

# INDEPENDENT ENVIRONMENTAL AUDIT 2018-2020

CAMDEN GAS PROJECT

13 October 2021

Prepared for:  
AGL Upstream Investments Pty Ltd

J0077/131021 (Rev 3)



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13 October 2021

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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
DPIE	Department of Planning, Industry 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), 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, Industry and Environment (DPIE). Of the ten development approvals and project approvals, 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 during the 2018-2020 audit period. Nominated development approvals, licences and leases formed the reference point against which performance was measured (**Appendix A** and **Appendix B**).

The findings of this report reflect conditions and documentation presented during the period 8 April 2021 to 22 May 2021, including a site inspection on 8 April 2021.

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 ninth IEA for the project and was commissioned within two 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 24 December 2020.

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 Post Approval Requirements (DPIE, May 2020) and ISO 19011:2018 – 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 the EMP performance measures and key operational activities as follows:

- Performance Measures – The EMP establishes a framework of objectives, targets and Key Performance Indicators (KPIs) as relevant to significant environmental aspects. The project was generally compliant with the targets/KPIs with non-compliances limited to air monitoring (due to a mechanical failure of Compressor 3) and noise monitoring during workover maintenance and decommissioning.
- Rosalind Park Gas Plant (RPGP) – The audit identified that the RPGP was generally compliant with development consents, licences and leases during the audit period. Environmental risks were adequately addressed, and the control environment was effective. Monitoring conducted during the audit period, including air quality, noise, water quality and landscaping, generally occurred in accordance with compliance obligations. Documentation was complete and the control environment was sufficiently mature.
- Decommissioning – The audit identified that decommissioning (or plug and abandonment works) completed during the audit period was conducted in accordance with development consents, licence conditions and documented plans.
- Workover Maintenance – While the audit determined that workover activities were substantially compliant, several non-compliances were identified in relation to noise monitoring.
- 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 2019). There were no matters of non-compliance identified and rehabilitation works were adequately progressed during the audit period.

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 nine non-compliances were identified with respect to 20 conditions. 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-compliances were all identified as 'low risk', meaning they had a low environmental consequence.

**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.

***g. 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**), 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, Industry and Environment (**DPIE**). Of the ten development approvals and project approvals, DA 171-7-2005 was not part of the audit scope as no works were enacted during the audit period and the approval has expired.

### 2.2 Independent Environmental Audit Requirement

The requirement to conduct an Independent Environmental Audit (**IEA**) is reflected in the conditions of nominated active development approvals and planning 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 8 April 2021 to 22 May 2021, including a site inspection on 8 April 2021.

### 2.3 Scope and Criteria

The scope of the audit included:

- Compliance against:
  - Relevant conditions of Development Consents and Project Approvals (**Table 2.1** and **Appendix B**)
  - Environmental Management Plans and Sub Plans and other relevant post approval documents

- Environment Protection Licence (**EPL**) 12003
- Water Access Licences (**WAL**) (2)
- Works and Usage Approvals (**WUA**) (2)
- Industrial bore licences (8)
- Petroleum Production Leases (**PPL**) (5).
- An assessment of the environmental performance of the development including impacts, physical extent and environmental compliance
- An assessment of the implementation of previous audit findings, recommendations and actions
- An evaluation of the adequacy of the Environmental Management Plan to achieve legislative requirements and drive performance improvements.

**Table 2.1 Development Approvals and Project Approvals**

Approval	Assets/Geographical Area
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

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. However, for the purpose of consistency, AGL has opted to conduct the IEA every two years. As such, the audit period is 2018-2020.

### 2.3.1 Agency Consultation

Reflecting the requirements of the Independent Audit Post Approval Requirements (DPIE, May 2020), the auditor must consult with DPIE who may request that other parties or agencies are consulted on the scope of the audit.

DPIE advised the auditor on 27 April 2021 that the NSW Environment Protection Authority (**EPA**) should also be consulted on the on the scope of the audit. On 5 May 2021, the EPA confirmed that they had no further comments or feedback on the scope of the audit.

The outcomes of the consultation with DPIE are detailed in **Table 2.2** and consultation records are provided in **Appendix G**.

**Table 2.2 Agency and Community Consultation**

Agency	Matters Raised	Where Addressed
DPIE	A review on the adequacy of the management plans. It is reported in AGL Camden's recent Annual Environmental Performance Report that revisions of the Environmental Management Plan were undertaken in the reporting period, however, it is not clear whether these plans were approved by the Planning Secretary.	Section 3.2.1 Appendix B
	Summary of performance measures in the management plans and any sub-plans and an assessment of whether these requirements are being complied with, preferably in a tabular format. Any non-compliances, inconsistencies, exceedances from criteria or performance measures must be clearly reported.	Section 3.3.1 Table 3.1
	A review of all incidents and complaints received during the reporting period. Note that 'incident' is defined in Schedule 4, Condition 94 of DA282-6-2003-I, as modified.	Appendix B The auditor sighted the CGP register of incidents, near misses and hazards. There were no events that fulfilled the definition of an 'incidents' as defined in Schedule 4, Condition 94 of DA282-6-2003-I, as modified.
	Brief description of all activities relating to construction, operation and decommissioning on the sites that are being audited in the 2021 IEA. Any new works undertaken in the reporting period must be reported. Please provide this information in a tabular format consisting of the development approval number, the name of the site and the activities observed.	Appendix A
	An audit table covering all conditions of the development approvals that are being audited in accordance with Appendix B- Independent Audit Table Example in the Department's Independent Audit Post Approval Requirements (2020) (IAPAR).	Appendix B
	The IEA report should be prepared in accordance with the IAPAR to the extent that it does not contradict with Schedule 5, Condition 10 of DA282-6-2003-I, as modified. Failure to meet these requirements will require revision and resubmission.	This report
	Please attach a copy of this email and the letter of the Planning Secretary's endorsement of the audit team to the IEA Report. Consultation requests and response to consultation from other agencies should also be attached.	Appendix F Appendix G

## 2.4 Methodology

The audit was conducted in accordance with the Independent Audit Post Approval Requirements (DPIE, May 2020) and ISO 19011:2018 – 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

c. Establish methods and procedures for conducting the audit, including testing methods.

The meeting was attended by Nicola Gardner (Environment Business Partner).

3. **Compliance register** – Reflecting the audit criteria, a register of compliance obligations was developed.
4. **Agency consultation** – Consultation was undertaken with DPIE and the EPA to inform the scope of the audit. A summary of feedback is provided in **Section 2.6**.
5. **Site Inspection** – The site inspection was conducted on 8 April 2021 and included all development areas and environmental aspects that form part of the scope of the audit. The purpose of the site inspection was to assess implementation of environmental controls, determine the status of the operations and assess overall environmental performance. In addition to the RGP, a sample of well sites from each development approval/projects approval were inspected (LB09, LB11, KP03, RB10, MT01, EM22, SL09, RB11, EM28, MP05A and MP5).
6. **Interviews** – The following employees with responsibility for environmental management and site operations were interviewed:
  - a. Nicola Gardner (Environment Business Partner)
  - b. Shane Bottin (Operations Superintendent Camden)
  - c. Brian Duncan (Maintenance Planner)
  - d. Om Prekash (Gas Production Supervisor).
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 2.3**). Matters of non-compliance were risk ranked as per the levels detailed in **Table 2.4**.
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.
10. **Closing meeting** – A closing meeting was held on completion of the audit to present preliminary audit findings, recommendations and any post-audit actions. The meeting was attended by Nicola Gardner (Environment Business Partner).

**Table 2.3 Compliance Status Definitions**

Compliance Status	Description
Compliant	The auditor has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with within the scope of the audit.
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 during the temporal scope of the audit being undertaken (may be a retrospective or future requirement), therefore an assessment of compliance is not relevant.
Note	A statement or fact, where no assessment of compliance is required.

**Table 2.4 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"><li>- Potential for serious environmental consequences, but is unlikely to occur; or</li><li>- Potential for moderate environmental consequences but is likely to occur.</li></ul>
Low	Non-compliance with: <ul style="list-style-type: none"><li>- Potential for moderate environmental consequences, but is unlikely to occur; or</li><li>- Potential for low environmental consequences but is likely to occur.</li></ul>

### 2.4.1 Audit Team

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

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 2014-2016 and 2016-2018 Independent Environmental Audits 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 24 December 2020.

## 3. Environmental Performance

### 3.1 Introduction

Reflecting the scope of the audit, this section presents an assessment of the CGP Environmental Management System (EMS) and a review of environmental performance including compliance.

### 3.2 Systems

#### 3.2.1 Environmental Management System

The CGP 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 appropriate for the nature and scale of the development. The control environment established through the EMS is generally mature and embedded into the project.

The following positive controls were identified that have enhanced the system during the audit period:

- Hazard reporting – In accordance with the EMP, environmental near misses and hazards are actively reported by the project. Environmental near misses and hazards are captured in a register, risk assessed and monitored until closure. This process has a strong focus on incident prevention and promotes awareness within the project team of environmental risk management.
- Environmental Controls – Implementation of the Sub Plans continues to be demonstrated through Environmental Walks, Critical Control Verifications, environmental training and monitoring.

The audit identified one non-compliance relating to the EMP review process (reference 1820-NC-01 **Table 4.2**). The matters, which were administrative in nature, are summarised as follows:

- During the audit period, annual reviews were limited to the main body of the EMP. The Appendices of the EMP, which include the Sub Plans, were not reviewed annually as required by nominated conditions.
- The EMP was submitted to DPIE on 29 March 2019 following the March 2019 annual review. However, there was no evidence to demonstrate that the EMP was submitted to DPIE following the March 2020 review.

#### 3.2.2 Compliance Management

Commencing in 2019, compliance obligations arising from licences, leases, approvals and legislation were migrated from CMO Compliance (a web-based database compliance management system) to SAP Compliance. While both CMO Compliance and SAP Compliance enable the tracking of obligations, verification of evidence and timely escalation, the auditor noted that records were not easily accessible due to the migration process. It is anticipated that additional time will be required to embed SAP and achieve the benefits of this compliance management system.

### 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 EMP performance measures and the following operational activities, each of which is detailed in the sections that follow:

- Rosalind Park Gas Plant (**RPGP**)
- Decommissioning
- Workover Maintenance
- Rehabilitation.

### 3.3.1 Performance Measures

The EMP establishes a framework of objectives, targets and Key Performance Indicators (**KPIs**) as relevant to significant environmental aspects. An assessment of performance against the targets and KPIs is provided in **Table 3.1**.

The project was generally compliant with the EMP targets and KPIs with non-compliances limited to air monitoring (due to a mechanical failure of Compressor 3) and noise monitoring during workover maintenance and decommissioning. The non-compliances are summarised below and detailed in **Table 4.2**.

**Table 3.1 CGP Aspects, Objectives, Targets and KPIs – Audit Assessment**

Aspect and Objective	Targets and KPIs	Independent Audit Findings and Status
<p><b>Land use</b> To avoid unauthorised disturbance to land use or damage to infrastructure.</p>	Zero complaints received from landowners relating to land disturbance or infrastructure	<p><b>Compliant</b> The auditor sighted the CGP Complaints Register and noted that there were no complaints received during the audit period. It was noted that the physical extent of the development was consistent with the approved project and there were no material off-site impacts identified.</p>
<p><b>Soils and Terrain</b> To minimise soil disturbance, prevent contamination and associated impacts on riparian corridors and native vegetation and promote and maintain soil stability throughout the life of the project.</p>	Zero complaints received from landowners or government agencies concerning land disturbance, contamination or soil stability.	<p><b>Compliant</b> The auditor sighted the CGP Complaints Register and noted that there were no complaints received during the audit period.</p>

Aspect and Objective	Targets and KPIs	Independent Audit Findings and Status
<p><b>Noise – Construction</b></p> <ul style="list-style-type: none"> <li>To comply with the construction standards for noise control.</li> <li>To minimise noise during the construction phase.</li> <li>Limit work activities (other than drilling where approved for 24 hours/ 7 days) to daylight hours between 7:00am and 6:00pm weekdays and between 8:00am and 1:00pm on Saturday. No work on Sundays or public holidays except in emergencies.</li> <li>Best available practice noise management measures for Construction works.</li> </ul>	<p>Zero exceedances of noise criteria.  Zero non-conformances with construction hours.  Zero complaints received from nearby receivers.</p>	<p><b>Non-Compliant</b></p> <p>The auditor sighted noise monitoring reports, Daily Workover Reports and the CGP Complaints Register (refer to <b>Appendix B</b> for references); there were no exceedances of noise criteria, no non-conformances with construction hours and no complaints received from nearby receivers.</p> <p>However, as detailed in <b>Appendix B</b>, noise monitoring was not undertaken in accordance with the Noise Management Sub-plan during workover maintenance and decommissioning of nominated well sites. As such, several conditions were identified as non-compliant (references 1820-NC-02, 1820-NC-03, 1820-NC-04, 1820-NC-05, 1820-NC-06, 1820-NC-07 and 1820-NC-08).</p>
<p><b>Noise – Operation</b></p> <ul style="list-style-type: none"> <li>To comply with the operations standards for noise control.</li> <li>To ensure that there are no unresolved noise related complaints from the public.</li> <li>Best practice noise management measures for Production Operation works.</li> </ul>	<p>Zero exceedances of noise criteria.  Zero non-conformances with construction hours.  Zero complaints received from nearby receivers.</p>	<p><b>Not Triggered</b></p> <p>There were no monitoring requirements triggered during the audit period.</p>



Aspect and Objective	Targets and KPIs	Independent Audit Findings and Status
<p><b>Air Emissions</b> To adequately protect air quality by:</p> <ul style="list-style-type: none"> <li>Controlling the quality and minimising the quantity of air emissions associated with compression of the coal seam gas resource.</li> <li>Minimising the quantity of vehicle exhaust emissions.</li> <li>Preventing dust generation during construction, maintenance and operations and rehabilitation activities.</li> <li>Ensuring that any uncontrolled air emissions are reported, and corrective actions promptly implemented.</li> </ul>	<p>Zero exceedances of the in-stack and ambient criteria relevant to controlled air emissions.</p> <p>Zero incidents or complaints received concerning uncontrolled air emissions.</p>	<p><b>Non- Compliant</b></p> <p>The auditor sighted air monitoring reports, the CGP Complaints Register and the incident register; there were no exceedances of the in-stack and ambient criteria, no incidents and no complaints.</p> <p>A non-compliance was identified by AGL and detailed in the Annual Return for the reporting period 22 December 2018 to 21 December 2019. As detailed in Appendix B, a mechanical failure of Compressor 3 occurred in mid-2019 resulting in an extended shut down for the remainder of the audit period. As such, scheduled quarterly monitoring was not undertaken for the nominated period.</p>
<p><b>Water Protection</b> To minimise negative impacts on groundwater and surface water resources.</p>	<p>Zero water contamination incidents from construction and operational activities.</p> <p>Zero incidents concerning water levels or water quality during operations.</p>	<p><b>Compliant</b></p> <p>The auditor sighted the incident register and noted that there were no incidents received during the audit period.</p>
<p><b>Noxious Weeds, Pathogens and Pest Species</b> To prevent the introduction and dispersal of noxious weeds, pathogens and pest species.</p>	<p>Close out identified weed introduction issues within two weeks.</p>	<p><b>Compliant</b></p> <p>The auditor inspected a sample of remediation sites and sighted a sample of Rehabilitation and Relinquishment Reports (ESF2 Forms) and noted the timely closure of weed introduction issues.</p>
<p><b>Flora</b> To minimise the loss of remnant native vegetation and promptly carry out rehabilitation activities. To promote, monitor and maintain regrowth of rehabilitated vegetation cover to ensure that it is consistent with the surrounding environment and to the satisfaction of the landowner.</p>	<p>Zero unauthorised disturbance to flora.</p> <p>Zero complaints received from landowners concerning native vegetation disturbance.</p>	<p><b>Compliant</b></p> <p>The auditor inspected a sample of well sites and reviewed the CGP Complaints Register. There was no unauthorised disturbance to flora identified during the audit period and no complaints received from landowners.</p>
<p><b>Fauna</b> To ensure habitat disturbance is avoided during construction and operational activities and to protect fauna from physical harm.</p>	<p>No injured fauna.</p>	<p><b>Compliant</b></p> <p>The auditor sighted the incident register and noted that there were no incidents received during the audit period.</p>

Aspect and Objective	Targets and KPIs	Independent Audit Findings and Status
<p><b>Cultural Heritage</b> To protect and preserve cultural heritage in the project area</p>	No unauthorised damage to heritage sites.	<b>Compliant</b> The auditor sighted the incident register and noted that there were no incidents received during the audit period.
<p><b>Visual Amenity</b> To minimise the impacts to the visual characteristics of the project area and avoid unauthorised disturbance to land use or damage to infrastructure.</p>	Zero complaints received from residents relating to visual impacts.	<b>Compliant</b> The auditor sighted the CGP Complaints Register and noted that there were no complaints received during the audit period.
<p><b>Waste</b> To minimise waste generation and disposal through the purchasing of environmentally friendly materials and implementation of reuse and recycling initiatives and ensuring that environmental impacts relating to waste management are reported and acted upon.</p>	Waste disposal and recycling records are accurately maintained for Environmental Footprint Report and reviewed annually for improvement opportunities and zero non-conformances concerning waste management practices.	<b>Complaint</b> The auditor sighted AGL Environmental Footprint spreadsheet for the financial years 2018/19 and 2019/20 and a sample of disposal records and there were no matters of non-compliance identified.
<p><b>Dangerous Goods and Hazardous Materials</b> To manage the purchasing, storage, transport, handling and disposal of Dangerous Goods and Hazardous Materials (including waste Dangerous Goods and Hazardous Materials) during construction, operation and maintenance activities so as to minimise risk to the environment (soil, surface water, groundwater, or atmosphere).</p>	Zero incidents from Dangerous Goods or Hazardous Materials entering the environment or causing harm or injury to personnel.	<b>Compliant</b> The auditor sighted the incident register and noted that there were no incidents received during the audit period.
<p><b>Resource use</b> To ensure the efficient use of water, electricity, fuel and gas resources.</p>	Resource usage records are accurately maintained for Environmental Footprint Report and reviewed annually for reduction opportunities.	<b>Complaint</b> The auditor sighted the AGL Environmental Footprint spreadsheet for the financial years 2018/19 and 2019/20 and there were no matters of non-compliance identified.
<p><b>Public Risk</b> To protect the health, safety and welfare of the public during construction and operational activities.</p>	Zero incidents or complaints concerning public safety. Zero missed landowner notifications prior to maintenance activities.	<b>Compliant</b> The auditor sighted the CGP Complaints Register and a sample of landowner notifications. There were no matters of non-compliance identified.
<p><b>Emergency Response</b> To quickly and effectively minimise adverse environmental impacts associated with an emergency.</p>	Minimal impacts from emergency events.	<b>Not Triggered</b> There were no emergency events during the audit period.

Aspect and Objective	Targets and KPIs	Independent Audit Findings and Status
<p><b>Traffic</b> To outline traffic management measures for construction and operation activities of the CGP, to minimise the potential traffic impacts on public roads.</p>	<p>Zero incidents or complaints received regarding traffic disruption.</p>	<p><b>Compliant</b> The auditor sighted the CGP Complaints Register and incident register and noted that there were no complaints or incidents received during the audit period.</p>

### 3.3.2 Rosalind Park Gas Plant

The audit identified that the RGP was generally compliant with development consents, licences and leases during the audit period. Environmental risks were adequately addressed, and the control environment was effective.

Environmental monitoring conducted during the audit period, including air quality, noise, water quality and landscaping, generally occurred in accordance with compliance obligations and demonstrated that actual impacts were less than or equal to predicted impacts. Documentation was complete and the control environment was sufficiently mature.

### 3.3.3 Decommissioning

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

As detailed in the EMP (March 2020), gas wells are suspended on cessation of gas production (typically within 15 years of construction). Following suspension, decommissioning works are undertaken, and sites are rehabilitated.

In line with a commitment to progressively undertake decommissioning works to enable closure of the facility in 2023, 23 well sites were plugged and abandoned during the audit period. A sample of well sites was inspected by the auditor to assess compliance against the Petroleum Operations Plan (**POP**) (Version 13, June 2020) and the Rehabilitation and Landscape Management Plan (June 2019). The rehabilitation works were noted to be adequate and in compliance with consents, licences and plans.

During the site inspection, the auditor inspected well site MP05A 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.

AGL are required to complete several tasks as part of decommissioning works and provide a report to the Secretary within two weeks of completion (PPL1 Condition 10d). Within the sample of documents sighted, the auditor noted that activities were compliant with the reporting requirements.

### 3.3.4 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 2020), include erosion, groundwater impacts, waste and noise.

During the audit period, workover maintenance was conducted on the following nominated well sites: WG03, GL17, MT06, SL03, RB06, EM20, EM34, EM39, MP05A, MP10, MP23, MP30 and SF05. 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. Implementation of plans was evidenced through the following key controls:

- Induction Training – A site-specific and role-specific induction program is delivered to all AGL employees and contractors.
- 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 is managed through SAP. The system effectively monitors maintenance requirements based on the use of plant and equipment. The auditor sighted a sample of look ahead reports, preventative workorders and corrective workorders.
- Pre-Site Hazard Inspection – Prior to commencement of workover activities, an inspection is conducted to identify environmental risks and establish appropriate controls.

While the audit determined that workover activities were substantially compliant, several non-compliances were identified in relation to noise monitoring. Additional details are provided in **Table 4.2** and **Appendix B** (references 1820-NC-02, 1820-NC-03, 1820-NC-04, 1820-NC-05, 1820-NC-06, 1820-NC-07 and 1820-NC-08).

### 3.3.5 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 2019). 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 during the audit 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.

As previously reported, the EPA commenced proceedings in June 2017 against AGL Upstream Investments Pty Limited, alleging a contravention of a condition of EPL 12003. The matter related to a flood event that occurred 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 affected. There is no allegation that environmental harm occurred. In March 2020, a decision was made by the EPA to withdraw the charge and the proceedings are now complete.

### 3.4.2 Environmental Incidents

There were no environmental incidents reported internally by AGL within the audit period. A total of 43 environmental hazards were reported during the audit period and nine near miss events which were sighted by the auditor.

Corrective actions taken in response to the environmental hazards and near miss events were appropriate, monitored and closed in a timely manner.

### **3.4.3 Environmental Complaints**

There were no complaints reported by AGL during the audit period.

## 4. Audit Findings

### 4.1 Previous Audit (2015-2018)

The 2015-2018 IEA was conducted by Treo Environment (20 December 2018). The audit identified 10 non-compliances of which nine were closed by AGL during the current audit period (**Table 4.1**). A recurring non-compliance was identified in relation to the monitoring of noise during workover activities (**Table 4.1** and **Table 4.2**).

**Table 4.1 Actions Arising from Previous Audit**

Reference	Requirement	Assessment and Recommendation	AGL Action	Auditor Assessment and Status
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).	Appendix J of the 2018-2019 AEPR and 2019-2020 AEPR now includes a comparison of estimated light levels, flare frequency and flare duration between the RPGP flare events and predictions in Table 2 of URS (2003).	Closed on 31 October 2019.
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 DPIE (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.	Independent arborists Accurate Tree Assessments were approved by the Department of Planning, Industry and Investment and completed the RPGP vegetation monitoring.	The requirements of this condition were assessed as compliant during the 2018-2020 IEA.
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.	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.  Noise monitoring conducted during the audit period was limited to production phase wells; noise monitoring was not performed during workover activities.  Based on the monitoring requirements of the	Wilkinson Murray have been engaged to conduct attended noise monitoring during well workovers in the Spring Farm and Menangle Park fields.	The requirements of this condition were assessed as non-compliant as part of the 2018-2020 IEA Refer to <b>Table 4.2</b> for further details.

Reference	Requirement	Assessment and Recommendation	AGL Action	Auditor Assessment and Status
		Noise Management Sub Plan, monitoring was warranted during workover activities.		
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"> <li>a. Information explaining the maintenance procedures to be undertaken.</li> <li>b. An estimate of the length of works at each site.</li> <li>c. Contact details for a representative of the Proponent.</li> <li>b. d. Information regarding a 24 hour telephone contact number.</li> </ul>	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.	Written notification of planned maintenance activities at the SF05 well were provided to landowners and affected stakeholders at least 14 days prior to commencement of works.	The requirements of this condition were assessed as compliant during the 2018-2020 IEA.
EPL 12003 Condition O2.1	All plant and equipment installed at the premises or used in connection with the licensed activity: <ul style="list-style-type: none"> <li>a. must be maintained in a proper and efficient condition; and</li> <li>b. must be operated in a proper and efficient manner.</li> </ul>	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.	On 14 December 2017, the EPA issued a variation to EPL 12003 in respect to the CEMS related conditions.	Closed on 14 December 2017.
EPL 12003 Condition 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	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)	On 14 December 2017, the EPA issued a variation to EPL 12003 in respect to the CEMS related conditions.	Closed on 14 December 2017.



Reference	Requirement	Assessment and Recommendation	AGL Action	Auditor Assessment and Status																								
	use the sampling method, units of measure, and sample at the frequency, specified opposite in the other columns:	until the condition was varied on 14 December 2017.																										
EPL 12003 Condition 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>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.	On 14 December 2017, the EPA issued a variation to EPL 12003 in respect to the CEMS related conditions.	Closed on 14 December 2017.
Pollutant	Units of Measure	Frequency	Sampling Method																									
Nitrogen Oxides	milligrams per cubic metre	Continuous	CEM-2																									
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Misture	percent	Continuous	Method approved by EPA in writing																									
Volumetric flow rate	cubic metres per second	Continuous	CEM-6																									
Oxygen	percent	Continuous	CEM-3																									
EPL 12003 Condition 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.	On 14 December 2017, the EPA issued a variation to EPL 12003 in respect to the CEMS related conditions.	Closed on 14 December 2017.																								
PPL 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>	Written notification of planned maintenance activities at the SF05 well were provided to landowners and affected stakeholders at least 14 days prior to commencement of works.	The requirements of this condition were assessed as compliant during the 2018-2020 IEA.																								

Reference	Requirement	Assessment and Recommendation	AGL Action	Auditor Assessment and Status
		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.		
PPL 10d iv	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: 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.	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.  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.	The format of the Plug and Abandonment Reports has been updated to include details on the gas and water makes and compositions.	The requirements of this condition were assessed as compliant during the 2018-2020 IEA.

## 4.2 Current Audit (2018-2020)

Within the defined scope, the audit determined that AGL is largely compliant with relevant approvals and licences. A total of nine non-compliances were identified with respect to 20 conditions. 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-compliances 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 eight matters of non-compliance associated with 17 conditions (**Table 4.2**).

