Department dated, 15 May 2005, amending the application to include the link between SL6 and RP3;		Not Verified
	(d) Letter from Sydney Gas (Camden) Operations Pty Ltd to the Department, dated 20 May 2005, amending the application to relocate SL5;		Not Verified
	(e) Letter from Sydney Gas (Camden) Operations Pty Ltd to the Department, dated 30 May 2005, providing a response to general public submissions;		Not Verified
	(f) Letter from Sydney Gas (Camden) Operations Pty Ltd to the Department, dated 17 June 2005, about the access roads;		Not Verified

B6. DA 75-4-2005

No.	Consent Condition	Compliance Assessment	Finding
	(g) Letter from Sydney Gas (Camden) Operations Pty Ltd to the Department of Environment and Conservation, dated 10 June 2005, about Aboriginal heritage issues;		Not Verified
	(h) Letter from Sydney Gas (Camden) Operations Pty Ltd to the Department, dated 11 July 2005, showing the updated plan of Aboriginal and archaeological assessment areas;		Not Verified
	(i) Modification Application MOD 29-3-2007 and Camden Gas Project Joint Venture Gas Well and Gathering Line Modification Project Statement of Environmental Effects , dated March 2007;		Not Verified
	(j) Modification Application DA 75-4-2005 MOD 2 and letter dated 18 December 2009;		Not Verified
	(k) EA titled Spring Farm and Menangle Park Gas Gathering System Modifications – Gas gathering line MP22 to SL02 prepared by AGL Gas Production (Camden) Pty Ltd, and dated 7 December 2010; and		Not Verified
	(l) conditions of this approval.	Refer to relevant conditions for an assessment of compliance.	Note
	If there is any inconsistency between the above documents, the latter document shall prevail over the former to the extent of the inconsistency. However, the conditions of this consent shall prevail over all other documents to the extent of any inconsistency.	Condition noted.	Note
3	The Applicant shall comply with any reasonable requirement/s of the Director-General arising from the Department’s assessment of:	Condition not triggered during the audit period.	Not Triggered
	(a) Any reports, plans or correspondence that are submitted in accordance with this consent; and		Not Triggered
	(b) The implementation of any actions or measures contained in these reports, plans or correspondence.		Not Triggered
	Limits on Approval		
4	This approval shall lapse within 21 years of the date of this consent or on the expiry date of Petroleum Production Lease No. 4, whichever is the shorter period.	Condition not triggered during the audit period.	Not Triggered
5	Nothing in this consent permits the drilling and operation of any additional wells (beyond the approved 9 wells for gas production).	The auditor reviewed the gas wells reported in the AEPR’s against the development consents and confirmed that no additional wells have been drilled or operated.	Compliant

B6. DA 75-4-2005

No.	Consent Condition	Compliance Assessment	Finding
6	If after five years of the date of this consent any well that is the subject of this consent has not yet been drilled or completed, then the Applicant shall surrender the approval for that well.	Condition closed in a previous audit.	Not Triggered
7	The access road near SL7 shall only be used in an emergency.	Condition closed in a previous audit.	Not Triggered
	Administration		
8	<p>Construction shall not commence until the Applicant has obtained a Part 3A Permit under the <i>Rivers and Foreshores Improvement Act 1948</i>, a Licence from the OEH under the <i>Protection of the Environment Operations Act 1997</i>, and an approval under section 60 of the <i>Heritage Act 1977</i> from the NSW Heritage Council.</p> <p>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.</p>	<p>Condition not triggered during the audit period.</p> <p>It was reported by AGL (AEPR 2016-2017 and AEPR 2017-2018) that there were no new gas wells or gas gathering system constructed during the audit period with respect to DA75-4-2005.</p>	Not Triggered
9	An application must be made to the OEH under section 90 of the <i>National Parks and Wildlife Act 1974</i> for approval to destroy the known objects at Sugarloaf Farm Site 1 (Locale 5) and Sugarloaf Farm Site 5.	Condition not triggered during the audit period.	Not Triggered
10	The Applicant must, in the opinion of the OEH be a fit and proper person to hold a Licence under the <i>Protection of the Environment Operations Act 1997</i> , having regard to the matters in section 83 of that Act.	AGL has not had a licence suspended or revoked during the audit period and as such would be considered to be a fit and proper person.	Compliant
11	The premises for the purposes of the Licence under the <i>Protection of the Environment Operations Act 1997</i> , includes the gas gathering system, access roads and gas wells and any associated effluent storages, temporary work areas and infrastructure associated with the gas gathering systems, access roads and gas wells.	Condition noted.	Note
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.	<p>Condition not triggered during the audit period.</p> <p>It was reported by AGL (AEPR 2016-2017 and AEPR 2017-2018) that there were no new gas wells or gas gathering system constructed during the audit period with respect to DA9-1-2005.</p>	Not Triggered
13	The Applicant must provide Council with the Geographical Positioning System (GPS) co-ordinates and digital survey data for the gas well sites and gas gathering system in a format suitable to the Council, within two months of the completion of the gas wells and gas gathering system.	<p>Condition not triggered during the audit period.</p> <p>It was reported by AGL (AEPR 2016-2017 and AEPR 2017-2018) that there were no new gas wells or gas gathering system constructed during the audit period with respect to DA9-1-2005.</p>	Not Triggered

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No.	Consent Condition	Compliance Assessment	Finding
14	The Applicant must provide Council with the Geographical Positioning System (GPS) co-ordinates and digital survey data for the gas well sites and gas gathering system in a format suitable to the Council, within two months of the completion of the gas wells and gas gathering system.	Condition not triggered during the audit period. It was reported by AGL (AEPR 2016-2017 and AEPR 2017-2018) that there were no new gas wells or gas gathering system constructed during the audit period with respect to DA9-1-2005.	Not Triggered
15	The Applicant shall provide written notification to the Director-General that it has fulfilled the requirements of Conditions 13 and 14, within two weeks of the information being provided to the Council.	Condition not triggered during the audit period.	Not Triggered
ENVIRONMENTAL PERFORMANCE CONDITIONS			
Activities Must be Carried out in a competent Manner			
16	The development must be carried out in a competent manner. This includes:	Competence is demonstrated through defined roles and responsibilities, training, and assurance, as detailed below: 1. Roles and responsibilities - Defined in the EMP (March 2018) and position descriptions. The position description of the Gas Plant Operator was sighted by the auditor and noted to include a requirement to achieve regulatory compliance and adhere to the EMP. 2. Training - The auditor sighted the induction program that is delivered to all AGL employees and contractors (Rapid Induct). Commencing in 2017, monthly awareness training was delivered during the HSE meeting. Training programs sighted by the auditor include air quality, noise management, rehabilitation works and flora and fauna. 3. Audit and inspection - Environmental Management Sub Plan Compliance Audits and periodic inspections were undertaken to assess implementation of control measures. The auditor sighted over 20 examples including for waste (3 March 2017), noise (22 December 2016), European heritage (28 April 2017), and flora/fauna (20 May 2018).	Compliant
	i The processing, handling, movement and storage of materials and substances used to carry out the activity; and		Compliant
	i The treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.		Compliant
Maintenance of Plant and Equipment			

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No.	Consent Condition	Compliance Assessment	Finding															
17	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.	The auditor sighted the following systems and documents demonstrating compliance with the requirements of this condition: 1. Preventative Maintenance - The preventative maintenance of plant and equipment is managed through the MEX system. The system effectively monitors maintenance requirements based on the use of plant and equipment. The auditor sighted the Weekly Maintenance Progress Dashboard and the Monthly Maintenance Planning Dashboard and noted a high level of compliance to program requirements. 2. Monitoring - Daily and weekly documented checks are undertaken of vehicles. 3. Procedures - Standard Operating Procedures have been developed to guide commonly undertaken activities. 4. Leak Detection and Repair Program - Refer to EPL 12003.	Compliant															
	Noise Limits																	
18	Noise from the operation of the development shall not exceed the sound pressure level (noise) limits presented in the Table below: <table border="1" data-bbox="344 831 875 938"> <thead> <tr> <th data-bbox="344 831 421 863">Location</th> <th data-bbox="427 831 533 863">Day</th> <th data-bbox="539 831 645 863">Evening</th> <th colspan="2" data-bbox="651 831 875 863">Night</th> </tr> <tr> <td data-bbox="344 868 421 900"></td> <td data-bbox="427 868 533 900">L_{Aeq} (15 minute)</td> <td data-bbox="539 868 645 900">L_{Aeq} (15 minute)</td> <td data-bbox="651 868 757 900">L_{Aeq} (15 minute)</td> <td data-bbox="763 868 875 900">L_{A1} (1 minute)</td> </tr> </thead> <tbody> <tr> <td data-bbox="344 904 421 936">Any residential premise</td> <td data-bbox="427 904 533 936">35</td> <td data-bbox="539 904 645 936">35</td> <td data-bbox="651 904 757 936">35</td> <td data-bbox="763 904 875 936">45</td> </tr> </tbody> </table>	Location	Day	Evening	Night			L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{A1} (1 minute)	Any residential premise	35	35	35	45	The auditor sighted the Noise Management Sub-Plan (June 2017) and noted the inclusion of this condition and appropriate controls to minimise noise. The Sub-Plan noted that monitoring should be carried out within the first week of production, after three months of production and if the well status changes. The auditor conducted a review of the Annual Environmental Performance Reports for the audit period and noted that there were no new activities undertaken at the DA75-4-2005 well sites. As such, the monitoring requirements were not triggered.	Compliant
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														
	Notes i The limits represent the sound pressure level (noise) contribution, at the nominated receiver locations in the table.		Compliant															
	i 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.		Compliant															
	i Evening is defined as the period from 6.00pm to 10.00pm.		Compliant															
	i 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.		Compliant															
	i 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.		Compliant															

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No.	Consent Condition	Compliance Assessment	Finding										
	i 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.		Compliant										
	i Where it can be demonstrated that direct measurement of noise from the premises is impractical, the OEHL may accept alternative means of determining compliance (see Chapter 11 of the <i>NSW Industrial Noise Policy</i>).		Compliant										
	i The modification factors presented in section 4 of the <i>NSW Industrial Noise Policy</i> shall also be applied to the measured noise level where applicable.		Compliant										
	i 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.		Compliant										
	Construction Noise Criteria for SIS Wells												
18A.	<p>Noise from the drilling and construction of SL08 and SL09 shall not exceed the sound pressure level (noise) limits in the table below:</p> <table border="1"> <thead> <tr> <th>Receiver Location</th> <th>Weekday (7.00am-6.00pm) Saturday (7.00am-1.00pm)</th> <th>Saturday (1.00pm-6.00pm) Sunday (7.00am-6.00pm)</th> <th>Evening (6.00pm-10.00pm)</th> <th>Night (10.00pm-7.00am)</th> </tr> </thead> <tbody> <tr> <td>Nearest Receiver</td> <td>54</td> <td>44</td> <td>47</td> <td>41</td> </tr> </tbody> </table>	Receiver Location	Weekday (7.00am-6.00pm) Saturday (7.00am-1.00pm)	Saturday (1.00pm-6.00pm) Sunday (7.00am-6.00pm)	Evening (6.00pm-10.00pm)	Night (10.00pm-7.00am)	Nearest Receiver	54	44	47	41	<p>Condition not triggered during the audit period.</p> <p>It was reported by AGL (AEPR 2016-2017 and AEPR 2017-2018) that there were no drilling or construction works undertaken during the audit period with respect to DA75-4-2005.</p>	Not Triggered
Receiver Location	Weekday (7.00am-6.00pm) Saturday (7.00am-1.00pm)	Saturday (1.00pm-6.00pm) Sunday (7.00am-6.00pm)	Evening (6.00pm-10.00pm)	Night (10.00pm-7.00am)									
Nearest Receiver	54	44	47	41									
19	<p>The Applicant shall prepare and implement a Construction Noise Management Protocol for construction of the development. The Protocol shall be submitted for the approval of the OEHL and the Director-General at least one week prior to commencement of construction. The Protocol must include but is not limited to:</p> <p>(a) Compliance with the noise criteria in Condition 18A during all construction activities, when assessed at sensitive locations including residences and schools;</p> <p>(b) Details of the proposed drill rig focussing on the noise emission characteristics for all phases of well establishment, including percussion drilling, setting and casing, and fracturing;</p> <p>(c) Identification of sensitive receivers likely to be impacted by noise levels exceeding the noise goal in (a) above;</p> <p>(d) Details of proposed best practice mitigation measures to seek achieve the noise goal in (a) above;</p>	Condition closed in a previous audit.	Not Triggered										
	(a) Compliance with the noise criteria in Condition 18A during all construction activities, when assessed at sensitive locations including residences and schools;		Not Triggered										
	(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;		Not Triggered										
	(c) Identification of sensitive receivers likely to be impacted by noise levels exceeding the noise goal in (a) above;		Not Triggered										
	(d) Details of proposed best practice mitigation measures to seek achieve the noise goal in (a) above;		Not Triggered										

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No.	Consent Condition	Compliance Assessment	Finding
	(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;		Not Triggered
	(f) Community consultation including advance notice of commencement of construction activities and site contact details;		Not Triggered
	(g) A system to receive, document, respond, action and monitor complaints; and		Not Triggered
	(h) Monitoring methods and program.		Not Triggered
20	At least one month prior to operation of the development the Applicant shall prepare and submit for the Director-General's approval, a Well Gathering System and Trunk Line Maintenance Noise Management Protocol to be used for the premises for the life of the consent. The Protocol shall include but is not limited to:	The auditor sighted the Noise Management Sub Plan (June 2017) and noted compliance with the requirements of this condition. There were no reported noise complaints during the audit period.	Compliant
	(a) A primary objective of attaining the noise limits in condition 18;		Compliant
	(b) Community consultation;		Compliant
	(c) Advance notice to affected members of the community for planned well maintenance activities;		Compliant
	(d) Complaints handling monitoring system;		Compliant
	(e) Mitigation measures;		Compliant
	(f) The design/orientation of the proposed mitigation methods demonstrating best practice;		Compliant
	(g) Construction times;		Compliant
	(h) Contingency measures where noise complaints are received; and		Compliant
	(i) Monitoring methods and programs.		Compliant
	Hours of Operation		
21	The Applicant shall ensure that all construction work (except for the drilling (including well casing and grouting) of SIS wells), shall only be conducted between 7.00am and 6.00pm Monday to Friday and between 8.00am and 1.00pm Saturdays, unless inaudible at any residential receiver. Note: Inaudible means that the construction activity cannot be heard by the human ear at the nearest affected residential receiver.	Condition not triggered during the audit period. It was reported by AGL (AEPR 2016-2017 and AEPR 2017-2018) that there were no drilling or construction works undertaken during the audit period with respect to DA75-4-2005.	Not Triggered
22	Planned maintenance activities at any of the wells must only be conducted between:	Condition not triggered during the audit period. It was reported by AGL (AEPR 2016-2017 and AEPR 2017-2018) that	Not Triggered
	(a) 7.00 am to 6.00 pm on weekdays; and		Not Triggered

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No.	Consent Condition	Compliance Assessment	Finding
	<p>(b) 8.00am and 1.00pm on Saturdays (excluding Public Holidays)</p> <p>Note: This condition does not apply to the delivery of material outside the hours of operation under condition 21 if that delivery is required by police or other authorities for safety reasons; and /or the operation or personnel or equipment are endangered. In such circumstances, prior notification is to be provided to the OEH and affected residents as soon as possible, or within a reasonable period in the case of an emergency.</p>	<p>there were no drilling or construction works undertaken during the audit period with respect to DA75-4-2005.</p>	<p>Not Triggered</p>
	<p>Air Quality</p>		
23	<p>The Applicant shall carry out the development in a manner that will minimise emissions of dust from the site.</p> <p>Note: The Protection of the Environment Operations Act 1997 states that no offensive odour may be emitted from particular premises unless potentially offensive odours are identified in the Licence and the odours are emitted in accordance with conditions specifically directed at minimising the odours are permitted. Where it is appropriate for a Licence to identify and control odours, conditions for the Licence should be developed in consultation with Air Policy.</p>	<p>The auditor sighted the Air Quality Management Sub Plan (June 2018) and noted the inclusion of adequate dust management controls.</p> <p>The auditor notes there were no dust (or odour) related complaints during the audit period in relation to this Development Consent (AEPR 2016-17 and AEPR 2017-18).</p> <p>There were no excavation works undertaken during the audit period with respect to DA75-4-2005.</p>	<p>Compliant</p>
	<p>Water</p>		
24	<p>Except as may be expressly provided by a Licence, the Applicant shall comply with section 120 of the <i>Protection of the Environment Operations Act 1997</i> during the carrying out of the development.</p> <p>Note: Section 120 of the Protection of the Environment Operations Act 1997 applies to the disposal of wastewater.</p>	<p>The auditor sighted the Soil and Water Management Sub Plan (June 2018). The plans detail a number of controls to prevent the pollution of water.</p> <p>There were no reported water pollution incidents during the audit period.</p>	<p>Compliant</p>
	<p>Stormwater/Sediment Control</p>		
25	<p>At least one week prior to the commencement of construction, the Applicant shall submit for the approval of the Director-General, an Erosion and Sediment Control Plan. The Plan must be implemented and used for the duration of all construction activities associated with the development. The Plan must describe the measures that will be employed to minimise soil erosion and the discharge of sediment and other pollutants to land and/or waters during construction activities. The Plan should be prepared in accordance with the requirements for such plans outlined in Landcom's <i>Managing Urban Stormwater: Soils and Construction</i>.</p>	<p>Condition closed in a previous audit.</p>	<p>Not Triggered</p>
	<p>Waste</p>		

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No.	Consent Condition	Compliance Assessment	Finding
26	<p>The Applicant must not cause, permit or allow any waste generated outside the site to be received at the site for storage, treatment, processing, reprocessing or disposal or any waste generated at the site to be disposed of at the site, except as expressly permitted by a licence under the <i>Protection of the Environment Operations Act 1997</i>.</p> <p>Note: this condition only applies to the storage, treatment, processing, reprocessing or disposal of waste at the site if it requires an environment protection licence under the Protection of the Environment Operations Act 1997.</p>	<p>The auditor sighted the AGL Environmental Footprint spreadsheet for the financial years 2016/2017 and 2017/2018 and noted compliance with the requirements of this condition. The Environmental Footprint provides a detailed record of waste streams generated, recycled/reused and disposed, including water, hazardous waste and non-hazardous waste.</p> <p>AGL reported that no wastes are received, or disposed, at the premises.</p> <p>The auditor sighted a sample of disposal records and reconciled against the Environmental Footprint. There were no errors or emissions identified.</p>	Compliant
27	<p>The Applicant must ensure that any hazardous, industrial or Group A waste is assessed and classified in accordance with the DECCW's Environmental Guidelines: Assessment Classification and Management of Liquid and Non-Liquid Wastes.</p>	<p>The auditor sighted the AGL Environmental Footprint spreadsheet for the financial years 2016/17 and 2017/18 which notes that produced water was primarily reused by external industries. The auditor sighted a sample of disposal records generated during the audit period and reconciled against the Environmental Footprint. There were no errors or emissions identified.</p>	Compliant
Safety and Risk Management			
28	<p>Prior to construction of the wellhead, the Applicant shall provide a Report to the Department from an independent and suitably qualified person approved by the Director-General, to confirm that the design and operation of the wellhead complies with the Department's <i>Locational Guidelines - Development in the Vicinity of Operating Coal Seam Methane Wells</i> (May 2004) for an Automatically Controlled Well (with Separator/Optional Pump). In particular, the Report shall confirm that all safety related systems required by the Guidelines have been included.</p>	Condition closed in a previous audit.	Not Triggered
29	<p>The Applicant shall develop and implement an Emergency Plan and Safety Management System for the development. The plan/system shall be submitted for the approval of the Director-General, at least one month prior to the commissioning of the development, or within such further period as the Director-General may agree. Commissioning shall not commence until the Director-General has approved the plan/system.</p>	<p>The Auditor sighted the Emergency Response Plan (June 2018) and the Safety Management Plan, Camden Project NSW (May 2018) and noted compliance with the requirements of this condition.</p>	Compliant

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No.	Consent Condition	Compliance Assessment	Finding
	<p>(a) Emergency Plan A comprehensive emergency plan and detailed emergency procedures for the development shall be prepared in accordance with the Department’s Hazardous Industry Planning Advisory Paper No. 1, Industry Emergency Planning Guidelines. The plan shall include detailed procedures for the safety of all people outside of the development who may be at risk from the development.</p>	<p>The Auditor sighted the Emergency Response Plan (June 2018) and the Safety Management Plan, Camden Project NSW (May 2018) and noted compliance with the requirements of this condition.</p>	<p>Compliant</p>
	<p>(b) Safety Management System A document setting out a comprehensive safety management system, covering all operations on the gas wells and gathering system shall be developed in accordance with the Department’s Hazardous Industry Planning Advisory Paper No. 9, Safety Management. The document shall clearly specify all safety related procedures, responsibilities and policies, along with details of mechanisms for ensuring adherence to procedures. Records shall be kept on-site and shall be made available for inspection by the Director-General 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. Note: The Applicant may update the current approved version of the relevant study/plan/system prepared to comply with Schedule 4 Condition 92 of development consent DA-282-6-2003-i, dated 16 June 2004. The updated version shall incorporate and adequately address the relevant aspects of the additional wells and related plant.</p>	<p>The Auditor sighted the Emergency Response Plan (June 2018) and the Safety Management Plan, Camden Project NSW (May 2018) and noted compliance with the requirements of this condition.</p> <p>Implementation was demonstrated through the following documents/systems:</p> <ol style="list-style-type: none"> 1. Induction programs; 2. Audit program; 3. Audit Actions Tracker; and 4. Standard methodologies for common works (e.g. confined space). 	<p>Compliant</p>
	<p>Compliance Report</p>		
<p>30</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 29, 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 32.</p> <p>This report shall verify that:</p>	<p>Condition closed in a previous audit.</p>	<p>Not Triggered</p> <p>Not Triggered</p> <p>Not Triggered</p> <p>Not Triggered</p> <p>Not Triggered</p>

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No.	Consent Condition	Compliance Assessment	Finding
	(a) The Emergency Plan required under Condition 29(a) is effectively in place and that at least one emergency exercise has been conducted; and		Not Triggered
	(b) The Safety Management System required under Condition 29(b) has been fully implemented and that records required by the system are being kept.		Not Triggered
	The report shall include a signed commitment by the Applicant’s representative responsible for the operation of the development, that for each study/plan/system:		Not Triggered
	(a) The required study/plan/system has been undertaken or prepared to the relevant Hazardous Industry Planning Advisory Paper;		Not Triggered
	(b) All recommendations of each study/plan/system have been implemented; and		Not Triggered
	(c) All safety management system and their associated risk controls have been implemented and are being maintained.		Not Triggered
	Hazard Audit		
31	Twelve months after the commencement of operations of the proposed development or within such further period as the Director-General may agree, the Applicant shall carry out a comprehensive hazard audit of the development and within one month of the audit submit a report to the Director- General.	<p>The auditor sighted the following documents demonstrating compliance with the requirements of this condition:</p> <ol style="list-style-type: none"> 1. 'Report of the 2016 Hazard Audit of the Camden Gas Project Operated by AGL Upstream Investments Pty Ltd', Planager, 10/06/16. 2. Correspondence from the DPE noting approval of Ms Karin Nilsson of Planager Pty Ltd to undertake the independent hazard audit. 3. Correspondence from AGL to the DPE enclosing the independent hazard audit (22/06/16). <p>AGL have advised that Pinnacle Risk Management has been engaged to conduct the 2019 hazard audit and work commenced on 12/11/2018.</p>	Not Triggered
	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.	AGL have advised that Pinnacle Risk Management has been engaged to conduct the 2019 hazard audit and work commenced on 12/11/2018.	Compliant

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No.	Consent Condition	Compliance Assessment	Finding
	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.	AGL have advised that Pinnacle Risk Management has been engaged to conduct the 2019 hazard audit and work commenced on 12/11/2018.	Compliant
32	The Applicant shall comply with all reasonable requirements of the Director-General in respect of the implementation of any measures arising from recommendations of the studies or reports referred to in Conditions 28 to 31 inclusive, within such time as the Director-General may agree.	The auditor sighted correspondence from the DPE to AGL (17/08/2016) in response to the 2016 Hazard Audit (10/06/2016). The DPE requested additional information on the AGL preventative maintenance program which was subsequently provided (1/12/2016).	Compliant
	Redrilling and Fracing Management Plan		
	Note: For the purposes of this consent the redrilling and/or additional fracing of a well does not constitute wellhead maintenance.	Condition noted.	Note
33	The Applicant shall obtain the prior approval of the Director-General for the redrilling and/or additional fracing of a gas well.	Condition not triggered during the audit period. It was reported by AGL (AEPR 2016-2017 and AEPR 2017-2018) that there were no redrilling or fracing activities undertaken during the audit period.	Not Triggered
34	The Applicant shall prepare a Redrilling and Fracing Management Plan in consultation with the Department of Primary Industries for the redrilling and/or refracing of an existing well. The Plan shall be submitted to the Director-General no later than one month prior to the commencement of the work or within such period as agreed by the Director-General. The Plan shall include, but not necessarily be limited to:	Condition not triggered during the audit period. It was reported by AGL (AEPR 2016-2017 and AEPR 2017-2018) that there were no redrilling or fracing activities undertaken during the audit period.	Not Triggered
	(a) A description of all the activities to be undertaken on the well site during the redrilling and/or refracing work;		Not Triggered
	(b) Details of how the environmental performance of the work will be monitored and what actions will be taken to address identified adverse environmental impacts;		Not Triggered
	(c) Reference to the relevant parts of the Environmental Management Plan required under condition 52;		Not Triggered
	(d) Compliance with all the relevant environmental performance requirements of this consent; and		Not Triggered
	(e) Arrangements for complaints handling procedures during the redrilling and/or refracing work.		Not Triggered

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No.	Consent Condition	Compliance Assessment	Finding
35	The Applicant shall give written notification of the proposed re-drilling and/or refracing work to potentially affected residences and other noise sensitive receivers at least fourteen days prior to work commencing.	Condition not triggered during the audit period. It was reported by AGL (AEPR 2016-2017 and AEPR 2017-2018) that there were no re-drilling or fracing activities undertaken during the audit period.	Not Triggered
	Gas Gathering System		
36	The Applicant shall ensure that the route of the gas gathering system follows previously or currently disturbed areas wherever possible.	Condition closed in a previous audit.	Not Triggered
37	The Applicant shall ensure that trenches constructed during the construction of gas gathering lines are not left open overnight unless otherwise agreed by the Director-General.	Condition not triggered during the audit period. It was reported by AGL (AEPR 2016-2017 and AEPR 2017-2018) that there were no gas gathering lines constructed during the audit period with respect to DA75-4-2005.	Not Triggered
38	The Applicant shall comply with the following in the construction of the gas gathering system pipeline:	Condition not triggered during the audit period. It was reported by AGL (AEPR 2016-2017 and AEPR 2017-2018) that there were no gas gathering lines constructed during the audit period with respect to DA75-4-2005.	Not Triggered
	(a) Signs stating the presence of a buried gas pipeline shall be erected periodically along the length of the trench once the pipeline has been laid;		Not Triggered
	(b) Trenches are to be restored and reseeded with local grass seeds on completion of the work;		Not Triggered
	(c) Construct the gas gathering system so as not to impeach lateral water flows;		Not Triggered
	(d) Ensure that no crown or camber remains along the gas gathering systems, following construction;		Not Triggered
	(e) Design, construct and operate the pipeline in accordance with the Australian Standard for the installation and maintenance of Plastic Pipe Systems for Gas AS 3723-1989 (or its latest version); and		Not Triggered
	(f) Notify the Department on the completion of any trenching works.		Not Triggered
	Flora and Fauna		
39	The Applicant shall take all practicable measures to minimise potential flora and fauna impacts of the development.	The auditor sighted the Flora and Fauna Management Sub-Plan (June 2018) which details a number of controls to minimise the impacts to flora and fauna during construction, operation and rehabilitation.	Compliant
40	The Applicant shall not remove mature trees as part of this development unless otherwise agreed by the Director-General of DoPE, or delegate.	It was reported by AGL that there were no mature trees removed during the audit period.	Not Verified

B6. DA 75-4-2005

No.	Consent Condition	Compliance Assessment	Finding
41	The Applicant shall prepare a translocation strategy for the threatened Cumberland Plain Snail, which will be submitted for the Director-General's approval prior to construction. The translocation strategy shall be implemented should any individuals or populations of the Cumberland Plain Snail be identified.	Condition closed in a previous audit.	Not Triggered
42	The Applicant shall prepare and implement a Weed Management Plan for the site for the life of the development. The Applicant shall submit the Weed Management Plan for the Director-General's approval within one month of the date of this consent.	The auditor sighted the Rehabilitation and Landscape Management Sub Plan (June 2018) and noted compliance with the requirements of this condition.	Compliant
	Threatened Species		
42A.	The Applicant shall ensure that, during the drilling and construction of SLO8 and SLO9, impacts on threatened species are minimised by implementing actions including, but not limited, to the following:	Condition not triggered during the audit period. It was reported by AGL (AEPR 2016-2017 and AEPR 2017-2018) that there were no drilling or construction works undertaken during the audit period with respect to DA75-4-2005.	Not Triggered
	(a) The recommendations outlined in Sections 6 and 7 of the Ecosearch Environmental Consultants Pty Ltd report titled <i>Flora and Fauna Assessment, AGL –Gas Well and Gathering Line Project Modifications</i> ; and		Not Triggered
	(b) Marking the boundaries of endangered ecological communities (EECs) and locations of other known threatened species and, where possible, avoiding construction activities within these areas.		Not Triggered
	Bushfire Management		
43	The Applicant shall:	The auditor sighted the Bush Fire Management Procedures in App. A19 and A20 of the Emergency Response Plan (June 2018). The procedures include a requirement to co-operate and assist the Rural Fire Service.	Compliant
	(a) Ensure that the development is suitably equipped to respond to any fires on the site; and		Compliant
	(b) Assist the Rural Fire Service and emergency services as much as possible if there is a fire on the site.		Compliant
44	Prior to operation the Applicant shall prepare a Bushfire Management Plan for the development, to the satisfaction of the Director-General. The Applicant shall consult with Council and the Rural Fire Service in the preparation of the Plan. Note: The Applicant may update the current approved version of the Bushfire Management Plan prepared to comply with Schedule 4 Condition 110 of development consent DA-282-6-2003-i, dated 16 June 2004. The updated version shall incorporate and adequately address the relevant aspects of the additional wells and related gas gathering system.	The auditor sighted the Bush Fire Management Procedures in App. A19 and A20 of the Emergency Response Plan (June 2018) which includes and is applicable to the entire well network. Correspondence was sighted between AGL and the respective Councils in the 2014-2016 independent compliance audit with respect to this condition.	Compliant

B6. DA 75-4-2005

No.	Consent Condition	Compliance Assessment	Finding
	Heritage		
45	The Applicant must ensure that should any historical relics be uncovered, excavation or disturbance of the area is to stop immediately and the Heritage Council of NSW is notified within a reasonable time of the discovery or location of these relics. Archaeological assessment and approval, or endorsement, may be required prior to works continuing in the affected area(s) based on the nature of the discovery.	Condition not triggered during the audit period.	Not Triggered
46	An Interpretation Study being prepared to the satisfaction of the Director, Heritage Office and executed by the Applicant within 6 months of the date of this approval.	Condition not triggered during the audit period.	Not Triggered
	Aboriginal Relics		
47	The Applicant must ensure that should any Aboriginal objects be uncovered, excavation or disturbance of the area is to stop immediately and the OEI is to be informed in accordance with section 91 of the <i>National Parks and Wildlife Act 1974</i> .	Condition not triggered during the audit period.	Not Triggered
48	Prior to the commencement of construction, the Applicant shall clearly mark the locations of known Aboriginal relics on the site (using flags, fencing or other appropriate method) and ensure that all employees and contractors are aware of these locations, to prevent the known relics being impacted or disturbed during site preparation and construction.	Condition not triggered during the audit period.	Not Triggered
	Sydney Water Supply Canal		
49	The Applicant shall carry out the construction and operation of the development in a manner that will not adversely affect the structural integrity of the Upper Canal and associated structures nor impact the quality of water in the Upper Canal. The Applicant shall be responsible for ensuring that all persons involved in the development are informed of these requirements.	Condition closed in a previous audit.	Not Triggered
50	The Applicant shall comply with the requirements in Sydney Water's <i>Guidelines on Precautions to be taken when Building Over or Adjacent to Sydney Water's Assets</i> .	Condition closed in a previous audit.	Not Triggered
	ENVIRONMENTAL MANAGEMENT AND MONITORING		
	Construction Environmental Management Plan (CEMP)		

B6. DA 75-4-2005

No.	Consent Condition	Compliance Assessment	Finding
51	<p>The Applicant shall prepare and implement a Construction Environmental Management Plan (CEMP) to provide environmental management, practices and procedures to be followed during the construction phases of the proposed development. A framework plan outlining key practices, procedures and environmental management practices should be approved by the Director-General of the Department of Planning and Infrastructure, or delegate prior to the commencement of construction.</p> <p>Note: The Applicant may update the current approved version of the CEMP prepared to comply with Schedule 5 Condition 1 of development consent DA-282-6-2003-i, dated 16 June 2004. The updated version shall incorporate and adequately address the relevant aspects of the additional wells and related plant approved by the Director-General prior to the commencement of construction.</p>	<p>The condition not triggered during this audit period as it was reported by AGL (AEPR 2016-2017 and AEPR 2017-2018) that there were no drilling or construction works undertaken with respect to DA75-4-2005.</p>	Not Triggered
	Operational Environmental Management Plan (OEMP)		
52	<p>The Applicant shall prepare and implement an Operational Environmental Management Plan (OEMP) to provide environmental management practices and procedures to be followed during the operation of the development. The OEMP shall be forwarded to the Director-General for approval within one month of the date of this consent. The OEMP shall include, but not necessarily be limited to:</p>	<p>The auditor sighted the EMP (March 2018 Rev 9) and noted compliance with the requirements of this condition.</p>	Compliant
	(a) Identification of all statutory and other obligations that the Applicant is required to fulfil in relation to operation of the development, including all consents, licences, approvals and consultations;	<p>A number of controls are in place to monitor and measure implementation of the EMS including Environmental Management Sub Plan Compliance Audits, Daily Workover Reports, air quality monitoring and noise monitoring. The auditor sighted a sample of monitoring controls and noted compliance with the requirements of the EMP.</p>	Compliant
	(b) A description of the roles and responsibilities for all key personnel involved in the operation of the development;	<p>The auditor sighted correspondence demonstrating submission of the document to the DPE (17/04/2018).</p>	Compliant
	(c) The overall environmental policies and principles to be applied to the operation of the development;		Compliant
	(d) Standards and performance measures to be applied to the development, and a means by which environmental performance can be periodically reviewed and improved; and		Compliant
	(e) Management policies to ensure that environmental performance goals are met and to comply with conditions of this consent.		Compliant
	<p>Note: The Applicant may update the current approved version of the OEMP prepared to comply with Schedule 5 Condition 2 of development consent DA-282-6-2003-i, dated 16 June 2004. The updated version shall incorporate and adequately address the relevant aspects of the additional wells and related plant.</p>		Note

B6. DA 75-4-2005

No.	Consent Condition	Compliance Assessment	Finding
	Annual Return		
53	The Applicant shall provide an annual return to the OEH in relation to the development as required by any Licence under the <i>Protection of the Environment Operations Act 1997</i> in relation to the development. In the return the Applicant must report on the annual monitoring undertaken (where the activity results in pollutant discharges), provide a summary of complaints relating to the development, report on compliance with Licence conditions and provide a calculation of licence fees (administrative fees and where relevant, load based fees) that are payable.	The auditor sighted the December 2016 and December 2017 Annual Returns and noted compliance against the requirements of this condition.	Compliant
	Annual Environmental Performance Reporting		
54	Within twelve months of the date of this consent, and annually thereafter during the life of the development, the Applicant shall submit an Annual Environmental Performance Report to the Director- General. This report shall include, but not be limited to:	The auditor sighted the AEPR (2016-2017 and 2017-2018) and noted compliance with the requirements of this condition. Correspondence was sighted to demonstrate submission of the Reports to the DPE (1/11/2017 and 2/11/2018).	Compliant
	(a) The standards, performance measures and statutory requirements the development is required to comply with;		Compliant
	(b) An assessment of the environmental performance of the development to determine whether it is complying with these standards, performance measures, and statutory requirements;		Compliant
	(c) Copy of the Complaints Register for the preceding twelve month period and indicating what actions were (or are being) taken to address these complaints;		Compliant
	(d) Indication of what actions were taken to address any issue and/or recommendation raised by the Camden Gas Project's Community Consultative Committee;		Compliant
	(e) Provision of the detailed results of all the monitoring required by this consent;		Compliant
	(f) Identify any non-compliance during the year;		Compliant
	(g) Identify any significant trends in the data; and		Compliant
	(h) If any non-compliance is detected, describe what actions and measures would be carried out to ensure compliance, clearly indicating who would carry out these actions and measures, when they would be carried out, and how the effectiveness of these measures would be monitored over time.		Compliant

B6. DA 75-4-2005

No.	Consent Condition	Compliance Assessment	Finding
	Note: The Applicant may include the operation of wells SL1 – 9 and the associated gas gathering system and the conditions of this consent, in the Annual Environmental Performance Report required under Schedule 5 Condition 5 of development consent DA-282-6-2003-i, dated 16 June 2004.		Compliant
55	The Director-General may require the Applicant to address certain matters identified in the Annual Environmental Performance Report. Any action required to be undertaken shall be completed within such period as the Director-General may agree.	The auditor sighted correspondence from the DPE to AGL (18/01/2016) requesting a status update of actions taken in response to recommendations or non-compliances identified in the IEA. The auditor sighted the 2017/18 Annual Environmental Performance Report and noted that this matter was adequately addressed. The DPE also requested that all subsequent Independent Environmental Audits include the status of non-compliances arising from the previous audit in the body of the report. This report satisfies this request.	Compliant
56	The Applicant shall also submit a copy of the Annual Environmental Performance Report to the DECCW, the 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 (2016/2017 and 2017/2018) to the following agencies: DPE, EPA, DPI, Campbelltown City Council, Camden Council and Wollondilly Council. A copy of each AEPR is available on the CGP website.	Compliant
	Independent Environmental Audit – Construction at Sugarloaf Farm		
57	On completion of all construction works, the Applicant shall commission and pay the full costs of an Independent Environmental Audit of the drilling and fracing of gas wells and construction of the gas gathering system and access roads on the site. The objective of the audit is to monitor the performance and effect of construction activities on the site. The Independent Environmental Audit shall:	Condition closed in a previous audit.	Not Triggered
	(a) Be conducted by a suitably qualified, experienced, and independent person(s) whose appointment has been approved by the Director-General; and		Not Triggered
	(b) Be consistent with ISO 19011:2002 - Guidelines for Quality and/ or Environmental Management Systems Auditing, or updated versions of these guidelines/manuals.		Not Triggered
	The Audit shall:		Not Triggered
	a) Assess the environmental performance of the construction of the development on the site, and its effects on the surrounding environment;		Not Triggered
	b) Assess whether the development is complying with the relevant standards, performance measures, and statutory requirements;		Not Triggered
	c) Consider the Applicant’s proposed Construction Environmental Management Plan; and		Not Triggered

B6. DA 75-4-2005

No.	Consent Condition	Compliance Assessment	Finding
	d) Recommend measures or actions to improve the environmental performance of the construction of the development, and/or its environmental management and monitoring systems (if required).		Not Triggered
	Within one month of completion of the audit, the Applicant must submit a copy of the audit report to the Director-General and the NSW Heritage Office. The Director-General may require the Applicant to address certain matters identified in the report and any comments received from the NSW Heritage Office. Any action required to be undertaken shall be completed within such period as the Director-General may agree.		Not Triggered
	Independent Environmental Audit – Operation		
58	Within two years of the date of this consent and every two years thereafter, unless the Director-General directs otherwise, the Applicant shall commission and pay the full costs of an Independent Environmental Audit. The Independent Environmental Audit shall:	The scope of this 2016-2018 IEA complies with the requirements of this condition.	Compliant
	(a) Be conducted by a suitably qualified, experienced, and independent person(s) whose appointment has been approved by the Director-General;		Compliant
	(b) Be consistent with ISO 19011:2002 - Guidelines for Quality and/ or Environmental Management Systems Auditing, or updated versions of these guidelines/manuals;		Compliant
	(c) Assess the environmental performance of the development, and its effects on the surrounding environment;		Compliant
	(d) Assess whether the development is complying with the relevant standards, performance measures, and statutory requirements;		Compliant
	(e) Review the adequacy of the Applicant’s Environmental Management Plan; and		Compliant
	(f) Recommend measures or actions to improve the environmental performance of the development, and/or its environmental management and monitoring systems.		Compliant
	Note: The Applicant may include the operation of wells SL1 – 9 and the associated gas gathering system and the conditions of this consent, in the Independent Environmental Audit required under Schedule 5 Condition 10 of development consent DA-282-6-2003-i, dated 16 June 2004.		
	Complaints Register		

B6. DA 75-4-2005

No.	Consent Condition	Compliance Assessment	Finding
59	The Applicant shall keep a legible record of all complaints made to the applicant or any employee or agent of the Applicant in relation to pollution arising from any activity of the development. The Register must:	The auditor sighted Consultation Manager, a software program used for managing stakeholder engagement, including complaints. Records retained within Consultation Manager comply with the requirements of this condition. There were no complaints associated with this Development Consent during the audit period.	Compliant
	(a) Record the date and time of the complaint;		Compliant
	(b) Record the method by which the complaint was made;		Compliant
	(c) Note any personal details of the complainant or, if no such details were provided, a note to that effect;		Compliant
	(d) The nature of the complaint;		Compliant
	(e) The action taken by the applicant in relation to the complaint, including any follow-up contact with the complainant; and		Compliant
	(f) State, if no action was taken by the Applicant, the reasons why no action was taken.		Compliant
	The record of a complaint must be kept for at least 4 years after the complaint was made, and must be produced to any authorised officer of the OEHL or the Department who asks to see them.		Compliant
60	The Applicant must:	The auditor sighted the Camden Gas Project website and noted the inclusion of a telephone line, contact and feedback form. The website notes that the purpose of the telephone line is for complaints and enquiries.	
	(a) Operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted on the site or by the vehicle or mobile plant, unless otherwise specified in the Licence; and		Compliant
	(b) Notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint.		Compliant
	Community Liaison		
61	The Applicant shall ensure the continuation of the existing Sydney Gas Operations Camden Project Community Consultative Committee to oversee the environmental performance of the development.	The auditor sighted the minutes of the Community Consultative Committee and noted compliance with the requirements of this condition.	Compliant

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No.	Consent Condition	Compliance Assessment - 2015-2018 Audit	Finding
	Schedule 2 Administrative Conditions		
	Obligation to Minimise Harm to the Environment		
2.1	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 EMS has been developed and implemented to manage environmental risks and achieve performance improvements. The EMS consists of an EMP, Sub Plans and a compliance management system.</p> <p>A number of controls are in place to monitor and measure implementation of the EMS including Environmental Management Sub Plan Compliance Audits, Daily Workover Reports, air quality monitoring and noise monitoring. The auditor sighted a sample of monitoring controls and noted compliance with the requirements of the EMP.</p> <p>Compliance obligations arising from licences, leases, environmental/ planning approvals and legislation are monitored through a web-based database compliance management system (CMO Compliance). The auditor sighted CMO Compliance and determined that the tool effectively monitors compliance against obligations.</p>	Compliant
2.2	The Proponent shall carry out the project generally in accordance with the:	<p>It was reported by AGL that the development is undertaken in accordance with the EMP and Sub Plans which reflect the requirements of the Consent Conditions. On receipt of an approved consent or modification, the EMP is reported to be revised to reflect the new requirements. This was evidenced by the frequent revision history of the document.</p> <p>A 'compliance-improvement recommended' was reported against this condition in the previous audit. The auditor recommended that a copy of each of the source documents listed under this Condition were made available for reference within AGL's compliance register (CMO-Compliance). The auditor sighted CMO and verified that the source documents are now available.</p>	Compliant
2.2(a)	Project Application 06_0137.		Compliant
2.2(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 Envirosiences Pty Ltd.		Compliant
2.2(c)	Proposed changes to works in the EMAI and Razorback projects contained in a letter from AGL to the Department, dated 23 November 2006.		Compliant
2.2(d)	Revised Statement of Commitments contained in a Letter from AGL to the Department, dated 4 December 2006.		Compliant
2.2(e)	Conditions of this approval.		Compliant
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.	Not Triggered

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No.	Consent Condition	Compliance Assessment - 2015-2018 Audit	Finding
2.4	The Proponent 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.	Not Triggered
2.4(a)	Any reports, plans or correspondence that are submitted in accordance with this approval.	Condition was not activated during the audit period.	Not Triggered
2.4(b)	The implementation of any actions or measures contained in these reports, plans or correspondence.	Condition was not activated during the audit period.	Not Triggered
	Limits on Approval		
2.5	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.	Not Triggered
2.6	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.	Compliant
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.	<p>It is noted that the approval has lapsed for any well that has not been drilled and as such, the approval must be surrendered for the nominated wells.</p> <p>A 'compliance-improvement recommended' was reported against this condition in the previous audit. The auditor recommended that AGL confirm the required process for surrendering approvals with the DPE.</p> <p>While it is acknowledged that the Petroleum Operations Plan states that AGL has no current plans to undertake any further drilling or development, the recommendation of the 2012-2015 IEA was not adequately addressed.</p>	Observation
	Notification		
2.8	Within 3 months of the commissioning of the wells, the Proponent shall provide Council with:	Condition not triggered during the audit period.	Not Triggered
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.		Not Triggered
2.8(b)	The wellhead configuration of each gas well.		Not Triggered

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No.	Consent Condition	Compliance Assessment - 2015-2018 Audit	Finding																	
2.9	The Proponent shall ensure that all plant and equipment used at the site is:	The auditor sighted the following systems and documents demonstrating compliance with the requirements of this condition: 1. Preventative Maintenance - The preventative maintenance of plant and equipment is managed through the MEX system. The system effectively monitors maintenance requirements based on the use of plant and equipment. The auditor sighted the Weekly Maintenance Progress Dashboard and the Monthly Maintenance Planning Dashboard and noted a high level of compliance to program requirements. 2. Monitoring - Daily and weekly documented checks are undertaken of vehicles. 3. Procedures - Standard Operating Procedures have been developed to guide commonly undertaken activities. 4. Leak Detection and Repair Program - Refer to EPL 12003.	Compliant																	
2.9(a)	Maintained in a proper and efficient condition.																			
2.9(b)	Operated in a proper and efficient condition.	There were no reportable environmental incidents during the audit period.	Compliant																	
SCHEDULE 3 ENVIRONMENTAL PERFORMANCE CONDITIONS																				
NOISE																				
Construction and Maintenance Hours																				
3.1	<p>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>Notes: Inaudible means that the construction activity cannot be heard by the human ear at the nearest affected residential receivers. This condition does not apply to the delivery of material if that delivery is required by the police or other authorities for safety reasons; and/or the operation or</p>	Activity	Day	Time	Construction	Monday – Friday	7:00am to 6:00pm	Saturday	8:00am to 1:00pm	Sunday and Public Holidays	Nil	Planned maintenance activities	Monday – Friday	7:00am to 6:00pm	Saturday	8:00am to 1:00pm	Sunday and Public Holidays	Nil (unless inaudible at any residential receiver)	The auditor sighted the Noise Management Sub-Plan (June 2017) and noted compliance 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.	Compliant
Activity	Day	Time																		
Construction	Monday – Friday	7:00am to 6:00pm																		
	Saturday	8:00am to 1:00pm																		
	Sunday and Public Holidays	Nil																		
Planned maintenance activities	Monday – Friday	7:00am to 6:00pm																		
	Saturday	8:00am to 1:00pm																		
	Sunday and Public Holidays	Nil (unless inaudible at any residential receiver)																		

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No.	Consent Condition	Compliance Assessment - 2015-2018 Audit	Finding										
	personnel or equipment is endangered. In such circumstances, prior notification is to be provided to affected residents where possible.												
	Construction Noise Goals												
3.2	<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" style="margin-left: 20px;"> <thead> <tr> <th>Location</th> <th>Day</th> </tr> </thead> <tbody> <tr> <td>Any residential receiver</td> <td>54</td> </tr> </tbody> </table> <p>Note: See notes to condition 4.</p>	Location	Day	Any residential receiver	54	The auditor sighted the Noise Management Sub-Plan (June 2017) and noted compliance 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.	Compliant						
Location	Day												
Any residential receiver	54												
	Construction Noise Management Plan												
3.3	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:	Condition closed in a previous audit.	Not Triggered										
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 (June 2017) and noted conformance to the requirements of this condition.	Compliant										
3.3(b)	A community notification protocol for the proposed construction activities (including any redrilling or re-fracing of wells).		Compliant										
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.		Compliant										
3.3(d)	Details of who would be responsible for monitoring, reviewing and implementing the plan.		Compliant										
	Operational Noise Criteria												
3.4	<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" style="margin-left: 20px;"> <thead> <tr> <th>Location</th> <th>Day LAeq(15 minute)</th> <th>Evening LAeq(15 minute)</th> <th>Night LAeq(15 minute)</th> <th>Night 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>	Location	Day LAeq(15 minute)	Evening LAeq(15 minute)	Night LAeq(15 minute)	Night LA1(1 minute)	Any residential receiver	39	39	35	45	<p>The auditor sighted the Noise Management Sub-Plan (June 2017) and noted the inclusion of this condition and appropriate controls to minimise noise. The Sub-Plan noted that monitoring should be carried out within the first week of production, after three months of production and if the well status changes.</p> <p>The auditor conducted a review of the Annual Environmental Performance Reports for the audit period and noted that there were no</p>	Compliant
Location	Day LAeq(15 minute)	Evening LAeq(15 minute)	Night LAeq(15 minute)	Night LA1(1 minute)									
Any residential receiver	39	39	35	45									

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No.	Consent Condition	Compliance Assessment - 2015-2018 Audit	Finding
	<p>Notes:</p> <ul style="list-style-type: none"> i 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. i 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. i 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). 	new activities undertaken at the PA06_0137 well sites. As such, the monitoring requirements were not triggered	
	Continuous Improvement		
3.5	The Proponent shall, to the satisfaction of the Director-General:	<p>The auditor sighted the Noise Management Sub Plan (June 2017) and noted the inclusion of noise mitigation measures.</p> <p>There were no reported noise complaints during the audit period.</p>	Compliant
3.5(a)	Implement all reasonable and feasible best practice noise mitigation measures.		Compliant
3.5(b)	Investigate ways to reduce the noise generated by the project.		Compliant
3.5(c)	Report on these investigations and the implementation and effectiveness of these measures in the AEPR.		Compliant
	Noise Monitoring Program		
3.6	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	The auditor sighted the Noise Management Sub Plan (June 2017) and noted the inclusion of a noise monitoring program.	Compliant
	AIR QUALITY		
3.7	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.	It was noted by the auditor that a number of dust mitigation measures are detailed in the Air Quality Management Sub-Plan (June 2018). There were no dust complaints reported during the audit period in relation to this condition.	Compliant
	SURFACE WATER		
3.8	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:	The auditor sighted the Soil and Water Management Sub-Plan (June 2018) and noted the inclusion of appropriate controls as detailed in this condition.	Compliant

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No.	Consent Condition	Compliance Assessment - 2015-2018 Audit	Finding
3.8(a)	Be consistent with the requirements in Managing Urban Stormwater: Soils and Construction, Volume 1, 4th Edition, 2004 (Landcom).		Compliant
3.8(b)	Identify construction and operational activities that could cause soil erosion and generate sediment.		Compliant
3.8(c)	Describe measures to minimise soil erosion and the potential for the transport of sediment to downstream waters.		Compliant
3.8(d)	Describe the location, function, and capacity of erosion and sediment control structures for both construction and operation.		Compliant
3.8(e)	Describe what measures would be implemented to maintain the structures over time.		Compliant
3.8(f)	Describe the procedures that would be followed for planned and unplanned water discharges from the site. 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.		Compliant
WASTE MANAGEMENT			
3.9	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 produced water and noted that the waste was appropriately classified. It is noted that a waste audit was not within the scope of this independent audit.	Compliant
HAZARDS AND RISK			
Safety and Risk Management			
3.10	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. 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.	The Auditor sighted the Emergency Response Plan (June 2018) and Safety Management Plan (May 2018) noted compliance with the requirements of this condition. The Plan notes that earlier revisions were provided to the then Department of Infrastructure Planning and Natural Resources.	Compliant

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No.	Consent Condition	Compliance Assessment - 2015-2018 Audit	Finding
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 Emergency Response Plan (June 2018) and Safety Management Plan (May 2018) and noted compliance with the requirements of this condition. Implementation was demonstrated through the following documents/systems: 1. Induction program (Rapid Induct); 2. Audit program and sample of completed audits; 3. Audit Actions Tracker; and 4. Standard methodologies for common works (e.g. confined space).	Compliant
3.11 (a)	Cover all operations on the wells and gas gathering system	The Emergency Response Plan (June 2018) applies to the whole of the Camden Gas Project.	Compliant
3.11 (b)	Clearly specify all safety related procedures, responsibilities and policies, along with details of mechanisms for ensuring adherence to procedures;	The Emergency Response Plan (June 2018) satisfies these requirements.	Compliant
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; and	Condition closed in a previous audit. AGL advised that there were no connections of new gas lines or new gas wells during the audit period.	Not Triggered
	Compliance Report		
3.12	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:	Condition closed in a previous audit.	Not Triggered
3.12 (a)	Dates of commencement of construction and commissioning.		Not Triggered
3.12 (b)	Actions taken (or proposed to be taken) to implement conditions 10 and 11.		Not Triggered

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No.	Consent Condition	Compliance Assessment - 2015-2018 Audit	Finding
3.12 (c)	A signed statement that: i the Emergency Plan required under condition 10 is effectively in place and that at least one emergency exercise has been conducted; i the SMS required under condition 11 has been fully implemented and that records required by the system are being kept; i the Emergency Plan and SMS have been prepared in accordance with the relevant Hazardous Industry Planning Advisory Paper; i all recommendations of the Emergency Plan and SMS have been implemented and are being maintained; and i all safety management systems and their associated risk controls have been implemented and are being maintained.	Condition closed in a previous audit.	Not Triggered
ABORIGINAL HERITAGE			
3.13	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 Camden Gas Project Aboriginal Cultural Heritage Management Plan (updated December 2013). The Plan includes documented consultation with the Tharawal Local Aboriginal Land Council and the Cubbitch Barta Native Title Claimants Aboriginal Corporation. The Plan states that it was prepared in consultation with the then Department of Environment and Climate Change and Water (DECCW). An earlier version of the Plan was submitted to the Director-General on 9 January 2007. There was no reported construction works associated with this development consent undertaken during the audit period.	Compliant
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.		Compliant
3.13 (b)	A description of the measures that would be implemented if any new Aboriginal objects are discovered during the project.		Compliant
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.		Compliant
ONGOING OPERATIONS			
Redrilling and Re-fracing			

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No.	Consent Condition	Compliance Assessment - 2015-2018 Audit	Finding
3.14	The Proponent shall obtain the prior approval of the Director-General prior to undertaking work involving the re-drilling and/or re-fracing of wells approved under this approval. Note: For the purposes of this approval the re-drilling and/or re fracing of a well does not constitute wellhead maintenance.	It was reported by AGL (AEPR 2016-2017 and AEPR 2017-2018) that there were no re-drilling or fracing activities during the audit period.	Not Triggered
	Gas Gathering System		
3.15	The Proponent shall, to the satisfaction of the Director-General, ensure that:	Condition closed in a previous audit. It is noted that there were no construction works undertaken during the audit period.	Not Triggered
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).	Condition closed in a previous audit. It is noted that there were no construction works undertaken during the audit period.	Not Triggered
3.15 (b)	The route of gas gathering and water transport systems and access roads follow previously or currently disturbed areas wherever possible.		Not Triggered
3.15 (c)	Trenches are not left open overnight, unless adequately covered.		Not Triggered
3.15 (d)	Routes of gas gathering and water transport lines are rehabilitated and reseeded with local grasses on completion of pipe laying.		Not Triggered
3.15 (e)	Works within 20 metres of watercourses are only undertaken during dry weather conditions.		Not Triggered
3.15 (f)	The pipeline crossing of Finns Road is located at a depth of at least 1.2 metres below the road surface.		Not Triggered
3.15 (g)	Construction activities do not impede lateral water flows.		Not Triggered
3.15 (h)	No crown or camber remains along any gas gathering system line, following rehabilitation.		Not Triggered
3.15 (i)	Signs are erected at intervals along all gas gathering system lines indicating the presence of a buried gas pipeline.		Not Triggered
	REHABILITATION		
3.16	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.	Not Triggered

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No.	Consent Condition	Compliance Assessment - 2015-2018 Audit	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 (June 2018) and noted compliance with the requirements of this condition.	Compliant
3.17 (a)	Identify the areas likely to be disturbed by the project.	It is noted that no rehabilitation works were required to be undertaken during the audit period.	Compliant
3.17 (b)	Describe the measures that would be implemented to rehabilitate the site.		Compliant
SCHEDULE 4 ENVIRONMENTAL MANAGEMENT AND MONITORING CONDITIONS			
OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN (OEMP)			
4.1	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 current version of the Environmental Management Plan (March 2018) and noted compliance with the requirements of this condition.	Compliant
4.1(a)	Incorporate the various environmental management plans, monitoring programs and other requirements set out in Schedule 3 of this approval.	A number of controls are in place to monitor and measure implementation of the EMP including Environmental Management Sub Plan Compliance Audits, Daily Workover Reports, air quality monitoring and noise monitoring. The auditor sighted a sample of monitoring controls and noted compliance with the requirements of the EMP. The auditor sighted correspondence demonstrating submission of the document to the DPE (17/04/2018).	Compliant
4.1(b)	Identify statutory and other obligations that the Proponent is required to fulfil during the operation of the project.		Compliant
4.1(c)	Describe the environmental policies and principles to be applied to the operation of the project.		Compliant
4.1(d)	Describe in general how the environmental performance of the project would be monitored and managed.		Compliant
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) 		Compliant
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		Compliant

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No.	Consent Condition	Compliance Assessment - 2015-2018 Audit	Finding
	updated version of the OEMP prepared under Schedule 5 condition 2 of development consent DA-282-6-2003;i, dated 16 June 2004.		
	INCIDENT REPORTING		
4.2	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 AEPRs for the audit period and noted there were no exceedances of goals limits or performance criteria in this audit period that may have threatened material harm.	Not Triggered
4.2(a)	Describe the date, time, and nature of the exceedance/incident.		Not Triggered
4.2(b)	Identify the cause (or likely cause) of the exceedance/incident;		Not Triggered
4.2(c)	Describe what action has been taken to date; and		Not Triggered
4.2(d)	Describe the proposed measures to address the exceedance/incident		Not Triggered
	ANNUAL REPORTING		
4.3	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 [sic] Director-General. The AEPR shall:	The auditor sighted the AEPRs for the audit period and noted compliance with the requirements of this condition.	Compliant
	a) Identify the standards, performance measures and statutory requirements that apply to the project;		Compliant
	b) Assess the environmental performance of the project to determine whether it is complying with these standards, performance measures, and statutory requirements;		Compliant
	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;		Compliant
	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;		Compliant
	e) Include a copy of complaints for the year and a description of actions taken or being taken to address registered complaints;		Compliant

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No.	Consent Condition	Compliance Assessment - 2015-2018 Audit	Finding
	f) Include a discussion of issues or recommendations raised by the Camden gas Project's Community Consultative Committee and a description of actions taken or being taken to address these issues or recommendations; and		Compliant
	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		Compliant
	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.		Compliant
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 (2016/2017 and 2017/2018) to the following agencies: DPE, EPA, DPI, Campbelltown City Council, Camden Council and Wollondilly Council. A copy of each AEPR is available on the CGP website.	Compliant
	INDEPENDENT ENVIRONMENTAL AUDIT		
4.5	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 and completion of both the 2012-2015 IEA, and the current IEA satisfy this condition.	Compliant
4.5(a)	Be conducted by a suitably qualified, experienced, and independent person(s) whose appointment has been approved by the Director-General.		Compliant
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.		Compliant
4.5(c)	Assess the environmental performance of the project, and its effects on the surrounding environment.		Compliant