**Table 4.2 Development Consent and Project Approval Non-Compliances**

ID	Reference	Condition	Non-Compliance	Risk	Recommended Action
1820-NC-01	DA 15-1-2002-I (Condition 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>The EMP specifies that the document will be reviewed annually at minimum. This requirement is applicable to both the EMP and the Sub Plan appendices.</p> <p>The following matters of non-compliance were identified:</p> <ul style="list-style-type: none"> <li>The EMP Appendices (Sub Plans), were not reviewed annually. Most plans were reviewed once during the audit period (2019), except the Groundwater Management Plan (EMP, Appendix O) and Aboriginal Cultural Heritage Management Sub Plan (EMP, Appendix G) which were not reviewed.</li> <li>The EMP was submitted to DPIE following the March 2019 review (29 March 2019). However, there was no evidence to demonstrate that the EMP was submitted to DPIE following the March 2020 review.</li> </ul> <p>It is noted that the amendments of the EMP and Sub Plans during the audit period were administrative in nature and the documents are available to agencies and the public via the CGP website.</p>	Low	<p>It is recommended that the EMP (inclusive of Sub Plans) is reviewed annually with the outcomes of the review recorded in the document control section of the relevant document.</p>
	DA 282-6-2003 (Condition 4)	<p>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.</p>			
	DA 183-8-2004 (Condition 23)	<p>The Applicant shall review and update the OEMP annually, or as directed by the Director-General</p>			

ID	Reference	Condition	Non-Compliance	Risk	Recommended Action															
1820-NC-02	DA 282-6-2003 (Condition 34(j))	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: <i>[Refer to DA 282-6-2003 for the complete condition.]</i> (j) monitoring methods and program.	In accordance with the Noise Management Sub Plan (July 2019), workover maintenance and decommissioning are defined as construction activities. During the audit period, workover maintenance was conducted of well sites EM39 and GL17 and as such, the noise monitoring requirements were triggered.  The auditor determined that noise monitoring was not undertaken during the workover maintenance of well sites EM39 and GL17.	Low	It is recommended that the Pre-Mobilisation Hazard Identification Form (DCS_GN_FM_HSE_003) be reviewed and revised to include a requirement to identify noise monitoring requirements (as detailed in the Noise Management Sub Plan) prior to commencement of works.															
	DA 282-6-2003 (Condition 34(c))	Noise from the drilling and construction of EM39 and GL17 shall not exceed the sound pressure level (noise) limits in the table below:  <table border="1"> <thead> <tr> <th>Receiver Location</th> <th>Weekday (7.00am-6.00pm) Saturday (7.00am-1.00pm)</th> <th>Saturday (1.00pm-6.00pm) Sunday (7.00am-6.00pm)</th> <th>Evening (6.00pm- 10.00pm)</th> <th>Night (10.00pm- 7.00am)</th> </tr> </thead> <tbody> <tr> <td>EM39 – R3</td> <td>40</td> <td>40</td> <td>40</td> <td>38</td> </tr> <tr> <td>GL17 – R3</td> <td>40</td> <td>40</td> <td>40</td> <td>38</td> </tr> </tbody> </table>				Receiver Location	Weekday (7.00am-6.00pm) Saturday (7.00am-1.00pm)	Saturday (1.00pm-6.00pm) Sunday (7.00am-6.00pm)	Evening (6.00pm- 10.00pm)	Night (10.00pm- 7.00am)	EM39 – R3	40	40	40	38	GL17 – R3	40	40	40	38
	Receiver Location	Weekday (7.00am-6.00pm) Saturday (7.00am-1.00pm)				Saturday (1.00pm-6.00pm) Sunday (7.00am-6.00pm)	Evening (6.00pm- 10.00pm)	Night (10.00pm- 7.00am)												
EM39 – R3	40	40	40	38																
GL17 – R3	40	40	40	38																
DA 282-6-2003 (Condition 38(d))	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: <i>[Refer to DA 282-6-2003 for the complete condition.]</i> (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																			

ID	Reference	Condition	Non-Compliance	Risk	Recommended Action														
1820-NC-03	DA 183-8-2004 (Condition 13B)	<p>Noise from the drilling and construction of MP30 shall not exceed the sound pressure level (noise) limits in the table below:</p> <table border="1"> <thead> <tr> <th rowspan="2">Location (nearest residential dwelling)</th> <th>Day</th> <th>Evening</th> <th>Night</th> <th>Saturday (1pm-6pm) Sunday (7am-6pm)</th> </tr> <tr> <th>L<sub>Aeq</sub>(15min)</th> <th>L<sub>Aeq</sub>(15min)</th> <th>L<sub>Aeq</sub>(15min)</th> <th>L<sub>Aeq</sub>(15min)</th> </tr> </thead> <tbody> <tr> <td>Nearest receptor</td> <td>57</td> <td>42</td> <td>40</td> <td>42</td> </tr> </tbody> </table>	Location (nearest residential dwelling)	Day	Evening	Night	Saturday (1pm-6pm) Sunday (7am-6pm)	L <sub>Aeq</sub> (15min)	L <sub>Aeq</sub> (15min)	L <sub>Aeq</sub> (15min)	L <sub>Aeq</sub> (15min)	Nearest receptor	57	42	40	42	<p>In accordance with the Noise Management Sub Plan (July 2019), workover maintenance and decommissioning are defined as construction activities. During the audit period, workover maintenance was conducted of well site MP30 and as such, the noise monitoring requirements were triggered.</p> <p>The auditor determined that noise monitoring was not undertaken during the workover maintenance of well site MP30.</p>	Low	Refer to 1820-NC-02 for recommended action.
Location (nearest residential dwelling)	Day	Evening		Night	Saturday (1pm-6pm) Sunday (7am-6pm)														
	L <sub>Aeq</sub> (15min)	L <sub>Aeq</sub> (15min)	L <sub>Aeq</sub> (15min)	L <sub>Aeq</sub> (15min)															
Nearest receptor	57	42	40	42															
1820-NC-04	DA 75-4-2005 (Condition 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 rowspan="2">Receiver Location</th> <th>Weekday (7.00am-6.00pm)</th> <th>Saturday (1.00pm-6.00pm) Sunday (7.00am-6.00pm)</th> <th>Evening (6.00pm-10.00pm)</th> <th>Night (10.00pm-7.00am)</th> </tr> </thead> <tbody> <tr> <td>Nearest Receiver</td> <td>54</td> <td>44</td> <td>47</td> <td>41</td> </tr> </tbody> </table>	Receiver Location	Weekday (7.00am-6.00pm)	Saturday (1.00pm-6.00pm) Sunday (7.00am-6.00pm)	Evening (6.00pm-10.00pm)	Night (10.00pm-7.00am)	Nearest Receiver	54	44	47	41	<p>In accordance with the Noise Management Sub Plan (July 2019), workover maintenance and decommissioning are defined as construction activities. During the audit period, decommissioning was conducted of well site SL09 and as such, the noise monitoring requirements were triggered.</p> <p>The auditor determined that noise monitoring was not undertaken during the decommissioning of well site SL09.</p>	Low	Refer to 1820-NC-02 for recommended action.				
	Receiver Location	Weekday (7.00am-6.00pm)		Saturday (1.00pm-6.00pm) Sunday (7.00am-6.00pm)	Evening (6.00pm-10.00pm)	Night (10.00pm-7.00am)													
Nearest Receiver		54	44	47	41														
	DA 75-4-2005 (Condition 19(h))	<p>The Applicant shall prepare and implement a Construction Noise Management Protocol for construction of the development. The Protocol shall be submitted for the approval of the OEH and the Director-General at least one week prior to commencement of construction. The Protocol must include but is not limited to:</p> <p>(h) Monitoring methods and program.</p>																	

ID	Reference	Condition	Non-Compliance	Risk	Recommended Action								
1820-NC-05	PA 06_0137 (Condition 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"> <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	<p>In accordance with the Noise Management Sub Plan (July 2019), workover maintenance and decommissioning are defined as construction activities. During the audit period, workover maintenance was conducted of well site RB06 and decommissioning was undertaken of well sites RB11 and RB12. As such, the noise monitoring requirements were triggered.</p> <p>The auditor determined that noise monitoring was not undertaken during the workover maintenance of well site RB06 or the decommissioning of well sites RB11 and RB12.</p>	Low	Refer to 1820-NC-02 for recommended action.				
	Location	Day											
Any residential receiver	54												
PA 06_0137 (Condition 3.6)	<p>The Proponent shall prepare and implement a Noise Monitoring Program for the construction and operation of the project to the satisfaction of the Director-General. The Program shall be submitted to the Director-General prior to construction commencing and shall include a noise monitoring protocol for evaluating compliance with the construction noise goals and the operational noise impact assessment criteria in this approval</p>												
1820-NC-06	PA 06_0138 (Condition 3.2)	<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"> <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>In accordance with the Noise Management Sub Plan (July 2019), workover maintenance and decommissioning are defined as construction activities. During the audit period, workover maintenance was conducted of well site EM34 and decommissioning was undertaken of well sites EM28, EM31, EM32, EM33 and EM34. As such, the noise</p>	Low	Refer to 1820-NC-02 for recommended action.
Location	Day	Evening	Night										
Any residential receiver	54	39	35										

ID	Reference	Condition	Non-Compliance	Risk	Recommended Action																																																												
	PA 06_0138 (Condition 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.	<p>monitoring requirements were triggered.</p> <p>The auditor determined that noise monitoring was not undertaken during the workover maintenance of well site EM34 or the decommissioning of well sites EM28, EM31, EM32, EM33 and EM34.</p>																																																														
1820-NC-07	PA 06_0291 (Condition 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"> <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>In accordance with the Noise Management Sub Plan (July 2019), workover maintenance and decommissioning are defined as construction activities. During the audit period, workover maintenance was conducted of well site MP23 and decommissioning was conducted of well site MP05. As such, the noise monitoring requirements were triggered.</p> <p>The auditor determined that noise monitoring was not undertaken during the workover maintenance of well site MP23 or during the decommissioning of well site MP05.</p>	Low	Refer to 1820-NC-02 for recommended action.
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																																																													



ID	Reference	Condition	Non-Compliance	Risk	Recommended Action
	PA 06_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.			
1820-NC-08	PA 06_0291 (Condition 4.1)	During the project, the Proponent shall:	During the audit period, environmental monitoring requirements were limited to attended noise monitoring during workover maintenance of well sites MP23 and SF05 and decommissioning of well site MP05. As detailed in the assessment of Conditions 3.2 and 3.7, the auditor determined that noise monitoring was not undertaken as required for MP23 and MP05. The monitoring results are therefore not publicly available on the website.	Low	Refer to 1820-NC-02 for recommended action.
	PA 06_0291 (Condition 4.10 (a))	Make a summary of all environmental monitoring results required under this approval publicly available on the website.			
	PA 06_0291 (Condition 4.10 (b))	Update these results on a regular basis (at least every 6 months) or as required.			

#### 4.2.2 Environment Protection Licence

An assessment was conducted against the conditions of EPL 12003 (21 December 2017) (**Appendix C, Table C1**). There was one non-compliance identified in relation to air monitoring, affecting three conditions (M2.1, M2.2 and M2.5). The non-compliance was previously reported by AGL in the 2019 Annual Return.

**Table 4.3 – EPL Non-Compliances**

ID	Reference	Condition	Non-Compliance	Risk	Recommended Action
1820-NC-09	M 2.1	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:	<p>The auditor sighted the following air monitoring results prepared by Ektimo:</p> <ul style="list-style-type: none"> <li>• Annual Emission Testing, Report R006497 (12 November 2018) (includes September 2018 quarterly monitoring)</li> <li>• Quarterly Emission Testing, Report R006724 (17 December 2018)</li> <li>• Quarterly Emission Testing, Report R007285 (5 April 2019)</li> <li>• Quarterly Emission Testing, Report R007600 (15 July 2019)</li> <li>• Quarterly Emission Testing, Report R008177 (30 October 2019)</li> <li>• Quarterly Emission Testing, Report R008415 (10 January 2020)</li> <li>• Quarterly Emission Testing, Report R008823 (26 March 2020)</li> <li>• Quarterly Emission Testing, Report R009153 (25 May 2020).</li> </ul> <p>There were no errors noted in the above reports and compliance was demonstrated against the sampling method, units of measure and frequency as defined in this condition.</p> <p>As detailed in the Annual Return for the reporting period 22 December 2018 to 21 December 2019, a mechanical failure of Compressor 3 occurred in mid-2019 resulting in an extended shut down for the remainder of the audit period. As such scheduled quarterly monitoring was not undertaken for the nominated period. There are no recommended corrective actions.</p>	Low	There are no recommended corrective actions.
	M2.2	Air Monitoring Requirements <i>[Refer to the Tables in EPL 12006.]</i>			
	M2.5	For the purposes of Condition M2.2, the selection of sampling positions for quarterly monitoring at points 1, 2, 3, 4 and 6 must be carried out in accordance with test method TM-1 as specified in Approved Methods for the Sampling and Analysis of Air Pollutants in NSW, as in force from time to time.			

### 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 compliance assessment identified no matters of non-compliance.

### 4.2.4 Petroleum Production Licences

The compliance assessment of the PPL conditions (**Appendix C, Table C5**) identified no matters of non-compliance.

## 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"> <li>• Operation of the existing 20 wells and 5 additional wells not yet completed and/or drilled;</li> <li>• Operation of the existing and proposed gas gathering system;</li> <li>• Operation of the existing gas treatment plant and production of up to 93,000 GJ/month;</li> <li>• Sale and distribution of gas to the AGL gas network; and</li> <li>• Operation of the existing site office and pipe yard depot.</li> </ul>	<ul style="list-style-type: none"> <li>• Operated selected wells and gas gathering line.</li> <li>• Completed decommissioning of JD01, JD11, LB09 and LB11.</li> <li>• Conducted final surface rehabilitation works of JD01, JD11, LB09 and LB11.</li> </ul>
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"> <li>• Connection of 3 existing wells (KP1, KP2, and KP3) to the Ray Beddoe Treatment Plant (in accordance with the attached plan); and</li> <li>• Continued production and sale of methane gas from the 3 wells.</li> </ul>	<ul style="list-style-type: none"> <li>• Operated wells and gas gathering line.</li> <li>• Completed decommissioning of KP03.</li> <li>• Conducted final surface rehabilitation works of KP03.</li> </ul>
MOD25-3-2007	4/07/2007	Modification of DA 246-8-2002-i granted for: <ul style="list-style-type: none"> <li>• Construction, drilling and operation of 2 Surface to in-seam wells (KP05 and KP06) from KP01.</li> </ul>	
MOD29-3-2007	4/08/2008	Modification of DA 246-8-2002-i granted for: <ul style="list-style-type: none"> <li>• Kay Park and Loganbrae gas gathering line modification project.</li> </ul>	
	3/12/2008	Modification of DA 246-8-2001i was issued for: <ul style="list-style-type: none"> <li>• Construction and operation of one SIS well (KP05) and one direction well (KP06) from KP01.</li> </ul>	
	20/04/2011	Modification of DA 246-8-2001i was issued for: <ul style="list-style-type: none"> <li>• Construction, drilling and operation of 2 surface to in-seam wells (KP05 and KP06).</li> </ul>	

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)	<p>Project approval for the Camden Gas Project Stage 2, including:</p> <ul style="list-style-type: none"> <li>Construction and drilling of 20 wells located on the EMAI Site;</li> <li>Operation and production of gas from the existing (drilled) 23 wells and 20 wells to be constructed (a total of 43 wells);</li> <li>Construction and operation of the gas gathering system;</li> <li>Construction and operation of the gas treatment plant, associated workshop and office facilities;</li> <li>Production of up to 14.5 petajoules per annum from the gas treatment plant.</li> </ul>	<ul style="list-style-type: none"> <li>Operated wells, gas gathering line and RPGP.</li> <li>Conducted workover maintenance of WG03 GL17, EM20 and EM39.</li> <li>Completed decommissioning of RP02, RP10, RP12, GL16, EM12 and EM40.</li> <li>Conducted final surface rehabilitation works of RP02, RP10, RP12, GL16, EM12 and EM40.</li> </ul>
MOD72-7-2004-i	26/08/2004	<p>Modification of DA 282-6-2003-i granted for:</p> <ul style="list-style-type: none"> <li>Limiting term of production lease approval to 21-years;</li> <li>Land omitted from development consent;</li> <li>Requirement for EMP for works in Campbelltown City Council road reserve; and</li> <li>Works to commence prior to granting of production lease.</li> </ul>	
MOD5-1-2005	1/02/2005	<p>Modification of DA 282-6-2003-i granted for:</p> <ul style="list-style-type: none"> <li>Amendment to EMAI Access Road (refer Figure 3 - Sydney Gas Camden Gas Project Stage 2 (18-11-2004 Map Ref M240329); and</li> <li>Amendment to EMAI Gathering System – refer Figure 4 - Sydney Gas Camden Gas Project Stage 2 (18-11-2004 Map Ref M240328).</li> </ul>	
MOD42-3-2005	1/06/2005	<p>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&amp;I – Modification Application, and the accompanying attachments.</p>	
MOD52-4-2006	16/05/2006	<p>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.</p>	
MOD119-10-2006	22/10/2006	<p>Modification of DA 282-6-2003-i granted for:</p> <ul style="list-style-type: none"> <li>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</li> <li>Additional limits on hours of operation and sound pressure levels.</li> </ul>	
MOD124-10-2006	1/11/2006	<p>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.</p>	
MOD11-2-2007	2/05/2007	<p>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.</p>	

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"> <li>Construction, drilling and operation of 1 Surface to in-seam well (EM38) at EM20; and</li> <li>Upgrading (twinning) of the gas gathering line between MP14-GL10, GL10-GL05, GL05-GL07 and RP03-RP08.</li> </ul>	
MOD9	11/04/2008	Modification of DA 282-6-2003-i granted for: <ul style="list-style-type: none"> <li>Construction, drilling and operation of 2 Surface to in-seam wells - EM39 (from EM02) and GL17 (from GL05);</li> <li>Upgrading (twinning) of the gas gathering line from EM39 to the junction of the gas gathering line and road to the EM03 well; and</li> <li>Connection of the new wells to the existing gas gathering system.</li> </ul>	
MOD10	16/03/2009	Modification of DA 282-6-2003-i granted for: <ul style="list-style-type: none"> <li>Construction of an access road to the existing RP09 gas well; and</li> <li>Twinning of a small section of the existing gas gathering line between RP08 and RGP.</li> </ul>	
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"> <li>Modification of RGP noise monitoring requirements, air emission concentration limits and waste storage and generation volumes.</li> </ul>	
MOD13	27/03/2017	Modification of DA 282-6-2003-i granted for: <ul style="list-style-type: none"> <li>Deletion of nominated conditions that are replicated in EPL 12003.</li> </ul>	
DA 183-8-2004-I (Mt Taurus and Menangle Park)	16/12/2004	Project approval granted for: <ul style="list-style-type: none"> <li>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</li> <li>Construction of a dam at the MT1 gas well site.</li> </ul>	<ul style="list-style-type: none"> <li>Operated wells and gas gathering line.</li> <li>Conducted workover maintenance of MT06 and MP30.</li> <li>Completed decommissioning of MT01.</li> <li>Conducted final surface rehabilitation works of MT01.</li> </ul>
MOD27-3-2007	4/07/2007	Modification of DA 183-8-2004-i granted for: <ul style="list-style-type: none"> <li>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.</li> </ul>	

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"> <li>Construction and drilling of well GL11;</li> <li>Construction of a gas gathering system between four wells at Glenlee and two wells at EMA1;</li> <li>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.</li> </ul>	<ul style="list-style-type: none"> <li>Operated gas gathering line.</li> <li>Operated wells.</li> <li>Completed decommissioning of EM21 and EM22.</li> <li>Conducted final surface rehabilitation works of EM21 and EM22</li> </ul>
MOD51-4-2006	16/05/2006	Modification of DA 9-2005 granted for: <ul style="list-style-type: none"> <li>Construction, drilling and operation of a directional well from each of GL02 and GL11.</li> </ul>	
MOD28-3-2007	4/07/2007	Modification of DA 9-1-2005 granted for: <ul style="list-style-type: none"> <li>Upgrading (twinning) of gas gathering line between GL02 and GL05.</li> </ul>	
	16/11/2010	Modification of DA 9-1-2005 granted for: <ul style="list-style-type: none"> <li>Modification of Schedule 2, Condition 26</li> </ul>	
DA 75-4-2005 (Sugarloaf Farm)	7/10/2005	Project approval granted for: <ul style="list-style-type: none"> <li>Construction and drilling of 7 wells;</li> <li>Construction of a gas gathering system and access roads;</li> <li>Connection of the wells to the Stage 2 Camden gas Project – Gas Treatment Plant; and</li> <li>Production of methane gas.</li> </ul>	<ul style="list-style-type: none"> <li>Operation of wells and gas gathering lines.</li> <li>Conducted workover maintenance of SL03.</li> <li>Completed decommissioning of SL09.</li> <li>Conducted final surface rehabilitation works of SL09.</li> </ul>
MOD29-3-2007	4/07/2007	Modification of DA 75-4-2005 granted for: <ul style="list-style-type: none"> <li>Construction and drilling of 9 wells, including 2 Surface to in-seam wells (SL08 and SL09) at SL03.</li> </ul>	
MOD2	10/01/2010	Modification of DA 75-4-2005 granted for: <ul style="list-style-type: none"> <li>Twinning of a gas gathering line from well surface locations SL03 and SL09 to the RPGP.</li> </ul>	
PA No. 06_0137 (Razorback)	9/12/2006	Project approval granted for: <ul style="list-style-type: none"> <li>Construction and drilling of wells RB03-RB12 and gas gathering lines.</li> </ul>	
			<ul style="list-style-type: none"> <li>Operation of wells and gas gathering lines.</li> <li>Conducted workover maintenance of RB06.</li> <li>Completed decommissioning of RB11 and RB12.</li> <li>Conducted final surface rehabilitation works of RB11 and RB12.</li> </ul>



Approval	Issue Date	Description	Audit Period Works
PA No. 06_0138 (Elizabeth Macarthur)	9/12/2006	Project approval granted for: <ul style="list-style-type: none"> <li>Construction and drilling of wells EM23-36 and gas gathering lines.</li> </ul>	<ul style="list-style-type: none"> <li>Operation of wells and gas gathering lines.</li> <li>Conducted workover maintenance of EM34.</li> <li>Completed decommissioning of EM28, EM31, EM32, EM33 and EM34.</li> <li>Conducted final surface rehabilitation works of EM28, EM31, EM32, EM33 and EM34.</li> </ul>
MOD1	6/08/2007	Modification of PA 06_0138 granted for: <ul style="list-style-type: none"> <li>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</li> </ul>	
PA No. 06_0291 (Spring Farm and Menangle Park);	4/09/2008	Project Approval granted for: <ul style="list-style-type: none"> <li>Drilling of well surface locations SF04A, SF10, SF17, and SF20 in Spring Farm.</li> <li>Well surface location SF04 is not permitted to be drilled.</li> <li>Drilling of well surface locations MP02, MP03, MP04, MP05, MP06, MP11, MP19, MP21, MP22, MP23, MP24, and MP33 in Menangle Park.</li> </ul>	<ul style="list-style-type: none"> <li>Operated wells and gas gathering line.</li> <li>Conducted workover maintenance of MP10, MP05A, MP23 and SF05.</li> <li>Completed decommissioning of MP05.</li> <li>Conducted final surface rehabilitation works of MP05.</li> </ul>
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	Evidence Collected, Independent Audit Findings & Recommendations	Status
	<b>Schedule 3</b>		
	<b>Obligation to Minimise Harm to the Environment</b>		
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 Walks, Critical Control Verifications, Daily Workover Reports and monitoring. The auditor sighted a sample of records and noted that AGL was generally compliant with the requirements of the EMP.</p> <p>Compliance obligations arising from licences, leases, environmental/ planning approvals and legislation are monitored through web-based database compliance management systems (CMO Compliance and SAP Compliance).</p>	Compliant
	<b>Terms of Approval</b>		
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. As such, assurance is limited to the available evidence.</p>	Compliant
	(a) DA submitted to the Department on 31 January 2002;		Compliant
	(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;		Compliant
	(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;		Compliant
	(d) Letter from Sydney Gas Company dated 8 April 2002 to the EPA in relation to background noise level monitoring;		Compliant
	(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;		Compliant
	(f) Letter from Sydney Gas Company dated 11 April 2002 to the EPA in relation to nitrogen dioxide impact assessment and odour issues;	Compliant	

**B1. DA 15-1-2002-i**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	(g) Letter from Sydney Gas Company dated 12 April 2002 to the EPA in relation to the 3 additional wells, and maintenance activities;		Compliant
	(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;		Compliant
	(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;		Compliant
	(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;		Compliant
	(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		Compliant
	(l) Conditions of this consent	Refer to relevant conditions for an assessment of compliance.	
	If there is any inconsistency between the above documents, the latter document shall prevail over the former to the extent of the inconsistency. However, the conditions of this consent shall prevail over all other documents to the extent of any inconsistency.	Condition noted.	
	<b>Period of Approval</b>		
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
	<b>Special Conditions of Approval</b>		
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

**B1. DA 15-1-2002-i**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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
<b>Further Approvals</b>			
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 2018-2019 AEPR and 2019-2020 AEPR against the development consents and confirmed that no additional wells have been drilled or operated.	Compliant
<b>Redrilling and Refracting Management Plan</b>			
	For the purposes of this consent the redrilling and/or additional fracing of a well does not constitute wellhead maintenance.	<p>Condition not triggered during the audit period.</p> <p>It was reported by AGL (AEPR 2018-2019 and AEPR 2019-2020) that there were no drilling or fracing works undertaken during the audit period.</p>	Not Triggered

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
9	The Applicant shall obtain the approval of the Director-General for the redrilling and/or additional fracking of a well.	Condition not triggered during the audit period.  It was reported by AGL (AEPR 2018-2019 and AEPR 2019-2020) that there was no drilling or fracking works undertaken during the audit period.	Not Triggered
10	The Applicant shall prepare a Redrilling and Refracking Management Plan in consultation with the DOPE for 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. The Plan shall include, but not necessarily be limited to:	Condition not triggered during the audit period.  It was reported by AGL (AEPR 2018-2019 and AEPR 2019-2020) that there was no drilling or fracking 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 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 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/refracking work. 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.		Not Triggered
	<b>Compliance</b>		
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 are monitored through web-based database compliance management systems (CMO Compliance and SAP Compliance).	Compliant

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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 (May 2020) 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. Attendance 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>	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
	<b>PRODUCTION OPERATIONS PLAN</b>		
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.	Not Triggered
	(a) ongoing operations and environmental management; and		Not Triggered
	(b) ongoing monitoring of the development.		Not Triggered
	A copy of the POP shall be forwarded to the Department within fourteen days of the DMR's acceptance.		Not Triggered
	<b>ENVIRONMENTAL MANAGEMENT</b>		
	<b>Environmental Management Plan</b>		
15	The Applicant shall prepare and implement an Environmental Management Plan (EMP) to provide an environmental management framework, practices and procedures to be followed during the drilling and operation of the development. The EMP shall be prepared in consultation with the relevant authorities (EPA, DMR, DLWC). The EMP shall include, but not necessarily be limited to:	<p>The auditor sighted the EMP (May 2020) and noted compliance with the requirements of this condition.</p> <p>A number of controls are in place to monitor and measure implementation of the EMP including Daily Workover Reports, Critical Control Verifications, Environmental Walks and monitoring. The auditor sighted a sample of monitoring controls and noted compliance with the requirements of the EMP.</p>	Compliant
	(a) identification of all statutory and other obligations that the Applicant is required to fulfil in relation to operation of the development, including all consents, licences, approvals and consultations;		Compliant

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	(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.  Amendments of the EMP and Sub Plans during the audit period were administrative in nature. The EMP and nominated Sub Plans are available to agencies and the public via the CGP website.	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.	Amendments of the EMP and Sub Plans during the audit period were administrative in nature. The EMP and nominated Sub Plans are available to agencies and the public via the CGP website.	Compliant



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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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>The EMP specifies that the document will be reviewed annually at minimum. This requirement is applicable to both the EMP and the Sub Plan appendices.</p> <p>The following matters of non-compliance were identified:</p> <ul style="list-style-type: none"> <li>The EMP Appendices (Sub Plans), were not reviewed annually. Most plans were reviewed once during the audit period (2019), except the Groundwater Management Plan (EMP, Appendix O) and Aboriginal Cultural Heritage Management Sub Plan (EMP, Appendix G) which were not reviewed.</li> <li>The EMP was submitted to DPIE following the March 2019 review (29 March 2019). However, there was no evidence to demonstrate that the EMP was submitted to DPIE following the March 2020 review.</li> </ul> <p>It is noted that the amendments of the EMP and Sub Plans during the audit period were administrative in nature and the documents are available to agencies and the public via the CGP website.</p> <p>It is recommended that the EMP (inclusive of Sub Plans) is reviewed annually with the outcomes of the review recorded in the document control section of the relevant document.</p>	Non-Compliant 1820-NC-01
	<b>Noise Management Plan</b>		
19	The Applicant shall prepare and implement a Noise Management Plan for the whole site. The Plan shall include, but not necessarily be limited to:	The auditor sighted the Noise Management Sub Plan (July 2019) and noted compliance with the requirements of this condition.	Compliant
	(a) identification of the potential sources of noise during drilling and operation;		Compliant
	(b) the noise criteria for these activities;	Implementation of the Sub Plan was demonstrated through monitoring records and the induction program.	Compliant
	(c) details of what actions and measures would be implemented to ensure that these operations would comply with the relevant noise criteria;		Compliant
	(d) describe how the effectiveness of these actions and measures would be monitored during the life of the development, clearly indicating who would conduct the monitoring, how often this monitoring would be conducted, how the results of this monitoring would be recorded and reported to the Director-General, and if any non-compliance is detected; And	There were no reported noise complaints during the audit period.	Compliant