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No.	Consent Condition	Compliance Assessment - 2015-2018 Audit	Finding
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 following documents demonstrating compliance with the requirements of this condition:</p> <ol style="list-style-type: none"> 1. 'Report of the 2016 Hazard Audit of the Camden Gas Project Operated by AGL Upstream Investments Pty Ltd', Planager, 10/06/16. 2. Correspondence from the DPE noting approval of Ms Karin Nilsson of Planager Pty Ltd to undertake the independent hazard audit. 3. Correspondence from AGL to the DPE enclosing the independent hazard audit (22/06/16). <p>AGL have advised that Pinnacle Risk Management has been engaged to conduct the 2019 hazard audit and work commenced on 12/11/2018.</p>	Compliant
4.5(e)	Assess whether the project is complying with the relevant standards, performance measures, and statutory requirements.	The scope and conduct of this 2012-2015 IEA satisfies this condition.	Compliant
4.5(f)	Review the adequacy of the OEMP.		Compliant
4.5(g)	<p>Recommend measures or actions to improve the environmental performance of the project, and/or its environmental management and monitoring systems.</p> <p>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.</p>		Compliant
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 2012-2015 Independent Environmental Audit was finalised on 4 December 2015. The report was submitted to the DPE, DPI and EPA on 14/12/2016 which was within one month of completion.	Compliant
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.	The last IEA pertaining to this approval was completed by Golder Associates (December 4, 2015). The auditor sighted email correspondence to the DPE (25/05/2016) with the revised EMP attached, demonstrating compliance to this requirement. A 'non-compliance Level 2' was reported against this condition in the previous audit. The auditor recommended that the Environmental Management Plan be revised and submitted to the DPE within six months of the audit. AGL has demonstrated compliance with this requirement.	Compliant
COMMUNITY CONSULTATIVE COMMITTEE			

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No.	Consent Condition	Compliance Assessment - 2015-2018 Audit	Finding
4.8	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;l, dated 16 June 2004.	The auditor sighted relevant documentation including meeting minutes and verified compliance with the requirements of this condition.	Compliant
ACCESS TO INFORMATION			
4.9	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 compliance with the requirements of this condition.	Compliant
4.9(a)	All current environmental management plans, strategies and programs.		Compliant
4.9(b)	All Independent Environmental Audits.		Compliant
4.9(c)	All AEPRs.		Compliant
4.9(d)	A summary of all environmental monitoring results required under this consent (to be updated at least every 6 months).		Compliant

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No.	Consent Condition	Compliance Assessment	Finding
	SCHEDULE 2 ADMINISTRATIVE CONDITIONS		
	Obligation to Minimise Harm to the Environment		
2.10	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 EMS has been developed and implemented to manage environmental risks and achieve performance improvements. The EMS consists of an EMP, Sub Plans and a compliance management system.</p> <p>A number of controls are in place to monitor and measure implementation of the EMS including Environmental Management Sub Plan Compliance Audits, Daily Workover Reports, air quality monitoring and noise monitoring. The auditor sighted a sample of monitoring controls and noted compliance with the requirements of the EMP.</p> <p>Compliance obligations arising from licences, leases, environmental/ planning approvals and legislation are monitored through a web-based database compliance management system (CMO Compliance). The auditor sighted CMO Compliance and determined that the tool effectively monitors compliance against obligations.</p>	Compliant
	Terms of Approval		
2.20	The Proponent shall carry out the project generally in accordance with the:	<p>It was reported by AGL that the development is undertaken in accordance with the EMP and Sub Plans which reflect the requirements of the Consent Conditions. On receipt of an approved consent or modification, the EMP is reported to be revised to reflect the new requirements. This was evidenced by the frequent revision history of the document.</p> <p>A 'compliance-improvement recommended' was reported against this condition in the previous audit. The auditor recommended that a copy of each of the source documents listed under this Condition were made available for reference within AGL's compliance register (CMO-Compliance). The auditor sighted CMO and verified that the source documents are now available.</p>	Compliant
2.2(a)	Project Application 06_0138.		Compliant
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 Envirosiences Pty Ltd.		Compliant
2.2(c)	EM32 and EM34 Additional Noise Assessment contained in a letter from AGL to the Department, dated 26 September 2006.		Compliant
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.		Compliant
2.2(e)	Raptor breeding seasons and revised Statement of Commitments contained in a letter from AGL to the Department, dated 4 December 2006.		Compliant
2.2(f)	Modification application (06_0138 Mod 1) titled EM37 Well Modification Project Environmental Assessment, dated 21 March 2007.		Compliant
2.2(g)	Letter concerning E\$M32 from AGL Gas Production (Camden) Pty Limited to the Department, dated 31 May 2007.		Compliant

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No.	Consent Condition	Compliance Assessment	Finding
2.2(h)	Conditions of this approval.		Note
2.30	If there is any inconsistency between the above documents, the latter document shall prevail over the former to the extent of the inconsistency. However, the conditions of this consent shall prevail over all other documents to the extent of any inconsistency.	Condition is noted.	Note
2.40	The Proponent shall comply with any reasonable requirement/s of the Director; General arising from the Department's assessment of:	Condition was not triggered during the audit period.	Not Triggered
2.4(a)	Any reports, plans, programs or correspondence that are submitted in accordance with this approval.	Condition was not triggered during the audit period.	Not Triggered
2.4(b)	The implementation of any actions or measures contained in these reports, plans, programs or correspondence.	Condition was not triggered during the audit period.	Not Triggered
	Limits on Approval		
2.50	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.	Not Triggered
2.60	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 (AEPR 2015-16, AEPR 2016-17, AEPR 2018-18).	Compliant
2.70	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.	As reported by AGL in Appendix B of the AEPR 2017-18, there are a number of wells under this approval that were never drilled. A 'compliance-improvement recommended' was reported against this condition in the previous audit. The auditor recommended that AGL confirm the required process for surrendering approvals with the DPE. Correspondence was signed from AGL to the DPE on 12/04/2016 noting the surrender of wells that have not been drilled to date. The correspondence adequately addresses the recommended action.	Compliant
	Notification of Council		
2.80	Within 3 months of the commissioning of the wells, the Proponent shall provide Council with:	Condition closed in a previous audit.	Not Triggered
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.	Condition closed in a previous audit.	Not Triggered
2.8(b)	The wellhead configuration of each well.	Condition closed in a previous audit.	Not Triggered

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No.	Consent Condition	Compliance Assessment	Finding
	Operation of Plant and Equipment		
2.90	The Proponent shall ensure that all plant and equipment used at the site is:	The auditor sighted the following systems and documents demonstrating compliance with the requirements of this condition: 1. Preventative Maintenance - The preventative maintenance of plant and equipment is managed through the MEX system. The system effectively monitors maintenance requirements based on the use of plant and equipment. The auditor sighted the Weekly Maintenance Progress Dashboard and the Monthly Maintenance Planning Dashboard and noted a high level of compliance to program requirements. 2. Monitoring - Daily and weekly documented checks are undertaken of vehicles. 3. Procedures - Standard Operating Procedures have been developed to guide commonly undertaken activities. 4. Leak Detection and Repair Program - Refer to EPL 12003.	Compliant
2.9(a)	Maintained in a proper and efficient condition.		Compliant
2.9(b)	Operated in a proper and efficient condition.		Compliant
	SCHEDULE 3 ENVIRONMENTAL PERFORMANCE CONDITIONS		
	NOISE		
	Construction and Maintenance Hours		

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No.	Consent Condition	Compliance Assessment	Finding																	
3.10	<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" data-bbox="322 451 1099 679"> <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>Notes:</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 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. 	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 (June 2017) and noted compliance with the requirements of this condition. Construction and maintenance hours are communicated to employees and contractors through the role-specific induction program.</p>	Compliant
Activity	Day	Time																		
Construction	Monday – Friday	7:00am to 6:00pm																		
	Saturday	8:00am to 1:00pm																		
	Sunday and Public Holidays	Nil																		
Planned maintenance activities	Monday – Friday	7:00am to 6:00pm																		
	Saturday	8:00am to 1:00pm																		
	Sunday and Public Holidays	Nil (unless inaudible at any residential receiver)																		
	Construction Noise Goals																			
3.20	<p>The Proponent shall use its best endeavours to undertake construction activities to comply with the construction noise goals specified in Table 2. Table 2: Construction Noise Goals dB(A) LA10(15 min)</p> <table border="1" data-bbox="322 1110 1106 1182"> <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>Note: See notes to condition 4.</p>	Location	Day	Evening	Night	Any residential receiver	54	39	35	<p>The auditor sighted the Noise Management Sub-Plan (June 2017) and noted compliance 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.</p>	Compliance									
Location	Day	Evening	Night																	
Any residential receiver	54	39	35																	
	Construction Noise Management Plan																			

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No.	Consent Condition	Compliance Assessment	Finding
3.30	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:	Condition closed in a previous audit.	Not Triggered
3.3(a)	A detailed description of the measures that would be implemented to achieve the construction noise goals in condition 2.	The auditor sighted the Noise Management Sub-Plan (June 2017) and noted compliance with the requirements of this condition.	Compliant
3.3(b)	A community notification protocol for the proposed construction activities (including any redrilling or re-fracing of wells).		Compliant
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.		Compliant
3.3(d)	Details of who would be responsible for monitoring, reviewing and implementing the plan.		Compliant
	Operational Noise Criteria		

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No.	Consent Condition	Compliance Assessment	Finding															
3.40	<p>The Proponent shall ensure that the noise generated by the project does not exceed the noise impact assessment criteria in Table 3. Table 3: Noise Impact Assessment Criteria dB(A)</p> <table border="1" data-bbox="331 440 1093 528"> <thead> <tr> <th data-bbox="331 440 546 467">Location</th> <th data-bbox="546 440 685 467">Day</th> <th data-bbox="685 440 824 467">Evening</th> <th colspan="2" data-bbox="824 440 1093 467">Night</th> </tr> <tr> <td></td> <th data-bbox="546 467 685 494"><i>L_{Aeq}(15 minute)</i></th> <th data-bbox="685 467 824 494"><i>L_{Aeq}(15 minute)</i></th> <th data-bbox="824 467 940 494"><i>L_{Aeq}(15 minute)</i></th> <th data-bbox="940 467 1093 494"><i>L_{A1}(1 minute)</i></th> </tr> </thead> <tbody> <tr> <td data-bbox="331 494 546 528">Any residential receiver</td> <td data-bbox="546 494 685 528">39</td> <td data-bbox="685 494 824 528">39</td> <td data-bbox="824 494 940 528">35</td> <td data-bbox="940 494 1093 528">45</td> </tr> </tbody> </table> <p>Notes:</p> <ul style="list-style-type: none"> ı Noise from the site is to be measured at the most affected point within the residential boundary, at the most affected point within 30 metre 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. ı 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. ı 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). ı The modification factors presented in Section 4 of the NSW Industrial Noise Policy shall also be applied to the measured noise level where applicable. ı The identified noise emission limits apply under meteorological conditions of wind speed up to 3m/s at 10 metres above ground level, and temperature inversion conditions. 	Location	Day	Evening	Night			<i>L_{Aeq}(15 minute)</i>	<i>L_{Aeq}(15 minute)</i>	<i>L_{Aeq}(15 minute)</i>	<i>L_{A1}(1 minute)</i>	Any residential receiver	39	39	35	45	<p>The auditor sighted the Noise Management Sub-Plan (June 2017) and noted the inclusion of this condition and appropriate controls to minimise noise. The Sub-Plan noted that monitoring should be carried out within the first week of production, after three months of production and if the well status changes.</p> <p>The auditor conducted a review of the Annual Environmental Performance Reports for the audit period and noted that there were no new activities undertaken at the PA06_0138 well sites. As such, the monitoring requirements were not triggered.</p>	Compliant
Location	Day	Evening	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														
	Continuous Improvement																	
3.50	The Proponent shall, to the satisfaction of the Director-General	The auditor sighted the Noise Management Sub Plan (June 2017) and noted the inclusion of noise mitigation measures.	Compliant															
3.5(a)	Implement all reasonable and feasible best practice noise mitigation measures.		Compliant															
3.5(b)	Investigate ways to reduce the noise generated by the project.		Compliant															
3.5(c)	Report on these investigations and the implementation and effectiveness of these measures in the AEPR.		No noise complaints were generated during the audit period.	Compliant														
	Noise Monitoring Program																	

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No.	Consent Condition	Compliance Assessment	Finding
3.60	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.	The auditor sighted the Noise Management Sub Plan (June 2017) and noted the inclusion of a noise monitoring program.	Compliant
AIR QUALITY			
3.70	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.	It was noted by the auditor that a number of dust mitigation measures are detailed in the Air Quality Management Sub-Plan (June 2018). There were no dust complaints associated with this development consent during the audit period.	Compliant
SURFACE WATER			
3.80	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:	The auditor sighted the Soil and Water Management Sub-Plan (June 2018) and noted the inclusion of appropriate controls as detailed in this condition. Implementation was demonstrated through the Environmental Management Sub Plan Compliance Audits and periodic inspections.	Compliant
3.8(a)	Be consistent with the requirements in Managing Urban Stormwater: Soils and Construction, Volume 1, 4th Edition, 2004 (Landcom).		Compliant
3.8(b)	Identify construction and operational activities that could cause soil erosion and generate sediment.		Compliant
3.8(c)	Describe measures to minimise soil erosion and the potential for the transport of sediment to downstream waters.		Compliant
3.8(d)	Describe the location, function, and capacity of erosion and sediment control structures for both construction and operation.		Compliant
3.8(e)	Describe what measures would be implemented to maintain the structures over time.		Compliant
3.8(f)	Describe the procedures that would be followed for planned and unplanned water discharges from the site. 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 4 of development consent DA 282 6 2003i, dated 16 June 2004.		Compliant
FLOOD MANAGEMENT			

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No.	Consent Condition	Compliance Assessment	Finding
3.90	<p>The Proponent shall prepare and implement a Flood Management Plan for wells EM34 and EM35 located within the 1 in 100 year flood level, to the satisfaction of the Director-General. The plan shall be submitted to the Director-General prior to commissioning of wells EM34 and EM35, and shall include measures to minimise and mitigate flooding impacts associated with the project.</p> <p>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.</p>	<p>The auditor sighted the Field Production and Flood and Management Procedure (8 May 2017) and noted the inclusion of controls to minimise and mitigate flooding impacts.</p> <p>It was reported that an earlier version of the plan was submitted prior to commissioning of the wells subject to this approval. However, this documentation is no longer available and the submission occurred outside of this audit period.</p>	Compliant
	WASTE MANAGEMENT		
3.10	<p>The Proponent shall ensure that any waste or wastewater is assessed and classified in accordance with the DEC's Environmental Guidelines: Assessment Classification and Management of Liquid and Non-Liquid Wastes, and disposed of at a licensed waste disposal facility or as otherwise agreed with the DEC.</p>	<p>It was reported that the waste service provider undertakes waste classification. The auditor sighted a sample of waste disposal dockets for produced water and noted that the waste appropriately classified.</p> <p>It is noted that a waste audit was not within the scope of this independent audit.</p>	Compliant
	HAZARDS AND RISK		
	Safety and Risk Management		
3.11	<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 for the project and shall be prepared in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 1 – Industry Emergency Planning Guidelines.</p> <p>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.</p>	<p>The Auditor sighted the Emergency Response Plan (June 2018) and Safety Management Plan (May 2018) noted compliance with the requirements of this condition.</p> <p>The Plan notes that earlier revisions were provided to the then Department of Infrastructure Planning and Natural Resources.</p>	Compliant

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No.	Consent Condition	Compliance Assessment	Finding
3.12	The Proponent shall prepare and implement a Safety Management System (SMS) for the project, to the satisfaction of the Director-General. The SMS shall be submitted to the Director-General prior to commissioning of the project and shall be prepared in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 9 - Safety Management. The SMS shall:	The Auditor sighted the Emergency Response Plan (June 2018) and Safety Management Plan (May 2018) and noted compliance with the requirements of this condition. Implementation was demonstrated through the following documents/systems: 1. Induction program (Rapid Induct); 2. Audit program; 3. Audit Actions Tracker; and 4. Standard methodologies for common works (e.g. confined space).	Compliant
3.12 (a)	Cover all operations on the wells and gas gathering system	The Emergency Response Plan (June 2018) applies to the entirety of the Camden Gas Project.	Compliant
3.12 (b)	Clearly specify all safety related procedures, responsibilities and policies, along with details of mechanisms for ensuring adherence to procedures	The Emergency Response Plan (June 2018) satisfies these requirements.	Compliant
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	Condition closed in a previous audit. AGL advised that there were no connections of new gas lines or new gas wells during the audit period.	Compliant
3.12 (d)	Confirm that the design and operation of all wellheads comply with the Department's Locational Guidelines - Development in the Vicinity of Operating Coal Seam Methane Wells (May 2004) for an Automatically Controlled Well (with Separator/Optional Pump) and that all safety related systems required by the guidelines have been included. 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.	The Auditor sighted the Safety Management Plan (May 2018) noted compliance with the requirements of this condition.	Compliant
	Compliance Report		
3.13	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:	Condition closed in previous audit	Not Triggered
3.13 (a)	Dates of commencement of construction and commissioning.		Not Triggered
3.13 (b)	Actions taken (or proposed to be taken) to implement conditions 11 and 12.		Not Triggered

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No.	Consent Condition	Compliance Assessment	Finding
3.13 (c)	<p>A signed statement that:</p> <ul style="list-style-type: none"> i the Emergency Plan required under condition 11 is effectively in place and that at least one emergency exercise has been conducted; i the SMS required under condition 12 has been fully implemented and that records required by the system are being kept; i the Emergency Plan and SMS have been prepared in accordance with the relevant Hazardous Industry Planning Advisory Paper; i all recommendations of the Emergency Plan and SMS have been implemented and are being maintained; and i all safety management systems and their associated risk controls have been implemented and are being maintained. 		Not Triggered
	FLORA AND FAUNA		
3.14	<p>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.</p>	Condition was not activated during the audit period.	Not Triggered
	ABORIGINAL HERITAGE		
3.15	<p>The Proponent shall prepare and implement an Aboriginal Heritage Management Plan for the project, in consultation with the DEC and relevant Aboriginal communities, and to the satisfaction of the Director-General. The plan shall be submitted to the Director-General prior to commencing construction (or as otherwise agreed by the Director-General) and shall include:</p>	<p>The auditor sighted the Camden Gas Project Aboriginal Cultural Heritage Management Plan (updated December 2013). The Plan includes documented consultation with the Tharawal Local Aboriginal Land Council and the Cubbitch Barta Native Title Claimants Aboriginal Corporation. The Plan states that it was prepared in consultation with the then Department of Environment and Climate Change and Water (DECCW). An earlier version of the Plan was submitted to the Director-General on 9 January 2007.</p>	Compliant
3.15 (a)	<p>A description of the measures that would be implemented for the mapping, and salvage or relocation of the archaeological relics on EMAI Sites 1, 2 4, 5, 6, and 7; CP OS 3; and IF 1 and IF 2.</p>	<p>There was no reported construction works associated with this development consent undertaken during the audit period.</p>	Compliant
3.15 (b)	<p>A description of the measures that would be implemented if any new Aboriginal objects are discovered during the project.</p>		Compliant

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No.	Consent Condition	Compliance Assessment	Finding
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.		Compliant
	ONGOING OPERATIONS		
	Redrilling and Re-fracing		
3.16	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. Note: For the purposes of this approval the redrilling and/or re-fracing of a well does not constitute wellhead maintenance.	It was reported by AGL (AEPRs for the reporting period) that there were no re-drilling or fracing activities during the audit period.	Not Triggered
	Gas Gathering System		
3.17	The Proponent shall, to the satisfaction of the Director-General, ensure that:	The auditor sighted the EMP and relevant Sub Plans and noted inclusion of the requirements of this condition. It is noted that there were no reported construction works undertaken during the audit period.	Not Triggered
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).		Not Triggered
3.17 (b)	The route of gas gathering and water transport systems and access roads follow previously or currently disturbed areas wherever possible.		Not Triggered
3.17 (c)	Trenches are not left open overnight, unless adequately covered.		Not Triggered
3.17 (d)	Works within 20 metres of watercourses are only undertaken during dry weather conditions.		Not Triggered
3.17 (e)	The pipeline crossing of Remembrance Drive is located at a depth of at least 1.2 metres below the road surface.		Not Triggered
3.17 (f)	Construction activities do not impede lateral water flows.		Not Triggered
3.17 (g)	No crown or camber remains along any gas gathering system line, following rehabilitation.		Not Triggered

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No.	Consent Condition	Compliance Assessment	Finding
3.17 (h)	Signs are erected at intervals along all gas gathering system lines indicating the presence of a buried gas pipeline.		Not Triggered
	REHABILITATION		
3.18	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. It is noted that the rehabilitation of EM23 was conducted prior to the audit period; quarterly monitoring continued during the current audit period.	Compliant
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 (June 2018) and noted compliance with the requirements of this condition.	Compliant
3.19 (a)	Identify the areas likely to be disturbed by the project.	It is noted that no rehabilitation works were required to be undertaken during the audit period.	Compliant
3.19 (b)	Describe the measures that would be implemented to rehabilitate the site.		Compliant
	SCHEDULE 4 ENVIRONMENTAL MANAGEMENT AND MONITORING CONDITIONS		
	OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN (OEMP)		
4.10	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 current version of the Environmental Management Plan (March 2018) and noted compliance with the requirements of this condition.	Compliant
4.1(a)	Incorporate the various environmental management plans, monitoring programs and other requirements set out in Schedule 3 of this approval.	A number of controls are in place to monitor and measure implementation of the EMS including Environmental Management Sub Plan Compliance Audits, Daily Workover Reports, air quality monitoring and noise monitoring. The auditor sighted a sample of monitoring controls and noted compliance with the requirements of the EMP.	Compliant
4.1(b)	Identify statutory and other obligations that the Proponent is required to fulfil during the operation of the project.		Compliant
4.1(c)	Describe the environmental policies and principles to be applied to the operation of the project.		Compliant
4.1(d)	Describe in general how the environmental performance of the project would be monitored and managed.	The auditor sighted correspondence demonstrating submission of the document to the DPE (17/04/2018).	Compliant

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No.	Consent Condition	Compliance Assessment	Finding
4.1(e)	Describe the procedures that would be implemented to: i keep the local community and relevant agencies informed about the environmental performance of the project; i receive, handle, respond to, and record complaints; i resolve any disputes that may arise during the course of the project; i respond to any non-compliance; i manage cumulative impacts; and i respond to emergencies (including bushfires).		Compliant
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.		Compliant
INCIDENT REPORTING			
4.20	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 AEPRs for the audit period (2015-2016, 2016-2017 and 2017-2018) and noted there were no exceedances of goals, limits or performance criteria in this audit period that may have threatened material harm.	Not Triggered
4.2(a)	Describe the date, time, and nature of the exceedance/incident.		Not Triggered
4.2(b)	Identify the cause (or likely cause) of the exceedance/incident.		Not Triggered
4.2(c)	Describe what action has been taken to date.		Not Triggered
4.2(d)	Describe the proposed measures to address the exceedance/incident.		Not Triggered
ANNUAL REPORTING			
4.30	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 AEPRs for 2015-2016, 2016-2017 and 2017-2018 and noted compliance with the requirements of this condition.	Compliant
4.3(a)	Identify the standards, performance measures and statutory requirements that apply to the project.		Compliant
4.3(b)	Assess the environmental performance of the project to determine whether it is complying with these standards, performance measures, and statutory requirements.		Compliant

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No.	Consent Condition	Compliance Assessment	Finding
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.		Compliant
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.		Compliant
4.3(e)	Include a copy of complaints for the year and a description of actions taken or being taken to address registered complaints.		Compliant
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.		Compliant
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.		Compliant
4.40	The Proponent shall submit a copy of the AEPR to the DPI, DEC and Council.	The auditor sighted evidence of submission of the AEPR (2015/2016, 2016/2017 and 2017/2018) to the following agencies: DPE, EPA, DPI, Campbelltown City Council, Camden Council and Wollondilly Council. A copy of each AEPR is available on the CGP website.	Compliant
INDEPENDENT ENVIRONMENTAL AUDIT			
4.50	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 and conduct of this 2015-2018 Independent Environmental Audit satisfies this condition.	Compliant
4.5(a)	Be conducted by a suitably qualified, experienced, and independent person(s) whose appointment has been approved by the Director-General.		Compliant
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.		Compliant
4.5(c)	Assess the environmental performance of the project, and its effects on the surrounding environment.		Compliant

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No.	Consent Condition	Compliance Assessment	Finding
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 following documents demonstrating compliance with the requirements of this condition:</p> <ol style="list-style-type: none"> 1. 'Report of the 2016 Hazard Audit of the Camden Gas Project Operated by AGL Upstream Investments Pty Ltd', Planager, 10/06/16. 2. Correspondence from the DPE noting approval of Ms Karin Nilsson of Planager Pty Ltd to undertake the independent hazard audit. 3. Correspondence from AGL to the DPE enclosing the independent hazard audit (22/06/16). <p>AGL have advised that Pinnacle Risk Management has been engaged to conduct the 2019 hazard audit and work commenced on 12/11/2018.</p>	Compliant
4.5(e)	Assess whether the project is complying with the relevant standards, performance measures and statutory requirements.	The scope and conduct of this 2015-2018 IEA satisfies this condition.	Compliant
4.5(f)	Review the adequacy of the OEMP.		Compliant
4.5(g)	<p>Recommend measures or actions to improve the environmental performance of the project, and/or its environmental management and monitoring systems.</p> <p>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.</p>		Compliant
4.60	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 2012-2015 IEA was finalised on 4 December 2015 and submitted to the Director-General of the NSW Department of Planning and Infrastructure on 14 December 2015 (within one month of completion).	Compliant
4.70	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>The previous IEA pertaining to this approval was completed by Golder Associates (December 4, 2015). The auditor sighted an email to the DPE dated 25 May 2016 with the revised EMP attached, demonstrating compliance to this requirement.</p> <p>A 'non-compliance Level 2' was reported against this condition in the previous audit. The auditor recommended that the Environmental Management Plan be revised and submitted to the DPE within six months of the audit. AGL has demonstrated compliance with this requirement.</p>	Compliant
COMMUNITY CONSULTATIVE COMMITTEE			

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No.	Consent Condition	Compliance Assessment		Finding
4.80	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 sighted relevant documentation including meeting minutes and verified compliance with the requirements of this condition.		Compliant
ACCESS TO INFORMATION				
4.90	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 compliance with the requirements of this condition.		Compliant
4.9(a)	OEMP.			Compliant
4.9(a)	All Independent Environmental Audits.			Compliant
4.9(a)	All AEPRs.			Compliant
4.9(a)	A summary of all environmental monitoring results required under this consent (to be updated at least every 6 months).			Compliant

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No.	Consent Condition	Compliance Assessment	Finding
	SCHEDULE 2 ADMINISTRATIVE		
	Obligation to Minimise Harm to the Environment		
2.1	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 EMS has been developed and implemented to manage environmental risks and achieve performance improvements. The EMS consists of an EMP, Sub Plans and a compliance management system.</p> <p>A number of controls are in place to monitor and measure implementation of the EMS including Environmental Management Sub Plan Compliance Audits, Daily Workover Reports, air quality monitoring and noise monitoring. The auditor sighted a sample of monitoring controls and noted compliance with the requirements of the EMP.</p> <p>Compliance obligations arising from licences, leases, environmental/ planning approvals and legislation are monitored through a web-based database compliance management system (CMO Compliance). The auditor sighted CMO Compliance and determined that the tool effectively monitors compliance against obligations.</p>	Compliant
	Terms of Approval		
2.2	The Proponent shall carry out the project generally in accordance with the:	<p>It was reported by AGL that the development is undertaken in accordance with the EMP and Sub Plans which reflect the requirements of the Consent Conditions. On receipt of an approved consent or modification, the EMP is reported to be revised to reflect the new requirements. This was evidenced by the frequent revision history of the document.</p> <p>A 'compliance-improvement recommended' was reported against this condition in the previous audit. The auditor recommended that a copy of each of the source documents listed under this Condition were made available for reference within AGL's compliance register (CMO-Compliance). The auditor sighted CMO and verified that the source documents are now available.</p>	Compliant
2.2(a)	Project Application 06-0291.		Compliant
2.2(b)	EA titled <i>Environmental Assessment of Expansion of Stage 2 of the Camden Gas Project Stage 2 Concept Area Spring Farm Project Area Menangle Park Project Area</i> , Volume 1 and 2 prepared by ENSR Australia Pty Ltd and dated December 2007.		Compliant
2.2(c)	Submissions Report prepared by ENSR Australia Pty Ltd, and dated December 2007.		Compliant
2.2(d)	Statement of Commitments.		Compliant
2.2(e)	EA titled <i>Spring Farm and Menangle Park Gas Gathering System Modifications - Gas gathering line MP06 to MP11 and MP11 to MP23 (via MP19)</i> prepared by AGL Gas Production (Camden) Pty Ltd, and dated December 2010.	Compliant	

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No.	Consent Condition	Compliance Assessment	Finding
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.		Compliant
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.		Compliant
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.		Compliant
2.2(i)	Conditions of this approval.		Compliant
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.	Not Triggered
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.	Condition was not triggered during the audit period.	Not Triggered
2.4	The Proponent shall comply with any reasonable requirements of the Director; General arising from the Department's assessment of:	Condition was not triggered during the audit period.	Not Triggered
2.4(a)	Any reports, plans, programs or correspondence that are submitted in accordance with this approval.		Not Triggered
2.4(b)	The implementation of any actions or measures contained in these reports, plans, programs or correspondence.		Not Triggered
Limits on Approval			
2.5	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.	Not Triggered
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 were drilled or operated during the audit period.	Compliant