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status	
	(e) describe what procedures would be followed to ensure compliance.		Compliant	
	<b>Soil and Water Management Plan</b>			
	The Applicant shall prepare and implement a Soil and Water Management Plan (SWMP) for the whole site. This plan shall include, but not necessarily be limited to:	The auditor sighted the Soil and Water Management Sub Plan (June 2019). The Sub Plan is compliant with the requirements of this condition.	Compliant	
	(a) the measures to be implemented to minimise the potential for soil erosion and the discharge of sediment and other pollutants to lands and/or waters during drilling activities;	Implementation of the Sub Plan was demonstrated through Environmental Walks and Critical Control Verifications to assess performance and identify improvement opportunities.	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;		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.	Compliant
	(d) consistency with the stormwater management plan for the catchment, should one exist, or with the EPA’s Managing Urban Stormwater: Council Handbook should a stormwater management plan for the catchment not exist;		It was reported by AGL (AEPR 2018-2019 and AEPR 2019-2020) that there were no incidents recorded during the audit period associated with the offsite movement of sediment.	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
	<b>Water Quality Management Plan</b>			
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 2019) and the Groundwater Management Plan for the Camden Gas Project (July 2018). The Plans comply with the requirements of this condition.	Compliant	
	(a) provide details of an appropriate soil sampling and monitoring program to ensure that areas used for waste water application do not lead to an unacceptable build-up of salts within the soil profile;	Implementation of the Sub Plans was demonstrated through Environmental Walks and Critical Control Verifications to assess performance and identify improvement opportunities.	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	

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	<b>Traffic Management Plan</b>		
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 2019) and noted compliance with the requirements of this condition. This condition is also reflected in the induction program.	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;	Note: as at July 2013, PAL 1 no longer exists.	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
	<b>Vegetation and Landscape Management Plan</b>		Compliant
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 Sub Plan (June 2019) and noted compliance 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;	The auditor inspected sites LB09 and LB11 that had been subject to recent decommissioning and rehabilitation works. Rehabilitation works were conducted in compliance with the Sub Plan.	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
	<b>Waste Management Plan</b>		
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 2019) 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

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	(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
	<b>Site Rehabilitation Management Plan</b>		
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 2019) and noted compliance with the requirements of this condition.	Compliant
	(a) details of the staging and timing for rehabilitation works;		Compliant
	(b) ongoing management strategies to ensure the success of rehabilitation works;		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	The auditor inspected sites LB09 and LB11 that had been subject to recent decommissioning and rehabilitation works. Rehabilitation works were conducted in compliance with the Sub Plan.	Compliant
	(d) the measures to remediate sites following the decommissioning of the wells, pipelines and treatment plant.		Compliant
	<b>PERFORMANCE REPORTING</b>		
	<b>Condition Report</b>		
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
	<b>Incident Reporting</b>		
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 Camden Gas Project. Notification details 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

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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
	<b>Complaints Register</b>		
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 register 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
	(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
	<b>Risk Assessment</b>		
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

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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 2020) and noted compliance with the requirements of this condition. Implementation was demonstrated through the following documents/ processes: <ul style="list-style-type: none"> <li>• Induction program (Rapid Induct)</li> <li>• HSE audit action tracking (SAP)</li> <li>• Standards and Critical Controls.</li> </ul>	Compliant
	<b>EPA Annual Return</b>		
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 2018 and December 2019 Annual Returns and noted compliance against the requirements of this condition.	Compliant
	<b>Annual Environmental Performance Reporting</b>		
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 evidence of submission of the 2018/2019 AEPR and the 2019/2020 DPIE.	Compliant
	(a) the standards, performance measures and statutory requirements the development is required to comply with;	The auditor sighted the AEPR 2018-2019 and the AEPR 2019-2020 and noted compliance with the requirements of this condition.	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

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	(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
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 AGL to DPIE (25 October 2019) providing the requested report on the court proceedings initiated by the EPA against AGL in June 2017. It is noted that this request from DPIE was initiated by a review of the AEPR but does not directly relate to this Development Consent.	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 2018/2019 AEPR and the 2019/2020 AEPR to the nominated agencies. It is noted that a copy of each AEPR is also available on the CGP website.	Compliant
	<b>Independent Environmental Audit</b>		
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 2018-2020 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	Evidence Collected, Independent Audit Findings & Recommendations	Status																				
	(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 auditor sighted correspondence confirming that the 2015-2018 Independent Environmental Audit was finalised on 20 December 2018 and submitted to the Director-General of the NSW Department of Planning and Infrastructure on 21 December 2018. As such, the requirements of this condition were satisfied.	Compliant																				
	<b>ENVIRONMENTAL PERFORMANCE</b>																						
	<b>Noise Limits</b>																						
38	<p>The Applicant shall comply with the noise criteria specified in the table below.</p> <p>Table 1 – Noise Limits (dB(A))</p> <table border="1"> <thead> <tr> <th>Location (Identified in Fig. 10.1 of the EIS)</th> <th>Day L<sub>AEO15min</sub></th> <th>Evening L<sub>AEO15min</sub></th> <th>Night L<sub>AEO15min</sub></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 <sub>AEO15min</sub>	Evening L <sub>AEO15min</sub>	Night L <sub>AEO15min</sub>	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 <sub>AEO15min</sub>	Evening L <sub>AEO15min</sub>	Night L <sub>AEO15min</sub>																				
Receiver Location A	40	40	40																				
Receiver Locations B, C and F	37	37	37																				
Receiver Locations D, E and G to M	37	37	35																				
Any other residential receiver	35	35	35																				
39	<p>For the purposes of assessment of noise levels specified in this consent, noise from the development shall be: more than 30m from the boundary, at the most affected point within 30m of the dwelling to determine compliance with the LAeq15min, LAeq day, LAeq evening and LAeq night noise limits;</p> <p>(a) measured at the most affected point on or within the residential boundary or, where the dwelling is</p> <p>(b) subject to the modification factors provided in Section 4 of the <i>NSW Industrial Noise Policy</i>; and</p> <p>(c) measured using the FAST response on the sound level meter.</p>	Condition closed in a previous audit.	Not Triggered																				
	(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																				
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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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
	<b>Noise – Well Maintenance</b>		
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 (July 2019) and noted compliance with the requirements of this condition.  Implementation was evidenced by the induction program (construction hours), Environmental Walks, Critical Control Verifications and notification letters provided to landowners in advance of workover and decommissioning works.  There were no well maintenance activities associated with DA 15-1-2002-I 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
	<b>Noise – Drilling Impacts</b>		
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 (July 2019) and noted compliance with the requirements of this condition. It was reported by AGL (AEPR 2018-2019 and AEPR 2019-2020) that there were no drilling 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 methods where appropriate;		Not triggered

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	(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
	<b>Hours of Operation</b>		
44	The Applicant shall ensure that all construction work, except:	The auditor sighted the Noise Management Sub Plan (July 2019) and noted the inclusion of the requirements of this condition.  It was reported by AGL (AEPR 2018-2019 and AEPR 2019-2020) 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 (July 2019) 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.	

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status								
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) <math>L_{Aeq}</math></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							
<b>Ray Beddoe Treatment Plant – Reduction of Noise</b>											
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 $L_{Aeq15min}$ level of 37 dB(A) for the day time period;		Not Triggered								
	(b) an $L_{Aeq15min}$ level of 37 dB(A) for the evening period; and		Not Triggered								
	(c) an $L_{Aeq15min}$ 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	Evidence Collected, Independent Audit Findings & Recommendations	Status
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
	<b>Odour</b>		
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
	<b>Water Quality Impacts</b>		
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 2019). The plan details a number of controls to prevent the pollution of water.</p> <p>Implementation of the Sub Plan was demonstrated through Environmental Walks and Critical Control Verifications to assess performance and identify improvement opportunities.</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>It was reported by AGL (AEPR 2018-2019 and AEPR 2019-2020) that there were no surface water contamination incidents recorded during the audit period.</p>	Compliant
	<b>Waste Water</b>		
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 2018/19 and 2019/20 and noted that produced water was disposed to an appropriately licenced facility. 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
	(d) reinjection into gas wells.		Compliant

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	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
	<b>Dust</b>		
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 2019) 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.	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 2019) and noted the inclusion of reasonable dust management controls including the covering of loads.  The auditor sighted the environmental complaints register and noted that there were no dust related complaints during the audit period.	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
	<b>Threatened Species</b>		
60A	The Applicant shall ensure that, during the drilling and construction of APO2 and APO3, 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

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	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
	<b>Waste</b>		
61	The Applicant shall not cause, permit or allow any waste generated outside the site to be received at the site for storage, treatment, processing, reprocessing or disposal or any waste generated at the site, to be disposed of at the site, except as expressly permitted by a licence under the <i>Protection of the Environment Operations Act 1997</i> . This condition only applies to the storage, treatment, processing, reprocessing or disposal of waste at the site, if it requires a licence under the <i>Protection of the Environment Operations Act 1997</i> .	<p>The auditor sighted the AGL Environmental Footprint spreadsheet for the financial years 2018/19 and 2019/20 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> <p>It is noted that a waste audit was not within the scope of this independent audit.</p>	Compliant
62	Notwithstanding condition 61 of this consent, the Applicant may dispose of waste water generated on the site in accordance with condition 54 of this consent.	<p>The auditor sighted the AGL Environmental Footprint spreadsheet for the financial years 2018/2019 and 2019/2020. 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.</p> <p>It is noted that a waste audit was not within the scope of this independent audit.</p>	Compliant
	<b>Lighting</b>		

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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
	<b>Gas Flare</b>		
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
	<b>Activated Carbon Filter</b>		
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
	<b>Steel Pipeline</b>		
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
	<b>Gas Gathering System Pipeline</b>		

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
68	The Applicant shall comply with the following in the construction of the gas gathering system pipeline:	The auditor sighted the AEPR 2018-2019 and the AEPR 2019-2020 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
	(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
	<b>LPG Storage</b>		
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
	<b>Indigenous Heritage</b>		
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
	<b>Cultural Heritage</b>		
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
	<b>Site Rehabilitation</b>		



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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
72	The Applicant shall ensure the prompt and effective rehabilitation of all disturbed areas of the site following the completion of construction, operations and associated activities and/or the decommissioning of plant, to minimise the generation of wind erosion dust.	<p>The auditor sighted the Rehabilitation and Landscape Management Sub Plan (June 2019) and noted compliance with the requirements of this condition.</p> <p>The auditor inspected sites LB09 and LB11 that had been subject to recent decommissioning and rehabilitation works. Rehabilitation works were conducted in compliance with the Sub Plan.</p>	Compliant
73	The Applicant shall carry out rehabilitation of the site in accordance with the requirements of the DMR and the Site Rehabilitation Management Plan.	<p>The auditor sighted the Rehabilitation and Landscape Management Sub Plan (June 2019) and noted compliance with the requirements of this condition.</p> <p>The auditor inspected sites LB09 and LB11 that had been subject to recent decommissioning and rehabilitation works. Rehabilitation works were conducted in compliance with the Sub Plan.</p>	Compliant
<b>ENVIRONMENTAL MONITORING</b>			
<b>Land Subsidence</b>			
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
<b>Vibration Impacts</b>			
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 Triggered
<b>Air Emissions</b>			

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status																				
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="309 475 987 1042"> <thead> <tr> <th data-bbox="309 475 465 555">Discharge Monitoring Point Identification Number</th> <th data-bbox="465 475 622 555">Type of Monitoring Point</th> <th data-bbox="622 475 779 555">Type of Discharge</th> <th data-bbox="779 475 987 555">Description of Location</th> </tr> </thead> <tbody> <tr> <td data-bbox="309 555 465 671">1</td> <td data-bbox="465 555 622 671">Air emissions monitoring</td> <td data-bbox="622 555 779 671">Discharge to air</td> <td data-bbox="779 555 987 671">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="309 671 465 788">2</td> <td data-bbox="465 671 622 788">Air emissions monitoring</td> <td data-bbox="622 671 779 788">Discharge to air</td> <td data-bbox="779 671 987 788">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="309 788 465 920">3</td> <td data-bbox="465 788 622 920">Air emissions monitoring</td> <td data-bbox="622 788 779 920">Air</td> <td data-bbox="779 788 987 920">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="309 920 465 1042">4</td> <td data-bbox="465 920 622 1042">Air emissions monitoring</td> <td data-bbox="622 920 779 1042">Discharge to air</td> <td data-bbox="779 920 987 1042">Odour control system exhaust <i>(located between the dehydrator unit and final gas filter as shown in Fig 3.9. of the EIS)</i></td> </tr> </tbody> </table>	Discharge Monitoring Point Identification Number	Type of Monitoring Point	Type of Discharge	Description of Location	1	Air emissions monitoring	Discharge to air	TEG reboiler exhaust <i>(located on the dehydrator unit as shown in Fig. 3.9 of the EIS)</i>	2	Air emissions monitoring	Discharge to air	Flare <i>(located on the southern corner of the Treatment Plant as shown in Fig. 3.9 of the EIS)</i>	3	Air emissions monitoring	Air	Coal seam methane gas supply to TEG reboiler <i>(located on the dehydrator unit as shown in Fig 3.9. of the EIS)</i>	4	Air emissions monitoring	Discharge to air	Odour control system exhaust <i>(located between the dehydrator unit and final gas filter as shown in Fig 3.9. of the EIS)</i>	Condition closed in a previous audit. The nominated monitoring locations were at the former Ray Beddoe Treatment Plant.	Not Triggered
Discharge Monitoring Point Identification Number	Type of Monitoring Point	Type of Discharge	Description of Location																				
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	<b>Load Limits</b>																						

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status																
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="311 576 983 1046"> <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)																		
Benzene	Applicant to negotiate with the EPA prior to issue of the licence																		
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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><b>Testing Method – Load Limits</b></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	Evidence Collected, Independent Audit Findings & Recommendations	Status												
	<b>Concentration Limits</b>														
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/m<sup>3</sup></td> <td>0.35</td> <td>Dry, 273 K, 101.3 kPa, 7% O<sub>2</sub></td> </tr> <tr> <td>Sulphuric acid mist and/or sulphur trioxide</td> <td>g/m<sup>3</sup></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 <sup>3</sup>	0.35	Dry, 273 K, 101.3 kPa, 7% O <sub>2</sub>	Sulphuric acid mist and/or sulphur trioxide	g/m <sup>3</sup>	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												
Nitrogen oxides	g/m <sup>3</sup>	0.35	Dry, 273 K, 101.3 kPa, 7% O <sub>2</sub>												
Sulphuric acid mist and/or sulphur trioxide	g/m <sup>3</sup>	0.1	Dry, 273 K, 101.3 kPa												
	<b>Destruction Efficiency</b>														
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												
	<b>Combustion Parameters</b>														

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status															
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															
	<b>Site Specific Emission Concentration Limit</b>																	
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 SO<sub>3</sub>) 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/m<sup>3</sup>)</th> <th>Averaging Time</th> <th>Percentile</th> </tr> </thead> <tbody> <tr> <td>Sulfuric acid mist and/or sulfur trioxide (as SO<sub>3</sub>)</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 <sup>3</sup> )	Averaging Time	Percentile	Sulfuric acid mist and/or sulfur trioxide (as SO <sub>3</sub> )	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 <sup>3</sup> )	Averaging Time	Percentile															
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Sulfur dioxide	712	10 minutes	100															
	570	1 hour	100															
	<b>Monitoring Records</b>																	

**B1. DA 15-1-2002-i**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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.	<p>Monitoring requirements in relation to DA 15-1-2002-i were limited to the Leak Detection and Repair Program undertaken in accordance with Environment Protection Licence 12003. The auditor sighted the following documents and noted compliance with the requirements of this condition:</p> <ul style="list-style-type: none"> <li>• Annual Leak Detection and Repair Summary Report (22 December 2017 to 21 December 2018)</li> <li>• Annual Leak Detection and Repair Summary Report (22 December 2019 to 21 December 2019)</li> <li>• Gas Leakage Audit, Camden Gas Project 2019 (Health Pipeline Services)</li> <li>• Gas Leakage Audit, High Pressure Pipeline 2019 (Health Pipeline Services).</li> </ul>	Compliant
85	The monitoring required under this consent for the concentration of a pollutant emitted to the air, shall be carried out in accordance with:	Leak detection monitoring was undertaken in accordance with US EPA Method 21 - Determination of Volatile Organic Compound Leaks (40 CFR Part 60, Appendix A, Method 21).	Compliant
	(a) any methodology which is required under the POEO Act to be used for the testing of the concentration of the pollutant; or		Compliant
	(b) if no such requirement is imposed by or under the POEO Act or by the consent or a condition of the licence or the protocol (as the case may be) requires to be used for that testing; or		Compliant
	(c) if no such requirement is imposed by or under the POEO Act or by the consent or a condition of the licence or the protocol (as the case may be), any methodology approved in writing by the EPA for the purposes of that testing prior to the testing taking place. Note: The Clean Air (Plant and Equipment) Regulation 1997 requires testing for certain purposes to be conducted in accordance with test methods contained in the publication Approved Methods for the Sampling and Analysis of Air Pollutants in NSW.		Compliant
86	All records required to be kept by the licence shall be:	Monitoring requirements in relation to DA 15-1-2002-i were limited to the Leak Detection and Repair Program undertaken to address Conditions R4.1-4.3 of Environment Protection Licence 12003. The	Compliant
	(a) in a legible form, or in a form that can readily be reduced to a legible form;		Compliant
	(b) kept for at least four years after the monitoring or event to which they relate took place; and		Compliant

**B1. DA 15-1-2002-i**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	(c) produced in a legible form to any authorised officer of the EPA who asks to see them.	auditor sighted the following documents and noted compliance with the requirements of this condition: <ul style="list-style-type: none"> <li>• Annual Leak Detection and Repair Summary Report (22 December 2017 to 21 December 2018)</li> <li>• Annual Leak Detection and Repair Summary Report (22 December 2019 to 21 December 2019)</li> <li>• Gas Leakage Audit, Camden Gas Project 2019 (Health Pipeline Services)</li> <li>• Gas Leakage Audit, High Pressure Pipeline 2019 (Health Pipeline Services).</li> </ul>	Compliant
87	The following records shall be kept in respect of any samples required to be collected:	Monitoring requirements in relation to DA 15-1-2002-i 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 following documents and noted compliance with the requirements of this condition: <ul style="list-style-type: none"> <li>• Annual Leak Detection and Repair Summary Report (22 December 2017 to 21 December 2018)</li> <li>• Annual Leak Detection and Repair Summary Report (22 December 2019 to 21 December 2019)</li> <li>• Gas Leakage Audit, Camden Gas Project 2019 (Health Pipeline Services)</li> <li>• Gas Leakage Audit, High Pressure Pipeline 2019 (Health Pipeline Services).</li> </ul>	Compliant
	(a) the date(s) on which the sample was taken;		Compliant
	(b) the time(s) at which the sample was taken;		Compliant
	(c) the point at which the sample was taken; and		Compliant
	(d) the name of the person who collected the sample.		Compliant
	<b>Requirement to Monitor Concentrations of Pollutants Discharged</b>		

**B1. DA 15-1-2002-i**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status																																																																																				
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="309 560 880 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/m<sup>3</sup></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/m<sup>3</sup></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/m<sup>3</sup></td> <td>Annual</td> <td>TM-4</td> </tr> <tr> <td>sulfuric acid mist and/or sulfur trioxide</td> <td>1</td> <td>g/m<sup>3</sup></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>Note<sup>1</sup></td> <td>Note<sup>1</sup></td> <td>Note<sup>1</sup></td> </tr> <tr> <td>velocity</td> <td>1 and 3</td> <td>m/s</td> <td>Annual</td> <td>TM-2</td> </tr> <tr> <td>volatile organic compounds (VOC)</td> <td>1 and 3</td> <td>ppm</td> <td>Annual</td> <td>OM-2</td> </tr> <tr> <td rowspan="2">volumetric flow rate</td> <td>1 and 3</td> <td>m<sup>3</sup>/s</td> <td>Annual</td> <td>TM-2</td> </tr> <tr> <td>2</td> <td>m<sup>3</sup>/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 <sup>3</sup>	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 <sup>3</sup>	Annual	TM-11	oxygen in stack gases	1 and 3	%	Annual	TM-25	sulfur dioxide	1	g/m <sup>3</sup>	Annual	TM-4	sulfuric acid mist and/or sulfur trioxide	1	g/m <sup>3</sup>	Annual	TM-3	temperature	1 and 3	°C	Annual	TM-2		2	°C	Continuous	TM-2	tertiary butyl mercaptan	4	Note <sup>1</sup>	Note <sup>1</sup>	Note <sup>1</sup>	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 <sup>3</sup> /s	Annual	TM-2	2	m <sup>3</sup> /s	Continuous	CEM-6	Condition closed in a previous audit. The nominated monitoring locations were at the former Ray Beddoe Treatment Plant.	Not Triggered
Pollutant	Discharge Monitoring Point	Unit of Measure	Frequency	Sampling Method																																																																																			
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89	The selection of sampling positions is to be carried out in accordance with test method TM-1.	Condition closed in a previous audit. The nominated monitoring locations were at the former Ray Beddoe Treatment Plant.	Not Triggered																																																																																				
	<b>Community Consultative Committee</b>																																																																																						
90	The Applicant shall establish a Community Consultative Committee to oversee the environmental performance of the development. This Committee shall:		Compliant																																																																																				



**B1. DA 15-1-2002-i**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	(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 following minutes of the Community Consultative Committee and noted compliance with the requirements of this condition: <ul style="list-style-type: none"> <li>September 2018</li> <li>March 2019</li> <li>September 2019.</li> </ul>	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 following minutes of the Community Consultative Committee and noted compliance with the requirements of this condition: <ul style="list-style-type: none"> <li>September 2018</li> <li>March 2019</li> <li>September 2019.</li> </ul> Correspondence from the independent chairperson to the auditor (19 April 2021), verified that the committee membership conformed to the requirements of this condition throughout the audit period.	Compliant
	(d) two representatives appointed by the Applicant (including the environmental officer);		Compliant
	(e) two (2) representatives from a recognised environmental group;		Compliant
	(f) meet at least quarterly;		Compliant
	(g) take minutes of the meeting; and	The minutes from the CCC Meeting in March 2017 reported that DPIE approved a change in the meeting frequency from quarterly to twice per year. Reflecting this change, the auditor sighted the following minutes of the Community Consultative Committee: <ul style="list-style-type: none"> <li>September 2018</li> <li>March 2019</li> <li>September 2019</li> </ul>	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.	Due to COVID-19, the March 2020 meeting was cancelled. In lieu of a meeting, a project update was provided to Committee members for the following periods: <ul style="list-style-type: none"> <li>September 2019 to March 2020</li> <li>March 2020 to July 2020.</li> </ul>	Compliant
	Representatives from relevant government agencies or other individuals may be invited to attend meetings as required by the Chairperson.		Compliant
91	The Applicant shall:	The auditor sighted the minutes of the Community Consultative Committee and presentations to the Committee and noted compliance with the requirements of this condition.	Compliant
	(a) provide the Committee with regular information on the environmental performance and management of the development;		Compliant

**B1. DA 15-1-2002-i**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	(b) ensure that the Committee has reasonable access to the necessary plans to carry out its functions;	All documentation relating to the CCC is available on the Camden Gas Project website.	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
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
	<b>SCHEDULE 4</b>		
	<b>MANDATORY CONDITIONS FOR ALL EPA LICENCES</b>		
	<b>ADMINISTRATIVE CONDITIONS</b>		
	<b>Other activities</b>		
	(To be used on licences with ancillary activities) This licence applies to all other activities carried on at the premises, including:	Condition noted.	
	i Gas wells and gathering system.		
	<b>OPERATING CONDITIONS</b>		
	<b>Activities must be carried out in a competent manner</b>		

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	Licensed activities must be carried out in a competent manner. This includes:	Competence is demonstrated through defined roles and responsibilities, training, and assurance, as detailed below: <ul style="list-style-type: none"> <li>• Roles and responsibilities – Defined in the EMP (May 2020) and position descriptions.</li> <li>• Training – The auditor sighted the induction program that is delivered to all AGL employees and contractors (Rapid Induct).</li> <li>• Audit and inspection – Environmental Walks and Critical Control Verifications were undertaken to assess implementation of control measures.</li> </ul>	Compliant
	(a) the processing, handling, movement and storage of materials and substances used to carry out the		Compliant
	(b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.		Compliant
	<b>Maintenance of plant and equipment</b>		
	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: <ul style="list-style-type: none"> <li>• Preventative Maintenance – The preventative maintenance of plant and equipment is managed through SAP. The system effectively monitors maintenance requirements based on the use of plant and equipment. The auditor sighted a sample of look ahead reports, preventative workorders and corrective workorders.</li> <li>• Monitoring – Regular documented checks are undertaken of plant and equipment.</li> <li>• Procedures – Standard Operating Procedures have been developed to guide commonly undertaken activities.</li> <li>• Leak Detection and Repair Program (refer to EPL 12003).</li> </ul>	Compliant
	(a) must be maintained in a proper and efficient condition; and		Compliant
	(b) must be operated in a proper and efficient manner.		Compliant
	<b>MONITORING AND RECORDING CONDITIONS</b>		
	<b>Recording of pollution complaints</b>		
	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 the Complaints Register and noted compliance with the requirements of this condition. There were no complaints during the audit period.	Compliant
	The record must include details of the following:		Compliant
	(a) the date and time of the complaint;		Compliant
	(b) the method by which the complaint was made;		Compliant

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	(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 the Complaints Register 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
	<b>Telephone complaints line</b>		
	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 number, contact details and feedback form. The website notes that the purpose of the telephone number is for complaints and enquiries. The auditor contacted the telephone number 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
	<b>REPORTING CONDITIONS</b>		
	<b>Annual Return documents</b>		
	<b>What documents must an Annual Return contain?</b>		
	The licensee must complete and supply to the EPA an Annual Return in the approved form comprising:	The auditor sighted the December 2018 and December 2019 Annual Returns and noted compliance against the requirements of this condition.	Compliant
	(a) a Statement of Compliance; and		Compliant
	(b) a Monitoring and Complaints Summary.		Compliant
	A copy of the form in which the Annual Return must be supplied to the EPA accompanies this licence. Before the end of each reporting period, the EPA will provide to the licensee a copy of the form that must be completed and returned to the EPA.		Compliant

**B1. DA 15-1-2002-i**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	<b>Period covered by Annual Return</b>		
	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 2018 and December 2019 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
	<b>Deadline for Annual Return</b>		
	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 2018 and December 2019 Annual Returns and noted compliance against the requirements of this condition.	Compliant
	<b>Notification where actual load cannot be calculated</b>		
	(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

**B1. DA 15-1-2002-i**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	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
	<b>Licensee must retain copy of Annual Return</b>		
	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
	<b>Certifying of Statement of Compliance and Signing of Monitoring and Complaints Summary</b>		
	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 2018 and December 2019 Annual Returns and noted compliance against the requirements of this condition.	Compliant
	(a) the licence holder; or		Compliant
	(b) by a person approved in writing by the EPA to sign on behalf of the licence holder. 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
	<b>Notification of environmental harm</b>		
	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	There were no environmental incidents reported by AGL during the audit period. The auditor sighted the Environmental Incident Register and noted the inclusion of 43 environmental hazards and nine near miss events.	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
	<b>Written report</b>		
	Where an authorised officer of the EPA suspects on reasonable grounds that:		Not Triggered
	(a) where this licence applies to premises, an event has occurred at the premises; or		Not Triggered

**B1. DA 15-1-2002-i**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	(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.	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
	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.		
	<b>GENERAL CONDITIONS</b>		
	<b>Copy of licence kept at the premises or on the vehicle or mobile plant</b>		
	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 evidence to demonstrate that a copy of the licence is kept at the premises.	Compliant
	The licence must be produced to any authorised officer of the EPA who asks to see it.		Compliant

**B1. DA 15-1-2002-i**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	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	Evidence Collected, Independent Audit Findings & Recommendations	Status
	<b>Schedule 3</b>		
	<b>Conditions of Consent</b>		
	<b>Obligation to Minimise Harm to the Environment</b>		
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 Walks, Critical Control Verifications, Daily Workover Reports and monitoring. The auditor sighted a sample of records and noted that AGL was generally compliant with the requirements of the EMP.</p> <p>Compliance obligations arising from licences, leases, environmental/ planning approvals and legislation are monitored through web-based database compliance management systems (CMO Compliance and SAP Compliance).</p>	Compliant
	<b>Terms of Approval</b>		
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. As such, assurance is limited to the available evidence.</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>	Compliant
	(a) DA submitted to the Department on 2 August 2002; and		Compliant
	(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;		Compliant
	(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;		Compliant
	(d) Conditions of the consent for DA No. 15-1-2002-I dated 23 July 2002;		
	(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	Compliant	