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No.	Consent Condition	Compliance Assessment	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 gas wells and noted that well surface location SF04 was not drilled. No wells were drilled during the audit period.	Not Triggered
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.	Condition closed in previous audit.	Not Triggered
2.9	The Proponent shall not drill more than 6 co-located wells within each well surface location.	There were no reported wells were drilled during the audit period.	Not Triggered
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.	<p>It is noted that the approval has lapsed for any well that has not been drilled and as such, the approval must be surrendered for the nominated wells.</p> <p>A 'compliance-improvement recommended' was reported against this condition in the previous audit. The auditor recommended that AGL confirm the required process for surrendering approvals with the Department of Planning & Environment.</p> <p>While it is acknowledged that the Petroleum Operations Plan states that AGL has no current plans to undertake any further drilling or development, the recommendation of the 2012-2015 IEA was not adequately addressed.</p>	Observation
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.	Not Triggered
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.	Condition was not activated during the audit period.	Not Triggered
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.	Condition was not activated during the audit period.	Not Triggered
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.	Condition was not activated during the audit period.	Not Triggered

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No.	Consent Condition	Compliance Assessment	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.	Condition closed in previous audit.	Not Triggered
2.13	Within three months of commissioning the wells, the Proponent shall provide Camden Council and Campbelltown City Council with:	Condition closed in previous audit.	Not Triggered
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.	Condition closed in previous audit.	Not Triggered
2.13 (b)	The wellhead configuration of each well. The Proponent shall provide a copy of this information to the landowner on request.	Condition closed in previous audit.	Not Triggered
Protection of Public Infrastructure			
2.14	The Proponent shall:	There was no report of damage to public infrastructure as a result of operations during the audit period.	Compliant
2.14 (a)	Repair, or pay all reasonable costs associated with repairing public infrastructure that is damaged by the project.		Compliant
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.		Compliant
	Where agreement is not reached with the owner on the cost of repairs, the Director; General shall determine the amount considered reasonable.		Compliant
Operation of Plant and Equipment			
2.15	The Proponent shall ensure that all plant and equipment used at the site is:	The auditor sighted the following systems and documents demonstrating compliance with the requirements of this condition: 1. Preventative Maintenance - The preventative maintenance of plant and equipment is managed through the MEX system. The system	Compliant

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No.	Consent Condition	Compliance Assessment	Finding
2.15 (a)	Maintained in a proper and efficient condition.	effectively monitors maintenance requirements based on the use of plant and equipment. The auditor sighted the Weekly Maintenance Progress Dashboard and the Monthly Maintenance Planning Dashboard and noted a high level of compliance to program requirements. 2. Monitoring - Daily and weekly documented checks are undertaken of vehicles. 3. Procedures - Standard Operating Procedures have been developed to guide commonly undertaken activities. 4. Leak Detection and Repair Program - Refer to EPL 12003. A 'non-compliance Level 2' was reported against this condition in the previous audit. The auditor recommended that AL work with the EPA to complete all actions prescribed within the Penalty Infringement Notice. AGL has demonstrated compliance with this requirement.	Compliant
2.15 (b)	Operated in a proper and efficient condition.	No environmental complaints or incidents were reported during the audit period for sites subject to this approval as a result of operation of plant and equipment.	Compliant
	SCHEDULE 3		
	ENVIRONMENTAL PERFORMANCE		
	IDENTIFICATION OF WELL SURFACE LOCATION		
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:	Condition closed in a previous audit.	Not Triggered
3.1(a)	The site construction layout and construction footprint.		Not Triggered
3.1(b)	The wellheads and production compound layout.		Not Triggered
3.1(c)	The route of the gas gathering lines and access roads.		Not Triggered
3.1(d)	Initial rehabilitation works following construction.		Not Triggered
	NOISE		
	Construction and Maintenance Hours		

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No.	Consent Condition	Compliance Assessment	Finding																																																												
3.2	<p>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" data-bbox="338 408 1041 584"> <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>7:00 am to 6:00 pm</td> </tr> <tr> <td>Saturday</td> <td>8:00 am to 1:00 pm</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>7:00 am to 6:00 pm</td> </tr> <tr> <td>Saturday</td> <td>8:00 am to 1:00 pm</td> </tr> <tr> <td>Sunday and Public Holidays</td> <td>Nil (unless inaudible at any residential receiver)</td> </tr> </tbody> </table> <p>Notes:</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 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. 	Activity	Day	Time	Construction	Monday - Friday	7:00 am to 6:00 pm	Saturday	8:00 am to 1:00 pm	Sunday and Public Holidays	Nil	Planned maintenance activities (includes well workover)	Monday – Friday	7:00 am to 6:00 pm	Saturday	8:00 am to 1:00 pm	Sunday and Public Holidays	Nil (unless inaudible at any residential receiver)	<p>The auditor sighted the Noise Management Sub-Plan (June 2017) and noted compliance against the requirements of this condition. This condition is communicated to employees and contractors through the role-specific induction program.</p>	Compliant																																											
Activity	Day	Time																																																													
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Construction Noise Goals																																																															
3.3	<p>The Proponent shall use its best endeavours to undertake construction activities to comply with the construction noise goals specified in Table 2: Table 2: Construction Noise Goals dB(A) Laeq(15min).</p> <table border="1" data-bbox="338 1015 846 1302"> <thead> <tr> <th>Location</th> <th>Day</th> <th>Evening</th> <th>Night</th> <th>Saturday 1pm-6pm</th> <th>Sunday 7am-6pm</th> </tr> </thead> <tbody> <tr> <td>(nearest residential dwelling)</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>MP02, MP03, MP04</td> <td>49</td> <td>47</td> <td>41</td> <td>47</td> <td></td> </tr> <tr> <td>MP05, MP06</td> <td>40</td> <td>40</td> <td>40</td> <td>40</td> <td></td> </tr> <tr> <td>MP11, MP24, MP33</td> <td>42</td> <td>42</td> <td>40</td> <td>42</td> <td></td> </tr> <tr> <td>MP19, R3</td> <td>40</td> <td>40</td> <td>40</td> <td>40</td> <td></td> </tr> <tr> <td>MP19, R25</td> <td>49</td> <td>47</td> <td>41</td> <td>47</td> <td></td> </tr> <tr> <td>MP21, MP22, MP23</td> <td>49</td> <td>47</td> <td>41</td> <td>47</td> <td></td> </tr> <tr> <td>SF04A</td> <td>43</td> <td>42</td> <td>37</td> <td>42</td> <td></td> </tr> <tr> <td>SF10, SF17, SF20</td> <td>43</td> <td>41</td> <td>36</td> <td>43</td> <td></td> </tr> </tbody> </table>	Location	Day	Evening	Night	Saturday 1pm-6pm	Sunday 7am-6pm	(nearest residential dwelling)						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	40		MP19, R25	49	47	41	47		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 (June 2017) and noted compliance 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.</p>	Compliant
Location	Day	Evening	Night	Saturday 1pm-6pm	Sunday 7am-6pm																																																										
(nearest residential dwelling)																																																															
MP02, MP03, MP04	49	47	41	47																																																											
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Construction Noise Management Plan																																																															

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No.	Consent Condition	Compliance Assessment	Finding
3.4	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:	The auditor sighted the Noise Management Sub-Plan (June 2017). The requirement to submit the Director-General was closed in a previous audit.	Compliant
3.4(a)	A detailed description of the measure that would be implemented to achieve the construction noise goals in condition 3.	The auditor sighted the Noise Management Sub-Plan (June 2017) and noted compliance with the requirements of this condition.	Compliant
3.4(b)	A community notification protocol for the proposed construction activates (including any redrilling or re-fracking of wells.		Compliant
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.		Compliant
3.4(d)	Details of who would be responsible for monitoring, reviewing and implementing the plan.		Compliant
	Operational Noise Criteria		

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No.	Consent Condition	Compliance Assessment	Finding																												
3.5	<p>The proponent shall ensure that the noise generated by the project does not exceed the noise impact assessment criteria in Table 3: Table 3: Noise Impact Assessment Criteria dB(A)Laeq</p> <table border="1" data-bbox="331 435 943 735"> <thead> <tr> <th>Location</th> <th>Day</th> <th>Evening</th> <th>Night</th> </tr> </thead> <tbody> <tr> <td>(nearest residential dwelling)</td> <td>L_{Aeq}(15 minute)</td> <td>L_{Aeq}(15 minute)</td> <td>L_{Aeq}(15 minute)</td> </tr> <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> <p>Notes:</p> <ul style="list-style-type: none"> i 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. i 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). i The modification factors presented in Section 4 of the NSW Industrial Noise Policy shall also be applied to the measured noise level where applicable. i 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. i As the area develops the background noise may change. At that time it may be appropriate to review the intrusive noise criteria for the proposal. 	Location	Day	Evening	Night	(nearest residential dwelling)	L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	SF10	43	42	37	SF04A, SF17, SF20	43	41	36	MP05, MP06, MP11	40	40	40	MP19, MP21, MP24, MP33	42	42	40	MP02, MP03, MP04, MP22, MP23	49	45	40	<p>The auditor sighted the Noise Management Sub-Plan (June 2017) and noted the inclusion of this condition and appropriate controls to minimise noise.</p> <p>It is noted that the 2012-2015 IEA identified a 'non-compliance level 2' in relation to isolated exceedences of the noise impact assessment criteria. Follow up monitoring during the 2012-2015 IEA confirmed compliance with the approved noise limits.</p> <p>During the current audit period, there were no noise complaints and workover activities were limited to day time only.</p>	Compliant
Location	Day	Evening	Night																												
(nearest residential dwelling)	L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{Aeq} (15 minute)																												
SF10	43	42	37																												
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MP02, MP03, MP04, MP22, MP23	49	45	40																												
	Continuous Improvement																														
3.6	The Proponent shall, to the satisfaction of the Director-General:	The auditor sighted the Noise Management Sub Plan (June 2017) and noted the inclusion of noise mitigation measures.	Compliant																												
3.6(a)	Implement all reasonable and feasible best practice noise mitigation measures.		Compliant																												

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No.	Consent Condition	Compliance Assessment	Finding
3.6(b)	Investigate ways to reduce the noise generated by the project.	No noise complaints were generated during the audit period.	Compliant
3.6(c)	Report on these investigations and the implementation and effectiveness of these measures in the AEMR.		Compliant
Noise Monitoring Program			
3.7	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>The auditor sighted the Noise Management Sub Plan (June 2017) and noted the inclusion of a noise monitoring program.</p> <p>The Sub Plan notes that monitoring should be carried out within the first week of production, after three months of production and if the well status changes.</p> <p>During the audit period, the wells were in production phase for the majority of the time. Workover maintenance was conducted on the following well sites:</p> <p>2015/2016: SF02, SF05, SF09, and MP25. 2016/2017: MP02, MP10 and MP22. 2017/2018: MP08, MP10, MP22, MP23.</p> <p>Monitoring of nominated Spring Farm well sites (SF1, SF02, SF03, SF05, SF07, SF08 and SF09) was conducted on 2/03/2016 (Wilkinson Murray, 08/03/2016), 7/02/2018 and 15/02/2018 (Wilkinson Murray, 7/03/2018). Although compliance was demonstrated against the requirements of this condition during the wells production phase, it is noted that noise monitoring was not performed during workover activities.</p> <p>Based on the monitoring requirements of the Noise Management Sub Plan, monitoring was warranted during workover activities.</p>	Non-Compliant
AIR QUALITY			
3.8	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.	It was noted by the auditor that a number of dust mitigation measures are detailed in the Air Quality Management Sub-Plan (June 2018). There were no dust complaints associated with this development consent during the audit period.	Compliant
WATER			

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No.	Consent Condition	Compliance Assessment	Finding
	Soil and Water Management Plan		
3.9	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:	The auditor sighted the Soil and Water Management Sub-Plan (June 2018) and noted the inclusion of appropriate controls as detailed in this condition. Implementation of the Sub Plan was demonstrated through Environmental Management Sub Plan Compliance Audits and periodic inspections. .	Compliant
3.9(a)	Be consistent with the requirements in <i>Managing Urban Stormwater: Soils and Construction, Volume 1, 4th Edition, 2004</i> (Landcom).		Compliant
3.9(b)	Identify construction and operation activities that could cause soil erosion and generate sediment.		Compliant
3.9(c)	Describe measure to minimise soil erosion and the potential for the transport of sediment to downstream waters.		Compliant
3.9(d)	Describe the location, function, and capacity of erosion and sediment control structures for both construction and operation.		Compliant
3.9(e)	Describe what measures would be implemented to maintain the structures over time.		Compliant
3.9(f)	Describe the procedures that would be followed for planned and unplanned water discharges from the site.		Compliant
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:	This condition was closed out in a previous IEA. AGL advised there was no underboring conducted during the audit period.	Not Triggered
3.9A (a)	Must proceed at a reduced force or load if vibration levels exceed 2.4 millimetres per second (mm/s).		Not Triggered
3.9A (b)	Must halt if vibration levels exceed 3mm/s, except with the prior agreement of the Sydney Catchment Authority.		Not Triggered
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)		Not Triggered
	Gas Gathering System		
3.10	The Proponent shall, to the satisfaction of the Director-General, ensure that:	The auditor sighted the EMP and relevant Sub Plans and noted compliance with the requirements of this condition.	Compliant

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No.	Consent Condition	Compliance Assessment	Finding
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).	<p>The current Petroleum Operations Plan (POP) (Version 11.1, August 2018) specifies the requirements for design, construction and operation of the gas gathering line. The POP states that the gas gathering line will be designed, constructed and operated in accordance with the requirements of Australian Standard AS 4645.3:2008 Gas Distribution Networks Part 3: Plastics pipe systems.</p> <p>It is noted that AS 4645.3: 2008 has superseded AS 3723-1989, which is referenced in PA06_0291 Schedule 3 Condition 10(a).</p> <p>AGL advised no further pipelines were designed or constructed during the audit period.</p>	Compliant
3.10 (b)	The route of gas gathering and water transport systems and access roads follow previously or currently disturbed areas wherever possible.	Condition not triggered during the audit period.	Not Triggered
3.10 (c)	Trenches are not left open overnight, unless adequately covered.		Not Triggered
3.10 (d)	Works within 20 metres of watercourses are only undertaken during dry weather conditions.		Not Triggered
3.10 (e)	Construction activities do not impede lateral water flows.		Not Triggered
3.10 (f)	No crown or camber remains along any gas gathering system line, following rehabilitation.		Not Triggered
3.10 (g)	Signs are erected at intervals along all gas gathering system lines indicating the presence of a buried gas pipeline.	The auditor sighted signs along the route of the gas gathering line indicating the presence of a buried gas pipeline.	Compliant
3.10 (h)	Impacts to riparian vegetation and endangered ecological communities are minimised.	The auditor inspected nominated sections of the gas gathering line which indicated minimal impacts to riparian vegetation and ecological communities.	Compliant
3.10 (i)	Impacts to the Cumberland Land Snail (<i>Meridolum corneovirens</i>) are negligible.	This condition was part of a modification that was issued for the gas gathering line between MP06 to MP11 and MP11 to MP23 as per the inclusion of Condition 2 (e). This section of the gas gathering line was not constructed during the audit period and as such the condition was not triggered.	Not Triggered

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No.	Consent Condition	Compliance Assessment	Finding
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 triggered during the audit period.	Not Triggered
FLOOD MANAGEMENT			
3.12	The Proponent shall prepare and implement a Flood Management Plan for well surface location within the 1 in 100 year flood level, to the satisfaction of the Director-General. The plan shall be submitted to the Director-General prior to the commissioning of the wells and shall include measure to minimise and mitigate flooding impacts associated to one occasion.	<p>The auditor sighted the Field Production and Flood and Management Procedure (8 May 2017) and noted the inclusion of controls to minimise and mitigate flooding impacts.</p> <p>It was reported that an earlier version of the plan was submitted prior to commissioning of the wells subject to this approval. However, this documentation is no longer available and the submission occurred outside of this audit period.</p>	Compliant
WASTE MANAGEMENT			
3.13	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>It was reported that the waste service provider undertakes waste classification. The auditor sighted a sample of waste disposal dockets for produced water and noted that the waste appropriately classified.</p> <p>It is noted that a waste audit was not within the scope of this independent audit.</p>	Compliant
HAZARD AND RISK			
Safety and Risk Management			
3.14	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>The Auditor sighted the Emergency Response Plan (June 2018) and Safety Management Plan (May 2018) and noted compliance with the requirements of this condition.</p> <p>The Plan notes that earlier revisions were provided to the then Department of Infrastructure Planning and Natural Resources.</p>	Compliant

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No.	Consent Condition	Compliance Assessment	Finding
3.15	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:	The Auditor sighted the Emergency Response Plan (June 2018) and Safety Management Plan (May 2018) noted compliance with the requirements of this condition. The Plan notes that earlier revisions were provided to the then Department of Infrastructure Planning and Natural Resources.	Compliant
3.15 (a)	Cover all operations on the wells and gas gathering system	The Auditor sighted the Emergency Response Plan (June 2018) and Safety Management Plan (May 2018) and noted compliance with the requirements of this condition. Implementation was demonstrated through the following documents/systems: 1. Induction program (Rapid Induct); 2. Audit program; 3. Audit Actions Tracker; and 4. Standard methodologies for common works (e.g. confined space).	Compliant
3.15 (b)	Clearly specify all safety related procedures, responsibilities and policies, along with details of mechanisms for ensuring adherence to procedures;	The Emergency Response Plan (June 2018) applies to the entirety of the Camden Gas Project.	Compliant
3.15 (c)	Include a summary of records to demonstrate that management of change procedures were followed for the connection of new gas lines to the existing network and for the integration of new wells into the automatic control system; and	The Emergency Response Plan (June 2018) satisfies the requirements of this condition.	Not Triggered
3.15 (d)	Confirm that the design and operation of all wellheads comply with the Department's Locational Guidelines; Development in the Vicinity of Operating Coal Seam Methane Wells (May 2004) or the Quantitative Risk Assessment carried out by Planager Pty Ltd (dated 19 September 2007) and that all safety related systems required by the guidelines or QRA have been included.	Condition closed in a previous audit. AGL advised that there were no connections of new gas lines or new gas wells during the audit period.	Not Triggered
Compliance Report			
3.16	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:	Condition closed out in previous audit	Not triggered
3.16 (a)	Dates of commencement of construction and commissioning.		Not Triggered

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No.	Consent Condition	Compliance Assessment	Finding
3.16 (b)	Actions taken (or proposed to be taken) to implement conditions 10 and 11.		Not Triggered
3.16 (c)	A signed statement that:		Not Triggered
	i the Emergency Plan required under condition 14 is effectively in place and that at least one emergency exercise has been conducted;		Not Triggered
	i the SMS required under condition 15 has been fully implemented and that records		Not Triggered
	i required by the system are being kept;		Not Triggered
	i the Emergency Plan and SMS have been prepared in accordance with the relevant Hazardous Industry Planning Advisory Paper;		Not Triggered
	i all recommendations of the QRA, Emergency Plan and SMS have been implemented and are being maintained; and		Not Triggered
	i all safety management systems and their associated risk controls have been implemented and are being maintained.		Not Triggered
LANDSCAPE AND REHABILITATION			
3.17	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 (June 2018) and noted compliance with the requirements of this condition. With respect to well sites captured by this Project Approval, there were no rehabilitation works commenced or completed during the audit period.	Compliant
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:	The auditor sighted the Rehabilitation and Landscape Management Sub-Plan (June 2018) and noted compliance with the requirements of this condition. With respect to well sites captured by this Project Approval, there were no rehabilitation works commenced or completed during the audit period.	Compliant
3.18 (a)	Be prepared in consultation with the landowner by suitably qualified experts.	The current version of the Rehabilitation and Landscape Management Plan (June 2018) was prepared by WSP, whom are considered appropriately qualified to do so. It was reported by AGL that previous versions of the Plan were prepared in consultation with landowners.	Compliant
3.18 (b)	Be submitted to the Director-General for approval prior to commissioning.	Condition closed in previous audits.	Not Triggered

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No.	Consent Condition	Compliance Assessment	Finding
3.18 (c)	Describe in detail the short, medium and long term measures that would be implemented to:	The auditor sighted the Rehabilitation and Landscape Management Plan (June 2018) and noted compliance with the requirements of this condition.	Compliant
	i rehabilitate the site		
	i implement planting of native vegetation;		
	i manage the remnant vegetation and habitat on the site; and		
	i landscape the site to mitigate visual impacts of the project.		
3.18 (d)	Include a description of what measures would be implemented to rehabilitate the site.		
3.18 (e)	Provide details on who is responsible for monitoring, reviewing and implementing the plan.		
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.	Condition not triggered during the audit period as there were no rehabilitation works undertaken under PA06_0291.	Not Triggered
ABORIGINAL HERITAGE			
3.2	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 Camden Gas Project Aboriginal Cultural Heritage Management Plan (December 2013) and noted compliance with the requirements of this condition. The Plan includes documented consultation with the Tharawal Local Aboriginal Land Council and the Cubbitch Barta Native Title Claimants Aboriginal Corporation.	Compliant
3.20 (a)	A description of the measures that would be implemented for the mapping, and salvage or relocation of the archaeological relics.	The Plan states that it was prepared in consultation with the then Department of Environment and Climate Change and Water (DECCW).	Compliant
3.20 (b)	A description of the measures that would be implemented if any new Aboriginal objects are discovered during the project.	It is noted that there were no construction works undertaken during the audit period.	Compliant
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.		Compliant
3.21	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 not triggered during the audit period.	Not Triggered
TRAFFIC AND TRANSPORT			

B9: PA 06_0291

No.	Consent Condition	Compliance Assessment	Finding
3.22	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:	Condition not triggered during the audit period.	Not triggered
3.22 (a)	A description of the measures that would be implemented to: -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 cause by the project.		
3.22 (b)	Traffic control plans where appropriate.		
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.	Condition closed in a previous audit.	Not Triggered
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.	Condition closed in a previous audit.	Not Triggered
3.23B	The Proponent shall ensure that the design, location and construction of any road under-boring in the vicinity of the Jim Affleck Bridge and under-boring of the proposed link road between Menangle Road and the F5 must be undertaken in consultation with, and to the satisfaction of the RTA.	Condition closed in a previous audit.	Not Triggered
3.23C	The Australian Botanic Garden, Mount Annan The Proponent shall ensure that the design, location and construction of any under-boring 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 closed in a previous audit.	Not Triggered
	ONGOING OPERATIONS		
	Community Notification		

B9: PA 06_0291

No.	Consent Condition	Compliance Assessment	Finding
3.24	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:	During the audit period, workover activities were completed of a number well sites within PA06_291. Adequate community notification records were sighted by the auditor for all workovers with the exception of MP02. It is recommended that written notification of planned maintenance activities is provided to landowners and affected stakeholders at least 14 days prior to commencement of works.	Non-Compliant
3.24(a)	Information explaining the maintenance procedures to be undertaken.		Non-Compliant
3.24 (b)	An estimate of the length of works at each site.		Non-Compliant
3.24 (c)	Contact details for a representative of the Proponent.		Non-Compliant
3.24 (d)	Information regarding a 24 hour telephone contact number.		Non-Compliant
Redrilling and Re-fracing			
3.25	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.	It was reported in the AEPRs (2015-2016, 2016-2017 and 2017-2018) that there was no redrilling or re-fracing undertaken during the audit period.	Not Triggered
Reporting			
3.26	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.	Condition closed in a previous audit.	Not Triggered
SCHEDULE 4 ENVIRONMENTAL MANAGEMENT AND MONITORING			
ENVIRONMENTAL MANAGEMENT PLAN			
4.1	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 (March 2018) and noted that the content conforms to the requirements of this condition. A number of controls are in place to monitor and measure implementation of the EMS including Environmental Management Sub Plan Compliance Audits, Daily Workover Reports, air quality monitoring and noise monitoring. The auditor sighted a sample of monitoring controls and noted compliance with the requirements of the EMP.	Compliant
4.1(a)	Incorporate the various environmental management plans, monitoring programs and other requirements set out in schedule 3 of this approval.		
4.1(b)	Identify statutory and other obligations that the Proponent is required to fulfil during the construction and operation of the project.		
4.1(c)	Describe the environmental policies and principles to be applied to the project.		

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No.	Consent Condition	Compliance Assessment	Finding
4.1(d)	Describe in general how the environmental performance of the project would be monitored and managed.	The auditor sighted correspondence demonstrating submission of the document to the DPE (17/04/2018).	
4.1(e)	Describe the procedure that would be implemented to: i keep the local community and relevant agencies informed about the environmental performance of the project; i receive, handle and respond to, and record complaints i resolve disputes that may arise during the course of the project; i respond to any non-Compliance; i manage cumulative impacts; and i respond to emergencies (including bushfires).		
4.1(f)	Describe the role, responsibility, authority and accountability of all the key personnel involved in the environmental management of the project.		
INCIDENT REPORTING			
4.2	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 AEPRs for the audit period (2015-2016, 2016-2017 and 2017-2018) and noted there were no exceedances of goals, limits or performance criteria in this audit period that may have threatened material harm.	Compliant
4.2(a)	Describe the date, time, and nature of the exceedance/incident.		Compliant
4.2(b)	Identify the cause (or likely cause) of the exceedance/incident.		Compliant
4.2(c)	Describe what action has been taken to date.		Compliant
4.2(d)	Describe the proposed measures to address the exceedance/incident.		Compliant
ANNUAL REPORTING			
4.3	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 AEPRs for the audit period (2015-2016, 2016-2017 and 2017-2018) and noted compliance with the requirements of this condition.	Compliant
4.3(a)	Identify the standards, performance measures and statutory requirements that apply to the project.		Compliant
4.3(b)	Assess the environmental performance of the project to determine whether it is complying with these standards, performance measures, and statutory requirements.		Compliant

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No.	Consent Condition	Compliance Assessment	Finding
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.		Compliant
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.		Compliant
4.3(e)	Include a copy of complaints for the year and a description of actions taken or being taken to address registered complaints.		Compliant
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.		Compliant
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.		Compliant
4.4	The Proponent shall submit a copy of the AEPR to the DPI, DECC, Camden Council and Campbelltown City Council.	The auditor sighted evidence of submission of the AEPR (2015/2016, 2016/2017 and 2017/2018) to the following agencies: DPE, EPA, DPI, Campbelltown City Council, Camden Council and Wollondilly Council. A copy of each AEPR is available on the CGP website.	Compliant
INDEPENDENT ENVIRONMENTAL AUDIT			
4.5	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 and conduct of this 2015-2018 IEA satisfies this condition.	Compliant
4.5(a)	Be conducted by a suitably qualified, experienced, and independent person(s) whose appointment has been approved by the Director-General.		Compliant
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.		Compliant
4.5(c)	Assess the environmental performance of the project, and its effects on the surrounding environment.		Compliant

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No.	Consent Condition	Compliance Assessment	Finding
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 following documents demonstrating compliance with the requirements of this condition:</p> <ol style="list-style-type: none"> 1. 'Report of the 2016 Hazard Audit of the Camden Gas Project Operated by AGL Upstream Investments Pty Ltd', Planager, 10/06/16. 2. Correspondence from the DPE noting approval of Ms Karin Nilsson of Planager Pty Ltd to undertake the independent hazard audit. 3. Correspondence from AGL to the DPE enclosing the independent hazard audit (22/06/16). <p>AGL have advised that Pinnacle Risk Management has been engaged to conduct the 2019 hazard audit and work commenced on 12/11/2018.</p>	Not Triggered
4.5(e)	Assess whether the project is complying with the relevant standards, performance measures and statutory requirements.	The scope and conduct of this 2015-2018 IEA satisfies this condition.	Compliant
4.5(f)	Review the adequacy of the OEMP.		Compliant
4.5(g)	Recommend measures or actions to improve the environmental performance of the project, and/or its environmental management and monitoring systems.		Compliant
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 2012-2015 Independent Environmental Audit was finalised on 4 December 2015 and submitted to the Director-General of the NSW Department of Planning and Infrastructure on 14 December 2015, i.e. to the relevant authorities within one month of completion.	Compliant
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>The previous IEA pertaining to this approval was completed by Golder Associates (December 4, 2015). The auditor sighted email correspondence from AGL to the DPE dated 25 May 2016 with the revised EMP attached, demonstrating compliance to this requirement.</p> <p>A 'non-compliance Level 2' was reported against this condition in the previous audit. The auditor recommended that the Environmental Management Plan be revised and submitted to the DPE within six months of the audit. AGL has demonstrated compliance with this requirement.</p>	Compliant
COMMUNITY CONSULTATIVE COMMITTEE			
4.8	The Proponent shall ensure that the construction and operation of the project is subject to the consideration of the Camden Gas Project Community Consultative	The auditor sighted relevant documentation including meeting minutes and verified compliance with the requirements of this condition.	Compliant

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No.	Consent Condition	Compliance Assessment	Finding
	Committee, as established under Schedule 5 condition 17 of development consent DA No. 282;6;2003;l, dated 16 June 2004.		
	ACCESS TO INFORMATION		
4.9	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 the AGL website and correspondence with third parties and verified compliance with the requirements of this condition.	Compliant
4.9(a)	Provide a copy of the relevant document(s) to the relevant agencies and the CCC.	The auditor sighted examples of documents provided to nominated agencies and the CCC.	Compliant
4.9(b)	Ensure that a copy of the relevant document(s) is made publicly available on its website.	The auditor sighted the AGL website and verified compliance with the requirements of this condition	Compliant
4.1	During the project, the Proponent shall:	Environmental monitoring results required under this approval (for noise monitoring) are available on the AGL website.	
4.10 (a)	Make a summary of all environmental monitoring results required under this approval publicly available on the website.		Compliant
4.10 (b)	Update these results on a regular basis (at least every 6 months) or as required.		Compliant
	Reporting		
4.11	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.	Condition noted. Refer to specific conditions for compliance status.	Note