**B2. DA 246-8-2002**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	(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.	Compliant
	(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. As such, assurance is limited to the available evidence.	Compliant
	(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.	Amendments of the EMP and Sub Plans during the audit period were administrative in nature. The EMP and nominated Sub Plans are available to agencies and the public via the CGP website.	Compliant
	(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. Condition noted.	
	<b>Period of Approval</b>		
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
	<b>Special Condition of Approval</b>		
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
	<b>Redrilling and Refracking Management Plan</b>		
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 2018-2019 and AEPR 2019-2020) that there was no drilling or fraccing works 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 2018-2019 and AEPR 2019-2020) that there was no drilling or fraccing works undertaken during the audit period.	Not Triggered

**B2. DA 246-8-2002**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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 2018-2019 and AEPR 2019-2020) that there was no drilling or fracing works undertaken during the audit period.	Not Triggered
7	The Applicant shall give written notification of the proposed redrilling/refracting work to potentially affected residences and other noise sensitive receivers at least fourteen days prior to work commencing.	Condition not triggered during the audit period.  It was reported by AGL (AEPR 2018-2019 and AEPR 2019-2020) that there was no drilling or fracing works undertaken during the audit period.	Not Triggered
<b>Compliance</b>			
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 web-based database compliance management systems (CMO Compliance and SAP Compliance).	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 (May 2020) 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. Attendance records and competency assessments are maintained within Rapid Induct and the system includes adequate controls to ensure induction currency is maintained for relevant contractors.	Compliant
<b>Production Operations Plan</b>			

## B2. DA 246-8-2002

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
10	The Applicant shall prepare a Production Operations Plan (POP) for the approval of the DOPE. The POP shall have regard to the conditions of this consent and the Environment Protection Licence under the Protection of the Environment Operations Act 1997. The POP will form the basis for the:	The auditor sighted the POP (Version 13) and noted compliance with the requirements of this condition. Adequate correspondence was sighted to demonstrate that the document is reviewed annually and submitted to DPIE for approval.	Compliant
	(a) ongoing operations and environmental management; and		Compliant
	(b) ongoing monitoring of the development. A copy of the POP shall be forwarded to the Department within fourteen days of the DOPE's acceptance.		Compliant
	<b>Environmental Management Plan</b>		
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
	<b>Condition Report</b>		
12	The Applicant shall prepare a Condition Report on residences and structures that may be potentially affected by drilling/fracking work, including the redrilling and refracking of an existing well. The Applicant shall undertake an inspection of the residence and/or structure prior to work commencing, and a follow up inspection within one month of the completion of the work. The Applicant shall take immediate action for repair of any damage to the residence or structure as a result of the work and to avoid any further damage. A copy of the Condition Report shall be submitted to the Director-General and the DOPE after completion of the work.	Condition not triggered during the audit period.  It was reported by AGL (AEPR 2018-2019 and AEPR 2019-2020) that there was no drilling or fracking works undertaken during the audit period.	Not Triggered
	<b>Incident Reporting</b>		
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 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

**B2. DA 246-8-2002**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	<b>Complaints Register</b>		
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 the Complaints Register and noted compliance with the requirements of this condition. There were no complaints during the audit period.	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 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
	<b>Annual Environmental Performance Reporting</b>		
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
	<b>Independent Environmental Audit</b>		
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
	<b>Noise – Well Maintenance</b>		

**B2. DA 246-8-2002**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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
	(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
	<b>Noise and Fracture Stimulation Impacts</b>		
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	

**B2. DA 246-8-2002**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status										
	<b>Construction Hours</b>												
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										
			Not Triggered										
	<b>Construction Noise Criteria for SIS and Directional Wells</b>												
19B.	Noise from the drilling and construction of KP05 and KP06 shall not exceed the sound pressure level (noise) limits in the table below: <table border="1" data-bbox="315 647 1048 847"> <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									
	<b>Water Quality Impacts</b>												
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 Soil and Water Management Sub Plan (June 2019) and the Groundwater Management Plan (July 2018). The plans detail a number of controls to prevent the pollution of water.</p> <p>The auditor sighted a number of active and rehabilitated sites during the site inspection and noted that environmental controls were effective and there was no evidence of erosion or uncontrolled releases to the environment.</p> <p>There were no water pollution incidents during the audit period.</p>	Compliant										
	<b>Waste Water</b>												
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 2018/19 and 2019/20 which note that produced water was disposed to an appropriately licenced facility. The auditor sighted a sample of disposal records generated during the audit period	Compliant										
	(a) dust suppression on any unsealed roads within the site;		Compliant										
	(b) irrigated onto pastures within the site;		Compliant										

**B2. DA 246-8-2002**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	(c) evaporation dam; and	and reconciled against the Environmental Footprint. There were no errors or emissions identified.  It is noted that a waste audit was not within the scope of this independent audit.	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
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 iS/cm.	Condition not triggered during the audit period.	Not Triggered
	<b>Dust</b>		
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.	The auditor sighted the Air Quality Management Sub Plan (June 2019) and noted the inclusion of adequate 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.  Surface disturbance works associated with this Development Consent where limited to rehabilitation works.	Compliant



**B2. DA 246-8-2002**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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>Surface disturbance works associated with this Development Consent where limited to rehabilitation works.</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
<b>Gas Gathering System Pipeline</b>			
28	The Applicant shall comply with the following in the construction of the gas gathering system pipeline:	It was reported by AGL (AEPR 2018-2019 and AEPR 2019-2020) 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
	(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
<b>Threatened Species</b>			
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

**B2. DA 246-8-2002**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	(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
	<b>Heritage</b>		
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.	During the reporting period, AGL engaged Biosis to complete an Aboriginal Cultural Heritage Assessment in consultation with Registered Aboriginal Parties for proposed maintenance upgrades to existing access tracks on the Wandinong property. The auditor sighted the approved Aboriginal Heritage Impact Permit (AHIP) to relocate several artefacts on the existing access track.	Compliant
	<b>Site Rehabilitation</b>		
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
	<b>Community Consultative Committee</b>		
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
	<b>Environment Protection Licence</b>		
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	Evidence Collected, Independent Audit Findings & Recommendations	Status
	<b>Schedule 3</b>		
	<b>Administrative Conditions</b>		
	<b>Obligation to Minimise Harm to the Environment</b>		
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 Walks, Critical Control Verifications, Daily Workover Reports, air quality monitoring and monitoring. The auditor sighted a sample of records and noted that AGL was generally compliant with the requirements of the EMP.</p> <p>Compliance obligations arising from licences, leases, environmental/ planning approvals and legislation are monitored through web-based database compliance management systems (CMO Compliance and SAP Compliance).</p>	Compliant
	<b>Terms of Approval</b>		
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. As such, assurance is limited to the available evidence.</p>	Compliant
	(a) DA submitted to the Department on 20 June 2003;		Compliant
	(b) <i>Camden Gas Project Stage II – Environmental Impact Statement for the Sydney Gas Company</i> (four volumes), dated 19 June 2003;		Compliant
	(c) All other documents listed in Appendix C;		Compliant
	(d) Drawings No. 32339 SK010 Issue 17 and SK014 Issue 1 ; and URS Plan LC-0100 Revision G dated 16 June 2004;		Compliant
	(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;		Compliant
	(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;	Compliant	

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	(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;		Compliant
	(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;		Compliant
	(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;		Compliant
	(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;		Compliant
	(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;		Compliant
	(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		Compliant
	(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;		Compliant
	(n) the modification application DA 282-6-2003i MOD 12 and accompanying letter prepared by AGL Energy Limited, dated 31 May 2010; and		Compliant

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	(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 <b>Note - Inserted by Mod 13 - 27 May 2017</b>	Refer to relevant conditions for an assessment of compliance.	
	(p) conditions of this consent	Refer to relevant conditions for an assessment of compliance.	
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.	
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
	<b>Limits of Approval</b>		
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 Performance Report prepared by AGL 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
	<b>Special Conditions of Approval</b>		
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	Evidence Collected, Independent Audit Findings & Recommendations	Status
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.	Condition closed in a previous audit	Closed
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
	<b>Further Approvals</b>		
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 2018-2019 and AEPR 2019-2020) that there were no wells drilled during the audit period.</p>	Compliant
	<b>Structural Adequacy</b>		
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

### B3. DA 282-6-2003

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	(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
	<b>Public Infrastructure</b>		
14	The Applicant shall:	AGL reported that there was no damage to public infrastructure as a result of operations during the audit period.	Not Triggered
	(a) Repair, or pay the full costs associated with repairing any existing public infrastructure that is damaged by the development;		Not Triggered
	(b) Relocate or pay the full costs associated with relocating any existing public infrastructure that needs to be relocated as part of the development; and	The auditor inspected a number of well sites and did not identify any damage to public infrastructure.	Not Triggered
	(c) Meet the reasonable requirements of Sydney Water and Macarthur Water regarding the construction and operation of the proposed development adjacent to the water mains operated by Sydney Water and Macarthur Water respectively.		Not Triggered
	Note: The Applicant may be required to apply to Sydney Water for a Section 73 Compliance Certificate under the <i>Sydney Water Act 1994</i> and to meet Sydney Water's reasonable requirements.		Not Triggered
	<b>Location of Gas Wells and Gas Gathering Systems</b>		
15	The Applicant shall provide Camden Council, Campbelltown City Council and Wollondilly Shire Council with the Geographical Positioning System (GPS) coordinates 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	Evidence Collected, Independent Audit Findings & Recommendations	Status
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
	<b>Compliance</b>		
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
	<b>SCHEDULE 4</b>		
	<b>SPECIFIC ENVIRONMENTAL CONDITIONS</b>		
	<b>VISUAL AMENITY</b>		
	<b>Visual Performance</b>		



**B3. DA 282-6-2003**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
1	The Applicant shall implement visual mitigation measures as depicted on the plan Camden Gas Project Stage 2: Vegetation and Landscape Management Plan Drawing No LC-0100 Revision G prepared by URS for Sydney Gas dated 16 June 2004 (the Landscape Design).	The auditor sighted the plan “Camden Gas Project Stage 2: Vegetation and Landscape Management Plan” Drawing No LC-0100 Revision G (16 June 2004) prepared by URS for Sydney Gas. An inspection was conducted of the RGP and it was noted that vegetation is largely being maintained in accordance with the plan.	Compliant
2	Prior to the commencement of construction of the workshop, office, plant and associated facilities at Rosalind Park, the Applicant shall submit for the approval of the 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.	Condition closed in a previous audit.	Not Triggered
	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).		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
<b>Lighting Performance</b>			
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	Evidence Collected, Independent Audit Findings & Recommendations	Status
	(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 2018-2019 and 2019-2020 AEPRs and the SCADA system, 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
10	The Applicant shall report on the effectiveness of the lighting controls in the AEPR.	The auditor sighted the AEPR 2018-2019 and AEPR 2019-2020 reports and the Complaints Register and noted that there were no lighting complaints. It can be assumed the controls are operating effectively.	Compliant

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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 the SCADA system and noted the inclusion of required information on the operation of the flare.	Compliant
	(a) date and time of each flare event;		Compliant
	(b) duration of each flare event;		Compliant
	(c) whether the flare operated during daylight or night-time hours;		Compliant
	(d) the cause for the operation of the flare;		Compliant
	(e) the number of compressor engines that have been commissioned and operating during the period; and		Compliant
	(f) comparison of the frequency, night-time frequency, duration and estimated light level of each type of flare event with the flare events predicted in Table 2 of the following report: URS (2003) Sydney Gas Proposal Stage 2 Coal Seam Methane Project Visual Assessment of Lighting and Flare prepared by URS for Sydney Gas dated 6 November 2003.		Compliant
	<b>Landscaping design</b>		
12	The site shall be landscaped as shown on the Landscape Design and this landscaping shall be maintained for the life of the development.	The auditor sighted the plan "Camden Gas Project Stage 2: Vegetation and Landscape Management Plan" Drawing No LC-0100 Revision G (16 June 2004) prepared by URS for Sydney Gas. An inspection was conducted of the RPGP and it was noted that vegetation is largely being maintained in accordance with the plan.	Compliant
	<b>Vegetation and Landscape Management Plan</b>		
13	The Applicant shall prepare and implement a Vegetation and Landscape Management Plan for the Gas Treatment Plant site and the gas well sites. The plan shall include, but not necessarily be limited to:	The auditor sighted the Rehabilitation and Landscape Management Plan (June 2019) and noted compliance with the requirements of this condition.  Implementation of the Plan was evidenced by the landscaping surrounding the RPGP and the rehabilitation of decommissioned well sites.	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

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	(e) measures intended to maximise the screening of infrastructure from views from the Mt Gilead property through planting and other measures;		Compliant
	(f) details of the visual appearance of all new buildings, structures and facilities (including paint colours and specifications). New buildings shall be constructed so as to present a neat and orderly appearance and to blend as far as practicable with the surrounding landscape;		Compliant
	(g) Details of any necessary irrigation system to ensure that adequate supplies of water are made available to all landscaping on site, the trees between the site and Menangle Creek and the trees located on the southern boundary of the Gas Treatment Plant site;		Compliant
	(h) Details of any necessary methods to be employed in the establishment of trees on cut batters in the event that the excavated surface is not conducive to the planting of vegetation of the type displayed in the Landscape Design;		Compliant
	(i) provision for assessing and regularly monitoring the health of the trees in the Menangle Creek riparian zone adjacent to the Gas Treatment Plant site. The objective of the monitoring is to determine the health of the trees and to recommend measures (if required) to improve the health of the trees;		Compliant
	(j) reasonable measures to ensure that mature trees within the riparian corridor along Menangle Creek are retained and protected;		Compliant
	(k) details of proposed screening works including supplementary planting along the border of the site with Menangle Creek;		Compliant
	(l) reasonable measures to minimise the impacts of the gas wells on the cultural heritage landscape of the EMAI;		Compliant
	(m) details of a monitoring program to assess the effectiveness of all visual impact mitigation measures, particularly the measures used to minimise the visual impacts on the Mount Gilead Homestead; and		Compliant
	(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

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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 DPIE to AGL (20 January 2020), confirming receipt of an Independent Arborist Report and a Vegetation and Landscape Monitoring Report for 2019. The correspondence verifies that the monitoring program was completed in 2019 in accordance with the requirements of this condition.	Compliant
	(a) identification of mature trees surrounding the site which afford screening of the Gas Treatment Plant from Mt Gilead Homestead;		Compliant
	(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;		Compliant
	(c) Description of the health of each tree identified under condition (a);		Compliant
	(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;		Compliant
	(e) Recommendation of any watering or fertilising that needs to be implemented to maintain the landscaping and surrounding trees;		Compliant
	(f) Recommendation of how to manage the landscaping to promote the maximisation of growth to maturity.		Compliant
	The results and recommendations of the monitoring program must be submitted to the Secretary at the conclusion of each stage of monitoring.		Compliant

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
18	<p>The Applicant shall commission and pay the full cost of an Independent Audit of the performance of the mitigation measures implemented to prevent and minimise visual impacts of the proposal including landscaping, preservation of existing trees, and night-lighting effects. The audit must be conducted within 6 months of the commissioning of the proposed development and every 2 years thereafter, unless the Secretary directs otherwise. This audit must:</p> <ul style="list-style-type: none"> <li>a) Be conducted by an independent landscape expert who is suitably qualified and experienced and whose appointment has been approved by the Secretary;</li> <li>b) Assess the performance of the visual mitigation measures with specific reference to the effectiveness of mitigation measures in screening the development and lighting from the development from the Mount Gilead Homestead;</li> <li>c) Review the adequacy of the Vegetation and Landscape Management Plan;</li> <li>d) Recommend actions or measures to improve the performance of the visual mitigation measures and the adequacy of the Vegetation and Landscape Management Plan (if required); and</li> <li>e) Be submitted to the Secretary; and</li> <li>f) Be implemented to the satisfaction of the Secretary.</li> </ul>	<p>The auditor sighted correspondence from the DPIE (2 August 2018) 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. The 2020 audit was commenced after 30 June 2020.</p>	Not Triggered
19	<p>Within 2 months of commissioning this audit the Applicant shall submit a copy of the audit report to the Secretary and provide a detailed response to any of the recommendations in the audit report. A copy of the Independent Audit, and/or the results and recommendations of any monitoring carried out under condition 14, will be provided to the owner of Lot 1 DP 807555 by the Secretary upon request.</p>	<p>The auditor sighted correspondence from the DPIE (2 August 2018) 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. The 2020 audit was commenced after 30 June 2020.</p>	Not Triggered
	<p><b>Raptor Breeding Zones at EMAI</b></p>		
20	<p>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>	<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, there were no construction related activities were undertaken within 100m of the Raptor Breed Zones (AEPR 2018-2019 and AEPR 2019-2020).</p>	Not Triggered

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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.	Condition not triggered during the audit period.  It was reported by AGL (AEPR 2018-2019 and AEPR 2019-2020) that there was no drilling or fraccing works undertaken during the audit period.	Not Triggered
<b>Flora and Fauna Protection Measures</b>			
23	The Applicant shall implement best practice flora and fauna management.	The auditor sighted the Flora and Fauna Management Sub Plan (June 2019) and Rehabilitation and Landscape Management Sub Plan (June 2019). The plans comply with the requirements of this condition.  It was noted that no drilling or well construction works were undertaken under this development consent during the audit period.	Compliant
24	The Applicant shall take all practicable measures to minimise potential flora and fauna impacts of the proposed development.	The auditor sighted the Flora and Fauna Management Sub Plan (June 2019) and Rehabilitation and Landscape Management Sub Plan (June 2019). The plans comply with the requirements of this condition.  It was noted that no drilling or well construction works were undertaken under this development consent during the audit period.	Compliant
25	The Applicant shall ensure that trenches constructed during the construction of gas gathering lines are not left open overnight unless otherwise agreed by the 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.	The auditor sighted the Flora and Fauna Management Sub Plan (June 2019) and noted the inclusion of procedures consistent with the requirements of this condition.  According to the AEPR 2018-2019 and AEPR 2019-2020 and interviews with site personnel, there were no trees removed in this audit period.	Compliant
27	The Applicant shall employ a suitably qualified ecologist with specific experience in identifying the Cumberland Plain Snail, during the construction period of the development. The ecologist shall monitor and examine areas for the presence of the threatened Cumberland Plain Snail, during the clearing for the proposed development.	Condition not triggered during the audit period.	Not Triggered



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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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
	<b>Threatened Species</b>		
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 2018-2019 and the AEPR 2019-2020 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
	<b>NOISE</b>		
	<b>Noise Impact Assessment Criteria</b>		

**B3. DA 282-6-2003**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status																				
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="331 408 1111 587"> <thead> <tr> <th data-bbox="331 408 495 448">Receiver Location</th> <th data-bbox="495 408 658 448">Day</th> <th data-bbox="658 408 822 448">Evening</th> <th data-bbox="822 408 985 448">Night</th> <th data-bbox="985 408 1111 448">Flaring (anytime)</th> </tr> <tr> <td></td> <td data-bbox="495 448 658 472">L<sub>Aeq</sub>(15 minute)</td> <td data-bbox="658 448 822 472">L<sub>Aeq</sub>(15 minute)</td> <td data-bbox="822 448 985 472">L<sub>Aeq</sub>(15 minute)</td> <td data-bbox="985 448 1111 472">L<sub>A1</sub>(1minute)</td> </tr> </thead> <tbody> <tr> <td data-bbox="331 472 495 528">R1 Medhurst Street Gilead</td> <td data-bbox="495 472 658 528">35</td> <td data-bbox="658 472 822 528">35</td> <td data-bbox="822 472 985 528">35</td> <td data-bbox="985 472 1111 528">45</td> </tr> <tr> <td data-bbox="331 528 495 587">R7 Mt. Gilead Gilead</td> <td data-bbox="495 528 658 587">37</td> <td data-bbox="658 528 822 587">36</td> <td data-bbox="822 528 985 587">36</td> <td data-bbox="985 528 1111 587">45</td> </tr> </tbody> </table>	Receiver Location	Day	Evening	Night	Flaring (anytime)		L <sub>Aeq</sub> (15 minute)	L <sub>Aeq</sub> (15 minute)	L <sub>Aeq</sub> (15 minute)	L <sub>A1</sub> (1minute)	R1 Medhurst Street Gilead	35	35	35	45	R7 Mt. Gilead Gilead	37	36	36	45	<p>In accordance with the Noise Management Sub Plan (July 2019) and condition 41 (Sch 4), attended noise monitoring is required to be undertaken quarterly at the nearest receivers as defined in this condition.</p> <p>The auditor sighted the following Quarterly Compliance Noise Monitoring reports prepared by Wilkinson Murray for the RPGP which demonstrate compliance with the requirements of this condition:</p> <ul style="list-style-type: none"> <li>September 2018 (monitoring conducted 12 September 2018)</li> <li>December 2018 (monitoring conducted 5 December 2018)</li> <li>March 2019 (monitoring conducted 4 March 2019)</li> <li>May 2019 (monitoring conducted 31 May 2019)</li> <li>October 2019 (monitoring conducted 18 October 2019)</li> <li>December 2019 (monitoring conducted 9 December 2019)</li> <li>March 2020 (monitoring conducted 18 March 2020)</li> <li>May 2020 (monitoring conducted 5 May 2020).</li> </ul>	Compliant
Receiver Location	Day	Evening	Night	Flaring (anytime)																			
	L <sub>Aeq</sub> (15 minute)	L <sub>Aeq</sub> (15 minute)	L <sub>Aeq</sub> (15 minute)	L <sub>A1</sub> (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="331 943 1077 1082"> <thead> <tr> <th data-bbox="331 943 495 983" rowspan="2">Receiver Location</th> <th data-bbox="495 943 622 983" rowspan="2">Noise Criteria</th> <th data-bbox="622 943 763 983">Day</th> <th data-bbox="763 943 904 983">Evening</th> <th data-bbox="904 943 1077 983">Night</th> </tr> <tr> <th data-bbox="622 983 763 1007">dBA L<sub>Aeq</sub></th> <th data-bbox="763 983 904 1007">dBA L<sub>Aeq</sub></th> <th data-bbox="904 983 1077 1007">dBA L<sub>Aeq</sub></th> </tr> </thead> <tbody> <tr> <td data-bbox="331 1007 495 1046">All residential receivers except R22 and R26</td> <td data-bbox="495 1007 622 1046">Project-Specific</td> <td data-bbox="622 1007 763 1046">40</td> <td data-bbox="763 1007 904 1046">40</td> <td data-bbox="904 1007 1077 1046">38</td> </tr> <tr> <td data-bbox="331 1046 495 1082">R22 and R26</td> <td data-bbox="495 1046 622 1082">Project-Specific</td> <td data-bbox="622 1046 763 1082">43</td> <td data-bbox="763 1046 904 1082">42</td> <td data-bbox="904 1046 1077 1082">37</td> </tr> </tbody> </table>	Receiver Location	Noise Criteria	Day	Evening	Night	dBA L <sub>Aeq</sub>	dBA L <sub>Aeq</sub>	dBA L <sub>Aeq</sub>	All residential receivers except R22 and R26	Project-Specific	40	40	38	R22 and R26	Project-Specific	43	42	37	<p>In accordance with the Noise Management Sub Plan (July 2019), attended noise monitoring to be undertaken at the receiver locations within the first week of production and again after three months for each well, then if the well status changes.</p> <p>Workover maintenance and decommissioning is defined as a construction activity in the Sub Plan and is not considered to be a change in well status. As such, the noise monitoring requirements were not triggered during the reporting period.</p>	Not Triggered		
Receiver Location	Noise Criteria			Day	Evening	Night																	
		dBA L <sub>Aeq</sub>	dBA L <sub>Aeq</sub>	dBA L <sub>Aeq</sub>																			
All residential receivers except R22 and R26	Project-Specific	40	40	38																			
R22 and R26	Project-Specific	43	42	37																			
30	For the purposes of condition 29, <b>29A</b> and 31:	Condition noted.	Note																				
	(a) Day is defined as the period from 7am to 6pm Monday to Saturday and 8am to 6pm Sundays and Public holidays;		Note																				
	(b) Evening is defined as the period 6pm to 10pm;		Note																				
	(c) Night is defined as the period from 10pm to 7am Monday to Saturday and 10pm to 8am Sundays and Public Holidays; and		Note																				

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status																																						
	(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.		Note																																						
31	<p>Noise from flaring events, must not exceed the noise limits in the table below:</p> <table border="1" data-bbox="331 486 1025 821"> <thead> <tr> <th>Location</th> <th>Duration of each Event</th> <th>Expected Type Of Event (2)</th> <th>Daytime L<sub>Aeq,15min</sub></th> <th>Evening L<sub>Aeq,15min</sub></th> <th>Night L<sub>Aeq,15min</sub></th> </tr> </thead> <tbody> <tr> <td rowspan="3">R1 Medhurst Street</td> <td>&gt; 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>&gt; 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 <sub>Aeq,15min</sub>	Evening L <sub>Aeq,15min</sub>	Night L <sub>Aeq,15min</sub>	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> <p>There were no noise complaints received during the audit period.</p>	Not Triggered
Location	Duration of each Event	Expected Type Of Event (2)	Daytime L <sub>Aeq,15min</sub>	Evening L <sub>Aeq,15min</sub>	Night L <sub>Aeq,15min</sub>																																				
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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.	<p>The monitoring reports sighted by the auditor in the assessment of Condition 29 comply with the requirements of this condition.</p> <p>However, it is noted that the noise monitoring records were incomplete. As such, a non-compliance has been identified against Condition 29A.</p>	Compliant																																						
33	<p>The noise emission limits identified in Conditions 29, <b>29A</b> and 31 apply under meteorological conditions of:</p> <ul style="list-style-type: none"> <li>i Wind speed up to 3m/s at 10 metres above ground level; or</li> <li>i Temperature inversion conditions of up to 3°C/100m and wind speed up to 2m/s at 10 metres above the ground.</li> </ul>	<p>The monitoring reports sighted by the auditor comply with the requirements of this condition.</p> <p>It is noted that the noise monitoring records were incomplete. As such, a non-compliance has been identified against Condition 29A.</p>	Compliant Compliant Compliant																																						
	<b>Noise – Construction and Well Maintenance</b>																																								

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status						
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 (July 2019) and noted compliance with the requirements of this condition.	Compliant						
	(a) noise compliance standards;	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.		<p>The auditor sighted the Noise Management Sub Plan (July 2019) and noted that the noise monitoring requirements of the Sub Plan were not implemented; noise monitoring was not conducted during workover maintenance of EM39 and GL17 (refer to condition 34C).</p> <p>It is recommended that the Pre-Mobilisation Hazard Identification Form (DCS_GN_FM_HSE_003) be reviewed and revised to include a requirement to identify noise monitoring requirements (as detailed in the Noise Management Sub Plan) prior to commencement of works.</p>	Non-Compliant 1820-NC-02					
34A.	<p>Noise from the drilling and construction of GL14 and GL15 shall not exceed the sound pressure level (noise) limits presented in the table below:</p> <table border="1" data-bbox="331 1157 909 1249"> <thead> <tr> <th data-bbox="331 1157 645 1189">Receiver Location</th> <th data-bbox="645 1157 909 1189">Night Time Noise Limit dB(A) <math>L_{Aeq}</math></th> </tr> </thead> <tbody> <tr> <td data-bbox="331 1189 645 1220">Glenlee House</td> <td data-bbox="645 1189 909 1220">35</td> </tr> <tr> <td data-bbox="331 1220 645 1249">Menangle Park</td> <td data-bbox="645 1220 909 1249">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								