Appendix C

Licences

C1: EPL 12003

No	Licence Condition	Compliance Assessment	Finding						
	What the licence authorises and regulates								
A1.1	<p>This licence authorises the carrying out of the scheduled activities listed below at the premises specified in A2. The activities are listed according to their scheduled activity classification, fee-based activity classification and the scale of the operation.</p> <table border="1"> <thead> <tr> <th>Scheduled Activity</th> <th>Fee Based Activity</th> <th>Scale</th> </tr> </thead> <tbody> <tr> <td>Petroleum exploration, assessment and production</td> <td>Petroleum exploration, assessment and production</td> <td>> 0.50 - 6 PJ annual production capacity</td> </tr> </tbody> </table> <p>Unless otherwise further restricted by a condition of this licence, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition.</p>	Scheduled Activity	Fee Based Activity	Scale	Petroleum exploration, assessment and production	Petroleum exploration, assessment and production	> 0.50 - 6 PJ annual production capacity	The auditor sighted the Annual Return spreadsheets for the periods ending 21 December 2016 and 21 December 2017 and noted conformance with the requirements of this condition.	Compliant
Scheduled Activity	Fee Based Activity	Scale							
Petroleum exploration, assessment and production	Petroleum exploration, assessment and production	> 0.50 - 6 PJ annual production capacity							
A1.2	This licence does not authorise the above scheduled activities where approval for these activities is also required under the Environmental Planning and Assessment Act or the Petroleum (Onshore) Act, and approval has not been granted.	Condition noted.	Note						
A2	Premises or plant to which this licence applies								
A2.1	The licence applies to the following premises: Rosalind Park Gas Plant, Medhurst Road, Gilead, NSW 2560, Park Lot DP 230946	Condition noted.	Note						
A2.2	The premises also includes the gas gathering reticulation system owned and operated by the licensee that is associated with the gas treatment plant(s) identified in condition A2.1.	Condition noted.	Note						
A2.3	The gas gathering reticulation system identified in condition A2.2 includes all gas wells, trunk lines, and any associated effluent storages, temporary work areas and infrastructure associated with the gathering systems, gas wells and trunk lines.	Condition noted.	Note						
A2.4	The licensee must maintain a current register of the gas gathering reticulation system documenting each gas well location, well head configuration and all trunk lines associated with the gas treatment plant identified in condition A2.1.	<p>The auditor sighted the following documents and noted compliance with the requirements of this condition:</p> <ol style="list-style-type: none"> 181115_CGP Well Configuration details (gas well locations and well head configuration); and Camden Gas Project Petroleum Operations Plan (January 2017) (details of all gas gathering lines). 	Compliant						

C1: EPL 12003

No	Licence Condition	Compliance Assessment	Finding
A2.5	For the purposes of this licence, the premises also includes immediate areas in a 10 metre radius of all infrastructure in connection to the operation of the gas wells. During well establishment, the premises have a nominal area of 100m x 70m and is surrounded by fencing. At various times during well head maintenance, the premises at the gas well head comprises an area of approximate dimensions 50m x 40m.	There were no establishment or workover activities occurring at the time of the audit site visit. However the auditor inspected EM31 and EM32 during decommissioning and estimated the activities were occurring within a 50mX40m compound.	Compliant
A2.6	Any maps referred to in this section and included as part of this licence indicate the activity that is authorised by this licence to be undertaken at each well site.	Condition noted.	Note
A3	Information supplied to the EPA		
A3.1	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: a) the applications for any licences (including former pollution control approvals) which this licence replaces under the Protection of the Environment Operations (Savings and Transitional) Regulation 1998; and b) the licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this licence.	The licence application was prepared by Sydney Gas and it was reported that records are no longer available. There was insufficient evidence provided to form an opinion in relation to this condition.	Not Verified
2	Discharges to Air and Water and Applications to Land		
P1	Location of monitoring/discharge points and areas		
P1.1	The points referred to in the table below [refer to EPL 12006] 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.	Note
P1.2	The following utilisation areas referred to in the table below [refer to EPL 12006] are identified in this licence for the purposes of the monitoring and/or the setting of limits for any application of solids or liquids to the utilisation area.	Condition noted.	Note
P1.3	The following points referred to in the table [refer to EPL 12006] are identified in this licence for the purposes of the monitoring and/or the setting of limits for discharges of pollutants to water from the point.	The auditor sighted the Groundwater Management Plan for the Camden Gas Project (DCS_CM_MP_HSE_023) and noted the inclusion of these points as groundwater monitoring locations.	Note
3	Limit Conditions		
L1	Pollution of Waters		

C1: EPL 12003

No	Licence Condition	Compliance Assessment	Finding
L1.1	Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997.	<p>The auditor sighted the Soil and Water Management Sub Plan (June 2018). The plans detail a number of controls to prevent the pollution of water. Inspections of activities around well heads during the audit visit suggested these controls were being effectively implemented.</p> <p>According to AEPR 2016-17(page 12) and AEPR 2017-18(Section 5.5.5) there were no reportable water pollution incidents during the audit period.</p>	Compliant
L2	Load Limits		
L2.1	<p>The actual load of an assessable pollutant discharged from the premises during the reporting period must not exceed the load limit specified for the assessable pollutant in the table below.</p> <p>Note: An assessable pollutant is a pollutant which affects the licence fee payable for the licence.</p>	<p>The auditor sighted the EPL annual returns for 2015-2016 and 2016-2017 (noting the 2018 EPL annual return will not be available until early 2019). It was observed that AGL achieved conformance during the audit period with each specified limit.</p> <p>Furthermore, an independent technical review was conducted by Golder Associates for the 2016 and 2017 Annual Returns prior to submission. Golder reviewed the Load Base Limit (LBL) data spreadsheets and checked the inputs against the original monitoring results. There is evidence that minor errors were identified and corrected providing a high level of confidence in the accuracy of the annual return.</p>	Compliant

C1: EPL 12003

No	Licence Condition	Compliance Assessment	Finding																																
L2.2	<p>The actual load of an assessable pollutant must be calculated in accordance with the relevant load calculation protocol. Note: There are no discharges to waters for purposes of the Condition L2.2.</p> <table border="1" data-bbox="338 411 1059 1139"> <thead> <tr> <th>Assessable Pollutant</th> <th>Load limit (kg)</th> </tr> </thead> <tbody> <tr> <td>Benzene (Air)</td> <td>47.00</td> </tr> <tr> <td>Benzo(a)pyrene (equivalent) (Air)</td> <td>0.27</td> </tr> <tr> <td>BOD (Enclosed Water)</td> <td></td> </tr> <tr> <td>Fine Particulates (Air)</td> <td>460.00</td> </tr> <tr> <td>Hydrogen Sulfide (Air)</td> <td>1.60</td> </tr> <tr> <td>Nitrogen Oxides - Summer (Air)</td> <td></td> </tr> <tr> <td>Nitrogen Oxides (Air)</td> <td>103000.00</td> </tr> <tr> <td>Oil and Grease (Enclosed Water)</td> <td></td> </tr> <tr> <td>Salt (Enclosed Water)</td> <td></td> </tr> <tr> <td>Sulfur Oxides (Air)</td> <td>3000.00</td> </tr> <tr> <td>Total PAHs (Enclosed Water)</td> <td></td> </tr> <tr> <td>Total Phenolics (Enclosed Water)</td> <td></td> </tr> <tr> <td>Total suspended solids (Enclosed Water)</td> <td></td> </tr> <tr> <td>Volatile organic compounds - Summer (Air)</td> <td></td> </tr> <tr> <td>Volatile organic compounds (Air)</td> <td>33000.00</td> </tr> </tbody> </table>	Assessable Pollutant	Load limit (kg)	Benzene (Air)	47.00	Benzo(a)pyrene (equivalent) (Air)	0.27	BOD (Enclosed Water)		Fine Particulates (Air)	460.00	Hydrogen Sulfide (Air)	1.60	Nitrogen Oxides - Summer (Air)		Nitrogen Oxides (Air)	103000.00	Oil and Grease (Enclosed Water)		Salt (Enclosed Water)		Sulfur Oxides (Air)	3000.00	Total PAHs (Enclosed Water)		Total Phenolics (Enclosed Water)		Total suspended solids (Enclosed Water)		Volatile organic compounds - Summer (Air)		Volatile organic compounds (Air)	33000.00	<p>The auditor sighted the LBL calculation sheets for the 2016 and 2017 Annual Returns. A sample review indicates the calculations to have been completed in accordance to the <i>Load Calculation Protocol</i> (NSW EPA June 2009).</p> <p>Furthermore, an independent technical review was conducted by Golder Associates for the 2016 and 2017 Annual Returns prior to submission.</p> <p>The auditor has a high level of confidence the LBLs were calculated appropriately.</p>	Compliant
Assessable Pollutant	Load limit (kg)																																		
Benzene (Air)	47.00																																		
Benzo(a)pyrene (equivalent) (Air)	0.27																																		
BOD (Enclosed Water)																																			
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Volatile organic compounds - Summer (Air)																																			
Volatile organic compounds (Air)	33000.00																																		
L3	Concentration limits																																		

C1: EPL 12003

No	Licence Condition	Compliance Assessment	Finding
L3.1	For each monitoring/discharge point or utilisation area specified in the table below (by a point number), the concentration of a pollutant discharged at that point, or applied to that area, must not exceed the concentration limits specified for that pollutant in the table.	<p>The auditor sighted the following quarterly air monitoring results prepared by Ektimo and noted compliance with the requirements of this condition.</p> <ul style="list-style-type: none"> - 3rd quarter (16/11/2016); - 4th quarter (23/12/2016); - 1st quarter (20 April 2017); - 2nd quarter(10/07/2017); - 3rd quarter (30/10/2017); - 4th quarter (20/12/2017); - 1st quarter (10/04/2018); and - 2nd quarter (24/07/2018). <p>It is noted that the concentration limit for nitrogen oxides is 110 mg/m3. During the monitoring event on 24/07/2018 the nitrogen oxide concentration limit of Reboiler Flue 4 (Point 4) was measured at 110 mg/m3. While the result is compliant with licence limits, it is recommended that AGL review operations and alarms to ensure compliance continues to be maintained.</p>	Observation
L3.2	Air Concentration Limits [Refer to EPL 12003]	Condition noted.	Note
L3.3	<p>Note: Should the licensee seek to revise the concentration limits as specified in Condition L3.1 for nitrogen oxides, the licensee must demonstrate that:</p> <ul style="list-style-type: none"> a) The revised emission limit is representative of the proper and efficient maintenance and operation of the equipment; 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; c) The revised emission limit is supported by Manufacturers Design Specification; and d) The revised emission limit does not cause adverse impacts on local air quality. <p>This assessment must be undertaken in accordance with the document: Approved Methods and Guidance for the Modelling and Assessment of Air Pollutants in NSW.</p>	<p>Modifications made to the licence in this reporting period included the following:</p> <p>14 December 2017</p> <ul style="list-style-type: none"> - Condition L3.3 licence concentration limit ON POINTS 2,3 changed from 461mg/m3 to 220mg/m3. <p>21 December 2017</p> <ul style="list-style-type: none"> - Removed seven percent oxygen correction from sulphuric acid mist and sulphur trioxide (as SO3) at Condition L3.2 Point 1 <p>Given the licence changes were granted by the NSW EPA, the auditor assumes the proposed changes satisfied these criteria.</p>	Compliant
L4	Waste		

C1: EPL 12003

No	Licence Condition	Compliance Assessment	Finding															
L4.1	<p>The licensee must not cause, permit or allow any waste to be received at the premises, except the wastes expressly referred to in the column titled “Waste” and meeting the definition, if any, in the column titled “Description” in the table below.</p> <p>Any waste received at the premises must only be used for the activities referred to in relation to that waste in the column titled “Activity” in the table below.</p> <p>Any waste received at the premises is subject to those limits or conditions, if any, referred to in relation to that waste contained in the column titled “Other Limits” in the table below.</p> <p>This condition does not limit any other conditions in this licence.</p> <table border="1" data-bbox="331 646 1077 943"> <thead> <tr> <th>Code</th> <th>Waste</th> <th>Description</th> <th>Activity</th> <th>Other Limits</th> </tr> </thead> <tbody> <tr> <td>NA</td> <td>General or Specific exempted waste</td> <td>Waste that meets all the conditions of a resource recovery exemption under Clause 51A of the Protection of the Environment Operations (Waste) Regulation 2005</td> <td>As specified in each particular resource recovery exemption</td> <td>NA</td> </tr> <tr> <td>NA</td> <td>Waste</td> <td>Any waste received on site that is below licensing thresholds in Schedule 1 of the POEO Act, as in force from time to time</td> <td>-</td> <td>NA</td> </tr> </tbody> </table>	Code	Waste	Description	Activity	Other Limits	NA	General or Specific exempted waste	Waste that meets all the conditions of a resource recovery exemption under Clause 51A of the Protection of the Environment Operations (Waste) Regulation 2005	As specified in each particular resource recovery exemption	NA	NA	Waste	Any waste received on site that is below licensing thresholds in Schedule 1 of the POEO Act, as in force from time to time	-	NA	<p>The auditor sighted the AGL Environmental Footprint spreadsheet for the financial years 2016/17 and 2017/18 and noted compliance with the requirements of this condition. The Environmental Footprint provides a detailed record of waste streams generated, recycled/reused and disposed, including water, hazardous waste and non-hazardous waste.</p> <p>AGL reported that no waste from outside the premises were received, or disposed, at the premises. There was no evidence of third party waste burial or stored during the site visit.</p>	Compliant
Code	Waste	Description	Activity	Other Limits														
NA	General or Specific exempted waste	Waste that meets all the conditions of a resource recovery exemption under Clause 51A of the Protection of the Environment Operations (Waste) Regulation 2005	As specified in each particular resource recovery exemption	NA														
NA	Waste	Any waste received on site that is below licensing thresholds in Schedule 1 of the POEO Act, as in force from time to time	-	NA														
L4.2	<p>Asbestos</p> <p>Note: The licensee must comply with the conditions as specified in this licence or where no specific conditions are outlined in this licence, the licensee must comply with the Protection of the Environment Operations (Waste) Regulation 2005.</p>	Condition not activated during the audit period.	Not Triggered															
L5	Noise Limits																	

C1: EPL 12003

No	Licence Condition	Compliance Assessment	Finding																				
L5.1	<p>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.</p> <table border="1" data-bbox="338 443 1061 580"> <thead> <tr> <th>Receiver Location</th> <th>Day</th> <th>Evening</th> <th>Night</th> <th>Flaring (night)</th> </tr> <tr> <td></td> <td>L_{Aeq}(15 minute)</td> <td>L_{Aeq}(15 minute)</td> <td>L_{Aeq}(15 minute)</td> <td>L_{Aeq}(15 minute)</td> </tr> </thead> <tbody> <tr> <td>R1 Medhurst Road, Gilead</td> <td>35</td> <td>35</td> <td>35</td> <td>45</td> </tr> <tr> <td>R7 Mt. Gilead, Gilead</td> <td>37</td> <td>36</td> <td>36</td> <td>45</td> </tr> </tbody> </table>	Receiver Location	Day	Evening	Night	Flaring (night)		L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	R1 Medhurst Road, Gilead	35	35	35	45	R7 Mt. Gilead, Gilead	37	36	36	45	<p>The auditor sighted the following noise assessment reports prepared by Wilkinson Murray for the RPGP and noted compliance with the requirements of this condition:</p> <p>13 July 2015 (monitoring conducted 23 June 2015) 11 April 2016 (monitoring conducted 11 March 2016) 30 September 2016 (monitoring conducted 20 September) 30 December 2016 (monitoring conducted 8, 19, 20 December) 19 April 2017 (monitoring conducted 27 March 2017) 25 June 2017 (monitoring conducted 14 June 2017) 19 September 2017 (monitoring conducted 11 September 2017) 29 December 2017 (monitoring conducted 11 and 15 June 2017) 30 March 2018 (monitoring conducted 11 March 2018) 19 June 2018 (monitoring conducted 14 June 2018)</p> <p>The auditor also sighted the annual noise summary reports prepared by Wilkinson Murray. It is noted that the measured noise limits at R7 Mt Gilead continue to be close to the noise limit provide by this licence.</p> <p>Note: In some instances Wilkinson Murray noted "non-significant weather conditions" present during the evening and night time measurements. Notwithstanding, the evening and night time measurement results would have shown full compliance with the relevant operational noise limits set by the EPA's Environment Protection Licence Conditions...".</p>	Compliant
Receiver Location	Day	Evening	Night	Flaring (night)																			
	L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{Aeq} (15 minute)																			
R1 Medhurst Road, Gilead	35	35	35	45																			
R7 Mt. Gilead, Gilead	37	36	36	45																			
L5.2	<p>For the purposes of condition L5.1:</p> <p>a) Day is defined as the period from 7am to 6pm Monday to Saturday and 8am to 6pm Sundays and Public holidays; b) Evening is defined as the period 6pm to 10pm; c) Night is defined as the period from 10pm to 7am Monday to Saturday and 10pm to 8am Sundays and Public Holidays; and d) The receiver locations R1 and R7 are as shown in Figure 5.1 of the Environmental Noise and Vibration Study by Environmental Resources Management Australia Pty Ltd dated June 2003 which accompanied the Environmental Impact Statement for the project.</p>	Condition noted.	Note																				

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No	Licence Condition	Compliance Assessment	Finding																																
L5.3	Incidence of flaring events	N/A																																	
L5.4	<p>Noise for flaring event, must not exceed the noise limits in the 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="2">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 rowspan="3">R7 Mt. Gilead, Gilead</td> <td>Compressor blowdown (shut down and unload) 6-15 minutes</td> <td>42</td> <td>42</td> <td>37</td> </tr> <tr> <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></td> <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 (Emergency Shut Down) flare events exceed a frequency of occurrence of 1 per 21 days or a duration higher than 15 minutes per event to a reduced flow rate of less the 0.5 mmscf/d for each event, a lower limit of 36dB(A) LAeq (15 Minutes) applies at night.</p> <p>Note: 2. For the purposes of the table above, a flare event is defined as the period of time when the gas flow to the flare is greater than the gas flow necessary to maintain the pilot flare.</p> <p>Note: 3. Pressure safety valve (discharge) and pressure safety valve (suction) flaring events are exempted from the limits in condition L5.4.</p>	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	R7 Mt. Gilead, Gilead	Compressor blowdown (shut down and unload) 6-15 minutes	42	42	37	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>Flaring events did not coincide with monitoring undertaken by external consultants and as such there were no measurements obtained.</p> <p>It was reported by AGL that noise from flaring events was monitored following commissioning of the plant. The results were reportedly compliant with this condition and as such, no further monitoring was undertaken.</p> <p>It was noted that the use of the flare has decreased since commissioning and there have been no noise complaints received during the audit period.</p>	Not Verified
Receiver Location	Type & Duration of Flare event	Day LAeq(15 minute)	Evening LAeq(15 minute)	Night LAeq(15 minute)																															
R1 Medhurst Road, Gilead	Spill valve >2.5 hours	35	35	35																															
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L5.5	Noise measurements																																		

C1: EPL 12003

No	Licence Condition	Compliance Assessment	Finding
L5.6	<p>Noise from the premises is to be measured at any point on or within the residential boundary or at any point within 30m of the dwelling (rural situations) where the dwelling is more than 30m from the boundary to determine compliance with the LAeq(15 minute) noise limits in condition L5.1. 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.</p>	<p>The auditor sighted all noise assessment reports prepared during the audit period by Wilkinson Murray and noted that Points R1 and R7 comply with the requirements of this condition.</p>	Compliant
L5.7	<p>Noise from the premises is to be measured at 1m from the dwelling façade to determine compliance with the LA1 (1 minute) noise level in L5.1.</p>	<p>The auditor sighted the following noise assessment reports prepared by Wilkinson Murray for the RPGP and noted compliance with the requirements of this condition:</p> <p>13 July 2015 (monitoring conducted 23 June 2015) 11 April 2016 (monitoring conducted 11 March 2016) 30 September 2016 (monitoring conducted 20 September) 30 December 2016 (monitoring conducted 8, 19, 20 December) 19 April 2017 (monitoring conducted 27 March 2017) 25 June 2017 (monitoring conducted 14 June 2017) 19 September 2017 (monitoring conducted 11 September 2017) 29 December 2017 (monitoring conducted 11 and 15 June 2017) 30 March 2018 (monitoring conducted 11 March 2018) 19 June 2018 (monitoring conducted 14 June 2018)</p>	Compliant
L5.8	<p>The noise emission limits identified in this licence apply under all meteorological conditions except:</p>	<p>The auditor sighted all noise assessment reports completed during the audit period and noted compliance with the requirements of this condition. The estimated LAeq(15minute) noise levels were based on Industrial Noise Policy assessable weather conditions (e.g. data under the weather condition of wind speed less than or equal to 3m/s (at 10-m height) or rain fall less than 0.3mm).</p>	Compliant
L5.8a)	<p>a) during rain and wind speeds (at 10m height) greater than 3m/s; and</p>		Compliant

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No	Licence Condition	Compliance Assessment	Finding
L5.8b)	b) under "non-significant weather conditions". Note: Field meteorological indicators for non-significant weather conditions are described in the NSW Industrial Noise Policy, Chapter 5 and Appendix E in relation to wind and temperature inversions.	In some instances Wilkinson Murray noted "non-significant weather conditions" present during the evening and night time measurements. Notwithstanding, Wilkinson advised that the evening and night time measurement results would have shown full compliance with the relevant operational noise limits set by the EPA's Environment Protection Licence Conditions.	Compliant
L5.9	Well, Gathering System and Trunk Line Maintenance noise management protocol		
L5.10	The licensee must have in place a Well, Gathering System and Trunk Line Maintenance Noise Management Protocol to be used for the premises as defined in Condition A2 of this licence for the duration of the licence. The Protocol must include, but not limited to:	The auditor sighted the Noise Management Sub Plan (June 2017) and noted compliance with the requirements of this condition.	Compliant
L5.10a)	noise compliance standards;		Compliant
L5.10b)	community consultation;		Compliant
L5.10c)	advance notice to affected members of the community for planned well maintenance activities;		Compliant
L5.10d)	complaints handling monitoring/system;		Compliant
L5.10e)	site contact person to follow up complaints;		Compliant
L5.10f)	mitigation measures;		Compliant
L5.10g)	the design/orientation of the proposed mitigation methods demonstrating best practice;		Compliant
L5.10h)	construction times;		Compliant
L5.10i)	contingency measures where noise complaints are received; and		Compliant
L5.10j)	monitoring methods and program.		Compliant
L6	Hours of Operation	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 (June 2017) and noted compliance with the requirements of this condition. Implementation was demonstrated by:	Compliant
L6.1a)	7am and 6pm on weekdays; and		Compliant
L6.1b)	8am and 1pm on Saturdays (excluding Public Holidays).		Compliant
		1. Site Induction program (Camden Module 2, Slide 2/34), and the 2. Pre-Mobilisation Hazard Identification Form DCS_GN_FM_HSE_003 (dated 7 August 2017).	

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No	Licence Condition	Compliance Assessment	Finding
L6.2	This condition does not apply to the delivery of material outside the hours of operation permitted by condition L6.1, if that delivery is required by police or other authorities for safety reasons; and/or the operation or personnel or equipment are endangered. In such circumstances, prior notification must be provided to the EPA and affected residents as soon as possible or within a reasonable period in the case of emergency.	Condition not triggered during the audit period.	Not Triggered
L7	Potentially offensive odour		
L7.1	No condition of this licence identifies a potentially offensive odour for the purposes of section 129 of the Protection of the Environment Operations Act 1997. Note: Section 129 of the Protection of the Environment Operations Act 1997, provides that the licensee must not cause or permit the emission of any offensive odour from the premises but provides a defence if the emission is identified in the relevant environment protection licence as a potentially offensive odour and the odour was emitted in accordance with the conditions of a licence directed at minimising odour. Note: Should odour emissions become an issue, the EPA will consider requiring investigation and implementation of further odour control measures.	Condition noted.	Note
L8	Other limit conditions	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".	Condition not triggered during the audit period.	Not Triggered
L8.2	Hydraulic Fracturing		
L8.3	The licensee must not use chemicals that contain BTEX compounds (Benzene, Toluene, Ethyl Benzene and Xylene) in the fracturing fluid additives.	The auditor sighted the Soil and Water Management Sub Plan (June 2018) which note that wells are to be constructed and operated in accordance with the Code of Practice for Coal Seam Gas – Fracture Stimulation Activities. The Code of Practice notes that the use of additives containing BTEX compounds is banned in NSW. It was reported in AEPR 2016-17 and AEPR 2017-18 that there were no fracking activities undertaken during the audit period.	Not Triggered
4	Operating Conditions		
O1	Activities must be carried out in a competent manner		

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No	Licence Condition	Compliance Assessment	Finding
O1.1	Licensed activities must be carried out in a competent manner. This includes:	<p>Competence is demonstrated through defined roles and responsibilities, training, and assurance, as detailed below:</p> <p>1. Roles and responsibilities - Defined in the EMP (March 2018) and position descriptions. The position description of the Gas Plant Operator was sighted by the auditor and noted to include a requirement to achieve regulatory compliance and adhere to the EMP.</p> <p>2. Training - The auditor sighted the induction program that is delivered to all AGL employees and contractors (Rapid Induct). Commencing in 2017, monthly awareness training was delivered during the HSE meeting. Training programs sighted by the auditor include air quality, noise management, rehabilitation works and flora and fauna.</p> <p>3. Audit and inspection - Environmental Management Sub Plan Compliance Audits and periodic inspections were undertaken to assess implementation of control measures. The auditor sighted over 20 examples including for waste (3 March 2017), noise (22 December 2016), European heritage (28 April 2017), and flora/fauna (20 May 2018).</p>	Compliant
O1.1a)	the processing, handling, movement and storage of materials and substances used to carry out the activity; and	The auditor sighted the Dangerous Goods and Hazardous Materials Sub Plan (June 2018) and a sample of a waste Environmental Management Sub Plan Compliance Audit (1 March 2018). The documents demonstrate compliance with the requirements of this condition.	Compliant
O1.1b)	the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.	The auditor sighted the AGL Environmental Footprint Spreadsheet and the Waste Management Sub Plan (June 2018). Samples of waste tracking documentation were sighted.	Compliant
O2	Maintenance of plant and equipment		
O2.1	All plant and equipment installed at the premises or used in connection with the licensed activity:	EPL Condition O2 requires AGL to maintain and operate all plant equipment in a proper and efficient manner. As a result of an equipment failure and non-compliance for the continuous emissions	Non-Compliant
O2.1a)	must be maintained in a proper and efficient condition; and		

C1: EPL 12003

No	Licence Condition	Compliance Assessment	Finding
O2.2b)	must be operated in a proper and efficient manner.	<p>monitoring system, Condition O2 could not be met.</p> <p>The non-compliance took place until 14 December 2017, when the EPA issued a variation to EPL 12003 Condition M2.2, removing the requirement to operate a CEMS on Monitoring Point 2 and Monitoring Point 3. EPL 12003 Condition L3.2 was also varied to lower the Nitrogen Oxides concentration limit from 461mg/m3 to 220mg/m3 on Monitoring Point 2 and Monitoring Point 3.</p> <p>It is noted that AGL has previously reported this Non-Compliance to the EPA in the 2016 and 2017 Annual Return.</p>	
O3	Dust		
O3.1	The premises must be maintained in a condition which minimises or prevents the emission of dust from the premises.	<p>The auditor sighted the Air Quality Management Sub Plan (July 2018) and noted the inclusion of adequate dust management control measures.</p> <p>The auditor sighted the complaints register noting there were no dust related complaints or incidents recorded during the audit period.</p>	Compliant
O4	Emergency Response		
O4.1	The licensee must maintain, and implement as necessary, a current emergency response plan for the premises. The licensee must keep the emergency response plan on the premises at all times. The emergency response plan must document systems and procedures to deal with all types of incidents (e.g. spills, explosions or fire) that may occur at the premises or that may be associated with activities that occur at the premises and which are likely to cause harm to the environment. If a current emergency response plan does not exist at the date on which this condition is attached to the licence, the licensee must develop an emergency response plan within three months of that date.	The auditor sighted the Pollution Incident Response Management Plan (PIRMP) and Emergency Response Plan for the Camden Gas Project and noted compliance with the requirements of this condition.	Compliant
O5	Process and management		

C1: EPL 12003

No	Licence Condition	Compliance Assessment	Finding
O5.1	The licensee must ensure that any liquid and/or non-liquid waste generated and/or stored at the premises is assessed and classified in accordance with the DECC Waste Classification Guidelines as in force from time to time.	The auditor sighted the Waste Management Sub Plan (June 2018). Implementation of the Sub Plan was demonstrated through the AGL Environmental Footprint spreadsheet for the financial years 2016/17 and 2017/18. The spreadsheets detail waste generated during the audit period. The auditor sighted a sample of disposal records and reconciled against the Environmental Footprint. There were no errors or emissions identified.	Compliant
O5.2	The licensee must ensure that waste identified for recycling is stored separately from other waste.	The auditor sighted the Waste Management Sub Plan (June 2018) and noted relevant procedures pursuant to this condition. The auditor inspected the RGP and observed the separation of waste for recycling, including oil filters, batteries, scrap metal, paper, cardboard and plastics.	Compliant
5	Monitoring and Recording Conditions		
M1	Monitoring Records		
M1.1	The results of any monitoring required to be conducted by this licence or a load calculation protocol must be recorded and retained as set out in this condition.	Monitoring records prepared during the audit period were sighted by the auditor and noted to comply with the requirements of this condition.	Compliant
M1.2	All records required to be kept by this licence must be:		Compliant
M1.2a)	in a legible form, or in a form that can readily be reduced to a legible form;		Compliant
M1.2b)	kept for at least 4 years after the monitoring or event to which they relate took place; and		Compliant
M1.2c)	produced in a legible form to any authorised officer of the EPA who asks to see them.		Compliant
M1.3	The following records must be kept in respect of any samples required to be collected for the purposes of this licence:	The auditor sighted all monitoring records as required by this licence and noted compliance with the requirements of this condition.	Compliant
M1.3a)	the date(s) on which the sample was taken;		Compliant
M1.3b)	the time(s) at which the sample was collected;		Compliant
M1.3c)	the point at which the sample was taken; and		Compliant
M1.3d)	the name of the person who collected the sample.		Compliant
M2	Requirement to monitor concentration of pollutants discharged		

C1: EPL 12003

No	Licence Condition	Compliance Assessment	Finding
M2.1	<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>Due to the non-compliance with EPL Licence Condition M2.3, AGL was unable to comply with EPL Conditions O2 (requirement to maintain plant and equipment) and M2.1 (requirement to monitor pollutants using the specific sampling method).</p> <p>EPL Condition M2.1 requires all monitoring to be undertaken in accordance with the specified pollutant concentration, sample frequency and sampling method. Due to equipment failure, AGL was not able to comply with the required sample frequency, and hence was not compliant.</p> <p>The non-compliance took place until 14 December 2017, when the EPA issued a variation to EPL 12003 Condition M2.2, removing the requirement to operate a CEMS on Monitoring Point 2 and Monitoring Point 3. EPL 12003 Condition L3.2 was also varied to lower the Nitrogen Oxides concentration limit from 461mg/m3 to 220mg/m3 on Monitoring Point 2 and Monitoring Point 3. AGL advised they will continue to operate a Predictive Emissions Monitoring System on Monitoring Point 2 and Monitoring Point 3 as an early warning system to detect when Nitrogen Oxide levels are likely to increase.</p> <p>It is noted that AGL has previously reported this Non-Compliance to the EPA in the 2016 and 2017 Annual Return.</p> <p>AGL demonstrated compliance at the time of the audit.</p>	Non-Compliant
M2.2	<p>Air Monitoring Requirements [Refer to the Tables in EPL 12006]</p>	<p>The auditor sighted quarterly air quality monitoring reports for the RGP and noted compliance with the requirements of this condition.</p>	Compliant

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No	Licence Condition	Compliance Assessment	Finding																								
M2.3	<p>Point 1</p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Units of Measure</th> <th>Frequency</th> <th>Sampling Method</th> </tr> </thead> <tbody> <tr> <td>Nitrogen Oxides</td> <td>milligrams per cubic metre</td> <td>Continuous</td> <td>CEM-2</td> </tr> <tr> <td>Temperature</td> <td>degrees Celsius</td> <td>Continuous</td> <td>TM-2</td> </tr> <tr> <td>Moisture</td> <td>percent</td> <td>Continuous</td> <td>Method approved by EPA in writing</td> </tr> <tr> <td>Volumetric flow rate</td> <td>cubic metres per second</td> <td>Continuous</td> <td>CEM-6</td> </tr> <tr> <td>Oxygen</td> <td>percent</td> <td>Continuous</td> <td>CEM-3</td> </tr> </tbody> </table>	Pollutant	Units of Measure	Frequency	Sampling Method	Nitrogen Oxides	milligrams per cubic metre	Continuous	CEM-2	Temperature	degrees Celsius	Continuous	TM-2	Moisture	percent	Continuous	Method approved by EPA in writing	Volumetric flow rate	cubic metres per second	Continuous	CEM-6	Oxygen	percent	Continuous	CEM-3	<p>As noted in condition O2.1, due to continuous emissions monitoring equipment failure, AGL remained non-compliant with this condition until 14 December 2017.</p> <p>It is noted that AGL has previously reported this Non-Compliance to the EPA in the 2016 and 2017 Annual Return.</p>	Non-Compliant
Pollutant	Units of Measure	Frequency	Sampling Method																								
Nitrogen Oxides	milligrams per cubic metre	Continuous	CEM-2																								
Temperature	degrees Celsius	Continuous	TM-2																								
Moisture	percent	Continuous	Method approved by EPA in writing																								
Volumetric flow rate	cubic metres per second	Continuous	CEM-6																								
Oxygen	percent	Continuous	CEM-3																								
M2.4	<p>Continuous emissions monitoring results for moisture, as required by Condition M2.3, must be calibrated by reference to sampling method TM-22 as specified in EPA Approved Methods for the Sampling and Analysis of Air Pollutants in NSW, as in force from time to time.</p> <p>Note: The requirement for quarterly monitoring at point 6 may be reviewed based on odour emission performance after 12 months from commissioning of the treatment plant.</p>	<p>As noted in condition O2.1, AGL management reported a non-compliance against condition M2.1 on 9 July 2012. Due to continuous emissions monitoring equipment failure, AGL remained non-compliant with this condition for a portion of the audit period.</p> <p>The non-compliance took place until 14 December 2017, when the EPA issued a variation to EPL 12003 Condition M2.2, removing the requirement to operate a CEMS on Monitoring Point 2 and Monitoring Point 3.</p> <p>It is noted that AGL has previously reported this Non-Compliance to the EPA in the 2016 and 2017 Annual Return.</p>	Non-Compliant																								
M2.5	<p>For the purposes of Condition M2.2, the selection of sampling positions for quarterly monitoring at points 1, 2, 3, 4 and 6 must be carried out in accordance with test method TM-1 as specified in Approved Methods for the Sampling and Analysis of Air Pollutants in NSW, as in force from time to time.</p>	<p>The auditor sighted quarterly air quality monitoring reports (Ektimo) and noted compliance with the requirements of this condition.</p>	Compliant																								
M2.6	<p>For the purposes of Condition M2.2, the selection of sampling positions for quarterly monitoring (excluding velocity) at point 5 must be carried out in accordance with test method TM-1 as specified in Approved Methods for the Sampling and Analysis of Air Pollutants in NSW, as in force from time to time.</p>	<p>The auditor sighted quarterly air quality monitoring reports (Ektimo) and noted compliance with the requirements of this condition.</p>	Compliant																								
M2.7	<p>Water and/ or Land Monitoring Requirements (refer to EPL 12003 for table)</p>	<p>Condition noted.</p>	Note																								

C1: EPL 12003

No	Licence Condition	Compliance Assessment	Finding
M2.8	For the purposes of the table above for points 8, 9, 10, 11, 12, 13, 14, and 15 the monitoring results are required to be submitted annually as a Groundwater Monitoring Report with the Annual Return.	The auditor sighted the Annual Groundwater Report prepared by EMM for the following reporting periods: 22 December 2016 - 21 December 2017; and 22 December 2015 - 21 December 2016. The reports comply with the requirements of this condition, noting that some wells were unable to be sampled due to absence of water following purging.	Compliant
M2.9	For the purposes of Condition M2.7 EPA has approved the following method of analysis for the following pollutants only: <ul style="list-style-type: none"> • Methane - ALS "Static Headspace GC/FID technique" • Phenols - USEPA method 8270D. • Polycyclic aromatic hydrocarbons - USEPA method 8270D All other monitoring must be undertaken in accordance with Condition M3.2.	Previous audits have sighted correspondence from ALS Environmental Sydney (05/06/14) confirming that the test methods performed by ALS comply with the requirements of this condition.	Compliant
M3	Testing methods - concentration limits		
M3.1	Monitoring for the concentration of a pollutant emitted to the air required to be conducted by this licence must be done in accordance with:	The auditor sighted air monitoring reports prepared during the audit period and noted compliance with the requirements of this condition.	Compliant
M3.1a)	any methodology which is required by or under the Act to be used for the testing of the concentration of the pollutant; or		Compliant
M3.1b)	if no such requirement is imposed by or under the Act, any methodology which a condition of this licence requires to be used for that testing; or		Compliant
M3.1c)	if no such requirement is imposed by or under the Act or by a condition of this licence, any methodology approved in writing by the EPA for the purposes of that testing prior to the testing taking place. Note: The Protection of the Environment Operations (Clean Air) Regulation 2010 requires testing for certain purposes to be conducted in accordance with test methods contained in the publication "Approved Methods for the Sampling and Analysis of Air Pollutants in NSW".		Compliant
M3.2	Subject to any express provision to the contrary in this licence, monitoring for the concentration of a water pollutant must be done in accordance with the EPA Approved Methods Publication "Approved Methods for the Sampling and Analysis of Water Pollutants in New South Wales" unless another method has been approved by the EPA in writing before any tests are conducted.	The auditor sighted produced water analytical reports by AGL (August 2016 and February 2017) and reviewed a sample of analytical methods against the EPA approved methods. The sample of analytical methods reviewed were compliant with the requirements of this condition.	Compliant

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No	Licence Condition	Compliance Assessment	Finding
M3.3	Subject to any express provision to the contrary in this licence, monitoring for the concentration of a pollutant discharged to waters or applied to a utilisation area must be done in accordance with the Approved Methods Publication unless another method has been approved by the EPA in writing before any tests are conducted.	Condition noted.	Note
M4	Testing methods - load limits Note: Division 3 of the Protection of the Environment Operations (General) Regulation 2009 requires that monitoring of actual loads of assessable pollutants listed in L2.2 must be carried out in accordance with the relevant load calculation protocol set out for the fee-based activity classification listed in the Administrative Conditions of this licence.	The auditor sighted the LBL spreadsheets for 2016-17 and 2017-18 which detail the load calculations based on quarterly or annual monitoring results. The auditor also sighted the 2017 and 2018 Annual Returns and independent technical reviews conducted by Golder Associates and noted compliance with the reporting requirements. In all cases, the load calculation method of source monitoring was applied. It is noted that Golder reviewed the LBL spreadsheets as part of the assurance review and provided minor corrections, indicating a robust review process.	Compliant
M5	Recording of pollution complaints		
M5.1	The licensee must keep a legible record of all complaints made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this licence applies.	The auditor sighted Consultation Manager, a software program used for managing stakeholder engagement, including complaints. Records retained within Consultation Manager comply with the requirements of this condition.	Compliant
M5.2	The record must include details of the following:		Compliant
M5.2a)	the date and time of the complaint;		Compliant
M5.2b)	the method by which the complaint was made;		Compliant
M5.2c)	any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect;		Compliant
M5.2d)	the nature of the complaint;		Compliant
M5.2e)	the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and		Compliant
M5.2f)	if no action was taken by the licensee, the reasons why no action was taken.		Compliant
M5.3	The record of a complaint must be kept for at least 4 years after the complaint was made.	The auditor sighted complaint records within Consultation Manager (a software program used for managing stakeholder engagement, including complaints). The Consultation Manager records demonstrate compliance with the requirements of this condition.	Compliant

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No	Licence Condition	Compliance Assessment	Finding
M5.4	The record must be produced to any authorised officer of the EPA who asks to see them.	Condition not triggered during the audit period.	Not Triggered
M6	Telephone complaints line		
M6.1	The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted at the premises or by the vehicle or mobile plant, unless otherwise specified in the licence.	The auditor sighted the Camden Gas Project website and noted the inclusion of a telephone line, contact and feedback form. The website notes that the purpose of the telephone line is for complaints and enquiries.	Compliant
M6.2	The licensee must notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint.		
M6.3	The preceding two conditions do not apply until 3 months after: the date of the issue of this licence.		Note
M7	Other monitoring and recording conditions		
M7.1	Leak Detection and Repair Program		
M7.2	The licensee must operate a Leak Detection And Repair Program for all relevant components of plant and equipment.	The auditor sighted the following reports which demonstrate compliance with the requirements of this condition: - Air Quality Management Sub Plan (June 2018) detailing the LDAR program procedures; - Annual Leak Detection and Repair Reports, 22 December 2016 – 21 December 2017; and - Annual Leak Detection and Repair Reports, 22 December 2015 – 21 December 2016.	Compliant
M7.3	The LDAR Program must, unless otherwise approved by the EPA, monitor for the detection of leaks in accordance with US EPA Method 21- Determination of Volatile Organic Compound Leaks (40 CFR Part 60, Appendix A, Method 21).	The auditor sighted the Annual Leak Detection and Repair Reports (referenced against Condition M7.2) prepared during the audit period and noted compliance with the requirements of this condition (Methodology, Section 1.3).	Compliant
6	Reporting Conditions		
R1	Annual return documents		

C1: EPL 12003

No	Licence Condition	Compliance Assessment	Finding
R1.1	<p>The licensee must complete and supply to the EPA an Annual Return in the approved form comprising:</p> <ol style="list-style-type: none"> 1. a Statement of Compliance, 2. a Monitoring and Complaints Summary, 3. a Statement of Compliance - Licence Conditions, 4. a Statement of Compliance - Load based Fee, 5. a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan, 6. a Statement of Compliance - Requirement to Publish Pollution Monitoring Data, 7. a Statement of Compliance - Environmental Management Systems and Practices; and 8. a Statement of Compliance - Environmental Improvement Works. <p>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.</p>	<p>The auditor sighted the December 2016 and December 2017 Annual Returns and noted compliance against the requirements of this condition.</p>	Compliant
R1.2	<p>An Annual Return must be prepared in respect of each reporting period, except as provided below.</p> <p>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.</p>	<p>The auditor sighted the December 2016 and December 2017 Annual Returns and noted compliance against the requirements of this condition.</p>	Compliant
R1.3	<p>Where this licence is transferred from the licensee to a new licensee:</p>	<p>Condition not triggered during the audit period.</p>	Not Triggered
R1.3a)	<p>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>Condition not triggered during the audit period.</p>	Not Triggered
R1.3b)	<p>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>Note: An application to transfer a licence must be made in the approved form for this purpose.</p>	<p>Condition not triggered during the audit period.</p>	Not Triggered
R1.4	<p>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:</p>	<p>Condition not triggered during the audit period.</p>	Not Triggered

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No	Licence Condition	Compliance Assessment	Finding
R1.4a)	in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or	Condition not triggered during the audit period.	Not Triggered
R1.4b)	in relation to the revocation of the licence - the date from which notice revoking the licence operates.	Condition not triggered during the audit period.	Not Triggered
R1.5	The Annual Return for the reporting period must be supplied to the EPA by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date').	The auditor sighted the following: - e-connect EPA confirmation of receipt for the 2016 Annual Return - dated 3/2/2017 indicating compliance. - e-connect EPA confirmation of receipt for the 2017 Annual Return - dated 8/2/2017 indicating compliance. The submission of the 2018 annual return will not occur until early 2019.	Compliant
R1.6	Where the licensee is unable to complete a part of the Annual Return by the due date because the licensee was unable to calculate the actual load of a pollutant due to circumstances beyond the licensee's control, the licensee must notify the EPA in writing as soon as practicable, and in any event not later than the due date. The notification must specify:	Condition not triggered during the audit period.	Not Triggered
R1.6a)	the assessable pollutants for which the actual load could not be calculated; and		Not Triggered
R1.6b)	the relevant circumstances that were beyond the control of the licensee.		Not Triggered
R1.7	The licensee must retain a copy of the Annual Return supplied to the EPA for a period of at least 4 years after the Annual Return was due to be supplied to the EPA.	The auditor sighted Annual Returns submitted in the previous four years on CMO and noted compliance with the requirements of this condition.	Compliant
R1.8	Within the Annual Return, the Statements of Compliance must be certified and the Monitoring and Complaints Summary must be signed by:	The auditor sighted the December 2016 and December 2017 Annual Returns and noted both had been signed by the Company Secretary.	Compliant
R1.8a)	the licence holder; or		Compliant
R1.b)	by a person approved in writing by the EPA to sign on behalf of the licence holder.		Compliant

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No	Licence Condition	Compliance Assessment	Finding
R1.9	The licensee must submit a noise compliance monitoring report on 16 April 2004 and on an annual basis with the annual return required in condition R1.1 thereafter, to assess compliance with the noise limits provided in condition L5.1. The noise monitoring must be undertaken in accordance with the NSW Industrial Noise Policy August 2000.	The auditor sighted the 30 December 2016 and 29 December 2017 Annual Noise Summary Reports prepared by Wilkinson Murray to accompany the annual returns. The reports compliance with the requirements of this condition.	Compliant
R2	Notification of environmental harm		
R2.1	Notifications must be made by telephoning the Environment Line service on 131 555.	Condition not triggered during the audit period.	Not Triggered
R2.2	The licensee must provide written details of the notification to the EPA within 7 days of the date on which the incident occurred. Note: The licensee or its employees must notify all relevant authorities of incidents causing or threatening material harm to the environment immediately after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act.	Condition not triggered during the audit period.	Not Triggered
R3	Written report		
R3.1	Where an authorised officer of the EPA suspects on reasonable grounds that:	Condition noted.	Note
R3.1a)	where this licence applies to premises, an event has occurred at the premises; or		Note
R3.1b)	where this licence applies to vehicles or mobile plant, an event has occurred in connection with the carrying out of the activities authorised by this licence, and the event has caused, is causing or is likely to cause material harm to the environment (whether the harm occurs on or off premises to which the licence applies), the authorised officer may request a written report of the event.		Note
R3.2	The licensee must make all reasonable inquiries in relation to the event and supply the report to the EPA within such time as may be specified in the request.	Condition noted.	Note
R3.3	The request may require a report which includes any or all of the following information:	Condition noted.	Note
R3.3a)	the cause, time and duration of the event;		Note
R3.3b)	the type, volume and concentration of every pollutant discharged as a result of the event;		Note
R3.3c)	the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event;		Note

C1: EPL 12003

No	Licence Condition	Compliance Assessment	Finding												
R3.3d)	the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort;		Note												
R3.3e)	action taken by the licensee in relation to the event, including any follow-up contact with any complainants;		Note												
R3.3f)	details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and		Note												
R3.3g)	any other relevant matters.		Note												
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.	Note												
R4	Other reporting conditions														
R4.1	Leak Detection and Repair Program Summary Report														
R4.2	The licensee must submit a brief summary report on the Leak Detection and Repair (LDAR) program with the annual return. The summary report must include, but may not be limited to: <table border="1" data-bbox="324 874 1099 1011"> <thead> <tr> <th>Scale of leak (ppmv)</th> <th>Initial remedial repair in response</th> <th>Actual repair time</th> </tr> </thead> <tbody> <tr> <td>1,000 - < 10,000 (Minor)</td> <td></td> <td></td> </tr> <tr> <td>>=10,000 - <50,000 (Major)</td> <td></td> <td></td> </tr> <tr> <td>>=50,000 (Significant)</td> <td></td> <td></td> </tr> </tbody> </table>	Scale of leak (ppmv)	Initial remedial repair in response	Actual repair time	1,000 - < 10,000 (Minor)			>=10,000 - <50,000 (Major)			>=50,000 (Significant)			The auditor sighted the AGL Annual Leak Detection and Repair Summary Reports for reporting periods 22 December 2015 – 21 December 2016 and 22 December 2016 – 21 December 2017. The reports comply with the requirements of this condition.	Compliant
Scale of leak (ppmv)	Initial remedial repair in response	Actual repair time													
1,000 - < 10,000 (Minor)															
>=10,000 - <50,000 (Major)															
>=50,000 (Significant)															
R4.2a)	The total number of components inspected, as well as the number and percentage of minor, major and significant leaking components found by component types;		Compliant												
R4.2b)	The type of components and the scale of the leak for any equipment where leaks are found;		Compliant												
R4.2c)	The emission level of leaking equipment and emission level of re-check after leak was repaired;		Compliant												
R4.2d)	The repair responses and times as listed in the table below		Compliant												

C1: EPL 12003

No	Licence Condition	Compliance Assessment	Finding
R4.3	Where a leak is identified, AGL should aim to have the component repaired as follows: <ul style="list-style-type: none"> • Within a period of 14 days if the concentration of the fugitive VOCs emission is greater than or equal to 1,000 parts per million by volume (ppmv) but not more than 10,000 ppmv (minor leak), as methane, above background • Within a period of 5 days if the concentration of the fugitive VOCs emission is greater than or equal to 10,000 ppmv but not more than 50,000 ppmv (major leak), as methane, above background • Within a period of one day if the concentration of the fugitive VOCs emission is greater than or equal to 50,000 ppmv (significant leak > 50,000 ppmv), as methane, above background. 	<p>The auditor sighted the Annual Leak Detection and Repair Reports prepared by AGL for reporting periods 22 December 2015 to 21 December 2016.</p> <p>A leak measuring greater than 50 000ppm was noted in Table 5 for Compressor 1. Following detection, the repair took 2 days to effect, although AGL advised the “aim” was to have it repaired within 1 day.</p> <p>The auditor believes the response was sufficiently prompt and satisfied the condition’s wording and intent.</p>	Compliant
R4.4	Groundwater Monitoring Report		
R4.5	The licensee must supply with the Annual Return a Groundwater Monitoring Report for points 8, 9, 10, 11, 12, 13, 14, and 15 which provides:	The auditor sighted the Annual Groundwater Report, Produced Water Quality Report (EMM) for the following reporting periods and noted compliance with the requirements of this condition: 22 December 2015 - 21 December 2016; and 22 December 2016 - 21 December 2017.	Compliant
R4.5a)	an analysis and interpretation of monitoring results and		Compliant
R4.5b)	actions to correct identified adverse trends.		Compliant
R4.6	Spatial information		
R4.7	The licensee must submit to the EPA updated spatial information with the Annual Return when there have been infrastructure changes to the licence as identified in condition A2.1. The information must be provided in an ESRI geodatabase or shapefile format or any ESRI compatible dataset in GDA94.	The auditor sighted the Annual Returns prepared during the audit period and noted compliance with the requirements of this condition.	Compliant
7	General Conditions		
G1	Copy of licence kept at the premises or plant	The auditor sighted a copy of the licence at the premises and noted compliance with the requirements of this condition.	Compliant
G1.1	A copy of this licence must be kept at the premises to which the licence applies.		Compliant
G1.2	The licence must be produced to any authorised officer of the EPA who asks to see it.	Condition not triggered during the audit period.	Not Triggered
G1.3	The licence must be available for inspection by any employee or agent of the licensee working at the premises.	The auditor sighted a copy of the licence at the premises and noted compliance with the requirements of this condition.	Compliant
G2	Signage		
G2.1	The location of EPA point number(s) 1,2,3,4,5,6 and 7 must be clearly marked by signs that indicate the point identification number used in this licence and be located as close as practical to the point.	The auditor inspected the RGP and noted compliance with the requirements of this condition.	Compliant

C1: EPL 12003

No	Licence Condition	Compliance Assessment	Finding
G3	Other general conditions		
G3.1	Completed Programs	Condition noted.	Note

C2: Industrial Bore Licences

No.	Condition	Compliance Assessment	Finding
1	Water must not be pumped, otherwise extracted or injected from the works authorised by this license for any other purpose other than coal seam gas production.	The auditor sighted the AGL Environmental Footprint spreadsheets (2016-17 and 2017-18) and the Annual DPI Water Compliance Reports (2016/17 and 2017/18). It was noted water was only produced for authorised works for the purpose of coal seam gas production. There were no auxiliary water uses evident in the documentation.	Compliant
2	Subject to appropriate occupational health and safety provisions the licensee shall allow the NSW Office of Water, or any other person authorised by it, full and free access to the works, either during or after construction, for the purpose of undertaking inspection or test of works and its fittings, and shall carry out any work or alterations deemed necessary by the NSW Office of Water to ensure the protection and maintenance of the works, or the control of the water extracted and for the protection of the quality and the prevention from pollution/contamination of surface and subsurface water.	Condition noted.	Note
3	If a work is abandoned at any time the licensee must notify the NSW Office of Water that the work has been abandoned and seal off the aquifer by (a) backfilling the work with clay or cement to ground level after withdrawing the casing (lining) or (b) such methods as agreed to or directed by the NSW Office of Water.	The auditor sighted the minutes of a meeting between AGL and DPI Water (03/11/16) confirming that notification of decommissioned works may be provided through the Annual DPI Water Compliance Report. The auditor sighted Table B1 in the following reports which satisfies this condition: - 2016/2017 Annual Compliance Report Production well water licences and approvals Camden Gas Project; and - 2017/2018 Annual Compliance Report Production well water licences and approvals Camden Gas Project.	Compliant

C2: Industrial Bore Licences

No.	Condition	Compliance Assessment	Finding
4	The licensee must not allow any tailwater/drainage to discharge from the licensee's property into or onto: any adjoining public or crown road; any other persons land; any crown land; any river, creek or watercourse, any groundwater aquifer; any native vegetation as described under the Native Vegetation Conservation Act 1997; any wetlands of environmental significance	<p>Adequate and appropriate evidence, detailed below, was provided to demonstrate compliance with the requirements of this condition.</p> <p>1. Well Sites - The auditor inspected a number of well sites and noted that produced water is stored within designated tanks. It was reported by AGL that wells with dewatering pumps have high level alarms installed on the storage tank.</p> <p>2. RPGP - The auditor inspected the RPGP and noted that produced water is stored within 70kL above ground double walled tanks. The transfer of produced water to the above ground tanks occurs within a bunded loading bay.</p> <p>3. Disposal Records - The auditor sighted the AGL Environmental Footprint spreadsheet for the financial years 2016/17 and 2017/18 which notes that produced water was primarily recycled offsite by Cleanaway.</p> <p>There were no reportable environmental incidents in this period involving discharge of tailwater/drainage.</p>	Compliant
5	Works used for the purpose of conveying, distributing or storing water taken by means of the licensed work must not be constructed or installed so as to obstruct the reasonable passage of flood waters flowing into or from a river.	The auditor inspected the RPGP and a sample of well sites and noted that there are no works used for the purpose of conveying, distributing or storing water that would obstruct the passage of flood waters.	Compliant
6	The works authorised by this license shall be constructed with annular seals to isolate aquifers overlying the producing aquifer and prevent the loss or mixing of water from different groundwater sources.	Condition not triggered during the audit period. It was reported by AGL (AEPR 2016-2017 and AEPR 2017-2018) that there were drilling activities undertaken during the audit period.	Not Triggered
7	All groundwater extracted must be distributed via dedicated transfer pipelines that are to be monitored to ensure pipeline failure does not occur.	The auditor inspected a number of well sites and noted that produced water is transferred via a short transfer pipeline to designated tanks at each well site. It was reported by AGL that inspections are undertaken weekly to ensure the integrity of the pipeline.	Compliant

C2: Industrial Bore Licences

No.	Condition	Compliance Assessment	Finding
8	The licensee must install to the satisfaction of the NSW Office of Water in respect of type and construction an appliance(s) to measure the quantity of water extracted from the works where extraction exceeds 50 KL in any 12 month period.	<p>The Auditor sighted correspondence from AGL to the DPI (7/08/2017) requesting approval of an alternative water quantity measurement method. It was proposed by AGL that produced water volumes continue to be monitored volumetrically in onsite storage tanks and recorded when the contents of the tanks are collected.</p> <p>Correspondence sighted from the DPI to AGL (undated) confirmed that the method proposed by AGL was a suitable mechanism for recording the volumes of produced water from each well. Further, the method was determined to be in compliance with the two works approvals and the two related water access licences.</p> <p>The 2014-2016 IEA identified a non-conformance in relation to this condition. The auditor recommended that AGL seek approval from DPI Water of the current method of measuring water volumes. Adequate evidence was provided by AGL to address this matter.</p>	Compliant
9	The licensee must maintain records of the actual volume of groundwater pumped (in kilolitres or megalitres) as measured by the installed appliance(s) as well as volumes of water transported from individual well sites for disposal or use and provide this information to the NSW Office of Water on an agreed basis, at the completion of the project, or upon request from the NSW Office of Water.	Produced water is contained at individual well sites within agricultural tanks and transported by AGLs haulage tanker to the RPGP storage tanks as required. Water volumes are measured on collection by the haulage contractor. The unit of measurement is BBL which is converted to ML. The auditor sighted a sample of haulage contractor dockets and reconciled against the logbook maintained by AGL ('Field Water'). There were no errors or omissions identified.	Compliant
10	The license holder shall engage a qualified groundwater consultant to produce or independent peer review, a groundwater management plan for the Camden Gas Project. The groundwater management plan shall be prepared in consultation with and to the satisfaction of NSW Office of Water. The groundwater management plan shall be prepared and implemented within 12 months of the issue of this licence.	Condition closed in previous audit.	Compliant
11	The licensee must maintain records of the results of water quality testing of samples from any extraction or monitoring locations and provide this information to the NSW Office of Water on an agreed basis, at the completion of the project, or upon request from the NSW Office of Water.	<p>The auditor sighted the produced water quality reports for the period, and the CGP Annual Groundwater Reports.</p> <p>The reports comply with the requirements of this condition.</p>	Compliant

C2: Industrial Bore Licences

No.	Condition	Compliance Assessment	Finding
12	The license holder must install, if and when called upon to do so, monitoring bores to the satisfaction of the NSW Office of Water in respect to location and depth.	Reflecting the AEPR 2016-17 and AEPR 2027-18, this condition was not triggered during the audit period.	Not Triggered
	A) The installation of monitoring bores is to be carried out within three years of the commencement of this license.	Condition not triggered during the audit period.	Not Triggered
	B) The license holder must maintain records of the groundwater levels as measured in the monitoring bores.	The auditor sighted the following reports demonstrating compliance with the requirements of this condition: - 2017 - 2018 Groundwater and Surface Water Monitoring Report Camden Gas Project (EMM); and - 2016-2017 Groundwater and Surface Water Monitoring Report Camden Gas Project (EMM).	Compliant
	C) Measurements of groundwater levels are to be taken and recorded as a minimum throughout the duration of the project and quarterly for a five year period thereafter as required by the NSW Office of Water.		Compliant
	D) groundwater level records are to be maintained for all aquifer(s) and any additional water bearing zones(s) or stratigraphic horizon(s) if required by the NSW Office of Water overlying the coal seam(s) from which gas is to be extracted.		Compliant
	E) Records of groundwater levels from the monitoring bores are to be provided to the NSW Office of Water on an annual basis after the monitoring period has expired, or upon request from the NSW Office of Water.		Compliant
13	The licensee must provide all raw monitoring data to the NSW Office of Water in an electronic format that is compatible with Microsoft Office and Adobe Acrobat software.	The auditor sighted the following reports which satisfies this condition: - 2016/2017 Annual Compliance Report, Production well water licences and approvals, Camden Gas Project; and - 2017/2018 Annual Compliance Report, Production well water licences and approvals, Camden Gas Project.	Compliant
14	The licensee shall provide to the NSW Office of Water for every operating period (herein adopted as 12 months) an interpreted technical groundwater report in hard copy format that documents the following:	The auditor sighted the following reports which satisfies this condition: - 2016/2017 Annual Compliance Report, Production well water licences and approvals, Camden Gas Project; and - 2017/2018 Annual Compliance Report, Production well water licences and approvals, Camden Gas Project.	Compliant
	A) Activities associated with the project for the preceding operating period, including the installation of new wells, the refurbishment of existing wells, the maintenance of disused wells and the decommissioning of abandoned wells.		Compliant
	B) Volumes of groundwater extracted during the preceding operating period from individual wells and in total from the project wellfield, together with volumes of water transported for disposal or use from individual wells.		Compliant