**B3. DA 282-6-2003**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status															
34B.	<p>Noise from the drilling and construction of EM38 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>EM38 – nearest residential receiver</td> <td>54</td> <td>39</td> <td>39</td> <td>35</td> </tr> </tbody> </table>	Receiver Location	Weekday (7.00am-6.00pm) Saturday (7.00am-1.00pm)	Saturday (1.00pm-6.00pm) Sunday (7.00am-6.00pm)	Evening (6.00pm-10.00pm)	Night (10.00pm-7.00am)	EM38 – nearest residential receiver	54	39	39	35	Condition not triggered during the audit period.	Not Triggered					
Receiver Location	Weekday (7.00am-6.00pm) Saturday (7.00am-1.00pm)	Saturday (1.00pm-6.00pm) Sunday (7.00am-6.00pm)	Evening (6.00pm-10.00pm)	Night (10.00pm-7.00am)														
EM38 – nearest residential receiver	54	39	39	35														
34C.	<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"> <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	<p>In accordance with the Noise Management Sub Plan (July 2019), workover maintenance and decommissioning are defined as construction activities. During the audit period, workover maintenance was conducted of well sites EM39 and GL17 and as such, the noise monitoring requirements were triggered.</p> <p>The auditor determined that noise monitoring was not undertaken during the workover maintenance of well sites EM39 and GL17.</p>	Non-Compliant 1820-NC-02
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														
	<b>Noise – Drilling Impacts</b>																	
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 (July 2019) 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;	Implementation was evidenced by the induction program (construction hours) and notification letters.	Not Triggered															
	(b) predicting potential noise levels from the proposed well drilling methods where appropriate;	There were no noise complaints reported during the audit period in relation to this development consent.	Not Triggered															
	(c) identifying and implementing all reasonable and feasible noise mitigation measures to reduce any drilling noise impacts;	It was reported by AGL (AEPR 2018-2019 and AEPR 2019-2020) that there were no re-drilling activities undertaken during the audit period.	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															
	<b>Hours of Operation</b>																	

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
36	Planned maintenance activities at any of the wells must only be conducted between:	The auditor sighted the Noise Management Sub Plan (July 2019) and noted inclusion of this condition.	Compliant
	i 7am and 6pm on weekdays; and		Compliant
	i 8am and 1pm on Saturdays (excluding Public Holidays).	Implementation was evidenced by the induction program (construction hours), Daily Completion/Workover Reports and community notification letters.	Compliant
	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
	<b>Construction Hours</b>		
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 (July 2019) 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
	<b>Flare – Measures to Reduce Noise</b>		
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
	<b>Operational Noise Management Plan</b>		
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 (July 2019) and noted compliance with the requirements of this condition.	Compliant

**B3. DA 282-6-2003**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations		Status
	(a) identification of the potential sources of noise during drilling and operation;	There were no noise complaints reported during the audit period in relation to this development consent.		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 Secretary, and if any non-compliance is detected; and	<p>The auditor sighted the Noise Management Sub Plan (July 2019) and noted that the noise monitoring requirements of the Sub Plan were partially implemented; noise monitoring was not conducted during the workover maintenance of EM39 and GL17.</p> <p>It is recommended that the Pre-Mobilisation Hazard Identification Form (DCS_GN_FM_HSE_003) be reviewed and revised to include a requirement to identify noise monitoring requirements (as detailed in the Noise Management Sub Plan) prior to commencement of works.</p>		Non-Compliant 1820-NC-02
	(e) describe what procedures would be followed to ensure compliance.	The auditor sighted the Noise Management Sub Plan (July 2019) and noted compliance with the requirements of this condition.		Compliant
	<b>Operating Conditions</b>			
39	The Applicant shall undertake the development in a way that minimises the noise generated by the development.	<p>The auditor sighted the Noise Management Sub Plan (July 2019) and noted compliance with the requirements of this condition.</p> <p>Implementation was detailed in AEPR 2018-2019 and AEPR 2019-2020 and demonstrated through quarterly noise monitoring.</p>		Compliant
	<b>Monitoring</b>			
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 2018 and December 2019 Annual Returns and noted compliance against the requirements of this condition.		Compliant

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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>In accordance with the Noise Management Sub Plan (July 2019) and condition 41 (Sch 4), attended noise monitoring is required to be undertaken quarterly at the nearest receivers as defined in this condition.</p> <p>The auditor sighted the following Quarterly Compliance Noise Monitoring reports prepared by Wilkinson Murray for the RGP which demonstrate compliance with the requirements of this condition:</p> <ul style="list-style-type: none"> <li>• September 2018 (monitoring conducted 12 September 2018)</li> <li>• December 2018 (monitoring conducted 5 December 2018)</li> <li>• March 2019 (monitoring conducted 4 March 2019)</li> <li>• May 2019 (monitoring conducted 31 May 2019)</li> <li>• October 2019 (monitoring conducted 18 October 2019)</li> <li>• December 2019 (monitoring conducted 9 December 2019)</li> <li>• March 2020 (monitoring conducted 18 March 2020)</li> <li>• May 2020 (monitoring conducted 5 May 2020).</li> </ul>	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:	<p>The auditor sighted the Noise Management Sub Plan (July 2019) and noted compliance with the requirements of this condition.</p> <p>There were no noise complaints reported during the audit period in relation to this development consent.</p>	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		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
	<b>Noise Monitoring Report - Flare</b>		



**B3. DA 282-6-2003**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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"> <li>i A listing of each incident when the flare operated including the duration, gas discharge rate and cause of the incident;</li> <li>i The temperature and volume data for each flare event, as required by Condition 59;</li> <li>i The results of noise measurements for flare operation for each flare type event, as required by Condition 31,</li> <li>i The results of noise measurements for flare operation for each flare event for receivers at location R7; and</li> <li>i An assessment of compliance with noise limits provided in Condition 31. The noise monitoring must be undertaken in accordance with Condition 42.</li> <li>i Where noise levels do not comply with Condition 31, noise mitigation measures to ensure compliance.</li> </ul> <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.	Not Triggered
	<b>Redrilling and Refracting Management Plan</b>		
	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.	<p>Condition not triggered during the audit period.</p> <p>It was reported by AGL (AEPR 2018-2019 and AEPR 2019-2020) that there was no drilling or fracing works undertaken during the audit period.</p>	Not Triggered

**B3. DA 282-6-2003**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
45	The Applicant shall prepare a Redrilling and Refracting Management Plan in consultation with the DRE for the redrilling and/or refracting 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 2018-2019 and AEPR 2019-2020) that there was 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 refracting work;		Not Triggered
	(b) details of how the environmental performance of the work will be monitored and what actions will be taken to address identified adverse environmental impacts;		Not Triggered
	(c) reference to the relevant parts of the Environmental Management Plan required under 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/refracting work.		Not Triggered
	The Applicant shall give written notification of the proposed redrilling/refracting work to potentially affected residences and other noise sensitive receivers at least fourteen days prior to work commencing.		Not Triggered
	<b>VIBRATION</b>		
	<b>Condition Report</b>		
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 2018-2019 and AEPR 2019-2020) that there was no drilling or fracing works undertaken during the audit period.	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
	<b>AIR QUALITY</b>		
	<b>Air Emission Criteria</b>		

**B3. DA 282-6-2003**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status																					
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="324 395 1079 560"> <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/m<sup>3</sup></td> </tr> <tr> <td>Nitrogen Dioxide</td> <td>Annual</td> <td>62 µg/m<sup>3</sup></td> </tr> <tr> <td>Sulphur Dioxide</td> <td>1 Hour</td> <td>570 µg/m<sup>3</sup></td> </tr> <tr> <td>Sulphur Dioxide</td> <td>Annual</td> <td>60 µg/m<sup>3</sup></td> </tr> <tr> <td>Sulphuric acid mist</td> <td>3 minute</td> <td>33 µg/m<sup>3</sup></td> </tr> <tr> <td>Methyl mercaptan</td> <td>3 minute</td> <td>0.84 µg/m<sup>3</sup></td> </tr> </tbody> </table>	Pollutant	Averaging Period	Criterion	Nitrogen Dioxide	1 Hour	246 µg/m <sup>3</sup>	Nitrogen Dioxide	Annual	62 µg/m <sup>3</sup>	Sulphur Dioxide	1 Hour	570 µg/m <sup>3</sup>	Sulphur Dioxide	Annual	60 µg/m <sup>3</sup>	Sulphuric acid mist	3 minute	33 µg/m <sup>3</sup>	Methyl mercaptan	3 minute	0.84 µg/m <sup>3</sup>	<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.</p>	Compliance
Pollutant	Averaging Period	Criterion																						
Nitrogen Dioxide	1 Hour	246 µg/m <sup>3</sup>																						
Nitrogen Dioxide	Annual	62 µg/m <sup>3</sup>																						
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48	Condition deleted.		Note																					
49	Condition deleted.		Note																					
	<b>Combustion Parameters</b>																							
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="324 874 1133 997"> <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																					
	<b>Operating Conditions</b>																							
51	Condition deleted.		Note																					

**B3. DA 282-6-2003**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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 2019) and noted the inclusion of load covering requirements (Section 3, Table 3.1).  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 2019) and noted compliance with the requirements of this condition.  It was reported by AGL (AEPR 2018-2019 and AEPR 2019-2020) that there were no construction works undertaken during the audit period.	Compliant
54	Condition deleted.		
55	Condition deleted.		
	<b>Manufacturers Design Specification</b>		
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
	<b>Monitoring</b>		

**B3. DA 282-6-2003**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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
58	Deleted.		
59	Deleted.		
	<b>Installation of Air Monitoring Points Report</b>		
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
	<b>Monitoring Program for Air Based Assessable Pollutants</b>		
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
	<b>Requirement to Monitor Concentrations of Pollutants Discharged</b>		

**B3. DA 282-6-2003**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
62	<p>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.</p> <p>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.</p>	Condition closed in a previous audit.	Not Triggered
	<b>Quarterly Reporting of Air Emissions</b>		
63	<p>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.</p>	Condition not triggered during the audit period.	Not Triggered
	<b>Odour</b>		
64	<p>The Applicant must not cause or permit the emission of offensive odours from the premises, as defined under Section 129 of the Protection of the Environment Operations Act 1997.</p>	<p>The auditor sighted quarterly monitoring reports prepared by Ektimo and Emission Testing Consultant and noted that the quarterly monitoring of odour is undertaken from Point 6 (odourised carbon vent). There are no emissions limits set on odour through EPL12003 or this development consent.</p> <p>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 by AGL that the fire control central and local residents are notified of this activity.</p>	Compliant

**B3. DA 282-6-2003**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
65	<p>The Applicant must not cause the emission of detectable mercaptan odour from the premises.</p> <p>Note. Should odour emissions become an issue, the EPA will consider requiring investigation and implementation of further odour control measures.</p>	<p>A review of the EPL annual returns for December 2018 and December 2019, and the site complaints register demonstrated there were no complaints relating to air quality during the audit period.</p>	Compliant
<b>SURFACE WATER TREATMENT</b>			
<b>Pollution of Waters</b>			
66	<p>Except as may be expressly provided for by a licence under the Protection of the Environment Operations Act 1997 in relation to the development, the Applicant shall comply with section 120 of the Protection of the Environment Operations Act 1997 in carrying out the development.</p>	<p>The auditor sighted the Soil and Water Management Sub Plan (June 2019) and the Groundwater Management Plan (July 2018). The plans detail a number of controls to prevent the pollution of water.</p> <p>The auditor sighted a number of active and rehabilitated sites during the site inspection and noted that environmental controls were effective and there was no evidence of erosion or uncontrolled releases to the environment.</p> <p>There were no water pollution incidents during the audit period.</p>	Compliant
<b>Management of Waste Water</b>			
<p>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.</p>		Condition noted.	
<b>Operating Conditions</b>			
67	<p>The applicant shall undertake the development in a way that minimises the potential surface water impacts of the development.</p>	<p>The auditor sighted the Soil and Water Management Sub Plan (June 2019) and the Groundwater Management Plan (July 2018). The plans detail a number of controls to prevent the pollution of water.</p> <p>The auditor a number of active and rehabilitated sites during the site inspection and noted that environmental controls were effective and there was no evidence of erosion or uncontrolled releases to the environment.</p> <p>There were no water pollution incidents during the audit period.</p>	Compliant
68	Deleted.		
<b>Monitoring of Effluent Parameters</b>			
69	Deleted.		

**B3. DA 282-6-2003**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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
<b>Monitoring Program for Water Based Assessable Pollutants</b>			
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.		
<b>Gas Gathering System – Stream Crossings</b>			
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 2018-2019 and AEPR 2019-2020) 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



**B3. DA 282-6-2003**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
74	<p>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.</p>	<p>Condition not triggered during the audit period.</p> <p>It was reported by AGL (AEPR 2018-2019 and AEPR 2019-2020) that there were no stream crossings constructed during the audit period with respect to DA282-6-2003.</p>	Not Triggered
75	<p>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.</p>	<p>Condition not triggered during the audit period.</p> <p>It was reported by AGL (AEPR 2018-2019 and AEPR 2019-2020) that there were no stream crossings constructed during the audit period with respect to DA282-6-2003.</p>	Not Triggered
76	<p>The Applicant shall ensure that stream crossing H as shown on plan Camden Gas Project Stage 2 – RFI Act 3A Permit Areas by Sydney Gas (Figure 2, Appendix B), is either strapped to the existing road crossing, strapped to an upgraded road crossing, under-bored or consist of a pipe bridge. Should a pipe bridge be proposed, the Applicant shall prepare and implement a design of the crossing which shall be prepared and implemented by a person(s) with relevant knowledge, qualifications and experience, in consultation with the 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.</p> <p>Note. A Part 3A Permit may be required for a road crossing upgrade.</p>	<p>Condition not triggered during the audit period.</p> <p>It was reported by AGL (AEPR 2018-2019 and AEPR 2019-2020) that there were no stream crossings constructed during the audit period with respect to DA282-6-2003.</p>	Not Triggered
77	<p>The Applicant shall advise the 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.</p>	<p>Condition not triggered during the audit period.</p> <p>It was reported by AGL (AEPR 2018-2019 and AEPR 2019-2020) that there were no stream crossings constructed during the audit period with respect to DA282-6-2003.</p>	Not Triggered

**B3. DA 282-6-2003**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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 2018-2019 and AEPR 2019-2020) 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 2018-2019 and AEPR 2019-2020) that there were no stream crossings constructed during the audit period with respect to DA282-6-2003.	Not Triggered
<b>Management of Site Water and Sediment Runoff</b>			
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 Soil and Water Management Sub Plan (June 2019). The plan details a number of controls to minimise soil erosion and the discharge of sediment/pollutants from the site.</p> <p>Implementation of the Sub Plan was demonstrated through Environmental Walks and Critical Control Verifications to assess performance and identify improvement opportunities.</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>It was reported by AGL (AEPR 2018-2019 and AEPR 2019-2020) that there were no surface water contamination incidents recorded during the audit period.</p>	Compliant

**B3. DA 282-6-2003**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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 Soil and Water Management Sub Plan (June 2019). The plan details a number of controls to ensure the offsite movement of dirty water and sediment is minimised.</p> <p>Implementation of the Sub Plan was demonstrated through Environmental Walks and Critical Control Verifications to assess performance and identify improvement opportunities.</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>It was reported by AGL (AEPR 2018-2019 and AEPR 2019-2020) that there were no incidents recorded during the audit period associated with the offsite movement of dirty water or sediment.</p>	Compliant
82	<p>The Applicant shall implement all relevant site drainage and sediment and erosion control works and measures and any other pollution controls as required by these conditions, prior to the commencement of any other works at the site.</p>	<p>The auditor sighted the Soil and Water Management Sub Plan (June 2019). The plan includes adequate and appropriate erosion and sediment controls.</p> <p>Implementation of the Sub Plan was demonstrated through Environmental Walks and Critical Control Verifications to assess performance and identify improvement opportunities.</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>It was reported by AGL (AEPR 2018-2019 and AEPR 2019-2020) that there were no incidents recorded during the audit period associated with the offsite movement of sediment.</p>	Compliant

**B3. DA 282-6-2003**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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 <i>Managing Urban Stormwater: Soils and Construction</i> (3rd Edition 1998).	The auditor inspected a number of rehabilitation sites and reviewed a sample of Rehabilitation and Relinquishment Reports prepared during the audit period. There was no evidence of erosion or off-site movement of sediment.	Compliant
	<b>Soil and Water Management Plan</b>		
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:	The auditor sighted the Soil and Water Management Sub Plan (June 2019) and noted compliance with the requirements of this condition. The plans detail a number of controls to minimise soil erosion and the discharge of sediments and water pollutants from the site.  Implementation of the Sub Plan was demonstrated through Environmental Walks, Critical Control Verifications and water monitoring (flare pond).	Compliant
	(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;	The 2018 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 expertise and experience. Amendments to the Sub Plan in 2019 were administrative in nature.	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> (3rd 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 <i>Managing Urban Stormwater: Council Handbook</i> 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

**B3. DA 282-6-2003**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	(h) measures to maintain the soil quality, soil integrity and soil structure of land on the EMAI during the construction and operation of the proposal;		Compliant
	(i) implement a program of regular testing of waste water quality for compounds, nutrients and metals, as outlined in the EIS;		Compliant
	(j) provide details of an appropriate soil sampling and monitoring program to ensure that areas used for waste water application do not lead to an unacceptable build-up of salts within the soil profile;	It was reported by AGL that wastewater is not applied to land. As such, a sampling program is not warranted.	Not Triggered
	(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 2019) and noted compliance with the requirements of this condition.  There were no water pollution incidents during the audit period.	Compliant
	(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		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
	<b>Soil and Water Management Plan – Rosalind Park Access Road</b>		
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 <sup>th</sup> 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
	<b>Piping and Filling of Watercourse</b>		

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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
<b>Evaporation Pond Liner Integrity Evaluation Program</b>			
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
<b>INDIGENOUS HERITAGE</b>			
<b>Protection of Indigenous Heritage</b>			
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
<b>Aboriginal Heritage – EM38</b>			

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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
<b>Aboriginal Heritage – EM39 and GL17</b>			
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
<b>NON-INDIGENOUS HERITAGE</b>			
<b>Protection of the Heritage Landscape of EMAI</b>			
89	The Applicant shall implement all mitigatory measures listed in Sections 7.1, 7.2 and 7.3 of the report titled Statement of Heritage Impact for Land within the Elizabeth Macarthur Agricultural Institute NSW Agriculture, Menangle by Geoffrey Britton dated September 2003.	Condition not triggered during the audit period.	Not Triggered
90	<p>The Applicant shall ensure roadside plantings for sites EM 16, EM 18, EM 19 and EM 20 are strengthened using the species outline provided in the report titled Statement of Heritage Impact for Land within the Elizabeth Macarthur Agricultural Institute NSW Agriculture, Menangle by Geoffrey Britton dated September 2003.</p> <p>Note: a relic is defined under the Heritage Act as any deposit, object or material evidence:</p> <ul style="list-style-type: none"> <li>i which relates to the settlement of the area that comprises NSW, not being Aboriginal settlement; and</li> <li>i which is more than 50 years old.</li> </ul>	Condition not triggered during the audit period.	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
<b>SAFETY AND RISK MANAGEMENT</b>			

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



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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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 (October 2019) and the Safety Management Plan, Camden Project NSW (May 2020) 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 (October 2019) 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 2020) and noted compliance with the requirements of this condition. Implementation was demonstrated through the following documents/ processes: <ul style="list-style-type: none"> <li>• Induction program (Rapid Induct)</li> <li>• HSE audit action tracking (SAP)</li> <li>• Standards and Critical Controls.</li> </ul>	Compliant
	<b>Compliance Report</b>		
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
	<b>Incident Report</b>		

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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 incident register for the audit period and noted compliance with the requirements of this condition.</p>	Compliant
	<p><b>Hazard Audit</b></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> <ul style="list-style-type: none"> <li>• Letter from DPIE to AGL (4 October 2010) approving the nominated auditor to conduct the hazard audit</li> <li>• Hazard Audit Report for the Camden Gas Project, Pinnacle Risk Management (9 January 2019)</li> <li>• Email correspondence from AGL to DPIE (4 February 2019) submitting the Hazard Audit Report.</li> </ul>	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><b>Crime Risk Performance</b></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><b>Gas Treatment Plant</b></p>		

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	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
	<b>Gas Wellhead Sites</b>		
	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
	<b>Dangerous Goods</b>		
97	The Applicant shall ensure that the storage, handling, and transport of:	The auditor sighted the Dangerous Goods and Hazardous Materials Sub Plan (June 2019) 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		
	(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
	<b>WASTE</b>		
	<b>Operating Conditions</b>		
	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.	

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	Incorporates a EPA General Term of Approval		
98	The Applicant must not cause, permit or allow any waste generated outside the premises to be received at the premises for storage, treatment, processing, reprocessing or disposal or any waste generated at the premises to be disposed of at the premises, except as expressly permitted by a licence under the Protection of the Environment Operations Act 1997.	<p>The auditor sighted the AGL Environmental Footprint spreadsheet for the financial years 2018/19 and 2019/20. 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 confirmed that no wastes streams are received from outside the premises.</p> <p>It is noted that a waste audit was not within the scope of this independent audit.</p>	Compliant
99	<p>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:</p> <ul style="list-style-type: none"> <li>i Waste oil/water, hydrocarbons/water mixtures or emulsions.</li> </ul>	<p>The auditor sighted the AGL Environmental Footprint spreadsheet for the financial years 2018/19 and 2019/20 and noted compliance with the requirements of this condition. The Environmental Footprint provides a detailed record of waste streams generated, recycled/reused and disposed, including water, hazardous waste and non-hazardous waste.</p> <p>It 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.</p> <p>It is noted that a waste audit was not within the scope of this independent audit.</p>	Compliant
100	Deleted		
101	Deleted		
102	Deleted		
103	Deleted.		
104	Deleted.		

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations		Status
105	Any movement of hazardous, industrial or Group A waste from the premises must be conducted in accordance with the DECC's waste tracking requirements. A copy of these tracking requirements is included in Schedule 8.	<p>The auditor sighted the Waste Management Sub Plan (June 2019) and noted compliance with the requirements of this condition.</p> <p>The auditor sighted a sample of waste tracking records and reconciled against the AGL Environmental Footprint spreadsheet for the financial years 2018/19 and 2019/20. There were no errors or emissions identified.</p> <p>It is noted that a waste audit was not within the scope of this independent audit.</p>		Compliant
106	<b>Waste Management Plan</b>			
	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 2019) 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.			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><b>ROADS AND TRAFFIC</b></p> <p>Roads within EMAI</p> <p>The Applicant shall not bring into the EMAI site, any roadbase material for new access roads to gas well sites EM1 to EM4 (inclusive) and gas well site EM6 (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	Evidence Collected, Independent Audit Findings & Recommendations	Status
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 2019) and noted compliance with the requirements of this condition. This condition is also reflected in the induction program. Evidence of implementation is demonstrated by:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• Induction Program</li> <li>• Site specific inductions</li> <li>• Toolbox meetings</li> <li>• Regular site inspections (Environmental Walks)</li> <li>• Review of records including the complaints register and incident register.</li> </ul>	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 2019) and evidence of daily prestart meetings (visual board 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.	<p>Condition not triggered during the audit period.</p> <p>It was reported by AGL (AEPR 2018-2019 and AEPR 2019-2020) that there were no drilling or fracing works undertaken during the audit period.</p>	Not Triggered
112	<p><b>Works within the Wollondilly Shire Council Road Reserve</b></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
112(b)	Soil erosion and sediment control measures for works undertaken during construction and following completion of the works.		Not Triggered

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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	<b>M5 Underbore – Menangle Park</b> 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
	<b>BUSHFIRE</b>	Condition closed in a previous audit.	Not Triggered
115	<b>Bushfire Hazard Measures</b>		
	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	<b>Measures for the Living Quarters Building</b>		
	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

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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
	<b>Bushfire Management Plan</b>		
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 2019 and 2020 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 (October 2019) was sighted by the auditor and bushfire response measures were detailed within.	Compliant
120	<b>REHABILITATION</b>		
	<b>Site Rehabilitation Performance</b>		
	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 2019) and inspected well site RP10 that had been subject to recent abandonment and rehabilitation works.  There was no evidence of dust generation at the inspected sites.	Compliant



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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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 2019) which details rehabilitation criteria developed in consultation with the DRE. The auditor inspected RP10 which had been successfully rehabilitated with a seed mix approved by the NSW EPA and local landowner.	Compliant
122		Condition not triggered during the audit period.	Not Triggered
123	<p><b>Rehabilitation of Gas Gathering System\Stream Crossings</b></p> <p>The Applicant shall ensure that for all trenched crossings, the natural bed and bank profiles are restored to their original conditions, with smooth and even surfaces following the installation of the gas pipe.</p>	<p>The auditor sighted the Rehabilitation and Landscape Management Sub Plan (June 2019) and noted compliance with the requirements of this condition.</p> <p>It was reported by AGL (AEPR 2018-2019 and AEPR 2019-2020) that no trenched crossings were undertaken during the audit period.</p>	Compliant
124	The Applicant shall stabilise and rehabilitate as soon as possible all disturbed soil surfaces with sterile exotic cover crops and local native grasses. The Applicant is not permitted to use Kikuyu and other invasive grass species.	<p>The auditor sighted the Rehabilitation and Landscape Management Sub Plan (June 2019) and noted compliance with the requirements of this condition.</p> <p>The auditor inspected RP10 which had been successfully rehabilitated with a seed mix approved by the NSW EPA and local landowner.</p>	Compliant
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 2019) and noted compliance with the requirements of this condition.</p> <p>The auditor sighted RP10 that had been decommissioned and subject to rehabilitation in accordance with the plan and this condition. Quarterly inspections were undertaken by AGL to assess weeds, plant losses, sediment controls and re-seeding as required.</p>	Compliant
126	<b>CONFIRMATION OF PROJECT COMPONENTS</b>		
	<b>Gas Flare Design Report</b>		
	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

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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
	<b>Gas Gathering System</b>		
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.  There were no new gas gathering systems constructed 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.		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

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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 2018-2019 and AEPR 2019-2020), there was no trenching works in this reporting period.	Not Triggered
128	<b>Menangle Park Urban Release</b> 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.	
	<b>SCHEDULE 5</b>		
	<b>ENVIRONMENTAL MANAGEMENT, MONITORING, AUDITING AND REPORTING</b>		
1	<b>CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN</b> 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	<b>OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN</b> 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 (May 2020) and noted inclusion of the requirements of this condition.  Implementation was demonstrated through inspections (Environmental Walks), Critical Control Verifications, Daily Workover Reports and monitoring records.	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

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations		Status
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.	<p>It was reported by AGL that the EMP was developed by Sydney Gas in consultation with the nominated agencies in 2002. However, documented evidence of the consultation was not available.</p> <p>It is noted that the EMP and Sub Plans are available to agencies and the public via the CGP website.</p>		Compliant

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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.	<p>The EMP specifies that the document will be reviewed annually at minimum. This requirement is applicable to both the EMP and the Sub Plan appendices.</p> <p>The following matters of non-compliance were identified:</p> <ul style="list-style-type: none"> <li>• The EMP Appendices (Sub Plans), were not reviewed annually. Most plans were reviewed once during the audit period (2019), except the Groundwater Management Plan (EMP, Appendix O) and Aboriginal Cultural Heritage Management Sub Plan (EMP, Appendix G) which were not reviewed.</li> <li>• The EMP was submitted to DPIE following the March 2019 review (29 March 2019). However, there was no evidence to demonstrate that the EMP was submitted to DPIE following the March 2020 review.</li> </ul> <p>It is noted that the amendments of the EMP and Sub Plans during the audit period were administrative in nature and the documents are available to agencies and the public via the CGP website.</p> <p>It is recommended that the EMP (inclusive of Sub Plans) is reviewed annually with the outcomes of the review recorded in the document control section of the relevant document.</p>	Non-Compliant 1820-NC-01
5	<b>ANNUAL ENVIRONMENTAL PERFORMANCE REPORTING</b>		
	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 evidence of submission of the 2018/2019 AEPR and the 2019/2020 AEPR to DPIE.	Compliant
5(a)	The standards, performance measures and statutory requirements the development is required to comply with.	The auditor sighted the AEPR 2018-2019 and AEPR 2019-2020 and noted compliance with the requirements of this condition.	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

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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
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.
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 2018/2019 AEPR and the 2019/2020 AEPR to the nominated agencies. It is noted that a copy of each AEPR is also available on the CGP website.	Compliant
8	<b>INDEPENDENT ENVIRONMENTAL AUDIT – CONSTRUCTION AT EMAI</b>		
	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.		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

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	(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
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	<b>INDEPENDENT ENVIRONMENTAL AUDIT\OPERATION</b>		
	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:	The scope of this IEA complies with the requirements of this conditions.	Compliant
	a) Be conducted by a suitably qualified, experienced, and independent person(s) whose appointment has been approved by the Secretary.		Compliant
	b) consistent with ISO 19011:2002 - Guidelines for Quality and/ or Environmental Management Systems Auditing, or updated versions of these guidelines/manuals.		Compliant
	c) Assess the environmental performance of the development, and its effects on the surrounding environment.		Compliant
	d) Assess whether the development is complying with the relevant standards, performance measures, and statutory requirements.		Compliant

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	e) Review the adequacy of the Applicant's Environmental Management Plan.		Compliant
	f) Recommend measures or actions to improve the environmental performance of the development, and/or its environmental management and monitoring systems.		Compliant
11	Within two months of commissioning the audit, the Applicant must submit a copy of the audit report to the Secretary, DECC and the DOPE.	The auditor sighted correspondence confirming that the 2015-2018 Independent Environmental Audit was finalised on 20 December 2018 and submitted to the Director-General of the NSW Department of Planning and Infrastructure on 21 December 2018. As such, the requirements of this condition were satisfied.	Compliant
12	Deleted.		
13	Deleted.		
14	Deleted.		
15	Deleted.		
16	<b>REPORTING CONDITIONS</b>		
	The Applicant shall provide an Annual Return to the DECC in relation to the development as required by any licence under the Protection of the Environment Operations Act 1997 in relation to the development. In the Annual Return the Applicant must report on the annual monitoring undertaken (where the activity results in pollutant discharges), provide a summary of complaints relating to the development, report on compliance with licence conditions and provide a calculation of licence fees (administrative fees and, where relevant, load based fees) that are payable. If load based fees apply to the activity the Applicant will be required to submit load-based fee calculation worksheets with the return.	The auditor sighted the December 2018 and December 2019 Annual Returns and noted compliance against the requirements of this condition.	Compliant
17	<b>COMMUNITY CONSULTATIVE COMMITTEE</b>		
	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:	The minutes from CCC Meeting in March 2017 reported that DPIE approved a change in meeting frequency from quarterly to twice per year. Reflecting this change, the auditor sighted the following minutes of the Community Consultative Committee: <ul style="list-style-type: none"> <li>September 2018</li> <li>March 2019</li> </ul>	Compliant
17(a)	Have four community representatives residing in the PEL 2 area.		Compliant



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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations		Status
(b)	Have one representative from each of the following Councils: Camden Council, Campbelltown City Council and Wollondilly Shire Council.	<ul style="list-style-type: none"> <li>September 2019.</li> </ul>		Compliant
(c)	Meet at least quarterly.	Due to COVID-19, the March 2020 meeting was cancelled. In lieu of a meeting, a project update was provided to Committee members for the following periods: <ul style="list-style-type: none"> <li>September 2019 to March 2020</li> <li>March 2020 to July 2020.</li> </ul>		Compliant
(d)	Take minutes of the meeting.			Compliant
(e)	Make comments and recommendations about the implementation of the development and environmental management plans, monitor compliance with conditions of this consent and other matters relevant to the operation of the Stage 2 development during the term of the consent.			Compliant
	Representatives from relevant government agencies or other individuals may be invited to attend meetings as required by the Chairperson.			Compliant
18	The Applicant shall:			
(a)	Ensure that two of its representatives attend the Committee's meetings.	The auditor sighted the following minutes of the Community Consultative Committee: <ul style="list-style-type: none"> <li>September 2018</li> <li>March 2019</li> <li>September 2019.</li> </ul> Correspondence from the independent chairperson to the auditor (19 April 2021), verified that the committee membership conformed to the requirements of this condition throughout the audit period.		Compliant
(b)	Provide the Committee with regular information on the environmental performance and management of the development.	The auditor sighted the following minutes of the Community Consultative Committee and noted compliance with the requirements of this condition: <ul style="list-style-type: none"> <li>September 2018</li> <li>March 2019</li> <li>September 2019.</li> </ul>		Compliant
(c)	Ensure that the Committee has reasonable access to the necessary plans to carry out its functions.			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.		All documentation relating to the CCC is available on the Camden Gas Project website.	