C2: Industrial Bore Licences

No.	Condition	Compliance Assessment	Finding
	C) Reconciliations of the extracted flow measurements with volumes of water transported for disposal or use for individual wells for the preceding operating period and identification of causes of any inconsistencies and rectification measures that will be undertaken.		Compliant
	D) The impacts of the wellfield operation and individual wells on the monitored groundwater systems for the preceding operating period.		Compliant
	E) Predictions of groundwater extraction, potential adverse effects of pumping and proposed mitigation measures for the next operating period.		Compliant
15	The NSW Office of Water shall have the right during the currency of this license to request an audit of all groundwater monitoring data collection, archiving and quality assurance/quality control (QA/QC) procedures subject to constraints imposed by the regulation of the operation, the licensee shall take any actions deemed necessary by the NSW Office of Water as a consequence of the audit findings.	Condition noted.	Note
16	The volume of groundwater extracted from the works authorised by this license and by license(s) listed in the attached schedule shall not exceed 30 megalitres in any 12 month period commencing 1st July.	The auditor sighted the 2016/17 Annual DPI Water Compliance Report (EMM, 28 September 2017) and 2017/18 Annual DPI Water Compliance Reports (EMM, 24 September 2018) and noted compliance with the requirements of this condition.	Compliant

C3: Water Access Licences

No.	Condition	Compliance Assessment	Finding
MW0029-00001	Take of Water From 1 July 2018, if the water supply work nominated on this access licence is located at or less than 40m from the top of the high bank of a river then:	The auditor sighted maps of the CGP noting the location of gas wells. An aerial photograph was sighted of the wells in close proximity to the Nepean River (MP16 and MP15) and the auditor verified that the wells are located more than 40m from the river.	Not Triggered
MW0029-00001, A	Water must not be taken in this groundwater source when flows are in the Very Low Flow Class for an unregulated river access licence in that river.	Condition not triggered during the audit period.	Not Triggered
MW0029-00001, B	This restriction will only apply when the system that confirms when water can be taken is available on DPI Water website.	Condition not triggered during the audit period.	Not Triggered
MW0029-00001, C	The relevant licensor will inform the licence holder in writing of the applicable restrictions and how to access the information on its website when this system becomes operative.	Condition not triggered during the audit period.	Not Triggered
MW0919-00001	A maximum water allocation of 0.1 ML/unit share may be carried over in the account for this access licence from one water year to the next water year if a water meter is installed on each water supply work nominated on this licence and each meter is maintained in working order.	No water allocation was required to be carried over from the previous year as water take was significantly less than the entitlement.	Not Triggered
MW0605-00001	Water must be taken in compliance with the conditions of the approval for the nominated work on this access licence through which water is to be taken.	Condition noted. Refer to the Works and Use Approval compliance assessment.	Note
MW0547-00001	The total volume of water taken under this licence in any water year must not exceed a volume equal to:	The following was reported in the Annual DPI Compliance Reports (EMM 2017 and 2018): 2016/2017 The total volume extracted was 1.7ML which was less than the entitlement volume of 15ML. This included 1.1ML from the Sydney Basin Central Groundwater Source and 0.6ML from the Sydney Basin Nepean Groundwater Source. 2017/2018 The total volume extracted was 1.4ML which was less than the entitlement volume of 15ML. This included 1.03ML from the Sydney Basin Central Groundwater Source and 0.32ML from the Sydney Basin Nepean Groundwater Source.	Compliant
MW0547-00001, A	The sum of water in the account from the available water determination for the current year, plus		Compliant
MW0547-00001, B	The water carried over in the account from the previous water year, plus		Compliant
MW0547-00001, C	The net amount of water assigned to or from the account under a water allocation assignment, plus		Compliant
MW0547-00001, D	Any water re-credited by the Minister to the account.		Compliant

C3: Water Access Licences

No.	Condition	Compliance Assessment	Finding
MW2338-00001	Monitoring and Recording The completed logbook must be retained for five (5) years from the last date recorded in the logbook.	Produced water is contained at individual well sites within agricultural tanks and transported by AGLs haulage tanker to the RGP storage tanks as required. Water volumes are measured on collection by the haulage contractor. AGL provided a sample of haulage contractor dockets (Pages 2914 to 2930) which were sighted by the auditor.	Compliant
MW2336-00001	The purpose or purposes for which water is taken, as well as details of the type of crop, area cropped, and dates of planting and harvesting, must be recorded in the logbook each time water is taken.	It was reported by AGL that water associated with the licence is only obtained for the purpose of coal seam production.	Not Verified
MW2337-00001	The following information must be recoded in the logbook for each period of time that water is taken:	The auditor sighted the AGL logbook ('Field Water') and noted compliance with the requirements of this condition.	Compliant
MW2337-00001, A	Date, volume of water, start and end time when water was taken as well as the pump capacity per unit of time, and		Compliant
MW2337-00001, B	The access licence number under which the water is taken, and		Compliant
MW2337-00001, C	The approval number under which the water is taken, and		Compliant
MW2337-00001, D	The volume of water taken for domestic consumption and/or stock watering.	Condition not triggered during the audit period.	Not Triggered
MW2339-00001	A logbook must be kept, unless the work is metered and fitted with a data logger. The logbook must be produced for inspection when requested by DPI Water.	The auditor sighted the AGL logbook ('Field Water') and noted compliance with the requirements of this condition.	Compliant
MW0051-00001	Reporting Once the licence holder becomes aware of a breach of any condition on this access licence, the licence holder must notify the Minister as soon as practicable. The Minister must be notified by:	Condition noted. It was reported by AGL (2016-17 Annual DPI Water Compliance Report and 2017-18 Annual DPI Water Compliance Report) that there were no breach of conditions during the reporting period.	Not Triggered
MW0051-00001, A	email: water.enquiries@ dpi.nsw.gov.au, or	Condition noted.	Note
MW0051-00001, B	telephone: 1800 353 104. Any notification by telephone must also be confirmed in writing within seven (7) business days of the telephone call.	Condition noted.	Note

C4: Works and Usage Approvals

No.	Condition	Compliance Assessment	Finding
MW0655-00001	Take of Water Any water supply work authorised by this approval must take water in compliance with the conditions of the access licence under which water is being taken.	Condition noted. Refer to the Water Access Licence compliance assessment.	Note
MW0097-00001	Water Management Works If contaminated water is found above the production aquifer during the construction of the water supply work authorised by this approval, the licensed driller must:	Condition not triggered during the audit period. It was reported by AGL (AEPR 2016-17 and AEPR 2017-2018) that there were no wells drilled during the audit period.	Not Triggered
MW0097-00001, A	A. notify DPI Water in writing within 48 hours of becoming aware of the contaminated water, and		Not Triggered
MW0097-00001, B	B. adhere to the Minimum Construction Requirements for Water Bores in Australia (2012), as amended or replaced from time to time.		Not Triggered
MW0487-00001	The water supply work authorised by this approval must be constructed within three (3) years from the date this approval is granted.	The approval was granted on 1 July 2011. It is understood there have been no wells drilled in the three year period following this date and hence compliance has been demonstrated.	Compliant
MW00044-00001	When a water supply work authorised by this approval is to be abandoned or replaced, the approval holder must contact DPI Water in writing to verify whether the work must be decommissioned. The work is to be decommissioned, unless the approval holder receives notice from the Minister not to do so. When decommissioning the work the approval holder must:	The auditor sighted a sample of the 'Application for Well Suspension or Abandonment' forms (OCSG-F07) for RP04, RP05, RP06, RP11 and RP03 as evidence of notification to the regulator. It is noted in the minutes of a meeting between DPI Water and AGL (3 November 2016) that "future wells that are P&A'd will be notified as part of the annual compliance report". An update on well status is provided in Table B1 of the Annual DPI Water Compliance Reports (EMM, 2016-17 and 2017-18).	Compliant
MW00044-00001, A	Comply with the minimum requirements for decommissioning bores prescribed in the Minimum Construction Requirements for Water Bores in Australia (2012), as amended or replaced from time to time, and	Decommissioning (plug and abandonment) of 14 wells (RP03, RP05, RP06, MT05, MT09, MT10, EM16, LP01, JS01, JS03, RP04, RP11, JS04 and WG06) was completed in this audit period. The auditor sighted a number of Plug and Abandonment records including EM16 and LP01. The content of the reports appears acceptable to the Regulator.	Compliant

C4: Works and Usage Approvals

No.	Condition	Compliance Assessment	Finding
MW00044-00001, B	Notify DPI Water in writing within sixty (60) days of decommissioning that the work has been decommissioned.	The auditor sighted the minutes of a meeting between AGL and DPI Water (03/11/16) confirming that notification of decommissioned works may be provided through the annual compliance report. An update on well status is provided in Table B1 of the Annual DPI Water Compliance Reports (EMM, 2016-17 and 2017-18).	Compliant
MW0481-00001	Monitoring and Recording A logbook must be kept and maintained at the authorised work site or on the property for each water supply work authorised by this approval, unless the work is metered and fitted with a data logger.	The auditor sighted a sample of haulage docketts and reconciled against the logbook maintained by AGL ('Field Water') for June 2018.	Compliant
MW0482-00001	Where a water meter is installed on a water supply work authorised by this approval, the meter reading must be recorded in the logbook before taking water. This reading must be recorded every time water is to be taken.	Condition not triggered during the audit period.	Not Triggered
MW0051-00001	Once the approval holder becomes aware of a breach of any condition on this approval, the approval holder must notify the Minister as soon as practicable. The Minister must be notified by:	Condition noted. It was reported by EMM (2016/17 Annual Compliance Report and 2017/18 Annual Compliance Report) that there were no breach of conditions during the reporting period.	Not Triggered
MW0051-00001, A	Email: water.enquiries@dpi.nsw.gov.au		
MW0051-00001, B	Telephone: 1800 353 104. Any notification by telephone must also be confirmed in writing within seven (7) business days of the telephone call.		
MW0485-00001	Within sixty (60) days of completing construction of the water supply work authorised by this approval, the approval holder must provide a completed Form A for that work to DPI Water.	It was reported by AGL (AEPR 2016-17 and AEPR 2017-18) that there were no new wells drilled during the audit period.	Compliant
	Other Conditions (10WA112288 only)		
DK1363-00001	Water Management Works The approval holder must not construct or install works used for the purpose of conveying, distributing or storing water from the works authorised by this approval, that obstruct the reasonable passage of floodwaters flowing in, to, or from a river or lake.	It was reported by AGL (AEPR 2016/17 and AEPR 2017/18) that there were no water management works conducted during the audit period.	Compliant

C5: Petroleum Production Licences

No.	Condition	Compliance Assessment	Finding
	SCHEDULE OF CONDITIONS OF PRODUCTION LEASE		
	Operations		
1	The lease holder must restrict operations to the lease area and must not adopt any other method of operations without the prior written approval of the Minister and subject to any conditions he may stipulate.	The auditor sighted the Petroleum Operations Plan (POP), Version 11.1 (August 2018) Section 2 - Areas of Operation, and noted compliance with the requirements of this condition.	Compliant
	Management and Rehabilitation of Lands (General)		
2	a) The lease holder must maintain the subject area in a clean and tidy condition at all times.	The auditor inspected the RPGP and a sample of well sites on 8 November 2018 and noted compliance with the requirements of this condition.	Compliant
	b) The lease holder must stabilise and rehabilitate to the satisfaction of the Minister and within such time as may be allowed by the Minister any lands within the subject area which may have been disturbed by the lease holder.	The auditor sighted the Rehabilitation and Landscape Management Sub Plan (June 2018) and noted compliance with the requirements of this condition. The auditor inspected a sample of well sites rehabilitated during the audit period on 8 November 2018. Rehabilitation works were satisfactory and broadly in compliance with the above plans and Appendix F of the POP (August 2018).	Compliant
	c) Operations must be carried out in a manner that interferes as little as possible with flora and fauna.	The auditor sighted the Flora and Fauna Management Sub Plan (June 2018) and Rehabilitation and Landscape Management Sub Plan (June 2018). The plans comply with the requirements of this condition.	Compliant
	d) The lease holder must take all reasonable precautions against causing outbreak of fire on the subject area.	The auditor sighted the Emergency Response Plan (June 2018) and noted compliance with the requirements of this condition.	Compliant
	e) The lease holder must conduct operations in such a manner as not to cause or aggravate soil erosion and the lease holder must observe and perform any written instructions given or which may be given by the Minister with a view to minimising or preventing soil erosion.	The auditor sighted the Soil and Water Management Sub Plan (May 2015) and noted compliance with the requirements of this condition. Implementation was demonstrated through Environmental Management Sub Plan Compliance Audits. The auditor sighted soil and water audits for 28 June 2018 and 20 June 2017.	Compliant

C5: Petroleum Production Licences

No.	Condition	Compliance Assessment	Finding
	f) The lease holder must provide and maintain to the satisfaction of the Minister efficient means to prevent contamination, pollution, erosion and siltation of any river, stream, creek, tributary, lake, dam, reservoir, watercourse or catchment area or any undue interference to fish or their environment and must observe any written instruction given or which may be given by the Minister with a view to preventing are minimising the contamination, pollution, erosion or siltation of any river, stream, creek, tributary, lake, dam, reservoir, watercourse or catchment area, or any undue interference to fish or their environment.	<p>The auditor sighted the EMP (March 2018) and Soil and Water Management Sub Plan (June 2018). The plans detail a number of controls to prevent the pollution of water.</p> <p>The auditor also sighted a sample of plug and abandonment works completed during the audit period and noted there was no evidence of erosion during the site visit on 8 November 2018.</p> <p>There were no reportable water pollution incidents during the audit period.</p>	Compliant
3	Production Operations plan		
	(1) Operations must be conducted in accordance with a Production Operations Plan (the Plan) satisfactory to the Director-General. The Plan together with environmental conditions of development consent and other approvals win. form the basis for:-	The auditor sighted the Petroleum Operations Plan (POP), Version 11.1 (August 2018) and noted compliance with the requirements of this condition.	Compliant
	(a) ongoing operations and environmental management; and		Compliant
	(b) ongoing monitoring of the project.		Compliant
	(2) The Plan must be prepared in accordance with the Director-General's guidelines current at the time of lodgement.		Compliant
	(3) The Plan must be lodged with the Director-General:-	Condition noted.	Note
	(a) within six (6) months from the date of grant of the production lease. The management plan current for Petroleum Assessment Lease No. 1 (PAL 1) will remain as the governing document for environmental management for the interim period;	Condition not triggered during the audit period.	Not Triggered
	(b) prior to the expiry of current Plan; and	The auditor sighted the revision history for the POP and noted it was reviewed three times in the audit period.	Compliant
	(c) in accordance with any direction issued by the Director-General.	Condition not triggered during the audit period.	Not Triggered
	(4) The Plan must present a schedule of proposed operations for a period of up to seven (7) years and contain diagrams and documentation which identify:-	The auditor sighted the POP Version 11.1 (August 2018) and noted compliance with the requirements of this condition. The auditor conducted a review of AEPR 2016-17 and AEPR 2017-18 and determined that operations were not occurring insensitive areas for the duration of the audit period.	Compliant
	a) area(s) proposed to be disturbed under the Plan;		Compliant
	b) production and rehabilitation methods to be used and their sequence;		Compliant
	c) existing and proposed surface infrastructure;		Compliant
	d) progressive rehabilitation schedules;		Compliant

C5: Petroleum Production Licences

No.	Condition	Compliance Assessment	Finding
	e) areas of particular environmental, ecological and cultural sensitivity; and		Compliant
	f) proposed resource recovery.		Compliant
	(5) The Plan when lodged will be reviewed by the Department of Mineral Resources.	Condition noted.	Note
	(6) The Director-General may within two (2) months of the lodgement of the Plan, require modification and re-lodgement.	Condition noted.	Note
	(7) If a requirement in accordance with sub-paragraph (6) is not issued within two (2) months of the lodgement of the Plan, the lease holder may proceed with implementation of the Plan submitted subject to the lodgement of the required security deposit within the specified time.	Condition noted.	Note
	(8) During the life of the Production Operations Plan, proposed modifications to the Plan must be lodged with the Director-General and will be subject to the review process outlined in sub-paragraphs (5), (6) and (7). Where the leaseholder and/or the Director-General is of the opinion that the Plan should be amended, the leaseholder shall submit an amended Plan for acceptance.	The auditor sighted the Petroleum Operations Plan (POP), Version 11.1 (August 2018). Correspondence was sighted from the DPE to AGL (17/08/18) confirming that the POP was submitted on 9/08/18 and approved for the period from the approval to 30 June 2019.	Compliant
4	Annual Environmental Management Report (AEMR)		
	(1) Within 12 months of the commencement of production operations and thereafter annually or, at such other times as may be allowed by the Director-General, the lease holder must lodge an Annual Environmental Management Report (AEMR) with the Director-General.	The auditor sighted emails from AGL to the DPE (1/11/2017 and 2/11/2018) noting the enclosure of the AEPR for each respective year.	Compliant
	(2) The AEMR must be prepared in accordance with the Director-General's guidelines current at the time of reporting and contain a review and forecast of performance for the preceding and ensuing months in terms of:	A review of AEPR 2016-17 and AEPR 2017-18 indicates that the documents generally meet the requirements of this condition.	Compliant
	(a) the accepted Production Operations Plan;		
	(b) development consent requirements and conditions;		
	(c) Environment Protection Authority and Department of Land and Water Conservation licences and approvals;		
	(d) any other statutory environmental requirements; and		
	(e) details of any variations to environmental approvals applicable to the lease area,		

C5: Petroleum Production Licences

No.	Condition	Compliance Assessment	Finding
	(3) After considering an AEMR the Director-General may, by notice in writing, direct the lease holder to undertake operations, remedial actions or supplementary studies in such manner and within such period as may be specified in the notice to ensure that operations on the lease area are conducted in accordance with sound environmental practice.	Condition noted.	Note
	(4) The leaseholder shall, as and when directed by the Minister, co-operate with the Director-General to conduct and facilitate review of the AEMR involving other government agencies.	Condition noted.	Note
5	Catchment Areas		
	(a) Operations must be carried out in such a way as not to cause any pollution of any Catchment Area.	The auditor sighted the Soil and Water Management Sub Plan (June 2018). The plan details a number of controls to prevent the pollution of water. Inspections of activities around well heads during the audit visit suggested these controls were being effectively implemented. According to AEPR 2016-17 (page 12) and AEPR 2017-18 (Section 5.5.5) there were no reportable water pollution incidents during the audit period.	Compliant
	(b) If the lease holder is using or about to use any process which in the opinion of the Minister is likely to cause contamination of the waters of any Catchment Area the lease holder must refrain from using or cease using as the case may require such process within twenty four (24) hours of the receipt by the lease holder of a notice in writing under the hand of the Minister requiring the lease holder to do so.		Compliant
	(c) The lease holder must comply with any regulations now in force or hereafter to be in force for the protection from pollution of any Catchment Area.		Compliant
6	Water		
	(a) The lease holder must make such provisions for sanitation as may be directed by the Director-General and must at all times observe and perform any requirements of the Director-General respecting sanitation.	Sewage is generated from the RPGP site and workover rig facilities. The waste is stored within tanks at the RPGP and disposed to an appropriately licensed facility (Environmental Footprint spreadsheet for the financial years 2016-17 and 2017-18).	Compliant
	(b) Operations must be carried out in a manner that avoids the pollution or siltation of any watercourse or waterbody.	The auditor sighted the Soil and Water Management Sub Plan (June 2018). The plans detail a number of controls to prevent the pollution of water. Inspections of activities around well heads during the audit visit suggested these controls were being effectively implemented. According to AEPR 2016-17 (page 12) and AEPR 2017-18 (Section 5.5.5) there were no reportable water pollution incidents during the audit period.	Compliant
	(c) The lease holder must not interfere with the flow of water in any stream or watercourse.	A review of works completed in this audit period suggests this condition was not triggered.	Not Triggered

C5: Petroleum Production Licences

No.	Condition	Compliance Assessment	Finding
	Dust		
7	The lease holder must take such reasonable precautions as are necessary to abate any dust nuisance.	<p>An inspection of the RPGP was undertaken by the auditor and a number of dust mitigation controls were observed, including:</p> <ul style="list-style-type: none"> -Car park and access road are constructed with asphalt; -Plant walkways are constructed with asphalt and concrete; -Plant surrounds are sealed with a mix of shale and crushed sandstone (low dust); and -Speed limits on the site and access road are limited to 20km/hr. <p>The auditor sighted the Air Quality Management Sub-Plan (June 2018) Table 3.1, and noted the inclusion of dust mitigation measures including the use of water carts where warranted, use of designated roads and access tracks, adherence to project vehicle speed limits and load covering procedures.</p> <p>There were no dust complaints reported during the audit period.</p>	Compliant
8	Fences		
	(a) Fences on or adjacent to the subject area must not be interfered with without the prior written approval of the owner thereof or the Director- General and subject to any conditions the Director-General may stipulate.	A review of works completed in this audit period suggests this condition was not triggered.	Not Triggered
	(b) Any gates within the subject area or any other gates used by the lease holder must be closed or left open in accordance with the requirements of the owner or occupier.	The auditor sighted a sample of gates during the site inspection on 8 November 2018 and noted compliance with the requirements of this condition.	Compliant
9	Vegetation		
	(a) The lease holder must not cut, destroy, ringbark or remove any timber or other vegetative cover on any other land subject of this lease except such as directly obstructs or prevents the carrying on of the operations.	<p>The auditor sighted the Flora and Fauna Management Sub Plan (June 2018) and noted the inclusion of appropriate controls.</p> <p>It was reported by AGL during the site visit there was no significant vegetation removal or tree removal in this reporting period.</p>	Compliant
	(b) All trees, shrubs and undergrowth which the lease holder cuts down, removes or damages for the purpose of the operations must be as directed by and to the satisfaction of the Director-General.	Condition was not triggered during the audit period. AGL advised that some minor dead vegetation was removed as part of general maintenance.	Not Triggered

C5: Petroleum Production Licences

No.	Condition	Compliance Assessment	Finding
	(c) The lease holder must observe any instructions given by any responsible authority with a view to the eradication of noxious weeds. The lease holder must make all reasonable efforts to prevent the introduction and establishment of noxious weeds.	The auditor sighted the Rehabilitation and Landscape Management Sub Plan (June 2018) and noted the inclusion of weed control measures. There were no significant weed infestations observed during the site inspection.	Compliant
	Roads		
10	In the event of the operations being conducted on the surface of any road, track or fire trail traversing the subject area or in the event of such operations causing damage to or interference with any such road, track or fire trail the lease holder must if directed in writing by the Minister provide to the satisfaction of the Minister an alternative road track or fire trail in a position as required by the Minister and must allow free and uninterrupted access along such alternate road, track or fire trail and, if required by the Minister, the lease holder must upon completion of operations rehabilitate the surface of the original road, track or fire trail to a condition satisfactory to the Minister. The lease holder must consult with prior to and implement local Council and Roads and Traffic Authority guidelines as applicable in respect of works carried out on road verges and underneath shire roadways.	Condition not triggered during the audit period.	Not Triggered
	Transmission Lines, Communication Lines and Other Utilities		
11	The lease holder must as far as is practicable so conduct operations as not to interfere with or impair the stability or efficiency of any transmission line, communication line or pipeline or any other utility traversing the surface or below the surface of the subject area and must comply with any written direction which may be given by the Minister in this regard.	Condition not triggered during the audit period.	Not Triggered
	Aboriginal Place or Relic		
12	The lease holder must not destroy, deface or damage any place or relic within the subject area except in accordance with an authority issued under the National Parks and Wildlife Act, 1974, and must take every precaution in drilling, excavating or disturbing the land against any such destruction, defacement or damage.	The auditor sighted the European Heritage Management Sub Plan (June 2018) and noted there were adequate controls and procedures in place for discovery of relics. AGL advised that this condition was not triggered in the audit period.	Not Triggered
13	Safety		

C5: Petroleum Production Licences

No.	Condition	Compliance Assessment	Finding
	(a) All production activity must be carried out in conformity with the "Schedule of Onshore Petroleum Exploration and Production Safety Requirements" published by the Department of Mineral Resources in August 1992, as may be amended from time to time. The lease holder will prepare a Safety Management Plan in accordance with the Schedule.	The Auditor sighted the Safety Management Plan, Camden Project NSW (May 2018) and noted compliance with the requirements of this condition.	Compliant
	(b) Operations must be carried out in a manner that ensures the safety of people and livestock in the vicinity of the operations. All drill holes, pipelines, installations, facilities and unattended worksites must be appropriately protected to ensure that access to them by members of the public and livestock is restricted.	The auditor inspected a sample of well sites (8 November 2018) and the RPGP and noted facilities to be adequately fenced and secured.	Compliant
	(c) The lease holder shall undertake all activities with due regard to identifying and managing the risk of the activities so as to not adversely affect the potential mineability, and the safe and efficient recovery of any mineable coal seams.	During the site visit 8 November 2018, the auditor sighted plug and abandonment activities on EM31 and EM32. The steel casings that may have crossed coal seams were being milled out to enable safe future mining activities.	Compliant
	(d) The lease holder shall work co-operatively and in good faith with the applicant or holder of any Mining Lease within the lease area, including with regard to identifying and managing the risk of the activities so as to not adversely affect the potential mineability, and the safe and efficient recovery of any mineable coal seams, and so as not to unreasonably impede rights to coal exploration and assessment activities provided under an Act.	Condition is noted by the auditor. There is no suggestion this condition was breached in the activities observed or documents reviewed during the audit.	Note
	Indemnity		
14	The lease holder must identify and keep indemnified the Crown from and against all and any accident or injury to any person or property which may arise out of the construction actions suits and claims and demands of whatsoever nature and all costs charges and expenses which may be brought against the lease holder or which the lease holder may incur in respect of maintenance or working of any workings now existing or to be made by the lease holder within the boundaries of the subject area or in connection with any of the operations notwithstanding that all other conditions of this lease must in all respects have been observed by the lease holder or that any such accident or injury must arise from any act or thing which the lease holder may be licensed or compelled to do herein.	Condition noted.	Note
15	Security Deposit		

C5: Petroleum Production Licences

No.	Condition	Compliance Assessment	Finding
	(a) A security in the sum of [amount varies for each PPL] must be lodged with the Minister by the lease holder for the purpose of ensuring the fulfilment by the lease holder of its obligations under this lease. If the lease holder fails to fulfil any one or more of such obligations the said sum may be applied at the discretion of the Minister towards the cost of fulfilling such obligations. For the purpose of this clause the lease holder must be deemed to have failed to fulfil the obligations of this lease if it fails to comply with any condition or provision hereof, any provision of the Act or regulations made thereunder or any condition or direction imposed or given pursuant to a condition or provision hereof or of any provision of the Act or regulations made thereunder.	Condition closed prior to the audit period.	Not Triggered
	(b) The lease holder must provide the security required by sub-clause (a) hereof in one of the following forms:- (i) cash; or (ii) a security certificate or bond in such form and given by such surety may from time to time be approved by the Minister.	Condition closed prior to the audit period.	Not Triggered
	Well Sealing		
16	All wells drilled by the lease holder within the lease area will be subject to the following condition:-	Condition not triggered during the audit period as no new wells were drilled.	Not Triggered
	The location and height (AHD) of each borehole collar must be determined to an accuracy of 1 metre and the position of the hole within potentially mineable coal seams must also be determined, using a gyroscopic downhole tool, to an accuracy of 1-2 metres.		Not Triggered
	This information must be supplied to the Department of Mineral Resources. Reasonable access must be provided to SHP Silliton field staff to carry out additional surveys as necessary.		Not Triggered
	Plugging and abandonment must be undertaken in a manner acceptable to the Director-General.	The auditor sighted a sample of reports for the 14 wells plugged and abandoned in this reporting period including JS01, LP01 and EM16. All reports were sufficiently detailed and AGL advised they were acceptable to the Regulator.	Compliant
17	Restriction to Area		
	(i) The area over which well maintenance/drilling activities are undertaken must be kept to the minimum practical size commensurate with best practice and safe operations. The working area must be clearly delineated by fencing and other barriers as appropriate.	During the site visit 8 November 2018, the auditor sighted plug and abandonment activities on EM31 and EM32. The setup met the requirements of this condition.	Compliant

C5: Petroleum Production Licences

No.	Condition	Compliance Assessment	Finding
	(ii) If so directed by the Director-General the lease holder must enclose the subject area with a secure stock proof fence and such fencing 'must -be erected and maintained in a manner satisfactory to the Director-General.	Condition not triggered during the audit period, however all fences inspected were in good condition and would be considered stock proof.	Not Triggered
	(iii) The lease holder must observe any instructions given by the Director- General with a view of minimising or preventing public inconvenience or damage to public or private property.	Condition noted	Note
18	Reporting		
	A) Well Drilling	Condition not triggered during the audit period as no new wells were drilled.	Not Triggered
	i) The standard requirements for reporting in the Petroleum (Onshore) Act 1991, shall apply.		Not Triggered
	ii) While an activity is taking place, the lease holder must submit a weekly progress report containing a summary of any test results and problems encountered.		Not Triggered
	iii) The lease holder must submit a copy of all reports undertaken relating to the interpretation of the results of work carried out in the area including geological and geophysical reports as well as engineering reports. These reports must be submitted within six (6) months of the completion of the assessment.		Not Triggered
	B) Well Assessment		
	The lease holder shall submit the following reports within seven (7) days of the completion of each month's activity:-	The auditor sighted a sample of monthly Gas Production Reports prepared by AGL and evidence of submission to the Department of Resources Industry and Energy.	Compliant
	(i) Gas flow rates for each well connected to the gas gathering system; and		Compliant
	(ii) Total gas flow into the treatment facility.		Compliant
	General		
19	The lease holder must submit a copy of all reports undertaken relating to the interpretation of the results of work carried out in the area including geological and geophysical reports as well as engineering reports. These reports must be submitted within six (6) months of the completion of the assessment.	Condition not triggered during the audit period. It was reported by AGL (AEPR 2016-17 and AEPR 2017-18) that there were no wells drilled or new exploration activities in this audit period.	Not Triggered
20	Control of Operations		
	(a) If an Inspector appointed under the Petroleum (Onshore) Act 1991, believes that the lease holder is not complying with any provision of the Act 1991 or Regulation or any condition of this lease relating to the working of the subject area, he may direct the lease holder to cease working the subject area and to rectify the situation.	Condition not triggered during the audit period.	Not Triggered
	(b) The lease holder must comply with any lawful direction given.		Not Triggered