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations		Status
(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	<b>COMPLAINTS REGISTER</b>			
	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 the complaints register. There were no complaints associated with this development consent during the audit period.		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.			
20	<b>COMMUNITY AWARENESS PROTOCOL</b>			
	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.	<p>The auditor sighted the Pollution Incident Response - Community Notification chart for the Camden Gas Project and noted compliance with the requirements of this condition.</p> <p>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.</p>		Compliant
	<b>SCHEDULE 7</b>			
	<b>GENERAL CONDITIONS FOR PART 3A PERMITS</b>			
	<b>DEPARTMENT OF WATER AND ENERGY</b>			

**B3. DA 282-6-2003**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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:	Condition not triggered during the audit period.	Not Triggered
	i A copy of the development consent including all conditions of approval;		Not Triggered
	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		Not Triggered
	i The appropriate permit fee paid to the DPI-Water.		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
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

**B3. DA 282-6-2003**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
7	All works proposed must be designed, constructed and operated so they do not cause erosion or sedimentation and to minimise adverse impacts on aquatic and riparian environments	<p>The auditor sighted the Soil and Water Management Sub Plan (June 2019). The plan includes adequate and appropriate erosion and sediment controls.</p> <p>Implementation of the Sub Plan was demonstrated through Environmental Walks and Critical Control Verifications to assess performance and identify improvement opportunities.</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>It was reported by AGL (AEPR 2018-2019 and AEPR 2019-2020) that there were no incidents recorded during the audit period associated with the offsite movement of sediment.</p>	Compliant
8	No plastic netting is to be used, for any purpose, in the stream or within the riparian zone unless such netting is of a rapidly biodegradable variety.	Condition not triggered during the audit period.	Not Triggered
9	Erosion and sediment control measures are required to be implemented prior to any works commencing, and must be maintained for as long as necessary after the completion of works, to prevent sediment and dirty water entering the river system. These measures are to be in accordance with Council's requirements and follow best management practices as outlined in the NSW Department of Housing's Managing Urban Stormwater: Soils and Construction (1998) manual (the Blue Book).	<p>The auditor sighted the Soil and Water Management Sub Plan (June 2019). The plan includes adequate and appropriate erosion and sediment controls.</p> <p>Implementation of the Sub Plan was demonstrated through Environmental Walks and Critical Control Verifications to assess performance and identify improvement opportunities.</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>It was reported by AGL (AEPR 2018-2019 and AEPR 2019-2020) that there were no incidents recorded during the audit period associated with the offsite movement of sediment.</p>	Compliant
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.	

**B3. DA 282-6-2003**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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
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

**B3. DA 282-6-2003**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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	Evidence Collected, Independent Audit Findings & Recommendations	Status
	<b>SCHEDULE 2</b>		
	<b>Obligation to Minimise Harm to the Environment</b>		
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 Walks, Critical Control Verifications, Daily Workover Reports and monitoring. The auditor sighted a sample of records and noted that AGL was generally compliant with the requirements of the EMP.</p> <p>Compliance obligations arising from licences, leases, environmental/ planning approvals and legislation are monitored through web-based database compliance management systems (CMO Compliance and SAP Compliance).</p>	Compliant
	<b>Terms of Approval</b>		
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. As such, assurance is limited to the available evidence.</p>	Compliant
	(a) DA submitted to the Department on 28 July 2004;		Compliant
	(b) Statement of Environmental Effects - Harness Racing Drilling Program Sydney Gas Company dated 24 June 2003;		Compliant
	(c) Review of Environmental Effects - Mt Taurus Drilling Program Sydney Gas Company dated March 2004;		Compliant
	(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		Compliant
	(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		Compliant
	(f) Conditions of this consent.	Refer to relevant conditions for an assessment of compliance.	

**B4. DA 183-8-2004**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations		Status
	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.		
3	The Applicant shall comply with any reasonable requirement/s of the Director-General arising from the Department's assessment of:	Condition is noted.		
	(a) Any reports, plans or correspondence that are submitted in accordance with this consent; and			
	(b) The implementation of any actions or measures contained in these reports, plans or correspondence.			
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 17 well approved by this development consent.		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
	<b>Environmental Management</b>			



**B4. DA 183-8-2004**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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.	<p>The auditor sighted the Soil and Water Management Sub Plan (June 2019) and the Groundwater Management Plan (July 2018). The plans detail a number of controls to prevent the pollution of water.</p> <p>The auditor sighted a number of active and rehabilitated sites during the site inspection and noted that environmental controls were effective and there was no evidence of erosion or uncontrolled releases to the environment.</p> <p>There were no water pollution incidents during the audit period.</p>	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 2018/19 and 2019/20 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>	<p>The auditor sighted the AGL Environmental Footprint spreadsheet for the financial years 2018/19 and 2019/20 which note that produced water was disposed to an appropriately licenced facility. 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> <p>It is noted that a waste audit was not within the scope of this independent audit.</p>	Compliant
13	The Applicant shall undertake the development in a way that minimises the noise generated by the development.	<p>The auditor sighted the Noise Management Sub Plan (July 2019). Implementation was evidenced by the induction program (construction hours).</p> <p>There were no reported noise complaints during the audit period.</p>	Compliant
	<b>Construction Hours</b>		

**B4. DA 183-8-2004**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status														
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 (July 2019) 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														
<b>Construction Noise Criteria for Surface to in-seam Wells</b>																	
13B.	Noise from the drilling and construction of MP30 shall not exceed the sound pressure level (noise) limits in the table below:  <table border="1" data-bbox="331 630 1086 758"> <thead> <tr> <th rowspan="2">Location (nearest residential dwelling)</th> <th>Day</th> <th>Evening</th> <th>Night</th> <th>Saturday (1pm-6pm) Sunday (7am-6pm)</th> </tr> <tr> <th>L<sub>Aeq</sub>(15min)</th> <th>L<sub>Aeq</sub>(15min)</th> <th>L<sub>Aeq</sub>(15min)</th> <th>L<sub>Aeq</sub>(15min)</th> </tr> </thead> <tbody> <tr> <td>Nearest receptor</td> <td>57</td> <td>42</td> <td>40</td> <td>42</td> </tr> </tbody> </table>	Location (nearest residential dwelling)	Day	Evening	Night	Saturday (1pm-6pm) Sunday (7am-6pm)	L <sub>Aeq</sub> (15min)	L <sub>Aeq</sub> (15min)	L <sub>Aeq</sub> (15min)	L <sub>Aeq</sub> (15min)	Nearest receptor	57	42	40	42	In accordance with the Noise Management Sub Plan (July 2019), workover maintenance and decommissioning are defined as construction activities. During the audit period, workover maintenance was conducted of well site MP30 and as such, the noise monitoring requirements were triggered.  The auditor determined that noise monitoring was not undertaken during the workover maintenance of well site MP30.  It is recommended that the Pre-Mobilisation Hazard Identification Form (DCS_GN_FM_HSE_003) be reviewed and revised to include a requirement to identify noise monitoring requirements (as detailed in the Noise Management Sub Plan) prior to commencement of works.	Non-Compliant 1820-NC-03
Location (nearest residential dwelling)	Day		Evening	Night	Saturday (1pm-6pm) Sunday (7am-6pm)												
	L <sub>Aeq</sub> (15min)	L <sub>Aeq</sub> (15min)	L <sub>Aeq</sub> (15min)	L <sub>Aeq</sub> (15min)													
Nearest receptor	57	42	40	42													
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="331 997 1030 1149"> <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 2018-2019 and AEPR 2019-2020) 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														

**B4. DA 183-8-2004**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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.	<p>The auditor sighted the Field Production Flood Management Procedure (August 2019) and noted compliance with the requirements of this condition. In this reporting period there were no flood-related incidents.</p> <p>As previously reported, the EPA commenced proceedings in June 2017 against AGL Upstream Investments Pty Limited, alleging a contravention of a condition of EPL 12003. The matter related to a flood event that occurred 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 affected. There is no allegation that environmental harm occurred. In March 2020, a decision was made by the EPA to withdraw the charge and the proceedings are now complete.</p>	Compliant
16	The Applicant is required to prepare and implement a /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
	<b>Soil and Water Management Plan at MP25</b>		
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

**B4. DA 183-8-2004**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	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
	<b>Bore Construction at MP25</b>		
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
	<b>Gas Gathering Line – MP16 to MP30</b>		
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

**B4. DA 183-8-2004**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	(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
	<b>Heritage</b>		
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 2018-2019 and AEPR 2019-2020 noted there were no European heritage matters identified and consequently no incidents in the audit period.	Not Triggered
	<b>Threatened Species</b>		
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 2018-2019 and AEPR 2019-2020) 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
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 2019) and noted the inclusion of 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
	<b>Redrilling and Refracking Management Plan</b>		
	<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.	

**B4. DA 183-8-2004**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
18	The Applicant shall obtain the prior approval of the Director-General for the redrilling and/or additional fraccing of a gas well.	Condition not triggered during the audit period.  It was reported by AGL (AEPR 2018-2019 and AEPR 2019-2020) that there was no drilling or fraccing works undertaken during the audit period.	Not Triggered
19	The Applicant shall prepare a Redrilling and Refraccing Management Plan in consultation with the Department of Primary Industries for the redrilling and/or refraccing of an existing well. The Plan shall be submitted to the Director-General no later than one month prior to the commencement of the work or within such period as agreed by the Director-General.	Condition not triggered during the audit period.  It was reported by AGL (AEPR 2018-2019 and AEPR 2019-2020) that there was no drilling or fraccing works undertaken 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 refraccing work;		Not Triggered
	(b) details of how the environmental performance of the work will be monitored and what actions will be taken to address identified adverse environmental impacts;		Not Triggered
	(c) reference to the relevant parts of the Environmental Management Plan required under 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/refraccing work.		Not Triggered
20	The Applicant shall give written notification of the proposed redrilling/refraccing work to potentially affected residences and other noise sensitive receivers at least fourteen days prior to work commencing.	Condition not triggered during the audit period.  It was reported by AGL (AEPR 2018-2019 and AEPR 2019-2020) that there was no drilling or fraccing works undertaken during the audit period.	Not Triggered
	<b>Operational Environmental Management Plan (OEMP)</b>		
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 2020) and noted compliance with the requirements of this condition.  A number of controls are in place to monitor and measure implementation of the EMP including Environmental Walks, Critical	Compliant

**B4. DA 183-8-2004**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations		Status
	(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;	Control Verifications, Daily Workover Reports and monitoring. The auditor sighted a sample of monitoring controls and noted compliance with the requirements of the EMP.  Amendments of the EMP and Sub Plans during the audit period were administrative in nature. The EMP and nominated Sub Plans are available to agencies and the public via the CGP website.		Compliant
	(b) a description of the roles and responsibilities for all key personnel involved in the operation of the development;			Compliant
	(c) the overall environmental policies and principles to be applied to the operation of the development;			Compliant
	(d) standards and performance measures to be applied to the development, and a means by which environmental performance can be periodically reviewed and improved; and			Compliant
	(e) management policies to ensure that environmental performance goals are met and to comply with conditions of this consent.			Compliant
21A.	Prior to the commencement of construction of the gas well at MP25, the OEMP submitted under condition 22 must:	Condition closed in a previous audit.		Not Triggered
	(a) be updated by a suitably qualified expert to include gas well MP25; and			Not Triggered
	(b) be re-submitted to the Director-General for approval.			Not Triggered
22	The Applicant shall supply a copy of the OEMP to Campbelltown City Council and Wollondilly Shire Council within fourteen days of the Director-General's approval. The Applicant shall ensure that a copy of the OEMP is publicly available.	The updated EMP was provided to stakeholders and made available on the AGL Camden gas website.		Not Triggered

**B4. DA 183-8-2004**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
23	The Applicant shall review and update the OEMP annually, or as directed by the Director-General.	<p>The EMP specifies that the document will be reviewed annually at minimum. This requirement is applicable to both the EMP and the Sub Plan appendices.</p> <p>The following matters of non-compliance were identified:</p> <ul style="list-style-type: none"> <li>• The EMP Appendices (Sub Plans), were not reviewed annually. Most plans were reviewed once during the audit period (2019), except the Groundwater Management Plan (EMP, Appendix O) and Aboriginal Cultural Heritage Management Sub Plan (EMP, Appendix G) which were not reviewed.</li> <li>• The EMP was submitted to DPIE following the March 2019 review (29 March 2019). However, there was no evidence to demonstrate that the EMP was submitted to DPIE following the March 2020 review.</li> </ul> <p>It is noted that the amendments of the EMP and Sub Plans during the audit period were administrative in nature and the documents are available to agencies and the public via the CGP website.</p> <p>It is recommended that the EMP (inclusive of Sub Plans) is reviewed annually with the outcomes of the review recorded in the document control section of the relevant document.</p>	Non-Compliant 1820-NC-01
<b>Annual Environmental Performance Reporting</b>			
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 (2018-2019 and 2019-2020) and noted compliance with the requirements of this condition.	Compliant
<b>Independent Environmental Audit</b>			
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	Evidence Collected, Independent Audit Findings & Recommendations	Status
	<b>SCHEDULE 2</b>		
	<b>Obligation to Minimise Harm to the Environment</b>		
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 Walks, Critical Control Verifications, Daily Workover Reports and monitoring. The auditor sighted a sample of records and noted that AGL was generally compliant with the requirements of the EMP.</p> <p>Compliance obligations arising from licences, leases, environmental/ planning approvals and legislation are monitored through web-based database compliance management systems (CMO Compliance and SAP Compliance).</p>	Compliant
	<b>Terms of Approval</b>		
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. As such, assurance is limited to the available evidence.</p>	Compliant
	(a) DA submitted to the Department on 4 January 2005;		Compliant
	(b) <i>Statement of Environmental Effects – Elizabeth Macarthur Agricultural Institute Horizontal Drilling Project Sydney Gas Company</i> dated July 2002;		Compliant
	(c) <i>Statement of Environmental Effects – Glenlee Drilling Project Drilling Operations Sydney Gas Company</i> dated September 2002		Compliant
	(d) Letter from Sydney Gas Operations Pty Ltd to the Department dated 13 May 2005, modifying the application to relocate well GL3;		Compliant
	(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;		Compliant

**B5. DA 9-1-2005**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	(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;		Compliant
	(g) letter from AGL Energy Limited to the Department dated 28th May 2010, modifying the application to revise condition 26 of schedule 2; and		Compliant
	(h) 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. 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.	
	(a) Any reports, plans or correspondence that are submitted in accordance with this consent; and		
	(b) The implementation of any actions or measures contained in these reports, plans or correspondence.		
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 2018-2019 AEPR and 2019-2020 AEPR against the development consents and confirmed that no additional wells have been drilled or operated.	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 2018-2019 and AEPR 2019-2020) 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	Evidence Collected, Independent Audit Findings & Recommendations	Status
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 2018-2019 and AEPR 2019-2020) 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 2018-2019 and AEPR 2019-2020) 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
	<b>Hours of Operation</b>		
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	Evidence Collected, Independent Audit Findings & Recommendations	Status
	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
	<b>Environmental Management</b>		
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.	<p>The auditor sighted the Soil and Water Management Sub Plan (June 2019) and the Groundwater Management Plan (July 2018). The plans detail appropriate controls to prevent the pollution of water.</p> <p>The auditor sighted a number of active and rehabilitated sites during the site inspection and noted that environmental controls were effective and there was no evidence of erosion or uncontrolled releases to the environment.</p> <p>There were no water pollution incidents during the audit period.</p>	Compliant

**B5. DA 9-1-2005**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
16	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 Soil and Water Management Sub Plan (June 2019). The plan includes adequate and appropriate erosion and sediment controls.</p> <p>Implementation of the Sub Plan was demonstrated through Environmental Walks and Critical Control Verifications to assess performance and identify improvement opportunities.</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>It was reported by AGL (AEPR 2018-2019 and AEPR 2019-2020) that there were no incidents recorded during the audit period associated with the offsite movement of sediment.</p>	Compliant
17	The Applicant shall implement all relevant site drainage and sediment and erosion control works and measures prior to the commencement of any other works at the site.	<p>The auditor sighted the Soil and Water Management Sub Plan (June 2019). The plan includes adequate and appropriate erosion and sediment controls.</p> <p>Implementation of the Sub Plan was demonstrated through Environmental Walks and Critical Control Verifications to assess performance and identify improvement opportunities.</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>It was reported by AGL (AEPR 2018-2019 and AEPR 2019-2020) that there were no incidents recorded during the audit period associated with the offsite movement of sediment.</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 (July 2019) and noted there were no reported noise complaints during the audit period.	Compliant

**B5. DA 9-1-2005**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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>The auditor sighted the Field Production Flood Management Procedure (August 2019) and noted compliance with the requirements of this condition. In this reporting period there were no flood-related incidents.</p> <p>As previously reported, the EPA commenced proceedings in June 2017 against AGL Upstream Investments Pty Limited, alleging a contravention of a condition of EPL 12003. The matter related to a flood event that occurred 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 affected. There is no allegation that environmental harm occurred. In March 2020, a decision was made by the EPA to withdraw the charge and the proceedings are now complete.</p>	Compliant
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
	<b>Threatened Species</b>		
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. There was no evidence of tree removal identified by the auditor during the site inspection.	Compliant
24	The Applicant shall implement best practice flora and fauna management.	The auditor sighted the Flora and Fauna Management Sub Plan (June 2019) and noted compliance with the requirements of this condition.	Compliant

**B5. DA 9-1-2005**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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 2019) 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 2019) 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
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 2019) and Flora and Fauna Management Sub plan (June 2019). 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
	<b>Safety and Risk</b>		



**B5. DA 9-1-2005**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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 (October 2019) and the Safety Management Plan, Camden Project NSW (May 2020) 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 (October 2019) and the Safety Management Plan, Camden Project NSW (May 2020) and noted compliance with the requirements of this condition.	Compliant
	(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.	The Auditor sighted the Safety Management Plan, Camden Project NSW (May 2020) and noted compliance with the requirements of this condition. Implementation was demonstrated through the following documents/ processes: <ul style="list-style-type: none"> <li>• Induction program (Rapid Induct)</li> <li>• HSE audit action tracking (SAP)</li> <li>• Standards and Critical Controls.</li> </ul>	Compliant
	Note: The Applicant may update the current approved version of the relevant study/plan/system prepared to comply with Schedule 4 Condition 92 of development consent DA-282-6-2003-i, dated 16 June 2004. The updated version shall incorporate and adequately address the relevant aspects of the additional wells and related plant.	Condition noted.	
	<b>Compliance Report</b>		
33	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:	Condition closed in a previous audit.	Not Triggered
	(a) dates of study/plan/system completion/submission and commencement of construction and commissioning;		Not Triggered

**B5. DA 9-1-2005**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	(b) actions taken or proposed, to implement recommendations made in the studies/plans/systems; and		Not Triggered
	(c) responses to any requirement imposed by the Director-General under Condition 35.		Not Triggered
	This report shall verify that:		Not Triggered
	(a) The Emergency Plan required under Condition 32(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 32(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 Panel;		Not Triggered
	(b) All recommendations of each study/plan/system have been implemented; and		Not Triggered
	(c) All safety management system and their associated risk controls have been implemented and are being maintained.		Not Triggered
	<b>Hazard Audit</b>		
34	Twelve months after the commencement of operations of the proposed development or within such further period as the Director-General may agree, the Applicant shall carry out a comprehensive hazard audit of the development and within one month of the audit submit a report to the Director- General.	<p>The auditor sighted the following documents demonstrating compliance with the requirements of this condition:</p> <ul style="list-style-type: none"> <li>• Letter from DPIE to AGL (4 October 2010) approving the nominated auditor to conduct the hazard audit</li> <li>• Hazard Audit Report for the Camden Gas Project, Pinnacle Risk Management (9 January 2019)</li> <li>• Email correspondence from AGL to DPIE (4 February 2019) submitting the Hazard Audit Report.</li> </ul>	Compliant

**B5. DA 9-1-2005**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	<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>		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
	<p><b>Drilling and Fracching Management Plan</b></p>		
	<p>Note: For the purposes of this consent the redrilling and/or additional fracching of a well does not constitute wellhead maintenance.</p>	Condition noted.	
36	<p>The Applicant shall obtain the prior approval of the Director-General for the drilling, redrilling and/or additional fracching of a gas well.</p>	<p>Condition not triggered during the audit period.</p> <p>It was reported by AGL (AEPR 2018-2019 and AEPR 2019-2020) that there was no drilling or fracching works undertaken during the audit period.</p>	Not Triggered
37	<p>The Applicant shall prepare a Drilling and Fracching Management Plan in consultation with the Department of Primary Industries for the drilling of a well, or redrilling and/or refracching of an existing well. The Plan shall be submitted to the Director-General no later than one month prior to the commencement of the work or within such period as agreed by the Director-General. The Plan shall include, but not necessarily be limited to:</p>	<p>Condition not triggered during the audit period.</p> <p>It was reported by AGL (AEPR 2018-2019 and AEPR 2019-2020) that there was no drilling or fracching works undertaken during the audit period.</p>	Not Triggered
	<p>(a) a description of all the activities to be undertaken on the well site during the drilling, redrilling and/or refracching work;</p>		Not Triggered
	<p>(b) details of how the environmental performance of the work will be monitored and what actions will be taken to address identified adverse environmental impacts;</p>		Not Triggered

**B5. DA 9-1-2005**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	(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, re-drilling and/or refracing work.		Not Triggered
38	The Applicant shall give written notification of the proposed drilling, 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 2018-2019 and AEPR 2019-2020) that there was no drilling or fracing works undertaken during the audit period.	Not Triggered
	<b>Construction Environmental Management Plan (CEMP)</b>		
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 2018-2019 and AEPR 2019-2020) 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 2018-2019 and AEPR 2019-2020) that there were no construction activities undertaken during the audit period with respect to DA9-1-2005.	Not Triggered
	<b>Operational Environmental Management Plan (OEMP)</b>		
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 2020) and noted compliance with the requirements of this condition.  A number of controls are in place to monitor and measure implementation of the EMP including Environmental Walks, Critical	Compliant

**B5. DA 9-1-2005**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations		Status
	(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;	Control Verifications, Daily Workover Reports and 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;			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
	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.			
	<b>Annual Environmental Performance Reporting</b>			
42	The Applicant shall include the operation of wells GL2 – 4 inclusive, GL 6, EMAI-1H and EMAI-1V and the associated gas gathering system and the conditions of this consent, in the Annual Environmental Performance Report required under Schedule 5 Condition 5 of development consent DA-282-6-2003-i, dated 16 June 2004.	The auditor sighted AEPR 2018-2019 and AEPR 2019-2020 and noted compliance with the requirements of this condition.		Compliant
	<b>Independent Environmental Audit – Construction at EMAI</b>			
43	The Applicant shall commission and pay the full costs of an Independent Environmental Audit of the construction of the gas gathering system, construction of the access roads and drilling and fracking of gas wells on the EMAI. The objective of the audit is to monitor the performance and effect of construction activities on the EMAI.	Condition closed in a previous audit.		Not Triggered
	The Independent Environmental Audit shall:			Not Triggered
	(a) be conducted by a suitably qualified, experienced, and independent person(s) whose appointment has been approved by the Director-General; and			Not Triggered

**B5. DA 9-1-2005**

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

**B6. DA 75-4-2005**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	<b>SCHEDULE 2</b>		
	<b>Obligation to Minimise Harm to the Environment</b>		
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 Walks, Critical Control Verifications, Daily Workover Reports and monitoring. The auditor sighted a sample of records and noted that AGL was generally compliant with the requirements of the EMP.</p> <p>Compliance obligations arising from licences, leases, environmental/ planning approvals and legislation are monitored through web-based database compliance management systems (CMO Compliance and SAP Compliance).</p>	Compliant
	<b>Terms of Approval</b>		
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. As such, assurance is limited to the available evidence.</p>	Compliant
	(a) Development Application submitted to the Department on 18 April 2005;		Compliant
	(b) <i>Statement of Environmental Effects – Camden Gas Project, Sugarloaf Farm Drilling Program, PPL4</i> Sydney Gas (Camden) Operations Pty Ltd, dated March 2005;		Compliant
	(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;		Compliant
	(d) Letter from Sydney Gas (Camden) Operations Pty Ltd to the Department, dated 20 May 2005, amending the application to relocate SL5;		Compliant
	(e) Letter from Sydney Gas (Camden) Operations Pty Ltd to the Department, dated 30 May 2005, providing a response to general public submissions;		Compliant
	(f) Letter from Sydney Gas (Camden) Operations Pty Ltd to the Department, dated 17 June 2005, about the access roads;		Compliant
	(g) Letter from Sydney Gas (Camden) Operations Pty Ltd to the Department of Environment and Conservation, dated 10 June 2005, about Aboriginal heritage issues;		Compliant