C5: Petroleum Production Licences

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

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No.	Condition	Compliance Assessment	Finding
1	The lease Holder must implement all practicable measures to prevent and/or minimise any harm to the environment that may result from the construction, operation or rehabilitation of the development.	<p>An EMS has been developed and implemented to manage environmental risks and achieve performance improvements. The EMS consists of an EMP, Sub Plans and a compliance management system.</p> <p>A number of controls are in place to monitor and measure implementation of the EMS including Environmental Management Sub Plan Compliance Audits, Daily Workover Reports, air quality monitoring and noise monitoring. The auditor sighted a sample of monitoring controls and noted compliance with the requirements of the EMP.</p> <p>Compliance obligations arising from licences, leases, environmental/ planning approvals and legislation are monitored through a web-based database compliance management system (CMO Compliance). The auditor sighted CMO Compliance and determined that the tool effectively monitors compliance against obligations.</p>	Compliant
2	Petroleum Operations Plan		
	a) Production operations must not be carried out otherwise than in accordance with a Petroleum Operations Plan (POP) which has been approved by the Director-General of the Department of Industry and investment.	The auditor sighted the Petroleum Operations Plan (POP), Version 11.1 (August 2018) which complies with the requirements of this condition.	Compliant
	b) The POP must:		Compliant
	i) identify areas that will be disturbed by operations;		Compliant
	ii) detail the staging of specific operations;		Compliant
	iii) identify how operations will be managed to allow closure of the site;		Compliant
	iv) identify how operations will be carried out on site in order to prevent and or minimise harm to environment, including groundwater;		Compliant
	v) reflect conditions of approval under:		Compliant
	(1) the Environmental Planning and Assessment Act 1979;		Compliant
	(2) the Protection of the Environment Operations Act 1997; and		Compliant
	(3) any other approvals relevant to the development including the conditions of the lease; and		Compliant
	vi) have regard to any relevant guidelines adopted by the Director-General.	Compliant	

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No.	Condition	Compliance Assessment	Finding
	c) The Lease Holder may apply to the Director-general to amend an approved POP at any time.	Condition noted.	Note
	d) It is not a breach of this condition if:	Condition noted.	Note
	i) the operations constituting the breach were necessary to comply with a lawful order or direction given under the Petroleum (Onshore) Act 1999 , the Environmental Planning and Assessment Act 1979, Protection of the Environment Operations Act 1997 or the Occupational Health and Safety Act 2000; and	Condition noted.	Note
	ii) the Director-General had been notified of the terms of the order of direction prior to the operations constituting the breach being carried out.	Condition noted.	Note
	Note: The Director-General is deemed to be notified of the terms of and order of directions if the order of direction was issued by the Department.	Condition noted.	Note
	e) A POP ceases to have affect 7 years after the date of approval of other such period as specified by the Director-General is deemed to be notified of the terms of and order of direction if the order of direction was issued by the Director-General.	The auditor notes that the POP is updated on a regular basis (three times in this audit period).	Not Triggered
3	Environment Management Reporting		
	a) The Lease Holder must lodge Environmental Management Reports (EMR) with the Director-General.	The auditor sighted the AEPR 2016-17 and AEPR 2017-18 and noted compliance with the requirements of this condition.	Compliant
	b) The EMR must		Compliant
	i) report against compliance with the POP;		Compliant
	ii) report on progress in respect of rehabilitation completion criteria;		Compliant
	iii) report on the extent of compliance with regulatory requirements; and		Compliant
	iv) have regard to any relevant guidelines adopted by the Director-General.		Compliant
	c) Additional environmental reports may be required on specific surface disturbing operations or environmental incidents from time to time as directed in writing by the Director-General and must be lodged as instructed.	Condition noted.	Note
4	Incident reporting		
	a) The Licence Holder must report any incidents causing or threatening material harm to the environment in accordance with Departmental guidelines.	The auditor sighted the Pollution Incident Response Management Plan (PIRMP) and Safety Management Plan (January 2017) for the CGP and noted compliance with the requirements of this condition.	Compliant
	For the purposes of the condition, harm to the environment is material if:		Compliant
	i) it involves actual or potential harm to the health of safety of human beings or to ecosystems that is not trivial, or		Compliant

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No.	Condition	Compliance Assessment	Finding
	ii) it results in actual or potential loss of property damage of an amount, or amounts in aggregate, exceeding \$10,000.	A review of the incident register indicated there were no incidents during the audit period meeting these criteria.	Compliant
	Loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment.		Compliant
	Rehabilitation		
5	Disturbed land must be rehabilitated to a sustainable/agreed end land use to the satisfaction of the Director-General.	<p>The auditor sighted the Rehabilitation and Landscape Management Sub Plan (June 2018) and noted the inclusion of procedures to comply with the requirements of this condition.</p> <p>The auditor inspected a sample of well sites rehabilitated during the audit period and noted rehabilitation works were in accordance with plans that have been approved by the DPE.</p>	Compliant
	SAFETY		
6	Industry Codes and Standards		
	a) All operations must be carried out in conformity with the "Schedule of Onshore Petroleum Exploration and Production Safety Requirements" published by the Department of Industry and Investment as amended for time to time. The Lease Holder must prepare a Safety Management Plan in accordance with the Schedule.	<p>The auditor sighted the Safety Management Plan - Camden Gas Project (May 2018). The plan notes it was developed in accordance with the Schedule of Onshore Petroleum Exploration and Production Safety Requirements (NSW) 1992.</p> <p>The scope of the audit did not include an assessment against the requirements of the Schedule of Onshore Petroleum Exploration and Production Safety Requirements (NSW) 1992.</p>	Not Verified
	b) The design, fabrication, installation, inspection, testing, operation and maintenance of all gas gathering pipelines shall conform to the appropriate Australian Standards. Technical records, inspection reports and the results of any tests must be made available to an inspector on request.	<p>The auditor sighted the EMP (March 2018) which notes that the gas gathering system route is designed, constructed and operated in accordance with the requirements of Australian Standard AS 4645.3:2008 Gas Distribution Networks – Plastic pipe systems.</p> <p>The scope of the audit did not include an assessment of compliance against the relevant Australian Standards.</p>	Not Verified
7	Gathering Pipelines		

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No.	Condition	Compliance Assessment	Finding
	a) Notice must be given to the Director-General prior to commencement of the gas gathering pipeline installation program and while trenches are open to allow inspection prior to backfilling.	Condition not triggered in this audit period. The 2014-2016 IEA identified a non-compliance in relation to this condition. The auditor recommended that AGL provide notice to the Director-General in the event of further gas gathering installation works. This recommendation was not triggered in the current audit period.	Not Triggered
	b) All gas gathering pipelines must be buried with an electronically conductive wire or other approved means provided for locating the pipe.	The auditor sighted the EMP (March 2018) which notes that tracer lines are installed within gas gathering pipelines (Section 3.4.1).	Compliant
	c) All gas gathering pipelines must be surveyed and prominent markers must be installed at appropriate intervals to show the location of these pipelines.	Condition not triggered in this audit period.	Not Triggered
	d) A progress report must be submitted to the Director General on or before the 15th day of each month during construction and installation of gas gathering pipeline.	Condition not triggered in this audit period. The 2014-2016 IEA identified a non-compliance in relation to this condition. The auditor recommended that AGL provide a progress report to the Director-General in the event of further gas gathering installation works. This recommendation was not triggered in the current audit period.	Not Triggered
	e) The gas gathering pipelines must be maintained free of leaks while in operation and a program implemented to confirm this. Records to be maintained and made available to an inspector on request.	The auditor sighted the following systems and reports demonstrating compliance with the requirements of this condition: 1. MEX preventative maintenance system for plant and equipment; and 2. Annual Leak Detection Repair and Summary Reports (AGL, December 2016-17 and December 2017-18).	Compliant
	f) Gas gathering pipelines must not be abandoned except in a manner approved by the Director General.	Condition noted.	Note
	WELLS		
	Notification of Activities		

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No.	Condition	Compliance Assessment	Finding
8	The Lease Holder must provide reasonable notice of disturbing activities to potentially affected parties prior to the commencement of activities on each site. The Lease Holder must accommodate reasonable requests for limited rescheduling of activities.	<p>During the audit period, workover activities were completed of a number well sites within PA06_291. Adequate community notification records were sighted by the auditor for all workovers with the exception of MP02.</p> <p>It is recommended that written notification of planned maintenance activities is provided to landowners and affected stakeholders at least 14 days prior to commencement of works.</p>	Non-Compliant
9	Well Surveying and Logging		
	a) The locations and height (AHD) of the collar of all wells drilled by the Lease Holder within the lease area must be determined to an accuracy of 1 metre, and the position of the hole within any potentially mineable coal seam must also be determined to an accuracy of 1 metre. This information must be supplied to the Director-General.	<p>Condition not triggered during the audit period.</p> <p>It was reported by AGL (AEPR 2016-17 and AEPR 2017-18) that there were no wells drilled during the audit period.</p>	Not Triggered
	b) All vertical wells must be downhole geophysically logged prior to the installation of production casing with logging suite which can accurately determine the location and properties of all production zones, and conventional gas reservoirs. In addition a cement bond log must be run to confirm the integrity of the cement annulus between the wall of the well and the entire length of the casing. All other suites must be run for the entire length of the hole.		Not Triggered
	c) In the event of horizontal wells being drilled, the Lease Holder must supply 3 dimensional coordinates determining the path and track of the hole, to the satisfaction of the Director-General.		Not Triggered
	d) The Lease Holder must provide a copy of all geophysical logs to the Director-General within 14 days of completion.		Not Triggered
10	Well Abandonment		

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No.	Condition	Compliance Assessment	Finding
	a) At the completion of production, steel casing must be removed from the vertical interval of any potentially mineable coal seam as determined by the Executive Director, Mineral Resources. Downhole geophysical surveys and/or cameras must be used to confirm the removal of all casing throughout the prescribed interval.	<p>The auditor inspected milling of steel casing during a site visit on 8 November 2018. In addition, the auditor sighted P&A Reports for all applicable well sites during the audit period. In the event of a potentially mineable coal seam, the auditor noted the inclusion of downhole geophysical surveys and/or cameras to confirm the removal of all casing. Alternatively, correspondence was sighted from the regulator granting approval to leave the casing in situ.</p> <p>The 2014-2016 IEA identified a non-compliance in relation to this condition. Adequate evidence was sighted to demonstrate closure of the recommended actions.</p>	Compliant
	b) A well must not be plugged and abandoned except in accordance with the schedule of Onshore Exploration and Production Safety Requirements, and any other guidelines in force from time to time.	<p>The auditor did not sight sufficient information to make a determination on these conditions. The scope of this audit does not include an assessment of compliance against the Onshore Exploration and Production Safety Requirements and the Department's guidelines.</p> <p>It is recommended that the P&A Reports include a statement of compliance against relevant requirements and guidelines.</p>	Not Verified
	c) All wells must be fully sealed in accordance with the Department's guidelines.		Not Verified
	d) The Lease Holder must, within 2 weeks of the abandonment of any well, submit to the Director-General a report providing details on the following items:	<p>The 2014-2016 IEA identified a non-compliance in relation to this condition. The auditor recommended that AGL submit Plug and Abandonment records to the DRE within two weeks of abandonment. Adequate records were provided by AGL to demonstrate closure of this matter. Reports were consistently submitted within 2 weeks of completion.</p>	Compliant
	i) Location of abandoned well		Compliant
	ii) Termination depth of drillhole and depth to worked seam.		Compliant
	iii) details of drillhole diameter and casing used.		Compliant
	iv) Gas and water makes and composition during the drilling and production test phases. The commencement and completion date of each phase of the operation and the date of any other significant events.	<p>The gas and water 'makes and compositions' were routinely recorded in P&A reports. However, the P&A report for well site MT10 did not contain the required descriptions.</p> <p>It is noted that AGL have recently revised the P&A report format to ensure that this matter is adequately captured in going forward. As such, there are no further recommended actions.</p>	Non-Compliant
	v) The estimated and actual quantities of grout used to seal the drillhole.	The auditor sighted the Plug and Abandonment Records for all well sites plugged and abandoned during the audit period. The records demonstrate compliance with the requirements of this condition.	Compliant

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No.	Condition	Compliance Assessment	Finding
	vi) Evidence of removal of steel casing from the interval encompassing any potentially mineable coal seam.	<p>The auditor inspected milling of steel casing during a site visit on 8 November 2018. In addition, the auditor sighted P&A Reports for all applicable well sites during the audit period. In the event of a potentially mineable coal seam, the auditor noted the inclusion of downhole geophysical surveys and/or cameras to confirm the removal of all casing. Alternatively, correspondence was sighted from the regulator granting approval to leave the casing in situ.</p> <p>The 2014-2016 IEA identified a non-compliance in relation to this condition. Adequate evidence was sighted to demonstrate closure of the recommended actions.</p>	Compliant
	IMPACT ON COAL SEAMS		
11	Operations not to affect mineability of coal seams		
	a) The Lease Holder must undertake all activities with due regard to identifying, managing and minimising the impact of the activities on the potential mineability of coal seams at the expiration of the lease.	<p>The auditor inspected milling of steel casing during a site visit on 8 November 2018. In addition, the auditor sighted P&A Reports for all applicable well sites during the audit period. In the event of a potentially mineable coal seam, the auditor noted the inclusion of downhole geophysical surveys and/or cameras to confirm the removal of all casing. Alternatively, correspondence was sighted from the regulator granting approval to leave the casing in situ.</p> <p>The 2014-2016 IEA identified a non-compliance in relation to this condition. Adequate evidence was sighted to demonstrate closure of the recommended actions.</p>	Compliant
	b) The Director-General may request the Lease Holder to provide to the Department all geological information pertinent to the drilling of any well in the lease area. The Director-General may request additional tests and data if required. The Lease Holder must comply with any such requests.	Condition not triggered. There were no new wells drilled during the audit period.	Not Triggered
	Well Casing		
12	As an alternative to steel casing, glass reinforced epoxy liners may be used across the Bulli coal seam subject to separate approval of the Director-General.	Condition noted.	Note
	OPERATIONS GENERALLY		
13	Commercial Production		

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No.	Condition	Compliance Assessment	Finding
	The Lease Holder must notify the Director-General when commercial production commences. The notification must be provided to the Director General within 7 days of the commercial production.	Condition not triggered during the audit period.	Not Triggered
	Commercial production in the condition means the use by of supply to any person (including the Lease Holder) of any petroleum extracted from the lease area for any purpose other than well assessment, flaring of equipment testing (not resulting in the generation of energy or supply of petroleum for commercial purposes).	Condition not triggered during the audit period.	Not Triggered
14	Disruption to utilities		
	a) If the activities carried out pursuant to the Lease will in any way impact on any utility, the Lease Holder must inform the authority in control of the utility and provide sufficient information for the authority to assess the proposal of its impacts.	Condition not triggered during the audit period.	Not Triggered
	b) The Lease Holder must pay costs for remediation or repair of damage to utilities caused by the Lease Holder's operations and associated activities.	Condition not triggered during the audit period.	Not Triggered
	GEOLOGICAL & PRODUCTION REPORTING		
15	Well Drilling		
	a) While a drilling activity is taking place, the Lease Holder must submit a daily drilling report to the Director-General.	Condition not triggered during the audit period. For the purpose of this audit, it has been assumed that 'drilling activity' applies to the construction of new wells. Be that as it may, daily activity sheets for Plug and Abandonment works are attached to the records submitted to the Regulator.	Not Triggered
	b) The Lease Holder must submit a weekly progress report containing a summary of any results and problems encountered. The weekly progress report must be submitted to the Director-General.	Condition not triggered during the audit period.	Not Triggered
	Note: These reports are in addition to the reporting requirements under s.131 of the Petroleum (Onshore) Act and the Petroleum (Onshore) Regulation 2007.	Condition not triggered during the audit period.	Not Triggered
	Well Assessment		
16	The lease holder must submit to the Director-General, a copy of all reports undertaken relating to the interpretation of the results of work carried out in the area, including geological and geophysical reports as well as engineering reports. These reports must be submitted within six (6) months of the completion of the assessment.	Condition not triggered during the audit period. There were no wells drilled during the audit period.	Not Triggered
	SECURITY		

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No.	Condition	Compliance Assessment	Finding
18	Security		
	a) The Lease Holder must lodge a security with the Minister in the sum set out in Appendix 2 for the purpose of ensuring the fulfilment of the Lease Holder's obligations under this licence.	The auditor sighted evidence of lodgement of a security deposit bond for PPL 1, 2, 4, 5 and 6 and correspondence from the DPE (1/08/2017) confirming receipt.	Compliant
	b) The security may be lodged in one of the following forms:		Compliant
	i) cash;		Compliant
	ii) a security certificate in a form approved by the Minister and issued by an authorised deposit-taking institution.		Compliant
	c) The Lease Holder must not carry out any activities under the authority conferred by this Lease unless the Security required by this condition has been lodged with the Director-General and the Lease Holder has received receipt of the lodgement.		Compliant
	Note: This condition is imposed pursuant to section 16 of the Petroleum (Onshore) Act 1991. The amount of the security by this condition can be varied by written notice served on the Lease Holder.		Compliant
	COOPERATION		
19	Cooperation Agreement		
	The lease holder must make every reasonable attempt, and be able to demonstrate their attempts, to enter into a cooperation agreement with the holder(s) of any overlapping coal title(s). The cooperation agreement should address but not be limited to issues such as: -access arrangements -operational interaction procedures -dispute resolution -information exchange -well location -timing of drilling -potential resource conflicts and -rehabilitation issues	Condition not triggered during the audit period.	Not Triggered

Appendix D Water Licence Review (Audit Period)

Well No.	Well Configuration	WAL	Tenure	WUA	Tenure	Industrial Bore Licence	Tenure	Exemption
EM02	Plugged and abandoned	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
EM03	Plugged and abandoned	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
EM04	Plugged and abandoned	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
EM05	Operational	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
EM06	Operational	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
EM07	Operational	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
EM08	Operational	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
EM09	Operational	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
EM10	Operational	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
EM11	Operational	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
EM12	Operational	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
EM13	Operational	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
EM14	Operational	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
EM15	Operational	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
EM16	Plugged and abandoned	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
EM17	Operational	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
EM18	Operational	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
EM19	Operational	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
EM20	Operational	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
EM21	Operational	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
EM22	Operational	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
EM23	Plugged and abandoned	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
EM24	Operational	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
EM25	Operational	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
EM27	Operational	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A

Well No.	Well Configuration	WAL	Tenure	WUA	Tenure	Industrial Bore Licence	Tenure	Exemption
EM28	Operational	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
EM30	Operational	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
EM31	Operational	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
EM32	Suspended	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
EM33	Operational	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
EM34	Suspended	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
EM37	Operational	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
EM38	Operational	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
EM39	Operational	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
EM40	Operational	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
GL02	Operational	24856	Continuing (perpetuity)	10WA112288	22/05/16	N/A	N/A	N/A
GL04	Operational	24856	Continuing (perpetuity)	10WA112288	22/05/16	N/A	N/A	N/A
GL05	Operational	24856	Continuing (perpetuity)	10WA112288	22/05/16	N/A	N/A	N/A
GL06	Operational	24856	Continuing (perpetuity)	10WA112288	22/05/16	N/A	N/A	N/A
GL07	Operational	24856	Continuing (perpetuity)	10WA112288	22/05/16	N/A	N/A	N/A
GL08	Operational	24856	Continuing (perpetuity)	10WA112288	22/05/16	N/A	N/A	N/A
GL09	Operational	24856	Continuing (perpetuity)	10WA112288	22/05/16	N/A	N/A	N/A
GL10	Plugged and abandoned	24856	Continuing (perpetuity)	10WA112288	22/05/16	N/A	N/A	N/A
GL11	Operational	24856	Continuing (perpetuity)	10WA112288	22/05/16	N/A	N/A	N/A
GL12	Operational	24856	Continuing (perpetuity)	10WA112288	22/05/16	N/A	N/A	N/A
GL13	Operational	24856	Continuing (perpetuity)	10WA112288	22/05/16	N/A	N/A	N/A
GL14	Operational	24856	Continuing (perpetuity)	10WA112288	22/05/16	N/A	N/A	N/A
GL15	Operational	24856	Continuing (perpetuity)	10WA112288	22/05/16	N/A	N/A	N/A
GL16	Operational	24856	Continuing (perpetuity)	10WA112288	22/05/16	N/A	N/A	N/A
GL17	Operational	24856	Continuing (perpetuity)	10WA112288	22/05/16	N/A	N/A	N/A
JD01	Operational	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
JD04	Plugged and abandoned	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A

Well No.	Well Configuration	WAL	Tenure	WUA	Tenure	Industrial Bore Licence	Tenure	Exemption
JD05	Plugged and abandoned	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
JD06	Plugged and abandoned	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
JD07A	Plugged and abandoned	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
JD11	Operational	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
JS01	Plugged and abandoned	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
JS03	Plugged and abandoned	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
JS04	Plugged and abandoned	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
KP01	Operational	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
KP02	Operational	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
KP03	Operational	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
KP05	Operational	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
KP06	Operational	24736	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
LB05	Plugged and abandoned	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
LB06	Operational	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
LB07	Plugged and abandoned	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
LB09	Operational	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
LB11	Operational	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
LP01	Plugged and abandoned			10WA112294	3/04/26	N/A	N/A	N/A
MH01	Plugged and abandoned	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
MP01	Suspended	24856	Continuing (perpetuity)	10WA112288	22/05/16	N/A	N/A	N/A
MP02	Operational	24856	Continuing (perpetuity)	10WA112288	22/05/16	N/A	N/A	N/A
MP03	Operational	24856	Continuing (perpetuity)	10WA112288	22/05/16	N/A	N/A	N/A
MP05	Suspended	24856	Continuing (perpetuity)	10WA112288	22/05/16	N/A	N/A	N/A
MP05a	Operational			10WA112288	22/05/16	N/A	N/A	N/A
MP07	Operational	24856	Continuing (perpetuity)	10WA112288	22/05/16	N/A	N/A	N/A
MP08	Operational	24856	Continuing (perpetuity)	10WA112288	22/05/16	N/A	N/A	N/A
MP09	Operational	24856	Continuing (perpetuity)	10WA112288	22/05/16	N/A	N/A	N/A

Well No.	Well Configuration	WAL	Tenure	WUA	Tenure	Industrial Bore Licence	Tenure	Exemption
MP10	Operational	24856	Continuing (perpetuity)	10WA112288	22/05/16	N/A	N/A	N/A
MP11	Operational	24856	Continuing (perpetuity)	10WA112288	22/05/16	N/A	N/A	N/A
MP12	Operational			10WA112288	22/05/16	N/A	N/A	N/A
MP13	Suspended			10WA112288	22/05/16	N/A	N/A	N/A
MP14	Operational	24856	Continuing (perpetuity)	10WA112288	22/05/16	N/A	N/A	N/A
MP15	Operational	24856	Continuing (perpetuity)	10WA112288	22/05/16	N/A	N/A	N/A
MP16	Operational	24856	Continuing (perpetuity)	10WA112288	22/05/16	N/A	N/A	N/A
MP17	Operational	24856	Continuing (perpetuity)	10WA112288	22/05/16	N/A	N/A	N/A
MP22	Operational	24856	Continuing (perpetuity)	10WA112288	22/05/16	N/A	N/A	N/A
MP23	Operational			10WA112288	22/05/16	N/A	N/A	N/A
MP25	Operational			10WA112288	22/05/16	N/A	N/A	N/A
MP30	Operational	24856	Continuing (perpetuity)	10WA112288	22/05/16	N/A	N/A	N/A
MT01	Operational	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
MT02	Operational	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
MT03	Operational	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
MT04	Operational	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
MT05	Plugged and abandoned	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
MT06	Operational	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
MT07	Operational	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
MT08	Operational	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
MT09	Plugged and abandoned	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
MT10	Plugged and abandoned	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
RB05	Not drilled			10WA112294	3/04/26	N/A	N/A	N/A
RB06	Suspended	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
RB07	Operational	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
RB08	Suspended	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
RB09	Operational	24856	Continuing (perpetuity)	Not verified	22/05/16	N/A	N/A	N/A

Well No.	Well Configuration	WAL	Tenure	WUA	Tenure	Industrial Bore Licence	Tenure	Exemption
RB10	Operational	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
RB11	Suspended	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
RB12	Suspended	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
RP02	Operational	24856	Continuing (perpetuity)	10WA112288	22/05/16	N/A	N/A	N/A
RP03	Plugged and abandoned			10WA112288	22/05/16	N/A	N/A	N/A
RP04	Plugged and abandoned			10WA112288	22/05/16	N/A	N/A	N/A
RP05	Plugged and abandoned			10WA112288	22/05/16	N/A	N/A	N/A
RP06	Plugged and abandoned			10WA112288	22/05/16	N/A	N/A	N/A
RP07	Operational	24856	Continuing (perpetuity)	10WA112288	22/05/16	N/A	N/A	N/A
RP08	Operational	24856	Continuing (perpetuity)	10WA112288	22/05/16	N/A	N/A	N/A
RP09	Operational	24856	Continuing (perpetuity)	10WA112288	22/05/16	N/A	N/A	N/A
RP10	Plugged and abandoned (in progress)	24856	Continuing (perpetuity)	10WA112288	22/05/16	N/A	N/A	N/A
RP11	Plugged and abandoned			10WA112288	22/05/16	N/A	N/A	N/A
RP12	Plugged and abandoned (in progress)	24856	Continuing (perpetuity)	10WA112288	22/05/16	N/A	N/A	N/A
SF01	Operational	24856	Continuing (perpetuity)	10WA112288	22/05/16	N/A	N/A	N/A
SF02	Operational	24856	Continuing (perpetuity)	10WA112288	22/05/16	N/A	N/A	N/A
SF03	Operational	24856	Continuing (perpetuity)	10WA112288	22/05/16	N/A	N/A	N/A
SF05	Operational			10WA112288	22/05/16	N/A	N/A	N/A
SF07	Operational			10WA112288	22/05/16	N/A	N/A	N/A
SF08	Operational			10WA112288	22/05/16	N/A	N/A	N/A
SF09	Operational			10WA112288	22/05/16	N/A	N/A	N/A
SF17	Pad location only	24856	Continuing (perpetuity)	Not verified	22/05/16	N/A	N/A	N/A
SLO2	Operational	24856	Continuing (perpetuity)	10WA112288	22/05/16	N/A	N/A	N/A
SLO3	Operational	24856	Continuing (perpetuity)	10WA112288	22/05/16	N/A	N/A	N/A
SLO9	Suspended	24856	Continuing (perpetuity)	10WA112288	22/05/16	N/A	N/A	N/A

Well No.	Well Configuration	WAL	Tenure	WUA	Tenure	Industrial Bore Licence	Tenure	Exemption
WG01	Suspended	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
WG02	Operational	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
WG03	Operational	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
WG04	Suspended	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
WG05	Suspended	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A
WG06	Plugged and abandoned	24856	Continuing (perpetuity)	10WA112294	3/04/26	N/A	N/A	N/A

Appendix E


Independent Audit Declaration Form

Independent Audit Certification Form	
<i>Development Name:</i>	Camden Gas Project
<i>Consent No.:</i>	<ul style="list-style-type: none"> • DA 15-1-2002-I (Apap, Joe Stanley, Johndilo, Loganbrae, Lipscombe and Mahon); • DA 246-8-2002-I (Kay Park); • DA 282-6-2003-I [RPGP, Rosalind Park, Wandinong, EMAI (EM01-20, 40)]; • DA 183-8-2004-I (Mt Taurus and Menangle Park); • DA 9-1-2005 (Glenlee Wells); and • DA 75-4-2005 (Sugarloaf Farm). • PA No. 06_0137 (Razorback); • PA No. 06_0138 (Elizabeth Macarthur); • PA No. 06_0291 (Spring Farm and Menangle Park) • Environment Protection Licence (EPL) 12003; • Water Access Licences (WAL) (2); • Works and Usage Approvals (WUA) (2); • Industrial bore licences (8); and • Petroleum Production Leases (PPL) (5)
<i>Description of Development:</i>	<p>The Camden Gas Project (CGP) is located 60 km southwest of Sydney in the Wollondilly, Camden and Campbelltown Local Government Areas. The project consists of the Rosalind Park Gas Plant (RPGP), 144 gas wells, low-pressure underground gas gathering lines and a high pressure supply line enabling the production, gathering and sale of coal seam gas.</p> <p>The development of the CGP has occurred in a staged manner with exploration activities commencing in 1998 under Sydney Gas (Camden) Operations. Since that time, the ownership of the project has changed and now operates as AGL Upstream Investments Pty Limited (AGL). A total of ten development approvals and project approvals have been granted to the project by the now Department of Planning and Environment (DPE).</p>
<i>Development Address:</i>	Rosalind Park Gas Plant Medhurst Road Gilead, NSW 2560
<i>Proponent:</i>	AGL Upstream Investments, Pty Ltd
<i>Proponent Address:</i>	PO Box 67 Menangle NSW 2568
Independent Audit	
<i>Title of Audit</i>	Camden Gas Project Independent Environmental Audit 2014-2016
<i>I declare that I have undertaken the Independent Audit and prepared the contents of the attached Independent Audit Report and to the best of my knowledge:</i>	

- *The audit has been undertaken in accordance with relevant condition(s) of consent and generally in accordance with the auditing standard AS/NZS ISO 19011:2014 and Post Approval Guidelines – Independent Audits*
- *The findings of the audit are reported truthfully, accurately and completely;*
- *I have exercised due diligence and professional judgement in conducting the audit;*
- *I have acted professionally, in an unbiased manner;*
- *I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child;*
- *I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent or child;*
- *Neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit; and*
- *I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.*

Note.

- Under section 10.6 of the Environmental Planning and Assessment Act 1979 a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and*
- The Crimes Act 1900 contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both).*
-

<i>Signature:</i>	
<i>Name of Auditor:</i>	Denise Corish
<i>Company:</i>	Treo Environment Pty Ltd
<i>Company Address:</i>	78 Denison Street, Bondi Junction, NSW 2022
<i>Email Address:</i>	Denise.corish@treoenvironment.com
<i>Auditor Certification:</i>	Lead Auditor, Exemplar Global
<i>Date:</i>	20 December 2018



Treo Environment

78 Denison Street
Bondi Junction
NSW, 2022

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

ABN: 42 158 013 944
ACN: 158 013 944