**B6. DA 75-4-2005**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	(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;		Compliant
	(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;		Compliant
	(j) Modification Application DA 75-4-2005 MOD 2 and letter dated 18 December 2009;		Compliant
	(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		Compliant
	(l) conditions of this approval.	Refer to relevant conditions for an assessment of compliance.	
	If there is any inconsistency between the above documents, the latter document shall prevail over the former to the extent of the inconsistency. However, the conditions of this consent shall prevail over all other documents to the extent of any inconsistency.	Condition noted.	
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
	<b>Limits on Approval</b>		
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 2018-2019 AEPR and 2019-2020 AEPR against the development consents and confirmed that no additional wells have been drilled or operated.	Compliant
6	If after five years of the date of this consent any well that is the subject of this consent has not yet been drilled or completed, then the Applicant shall surrender the approval for that well.	Condition closed in a previous audit.	Not Triggered
7	The access road near SL7 shall only be used in an emergency.	Condition closed in a previous audit.	Not Triggered
	<b>Administration</b>		



**B6. DA 75-4-2005**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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 2018-2019 and AEPR 2019-2020) 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	<p>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.</p>	<p>Condition not triggered during the audit period.</p>	Not Triggered
10	<p>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.</p>	<p>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.</p>	Compliant
11	<p>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.</p>	<p>Condition noted.</p>	
12	<p>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>	<p>Condition not triggered during the audit period.</p> <p>It was reported by AGL (AEPR 2018-2019 and AEPR 2019-2020) 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	<p>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>	<p>Condition not triggered during the audit period.</p> <p>It was reported by AGL (AEPR 2018-2019 and AEPR 2019-2020) 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

**B6. DA 75-4-2005**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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 2018-2019 and AEPR 2019-2020) that there were no new gas wells or gas gathering system constructed during the audit period.	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
<b>ENVIRONMENTAL PERFORMANCE CONDITIONS</b>			
<b>Activities Must be Carried out in a competent Manner</b>			
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:  <ul style="list-style-type: none"> <li>• Roles and responsibilities – Defined in the EMP (May 2020) and position descriptions.</li> <li>• Training – The auditor sighted the induction program that is delivered to all AGL employees and contractors (Rapid Induct).</li> <li>• Audit and inspection – Environmental Walks and Critical Control Verifications were undertaken to assess implementation of control measures.</li> </ul>	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
<b>Maintenance of Plant and Equipment</b>			
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:  <ul style="list-style-type: none"> <li>• Preventative Maintenance – The preventative maintenance of plant and equipment is managed through SAP. The system effectively monitors maintenance requirements based on the use of plant and equipment. The auditor sighted a sample of look ahead reports, preventative workorders and corrective workorders.</li> <li>• Monitoring – Regular documented checks are undertaken of plant and equipment.</li> <li>• Procedures – Standard Operating Procedures have been developed to guide commonly undertaken activities.</li> <li>• Leak Detection and Repair Program (refer to EPL 12003).</li> </ul>	Compliant
<b>Noise Limits</b>			

**B6. DA 75-4-2005**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status														
18	<p>Noise from the operation of the development shall not exceed the sound pressure level (noise) limits presented in the Table below:</p> <table border="1" data-bbox="338 389 871 494"> <thead> <tr> <th rowspan="2">Location</th> <th>Day</th> <th>Evening</th> <th colspan="2">Night</th> </tr> <tr> <th>L<sub>Aeq</sub> (15 minute)</th> <th>L<sub>Aeq</sub> (15 minute)</th> <th>L<sub>Aeq</sub> (15 minute)</th> <th>L<sub>A1</sub> (1 minute)</th> </tr> </thead> <tbody> <tr> <td>Any residential premise</td> <td>35</td> <td>35</td> <td>35</td> <td>45</td> </tr> </tbody> </table> <p>Notes</p> <ul style="list-style-type: none"> <li>The limits represent the sound pressure level (noise) contribution, at the nominated receiver locations in the table.</li> <li>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.</li> <li>Evening is defined as the period from 6.00pm to 10.00pm.</li> <li>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.</li> <li>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.</li> <li>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.</li> <li>Where it can be demonstrated that direct measurement of noise from the premises is impractical, the OEH may accept alternative means of determining compliance (see Chapter 11 of the <i>NSW Industrial Noise Policy</i>).</li> <li>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.</li> <li>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.</li> </ul>	Location	Day	Evening	Night		L <sub>Aeq</sub> (15 minute)	L <sub>Aeq</sub> (15 minute)	L <sub>Aeq</sub> (15 minute)	L <sub>A1</sub> (1 minute)	Any residential premise	35	35	35	45	<p>In accordance with the Noise Management Sub Plan (July 2019), attended noise monitoring to be undertaken at the receiver locations within the first week of production and again after three months for each well, then if the well status changes.</p> <p>Workover maintenance and decommissioning is defined as a construction activity in the Sub Plan and is not considered to be a change in well status. As such, the noise monitoring requirements were not triggered during the reporting period.</p>	Not Triggered
Location	Day		Evening	Night													
	L <sub>Aeq</sub> (15 minute)	L <sub>Aeq</sub> (15 minute)	L <sub>Aeq</sub> (15 minute)	L <sub>A1</sub> (1 minute)													
Any residential premise	35	35	35	45													
	<b>Construction Noise Criteria for SIS Wells</b>																

**B6. DA 75-4-2005**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status										
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" data-bbox="331 389 857 488"> <thead> <tr> <th data-bbox="331 389 432 453">Receiver Location</th> <th data-bbox="432 389 544 453">Weekday (7.00am-6.00pm) Saturday (7.00am-1.00pm)</th> <th data-bbox="544 389 656 453">Saturday (1.00pm-6.00pm) Sunday (7.00am-6.00pm)</th> <th data-bbox="656 389 768 453">Evening (6.00pm-10.00pm)</th> <th data-bbox="768 389 857 453">Night (10.00pm-7.00am)</th> </tr> </thead> <tbody> <tr> <td data-bbox="331 453 432 488">Nearest Receiver</td> <td data-bbox="432 453 544 488">54</td> <td data-bbox="544 453 656 488">44</td> <td data-bbox="656 453 768 488">47</td> <td data-bbox="768 453 857 488">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>In accordance with the Noise Management Sub Plan (July 2019), workover maintenance and decommissioning are defined as construction activities. During the audit period, decommissioning was conducted of well site SL09 and as such, the noise monitoring requirements were triggered.</p> <p>The auditor determined that noise monitoring was not undertaken during the decommissioning of well site SL09.</p> <p>It is recommended that the Pre-Mobilisation Hazard Identification Form (DCS_GN_FM_HSE_003) be reviewed and revised to include a requirement to identify noise monitoring requirements (as detailed in the Noise Management Sub Plan) prior to commencement of works.</p>	Non-Compliant 1820-NC-04
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 OEH and the Director-General at least one week prior to commencement of construction. The Protocol must include but is not limited to:</p>	<p>The auditor sighted the Noise Management Sub Plan (July 2019) and noted compliance with the requirements of this condition.</p>	Compliant										
	(a) Compliance with the noise criteria in Condition 18A during all construction activities, when assessed at sensitive locations including residences and schools;		Compliant										
	(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;		Compliant										
	(c) Identification of sensitive receivers likely to be impacted by noise levels exceeding the noise goal in (a) above;		Compliant										
	(d) Details of proposed best practice mitigation measures to seek achieve the noise goal in (a) above;		Compliant										
	(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;		Compliant										
	(f) Community consultation including advance notice of commencement of construction activities and site contact details;		Compliant										
	(g) A system to receive, document, respond, action and monitor complaints; and		Compliant										

**B6. DA 75-4-2005**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	(h) Monitoring methods and program.	<p>The auditor sighted the Noise Management Sub Plan (July 2019) and noted that the noise monitoring requirements of the Sub Plan were not implemented; noise monitoring was not conducted during workover maintenance of SL09 (refer to condition 18A).</p> <p>It is recommended that the Pre-Mobilisation Hazard Identification Form (DCS_GN_FM_HSE_003) be reviewed and revised to include a requirement to identify noise monitoring requirements (as detailed in the Noise Management Sub Plan) prior to commencement of works.</p>	Non-Compliant 1820-NC-04
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:	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
	<b>Hours of Operation</b>		
21	<p>The Applicant shall ensure that all construction work (except for the drilling (including well casing and grouting) of SIS wells), shall only be conducted between 7.00am and 6.00pm Monday to Friday and between 8.00am and 1.00pm Saturdays, unless inaudible at any residential receiver.</p> <p>Note: Inaudible means that the construction activity cannot be heard by the human ear at the nearest affected residential receiver.</p>	<p>Condition not triggered during the audit period.</p> <p>It was reported by AGL (AEPR 2018-2019 and AEPR 2019-2020) that there were no drilling or construction works undertaken during the audit period with respect to DA75-4-2005.</p>	Not Triggered

**B6. DA 75-4-2005**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
22	Planned maintenance activities at any of the wells must only be conducted between:	The auditor sighted the Noise Management Sub Plan (July 2019) and noted compliance with the requirements of this condition.	Compliant
	(a) 7.00 am to 6.00 pm on weekdays; and		Compliant
	(b) 8.00am and 1.00pm on Saturdays (excluding Public Holidays)	The auditor sighted the Site Induction Program, a sample of Daily Completion/Workover Reports prepared by AGL and community notification letters. The documents demonstrate compliance with the specified hours.	Compliant
	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.		Compliant
	<b>Air Quality</b>		
23	The Applicant shall carry out the development in a manner that will minimise emissions of dust from the site.	The auditor sighted the Air Quality Management Sub Plan (June 2019) and noted the inclusion of adequate dust management controls.	Compliant
	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.	The auditor notes there were no dust related complaints during the audit period in relation to this development consent (AEPR 2018-2019 and AEPR 2019-2020).  Surface disturbance works associated with this Development Consent where limited to rehabilitation works.	
	<b>Water</b>		
24	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.	The auditor sighted the Soil and Water Management Sub Plan (June 2019) and the Groundwater Management Plan (July 2018). The plans detail adequate controls to prevent the pollution of water.	Compliant
	Note: Section 120 of the Protection of the Environment Operations Act 1997 applies to the disposal of wastewater.	The auditor sighted a number of active and rehabilitated sites during the site inspection and noted that environmental controls were effective and there was no evidence of erosion or uncontrolled releases to the environment.  There were no water pollution incidents during the audit period.	
	<b>Stormwater/Sediment Control</b>		

**B6. DA 75-4-2005**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
25	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> .	Condition closed in a previous audit.	Not Triggered
	<b>Waste</b>		
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 2018/2019 and 2019/2020 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	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>The auditor sighted the AGL Environmental Footprint spreadsheet for the financial years 2018/2019 and 2019/2020 and noted compliance with the requirements of this condition. The Environmental Footprint provides a detailed record of waste streams generated, recycled/reused and disposed, including water, hazardous waste and non-hazardous waste.</p> <p>The auditor sighted a sample of disposal records generated during the audit period and reconciled against the Environmental Footprint. There were no errors or emissions identified.</p> <p>It is noted that a waste audit was not within the scope of this independent audit.</p>	Compliant
	<b>Safety and Risk Management</b>		

**B6. DA 75-4-2005**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
28	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.	Condition closed in a previous audit.	Not Triggered
29	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 (October 2019) and the Safety Management Plan, Camden Project NSW (May 2020) and noted compliance with the requirements of this condition.	Compliant
	(a) Emergency Plan A comprehensive emergency plan and detailed emergency procedures for the development shall be prepared in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 1, Industry Emergency Planning Guidelines. The plan shall include detailed procedures for the safety of all people outside of the development who may be at risk from the development.	The Auditor sighted the Emergency Response Plan (October 2019) and the Safety Management Plan, Camden Project NSW (May 2020) and noted compliance with the requirements of this condition.	Compliant



**B6. DA 75-4-2005**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	<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.</p> <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>	<p>The Auditor sighted the Safety Management Plan, Camden Project NSW (May 2020) and noted compliance with the requirements of this condition. Implementation was demonstrated through the following documents/ processes:</p> <ul style="list-style-type: none"> <li>• Induction program (Rapid Induct)</li> <li>• HSE audit action tracking (SAP)</li> <li>• Standards and Critical Controls.</li> </ul>	Compliant
	<b>Compliance Report</b>		
30	<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>(a) The Emergency Plan required under Condition 29(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 29(b) has been fully implemented and that records required by the system are being kept.</p>	Condition closed in a previous audit.	Not Triggered

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	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
	<b>Hazard Audit</b>		
31	Twelve months after the commencement of operations of the proposed development or within such further period as the Director-General may agree, the Applicant shall carry out a comprehensive hazard audit of the development and within one month of the audit submit a report to the Director- General.	The auditor sighted the following documents demonstrating compliance with the requirements of this condition: <ul style="list-style-type: none"> <li>Letter from DPIE to AGL (4 October 2010) approving the nominated auditor to conduct the hazard audit</li> <li>Hazard Audit Report for the Camden Gas Project, Pinnacle Risk Management (9 January 2019)</li> <li>Email correspondence from AGL to DPIE (4 February 2019) submitting the Hazard Audit Report.</li> </ul>	Compliant
	The audit shall be carried out at the Applicant’s expense by a duly qualified independent person or team approved by the Director-General prior to commencement of the audit. Further audits shall be carried out every three years or as determined by the Director-General and a report of each audit shall, within one month of the audit, be submitted to the Director-General. Hazard audits shall be carried out in accordance with the Department’s Hazardous Industry Planning Advisory Paper No. 5, Hazard Audit Guidelines.		Compliant
	Note: The Applicant may include the three yearly hazard audit of the development with the Hazard Audit required under Schedule 4 Condition 95 of development consent DA-282-6-2003-i, dated 16 June 2004. The due date for a combined audit shall be the earlier of the due dates for the separate audits.		Compliant
32	The Applicant shall comply with all reasonable requirements of the Director-General in respect of the implementation of any measures arising from recommendations of the studies or reports referred to in Conditions 28 to 31 inclusive, within such time as the Director-General may agree.	Condition not triggered during the audit period.	Not
	<b>Redrilling and Fracing Management Plan</b>		
	Note: For the purposes of this consent the redrilling and/or additional fracing of a well does not constitute wellhead maintenance.	Condition noted.	

**B6. DA 75-4-2005**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
33	The Applicant shall obtain the prior approval of the Director-General for the redrilling and/or additional fraccing of a gas well.	Condition not triggered during the audit period.  It was reported by AGL (AEPR 2018-2019 and AEPR 2019-2020) that there was no drilling or fraccing works undertaken during the audit period.	Not Triggered
34	The Applicant shall prepare a Redrilling and Fraccing Management Plan in consultation with the Department of Primary Industries for the redrilling and/or refraccing of an existing well. The Plan shall be submitted to the Director-General no later than one month prior to the commencement of the work or within such period as agreed by the Director-General. The Plan shall include, but not necessarily be limited to:	Condition not triggered during the audit period.  It was reported by AGL (AEPR 2018-2019 and AEPR 2019-2020) that there was no drilling or fraccing 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 refraccing work;		Not Triggered
	(b) Details of how the environmental performance of the work will be monitored and what actions will be taken to address identified adverse environmental impacts;		Not Triggered
	(c) Reference to the relevant parts of the Environmental Management Plan required under 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 refraccing work.		Not Triggered
35	The Applicant shall give written notification of the proposed redrilling and/or refraccing work to potentially affected residences and other noise sensitive receivers at least fourteen days prior to work commencing.	Condition not triggered during the audit period.  It was reported by AGL (AEPR 2018-2019 and AEPR 2019-2020) that there were no drilling or fraccing works undertaken during the audit period.	Not Triggered
	<b>Gas Gathering System</b>		
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 2018-2019 and AEPR 2019-2020) that there were no gas gathering lines constructed during the audit period.	Not Triggered

**B6. DA 75-4-2005**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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 2018-2019 and AEPR 2019-2020) that there were no gas gathering lines constructed during the audit period.	Not Triggered
	(a) Signs stating the presence of a buried gas pipeline shall be erected periodically along the length of the trench once the pipeline has been laid;		Not Triggered
	(b) Trenches are to be restored and reseeded with local grass seeds on completion of the work;		Not Triggered
	(c) 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
	<b>Flora and Fauna</b>		
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 2019) which details adequate 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. There was no evidence of tree removal during the site inspection conducted by the auditor.	Compliant
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 2019) and noted compliance with the requirements of this condition.	Compliant
	<b>Threatened Species</b>		

**B6. DA 75-4-2005**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
42A.	The Applicant shall ensure that, during the drilling and construction of SL08 and SL09, 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 2018-2019 and AEPR 2019-2020) that there were no drilling or construction works 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 <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
	<b>Bushfire Management</b>		
43	The Applicant shall:	The auditor sighted the Bush Fire Management Procedures in the Emergency Response Plan (October 2019). 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 the Emergency Response Plan (October 2019) which includes and is applicable to the entire well network.  Correspondence was sighted between AGL and the respective Councils in the 2018-2020 independent environmental audit period with respect to this condition.	Compliant
	<b>Heritage</b>		
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

**B6. DA 75-4-2005**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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
	<b>Aboriginal Relics</b>		
47	The Applicant must ensure that should any Aboriginal objects be uncovered, excavation or disturbance of the area is to stop immediately and the OEH is to be informed in accordance with section 91 of the <i>National Parks and Wildlife Act 1974</i> .	Condition not triggered during the audit period.	Not Triggered
48	Prior to the commencement of construction, the Applicant shall clearly mark the locations of known Aboriginal relics on the site (using flags, fencing or other appropriate method) and ensure that all employees and contractors are aware of these locations, to prevent the known relics being impacted or disturbed during site preparation and construction.	Condition not triggered during the audit period.	Not Triggered
	<b>Sydney Water Supply Canal</b>		
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
	<b>ENVIRONMENTAL MANAGEMENT AND MONITORING</b>		
	<b>Construction Environmental Management Plan (CEMP)</b>		

**B6. DA 75-4-2005**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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 2018-2019 and AEPR 2019-2020) that there were no drilling or construction works undertaken during the audit period.</p>	Not Triggered
<b>Operational Environmental Management Plan (OEMP)</b>			
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 2020) 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 EMP including inspections (Environmental Walks), Critical Control Verifications, Daily Workover Reports and monitoring. The auditor sighted a sample of monitoring reports and noted compliance with the requirements of the EMP.</p>	Compliant
	(b) A description of the roles and responsibilities for all key personnel involved in the operation of the development;		Compliant
	(c) The overall environmental policies and principles to be applied to the operation of the development;		Compliant
	(d) Standards and performance measures to be applied to the development, and a means by which environmental performance can be periodically reviewed and improved; and		Compliant
	(e) Management policies to ensure that environmental performance goals are met and to comply with conditions of this consent.		Compliant
	<p>Note: The Applicant may update the current approved version of the OEMP prepared to comply with Schedule 5 Condition 2 of development consent DA-282-6-2003-i, dated 16 June 2004. The updated version shall incorporate and adequately address the relevant aspects of the additional wells and related plant.</p>		

**B6. DA 75-4-2005**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	<b>Annual Return</b>		
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 2018 and December 2019 Annual Returns and noted compliance against the requirements of this condition.	Compliant
	<b>Annual Environmental Performance Reporting</b>		
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 evidence of submission of the 2018/2019 AEPR and the 2019/2020 AEPR to DPIE.	Compliant
	(a) The standards, performance measures and statutory requirements the development is required to comply with;	The auditor sighted the AEPR (AEPR 2018-2019 and AEPR 2019-2020) and noted compliance with the requirements of this condition.	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	Evidence Collected, Independent Audit Findings & Recommendations	Status
	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 AGL to DPIE (25 October 2019) providing the requested report on the court proceedings initiated by the EPA against AGL in June 2017. It is noted that this request from DPIE was initiated by a review of the AEPR but does not directly related to this Development Consent.	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 2018/2019 AEPR and the 2019/2020 AEPR to the nominated agencies. It is noted that a copy of each AEPR is also available on the CGP website.	Compliant
	<b>Independent Environmental Audit – Construction at Sugarloaf Farm</b>		
57	<p>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:</p> <p>(a) Be conducted by a suitably qualified, experienced, and independent person(s) whose appointment has been approved by the Director-General; and</p> <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> <p>The Audit shall:</p> <p>a) Assess the environmental performance of the construction of the development on the site, and its effects on the surrounding environment;</p> <p>b) Assess whether the development is complying with the relevant standards, performance measures, and statutory requirements;</p> <p>c) Consider the Applicant’s proposed Construction Environmental Management Plan; and</p> <p>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).</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>

**B6. DA 75-4-2005**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	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
	<b>Independent Environmental Audit – Operation</b>		
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 2018-2020 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.		
	<b>Complaints Register</b>		
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 the Complaints Register and noted compliance with the requirements of this condition. There were no complaints 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

**B6. DA 75-4-2005**

No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations		Status
	(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:			
	(a) Operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted on the site or by the vehicle or mobile plant, unless otherwise specified in the Licence; and	The auditor sighted the 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
	(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
	<b>Community Liaison</b>			
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	Evidence Collected, Independent Audit Findings & Recommendations	Status
	<b>Schedule 2 Administrative Conditions</b>		
	<b>Obligation to Minimise Harm to the Environment</b>		
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 Walks, Critical Control Verifications, Daily Workover Reports and monitoring. The auditor sighted a sample of records and noted that AGL was generally compliant with the requirements of the EMP.</p> <p>Compliance obligations arising from licences, leases, environmental/ planning approvals and legislation are monitored through web-based database compliance management systems (CMO Compliance and SAP Compliance).</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>	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
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

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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
	<b>Limits on Approval</b>		
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 reported in the 2018-2019 AEPR and 2019-2020 AEPR 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>The auditor sighted a letter from AGL to the Resources Assessments section of DPIE (19 April 2016) confirming the formal surrender of nominated wells that were approved but not drilled. The letter demonstrates compliance with the requirements of this condition.</p>	Closed
	<b>Notification</b>		
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
2.9	The Proponent shall ensure that all plant and equipment used at the site is:	<p>The auditor sighted the following systems and documents demonstrating compliance with the requirements of this condition:</p> <ul style="list-style-type: none"> <li>Preventative Maintenance – The preventative maintenance of plant and equipment is managed through SAP. The system effectively monitors maintenance requirements based on the use of plant and</li> </ul>	Compliant

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status																	
2.9(a)	Maintained in a proper and efficient condition.	equipment. The auditor sighted a sample of look ahead reports, preventative workorders and corrective workorders. <ul style="list-style-type: none"> <li>Monitoring – Regular documented checks are undertaken of plant and equipment.</li> <li>Procedures – Standard Operating Procedures have been developed to guide commonly undertaken activities.</li> <li>Leak Detection and Repair Program (refer to EPL 12003).</li> </ul>																		
2.9(b)	Operated in a proper and efficient condition.	There were no environmental incidents reported by AGL during the audit period.	Compliant																	
<b>SCHEDULE 3 ENVIRONMENTAL PERFORMANCE CONDITIONS</b>																				
<b>NOISE</b>																				
<b>Construction and Maintenance Hours</b>																				
3.1	The Proponent shall comply with the construction and maintenance hours in <b>Table 1</b> : Table 1: Construction and Maintenance Hours for the Project <table border="1" data-bbox="315 810 887 1098"> <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 personnel or equipment is endangered. In such circumstances, prior notification is to be provided to affected residents where possible.</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 (July 2019) and noted compliance with the requirements of this condition.  The auditor sighted a sample of Daily Completion/Workover Reports prepared by AGL and community notification letters. The documents demonstrate compliance with the specified maintenance hours.	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)																		
<b>Construction Noise Goals</b>																				
3.2	The Proponent shall use its best endeavours to undertake construction activities to comply with the construction noise goal specified in Table 2.	In accordance with the Noise Management Sub Plan (July 2019), workover maintenance and decommissioning are defined as	Non-Compliant																	

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No.	Consent Condition		Evidence Collected, Independent Audit Findings & Recommendations		Status										
	<table border="1"> <tr> <th>Location</th> <th>Day</th> </tr> <tr> <td>Any residential receiver</td> <td>54</td> </tr> </table> <p>Note: See notes to condition 4.</p>	Location	Day	Any residential receiver	54		<p>construction activities. During the audit period, workover maintenance was conducted of well site RB06 and decommissioning was undertaken of well sites RB11 and RB12. As such, the noise monitoring requirements were triggered.</p> <p>The auditor determined that noise monitoring was not undertaken during the workover maintenance of well site RB06 or the decommissioning of well sites RB11 and RB12.</p> <p>It is recommended that the Pre-Mobilisation Hazard Identification Form (DCS_GN_FM_HSE_003) be reviewed and revised to include a requirement to identify noise monitoring requirements (as detailed in the Noise Management Sub Plan) prior to commencement of works.</p>		1820-NC-05						
Location	Day														
Any residential receiver	54														
	<b>Construction Noise Management Plan</b>														
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:		The auditor sighted the Noise Management Sub Plan (July 2019) and noted compliance with the requirements of this condition.		Compliant										
3.3(a)	A detailed description of the measures that would be implemented to achieve the construction noise goal in condition 2.		Implementation of the Sub Plan was demonstrated through the Environmental Walks, Critical Control Verifications, monitoring records and the induction program.		Compliant										
3.3(b)	A community notification protocol for the proposed construction activities (including any re-drilling or re-fracking of wells).		There were no reported noise complaints during the audit period.		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										
	<b>Operational Noise Criteria</b>														
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><b>Table 3: Noise Impact Assessment Criteria dB(A)</b></p> <table border="1"> <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>In accordance with the Noise Management Sub Plan (July 2019), attended noise monitoring to be undertaken at the receiver locations within the first week of production and again after three months for each well, then if the well status changes.</p> <p>Workover maintenance and decommissioning is defined as a construction activity in the Sub Plan and is not considered to be a</p>		Not Triggered
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	Evidence Collected, Independent Audit Findings & Recommendations	Status
	<p>Notes:</p> <ul style="list-style-type: none"> <li>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.</li> <li>Noise from the project is to be measured at 1 metre from the dwelling facade to determine compliance with the LA1 (1 minute) noise level. Where it can be demonstrated that direct measurement of noise from the project is impractical, alternative means of determining compliance may be acceptable (see Chapter 11 of the NSW Industrial Noise Policy).</li> </ul>	change in well status. As such, the noise monitoring requirements were not triggered during the reporting period.	
	<b>Continuous Improvement</b>		
3.5	The Proponent shall, to the satisfaction of the Director-General:	The auditor sighted the Noise Management Sub Plan (July 2019) and noted the inclusion of noise mitigation measures.  There were no reported noise complaints during the audit period.	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
	<b>Noise Monitoring Program</b>		
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	<p>The auditor sighted the Noise Management Sub Plan (July 2019) and noted that the noise monitoring requirements of the Sub Plan were not implemented; noise monitoring was not conducted during the workover maintenance of well site RB06 or the decommissioning of well sites RB11 and RB12.</p> <p>It is recommended that the Pre-Mobilisation Hazard Identification Form (DCS_GN_FM_HSE_003) be reviewed and revised to include a requirement to identify noise monitoring requirements (as detailed in the Noise Management Sub Plan) prior to commencement of works.</p>	Non-Compliant 1820-NC-05
	<b>AIR QUALITY</b>		
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 adequate dust mitigation measures are detailed in the Air Quality Management Sub-Plan (June 2019). There	Compliant



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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status	
		were no dust complaints reported during the audit period in relation to this condition.		
	<b>SURFACE WATER</b>			
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 2019). The Sub Plan is compliant with the requirements of this condition.	Compliant	
3.8(a)	Be consistent with the requirements in Managing Urban Stormwater: Soils and Construction, Volume 1, 4th Edition, 2004 (Landcom).	Implementation of the Sub Plan was demonstrated through Environmental Walks and Critical Control Verifications to assess performance and identify improvement opportunities.	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.		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.	Compliant
3.8(e)	Describe what measures would be implemented to maintain the structures over time.		It was reported by AGL (AEPR 2018-2019 and AEPR 2019-2020) that there were no incidents recorded during the audit period associated with the offsite movement of sediment.	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
	<b>WASTE MANAGEMENT</b>			
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.	The auditor sighted the AGL Environmental Footprint spreadsheet for the financial years 2018/19 and 2019/20 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.  It is noted that a waste audit was not within the scope of this independent audit.	Compliant	
	<b>HAZARDS AND RISK</b>			
	<b>Safety and Risk Management</b>			

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
3.10	<p>The Proponent shall prepare and implement an Emergency Plan for the project to the satisfaction of the Director-General. The plan shall be submitted to the Director General prior to commissioning of the project and shall be prepared in accordance with the Department’s Hazardous Industry Planning Advisory Paper No. 1; Industry Emergency Planning Guidelines.</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 (October 2019) and Safety Management Plan (May 2020) 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
3.11	<p>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:</p>	<p>The Auditor sighted the Safety Management Plan, Camden Project NSW (May 2020) and noted compliance with the requirements of this condition. Implementation was demonstrated through the following documents/ processes:</p> <ul style="list-style-type: none"> <li>• Induction program (Rapid Induct)</li> <li>• HSE audit action tracking (SAP)</li> <li>• Standards and Critical Controls.</li> </ul>	Compliant
3.11 (a)	Cover all operations on the wells and gas gathering system	<p>The Emergency Response Plan (October 2019) applies to the whole of the Camden Gas Project and satisfies the requirements of this condition.</p>	Compliant
3.11 (b)	Clearly specify all safety related procedures, responsibilities and policies, along with details of mechanisms for ensuring adherence to procedures;		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	<p>Condition closed in a previous audit.</p> <p>AGL advised that there were no connections of new gas lines or new gas wells during the audit period.</p>	Not Triggered
<b>Compliance Report</b>			
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:	<p>Condition closed in a previous audit.</p>	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	Evidence Collected, Independent Audit Findings & Recommendations	Status
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; j the SMS required under condition 11 has been fully implemented and that records required by the system are being kept; k the Emergency Plan and SMS have been prepared in accordance with the relevant Hazardous Industry Planning Advisory Paper; l all recommendations of the Emergency Plan and SMS have been implemented and are being maintained; and m all safety management systems and their associated risk controls have been implemented and are being maintained.	Condition closed in a previous audit.	Not Triggered
<b>ABORIGINAL HERITAGE</b>			
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 (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 were no new Aboriginal objects discovered during the audit period with respect to PA 06_0137 and no reported construction works.	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
<b>ONGOING OPERATIONS</b>			
<b>Redrilling and Re-fracking</b>			

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
3.14	The Proponent shall obtain the prior 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.	Condition not triggered during the audit period.  It was reported by AGL (AEPR 2018-2019 and AEPR 2019-2020) that there was no drilling or fracing works undertaken during the audit period.	Not Triggered
	<b>Gas Gathering System</b>		
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
	<b>REHABILITATION</b>		

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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
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 2019) and noted compliance with the requirements of this condition.	Compliant
3.17 (a)	Identify the areas likely to be disturbed by the project.	During the audit period, final rehabilitation works were undertaken of RB11 and RB12. The auditor inspected wellsite RB11 on 8 April 2021 and noted compliance with the requirements of the Sub-plan.	Compliant
3.17 (b)	Describe the measures that would be implemented to rehabilitate the site.		Compliant
<b>SCHEDULE 4</b>			
<b>ENVIRONMENTAL MANAGEMENT AND MONITORING CONDITIONS</b>			
<b>OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN (OEMP)</b>			
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 EMP (March 2020) 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 inspections (Environmental Walks), Critical Control Verifications, Daily Workover Reports and monitoring.	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"> <li>• keep the local community and relevant agencies informed about the environmental performance of the project;</li> <li>• receive, handle, respond to, and record complaints;</li> <li>• resolve any disputes that may arise during the course of the project;</li> <li>• respond to any non-compliance;</li> <li>• manage cumulative impacts; and</li> <li>• respond to emergencies (including bushfires)</li> </ul>		Compliant

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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;j, dated 16 June 2004.		Compliant
<b>INCIDENT REPORTING</b>			
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:	It was reported by AGL (AEPR 2018-2019 and AEPR 2019-2020) that there were no exceedances of goals/limits/ performance criteria or environmental incidents 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
<b>ANNUAL REPORTING</b>			
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 evidence of submission of the 2018/2019 AEPR and the 2019/2020 AEPR to DPIE.	Compliant
	a) Identify the standards, performance measures and statutory requirements that apply to the project;	The auditor sighted the AEPRs for the audit period and noted compliance with the requirements of this condition.	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	Evidence Collected, Independent Audit Findings & Recommendations	Status
	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-l, 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 2018/2019 AEPR and the 2019/2020 AEPR to the nominated agencies. It is noted that a copy of each AEPR is also available on the CGP website.	Compliant
<b>INDEPENDENT ENVIRONMENTAL AUDIT</b>			
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 of this 2018-2020 IEA satisfies the requirements of 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
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> <ul style="list-style-type: none"> <li>• Letter from DPIE to AGL (4 October 2010) approving the nominated auditor to conduct the hazard audit</li> <li>• Hazard Audit Report for the Camden Gas Project, Pinnacle Risk Management (9 January 2019)</li> <li>• Email correspondence from AGL to DPIE (4 February 2019) submitting the Hazard Audit Report.</li> </ul>	Compliant

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
4.5(e)	Assess whether the project is complying with the relevant standards, performance measures, and statutory requirements.	The scope and conduct of this 2018-2020 IEA satisfies the requirements of 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. 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.		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 2015-2018 Independent Environmental Audit was finalised on 20 December 2018 and submitted to the Director-General of the NSW Department of Planning and Infrastructure on 21 December 2018. As such, the requirements of this condition were satisfied.	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 Treo Environment (20 December 2018). The auditor sighted email correspondence to the DPIE (29 March 2019) with the revised EMP attached, demonstrating compliance against the requirements of this condition.	Compliant
<b>COMMUNITY CONSULTATIVE COMMITTEE</b>			
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 Community Consultative Committee meeting minutes and verified compliance with the requirements of this condition.	Compliant
<b>ACCESS TO INFORMATION</b>			
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 Camden Gas Project website ( <a href="https://www.agl.com.au/about-agl/how-we-source-energy/camden-gas-project#environment">https://www.agl.com.au/about-agl/how-we-source-energy/camden-gas-project#environment</a> ) and noted the inclusion of all environmental management plans, strategies and programs with the exception of the following documents: <ul style="list-style-type: none"> <li>Aboriginal Cultural Heritage Management Sub Plan (December 2013)</li> <li>Emergency Response Plan (October 2019).</li> </ul>	Compliant
4.9(a)	All current environmental management plans, strategies and programs.		



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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations		Status
		It was advised by AGL that the above plans contain sensitive and/or confidential information and as such, are not included on the project website.		
4.9(b)	All Independent Environmental Audits.	The auditor sighted the AGL Camden Gas Project website ( <a href="https://www.agl.com.au/about-agl/how-we-source-energy/camden-gas-project#environment">https://www.agl.com.au/about-agl/how-we-source-energy/camden-gas-project#environment</a> ) and noted compliance with the requirements of this condition.		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	Evidence Collected, Independent Audit Findings & Recommendations	Status
	<b>SCHEDULE 2 ADMINISTRATIVE CONDITIONS</b>		
	<b>Obligation to Minimise Harm to the Environment</b>		
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 Walks, Critical Control Verifications, Daily Workover Reports and monitoring. The auditor sighted a sample of records and noted that AGL was generally compliant with the requirements of the EMP.</p> <p>Compliance obligations arising from licences, leases, environmental/ planning approvals and legislation are monitored through web-based database compliance management systems (CMO Compliance and SAP Compliance).</p>	Compliant
	<b>Terms of Approval</b>		
2.2	The Proponent shall carry out the project generally in accordance with the:	It was reported by AGL that the development is undertaken in accordance with the EMP and Sub Plans which reflect the requirements of the Consent Conditions. On receipt of an approved consent or modification, the EMP is reported to be revised to reflect the new requirements. This was evidenced by the frequent revision history of the document.	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 Envirosciences 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
2.2(h)	Conditions of this approval.		

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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.	
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 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
	<b>Limits on Approval</b>		
2.5	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
2.6	Nothing in this approval permits the drilling and operation of any additional gas wells (beyond the approved 15 wells for gas production).	The auditor reviewed the gas wells reported in the 2018-2019 AEPR and 2019-2020 AEPR 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 surface location where work has not been commenced within 5 years of the date of this approval.	It is noted that the approval has lapsed for any well that has not been drilled and as such, the approval must be surrendered for the nominated wells.  The auditor sighted a letter from AGL to the Resources Assessments section of DPIE (19 April 2016) confirming the formal surrender of nominated wells that were approved but not drilled. The letter demonstrates compliance with the requirements of this condition.	Closed
	<b>Notification of Council</b>		
2.8	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
	<b>Operation of Plant and Equipment</b>		

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations		Status
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: <ul style="list-style-type: none"> <li>• Preventative Maintenance – The preventative maintenance of plant and equipment is managed through SAP. The system effectively monitors maintenance requirements based on the use of plant and equipment. The auditor sighted a sample of look ahead reports, preventative workorders and corrective workorders.</li> <li>• Monitoring – Regular documented checks are undertaken of plant and equipment.</li> <li>• Procedures – Standard Operating Procedures have been developed to guide commonly undertaken activities.</li> <li>• Leak Detection and Repair Program (refer to EPL 12003).</li> </ul>		Compliant
2.9(a)	Maintained in a proper and efficient condition.			Compliant
2.9(b)	Operated in a proper and efficient condition.			Compliant
	<b>SCHEDULE 3 ENVIRONMENTAL PERFORMANCE CONDITIONS</b>			
	<b>NOISE</b>			
	<b>Construction and Maintenance Hours</b>			

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status																	
3.1	<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="318 443 1095 676"> <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"> <li>i Inaudible means that the construction activity cannot be heard by the human ear at the nearest affected residential receivers.</li> <li>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.</li> </ul>	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 (July 2019) and noted compliance with the requirements of this condition.</p> <p>The auditor sighted a sample of Daily Completion/Workover Reports prepared by AGL and community notification letters. The documents demonstrate compliance with the specified maintenance hours.</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)																		
	<b>Construction Noise Goals</b>																			

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status								
3.2	<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="322 443 1106 513"> <thead> <tr> <th data-bbox="322 443 562 475">Location</th> <th data-bbox="562 443 743 475">Day</th> <th data-bbox="743 443 925 475">Evening</th> <th data-bbox="925 443 1106 475">Night</th> </tr> </thead> <tbody> <tr> <td data-bbox="322 475 562 513">Any residential receiver</td> <td data-bbox="562 475 743 513">54</td> <td data-bbox="743 475 925 513">39</td> <td data-bbox="925 475 1106 513">35</td> </tr> </tbody> </table> <p>Note: See notes to condition 4.</p>	Location	Day	Evening	Night	Any residential receiver	54	39	35	<p>In accordance with the Noise Management Sub Plan (July 2019), workover maintenance and decommissioning are defined as construction activities. During the audit period, workover maintenance was conducted of well site EM34 and decommissioning was undertaken of well sites EM28, EM31, EM32, EM33 and EM34. As such, the noise monitoring requirements were triggered.</p> <p>The auditor determined that noise monitoring was not undertaken during the workover maintenance of well site EM34 or the decommissioning of well sites EM28, EM31, EM32, EM33 and EM34.</p> <p>It is recommended that the Pre-Mobilisation Hazard Identification Form (DCS_GN_FM_HSE_003) be reviewed and revised to include a requirement to identify noise monitoring requirements (as detailed in the Noise Management Sub Plan) prior to commencement of works.</p>	Non-Compliant 1820-NC-06
Location	Day	Evening	Night								
Any residential receiver	54	39	35								
	<b>Construction Noise Management Plan</b>										
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 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 (July 2019) 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).	Implementation of the Sub Plan was demonstrated through Environmental Walks, Critical Control Verifications, monitoring records and the induction program.	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.	There were no reported noise complaints during the audit period.	Compliant								
3.3(d)	Details of who would be responsible for monitoring, reviewing and implementing the plan.		Compliant								
	<b>Operational Noise Criteria</b>										

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status														
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. Table 3: Noise Impact Assessment Criteria dB(A)</p> <table border="1"> <thead> <tr> <th rowspan="2">Location</th> <th>Day</th> <th>Evening</th> <th colspan="2">Night</th> </tr> <tr> <th>L<sub>Aeq</sub>(15 minute)</th> <th>L<sub>Aeq</sub>(15 minute)</th> <th>L<sub>Aeq</sub>(15 minute)</th> <th>L<sub>A1</sub>(1 minute)</th> </tr> </thead> <tbody> <tr> <td>Any residential receiver</td> <td>39</td> <td>39</td> <td>35</td> <td>45</td> </tr> </tbody> </table> <p>Notes:</p> <ul style="list-style-type: none"> <li>i 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.</li> <li>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.</li> <li>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).</li> <li>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.</li> <li>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.</li> </ul>	Location	Day	Evening	Night		L <sub>Aeq</sub> (15 minute)	L <sub>Aeq</sub> (15 minute)	L <sub>Aeq</sub> (15 minute)	L <sub>A1</sub> (1 minute)	Any residential receiver	39	39	35	45	<p>The auditor sighted the Noise Management Sub-Plan (July 2019) 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 AEPRs 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													
	L <sub>Aeq</sub> (15 minute)	L <sub>Aeq</sub> (15 minute)	L <sub>Aeq</sub> (15 minute)	L <sub>A1</sub> (1 minute)													
Any residential receiver	39	39	35	45													
	<b>Continuous Improvement</b>																
3.5	The Proponent shall, to the satisfaction of the Director-General	The auditor sighted the Noise Management Sub Plan (July 2019), the 2018-2019 AEPR and 2019-2020 AEPR and compliance against the requirements of this condition.	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														
	<b>Noise Monitoring Program</b>																

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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.	<p>The auditor sighted the Noise Management Sub Plan (July 2019) and noted that the noise monitoring requirements of the Sub Plan were not implemented; noise monitoring was not conducted during the workover maintenance of well site EM34 or the decommissioning of well sites EM28, EM31, EM32, EM33 and EM34 (refer to condition 3.2).</p> <p>It is recommended that the Pre-Mobilisation Hazard Identification Form (DCS_GN_FM_HSE_003) be reviewed and revised to include a requirement to identify noise monitoring requirements (as detailed in the Noise Management Sub Plan) prior to commencement of works.</p>	Non-Compliant 1820-NC-06
	<b>AIR QUALITY</b>		
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 2019). There were no dust complaints associated with this development consent during the audit period.	Compliant
	<b>SURFACE WATER</b>		
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 construction commencing and shall:	The auditor sighted the Soil and Water Management Sub Plan (June 2019). The Sub Plan is compliant with the requirements of this condition.	Compliant
3.8(a)	Be consistent with the requirements in Managing Urban Stormwater: Soils and Construction, Volume 1, 4th Edition, 2004 (Landcom).	Implementation of the Sub Plan was demonstrated through Environmental Walks and Critical Control Verifications to assess performance and identify improvement opportunities.	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.	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.	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.		It was reported by AGL (AEPR 2018-2019 and AEPR 2019-2020) that



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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
3.8(f)	<p>Describe the procedures that would be followed for planned and unplanned water discharges from the site.</p> <p>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.</p>	<p>there were no incidents recorded during the audit period associated with the offsite movement of sediment.</p>	Compliant
<b>FLOOD MANAGEMENT</b>			
3.9	<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 Flood Management Procedure (August, 2019) 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
<b>WASTE MANAGEMENT</b>			
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>The auditor sighted the AGL Environmental Footprint spreadsheet for the financial years 2018/19 and 2019/20 which notes that produced water was disposed to an appropriately licenced facility. 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> <p>It is noted that a waste audit was not within the scope of this independent audit.</p>	Compliant
<b>HAZARDS AND RISK</b>			
<b>Safety and Risk Management</b>			

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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-l, dated 16 June 2004.</p>	<p>The Auditor sighted the Emergency Response Plan (October 2019) and Safety Management Plan (May 2020) 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
3.12	<p>The Proponent shall prepare and implement a Safety Management System (SMS) for the project, to the satisfaction of the Director-General. The SMS shall be submitted to the Director-General prior to commissioning of the project and shall be prepared in accordance with the Department’s Hazardous Industry Planning Advisory Paper No. 9 - Safety Management. The SMS shall:</p>	<p>The Auditor sighted the Safety Management Plan, Camden Project NSW (May 2020) and noted compliance with the requirements of this condition. Implementation was demonstrated through the following documents/ processes:</p> <ul style="list-style-type: none"> <li>• Induction program (Rapid Induct)</li> <li>• HSE audit action tracking (SAP)</li> <li>• Standards and Critical Controls.</li> </ul>	Compliant
3.12 (a)	<p>Cover all operations on the wells and gas gathering system</p>	<p>The Emergency Response Plan (October 2019) applies to the entirety of the Camden Gas Project and satisfies the requirements of this condition.</p>	Compliant
3.12 (b)	<p>Clearly specify all safety related procedures, responsibilities and policies, along with details of mechanisms for ensuring adherence to procedures</p>		Compliant
3.12 (c)	<p>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</p>	<p>Condition closed in a previous audit.</p> <p>AGL advised that there were no connections of new gas lines or new gas wells during the audit period.</p>	Not Triggered
3.12 (d)	<p>Confirm that the design and operation of all wellheads comply with the Department’s Locational Guidelines - Development in the Vicinity of Operating Coal Seam Methane Wells (May 2004) for an Automatically Controlled Well (with Separator/Optional Pump) and that all safety related systems required by the guidelines have been included.</p> <p>Note: To fulfil this condition the Proponent may prepare and implement an updated version of the SMS prepared under Schedule 4 condition 92(b) of development consent DA;282;6;2003;i, dated 16 June 2004.</p>	<p>The Auditor sighted the Safety Management Plan (May 2020) noted compliance with the requirements of this condition.</p>	Compliant
	<p><b>Compliance Report</b></p>		

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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
3.13 (c)	A signed statement that: 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
<b>FLORA AND FAUNA</b>			
3.14	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.	Condition not triggered during the audit period.  It was reported by AGL (AEPR 2018-2019 and AEPR 2019-2020) that there was no drilling or fracking works undertaken during the audit period.	Not Triggered
<b>ABORIGINAL HERITAGE</b>			
3.15	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 (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-	Compliant

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
3.15 (a)	A description of the measures that would be implemented for the mapping, and salvage or relocation of the archaeological relics on EMAI Sites 1, 2 4, 5, 6, and 7; CP OS 3; and IF 1 and IF 2.	<p>General on 9 January 2007.</p> <p>There was no reported construction works associated with this development consent undertaken during the audit period.</p>	Compliant
3.15 (b)	A description of the measures that would be implemented if any new Aboriginal objects are discovered during the project.		Compliant
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
<b>ONGOING OPERATIONS</b>			
<b>Redrilling and Re-fracing</b>			
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.	<p>Condition not triggered during the audit period.</p> <p>It was reported by AGL (AEPR 2018-2019 and AEPR 2019-2020) that there were no redrilling or re-fracing works undertaken during the audit period.</p>	Not Triggered
<b>Gas Gathering System</b>			
3.17	The Proponent shall, to the satisfaction of the Director-General, ensure that:	<p>The auditor sighted the EMP and relevant Sub Plans and noted inclusion of the requirements of this condition.</p> <p>There were no reported construction works undertaken during the audit period.</p>	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

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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
3.17 (h)	Signs are erected at intervals along all gas gathering system lines indicating the presence of a buried gas pipeline.		Not Triggered
	<b>REHABILITATION</b>		
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.	The auditor inspected well site EM28 which had been subject to rehabilitation works during the audit period and associated reports submitted to DPIE (Rehabilitation and Relinquishment Report, May 2020 and the ESF2 Form). The site conditions and documents demonstrate compliance with the requirements of this condition.	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 2019) and noted compliance with the requirements of this condition.	Compliant
3.19 (a)	Identify the areas likely to be disturbed by the project.	During the audit period, rehabilitation works were undertaken at well sites EM28, EM31, EM32, EM33 and EM34, of which EM28 was inspected by the auditor. The auditor noted that the rehabilitation works were consistent with the requirements of the Sub-plan.	Compliant
3.19 (b)	Describe the measures that would be implemented to rehabilitate the site.		Compliant
	<b>SCHEDULE 4 ENVIRONMENTAL MANAGEMENT AND MONITORING CONDITIONS</b>		
	<b>OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN (OEMP)</b>		
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 2020) 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 Walks, Critical Control Verifications, Daily Workover Reports and 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

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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 DPIE (29 March 2019).	Compliant
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
	<b>INCIDENT REPORTING</b>		
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 (2018-2019 and 2019-2020) and noted there were no exceedances of goals/limits/performance criteria or environmental incidents 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
	<b>ANNUAL REPORTING</b>		
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 evidence of submission of the 2018/2019 AEPR and the 2019/2020 AEPR to DPIE.	Compliant
4.3(a)	Identify the standards, performance measures and statutory requirements that apply to the project.		Compliant

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
4.3(b)	Assess the environmental performance of the project to determine whether it is complying with these standards, performance measures, and statutory requirements.	The auditor sighted the AEPRs for the audit period (2018-2019 and 2019-2020) and noted compliance with the requirements of this condition.	Compliant
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, DEC and Council.		The auditor sighted evidence of submission of the 2018/2019 AEPR and the 2019/2020 AEPR to the nominated agencies. It is noted that a copy of each AEPR is also available on the CGP website.
<b>INDEPENDENT ENVIRONMENTAL AUDIT</b>			
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 2018-2020 Independent Environmental Audit satisfies the requirements of 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

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
4.5(c)	Assess the environmental performance of the project, and its effects on the surrounding environment.		Compliant
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> <ul style="list-style-type: none"> <li>• Letter from DPIE to AGL (4 October 2010) approving the nominated auditor to conduct the hazard audit</li> <li>• Hazard Audit Report for the Camden Gas Project, Pinnacle Risk Management (9 January 2019)</li> <li>• Email correspondence from AGL to DPIE (4 February 2019) submitting the Hazard Audit Report.</li> </ul>	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 2018-2020 IEA satisfies the requirements of 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
4.6	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 2015-2018 Independent Environmental Audit was finalised on 20 December 2018 and submitted to the Director-General of the NSW Department of Planning and Infrastructure on 21 December 2018. As such, the requirements of this condition were satisfied.	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 previous IEA pertaining to this approval was completed by Treo Environment (20 December 2018). The auditor sighted an email to the DPIE dated 29 March 2019 with the revised EMP attached, demonstrating compliance to this requirement.	Compliant
<b>COMMUNITY CONSULTATIVE COMMITTEE</b>			
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 Committee meeting minutes and verified compliance with the requirements of this condition.	Compliant
<b>ACCESS TO INFORMATION</b>			



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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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:	<p>The auditor sighted the AGL Camden Gas Project website (<a href="https://www.agl.com.au/about-agl/how-we-source-energy/camden-gas-project#environment">https://www.agl.com.au/about-agl/how-we-source-energy/camden-gas-project#environment</a>) and noted the inclusion of all environmental management plans, strategies and programs with the exception of the following documents:</p> <ul style="list-style-type: none"> <li>Aboriginal Cultural Heritage Management Sub Plan (December 2013)</li> <li>Emergency Response Plan (October 2019).</li> </ul> <p>It was advised by AGL that the above plans contain sensitive and/or confidential information and as such, are not included on the project website.</p>	Compliant
4.9(a)	OEMP.		
4.9(a)	All Independent Environmental Audits.	The auditor sighted the AGL website and verified compliance with the requirements of this condition.	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	Evidence Collected, Independent Audit Findings & Recommendations	Status
	<b>SCHEDULE 2 ADMINISTRATIVE</b>		
	<b>Obligation to Minimise Harm to the Environment</b>		
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 Walks, Critical Control Verifications, Daily Workover Reports and monitoring. The auditor sighted a sample of records and noted that AGL was generally compliant with the requirements of the EMP.</p> <p>Compliance obligations arising from licences, leases, environmental/ planning approvals and legislation are monitored through web-based database compliance management systems (CMO Compliance and SAP Compliance).</p>	Compliant
	<b>Terms of Approval</b>		
2.2	The Proponent shall carry out the project generally in accordance with the:	It was reported by AGL that the development is undertaken in accordance with the EMP and Sub Plans which reflect the requirements of the Consent Conditions. On receipt of an approved consent or modification, the EMP is reported to be revised to reflect the new requirements. This was evidenced by the frequent revision history of the document.	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
2.2(f)	EA titled, <i>Spring Farm and Menangle Park Gas Gathering System Modifications - Gas gathering line MP03 to MP05</i> prepared by AGL Gas Production (Camden) Pty Ltd, and dated 24 November 2010.		Compliant

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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
	<b>Limits on Approval</b>		
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 reported in the 2018-2019 AEPR and 2019-2020 AEPR against the development consents and confirmed that no additional wells have been drilled or operated.	Compliant
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

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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>The auditor sighted a letter from AGL to the Resources Assessments section of DPIE (19 April 2016) confirming the formal surrender of nominated wells that were approved but not drilled. The letter demonstrates compliance with the requirements of this condition.</p>	Closed
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
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

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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
	<b>Protection of Public Infrastructure</b>		
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
	<b>Operation of Plant and Equipment</b>		
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: <ul style="list-style-type: none"> <li>Preventative Maintenance – The preventative maintenance of plant and equipment is managed through SAP. The system effectively monitors maintenance requirements based on the use of plant and equipment. The auditor sighted a sample of look ahead reports, preventative workorders and corrective workorders.</li> <li>Monitoring – Regular documented checks are undertaken of plant and equipment.</li> <li>Procedures – Standard Operating Procedures have been developed to guide commonly undertaken activities.</li> <li>Leak Detection and Repair Program (refer to EPL 12003).</li> </ul>	Compliant
2.15 (a)	Maintained in a proper and efficient condition.		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.
	<b>SCHEDULE 3</b>		
	<b>ENVIRONMENTAL PERFORMANCE</b>		
	<b>IDENTIFICATION OF WELL SURFACE LOCATION</b>		
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

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status																	
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																	
	<b>NOISE</b>																			
	<b>Construction and Maintenance Hours</b>																			
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"> <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"> <li>i Inaudible means that the construction activity cannot be heard by the human ear at the nearest affected residential receivers.</li> <li>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.</li> </ul>	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 (July 2019) and noted compliance with the requirements of this condition. This condition is communicated to employees and contractors through the role-specific induction program.</p> <p>The auditor sighted a sample of Daily Completion/Workover Reports prepared by AGL and community notification letters. The documents demonstrate compliance with the specified maintenance hours.</p>	Compliant
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)																		
	<b>Construction Noise Goals</b>																			

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status																																																		
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:</p> <p>Table 2: Construction Noise Goals dB(A) Laeq(15min).</p> <table border="1" data-bbox="327 437 842 724"> <thead> <tr> <th>Location</th> <th>Day</th> <th>Evening</th> <th>Night</th> <th>Saturday 1pm-8pm</th> </tr> </thead> <tbody> <tr> <td>(nearest residential dwelling)</td> <td></td> <td></td> <td></td> <td>Sunday 7am-8pm</td> </tr> <tr> <td>MP02, MP03, MP04</td> <td>49</td> <td>47</td> <td>41</td> <td>47</td> </tr> <tr> <td>MP05, MP06</td> <td>40</td> <td>40</td> <td>40</td> <td>40</td> </tr> <tr> <td>MP11, MP24, MP33</td> <td>42</td> <td>42</td> <td>40</td> <td>42</td> </tr> <tr> <td>MP19, R3</td> <td>40</td> <td>40</td> <td>40</td> <td>40</td> </tr> <tr> <td>MP19, R25</td> <td>49</td> <td>47</td> <td>41</td> <td>47</td> </tr> <tr> <td>MP21, MP22, MP23</td> <td>49</td> <td>47</td> <td>41</td> <td>47</td> </tr> <tr> <td>SF04A</td> <td>43</td> <td>42</td> <td>37</td> <td>42</td> </tr> <tr> <td>SF10, SF17, SF20</td> <td>43</td> <td>41</td> <td>36</td> <td>43</td> </tr> </tbody> </table>	Location	Day	Evening	Night	Saturday 1pm-8pm	(nearest residential dwelling)				Sunday 7am-8pm	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>In accordance with the Noise Management Sub Plan (July 2019), workover maintenance and decommissioning are defined as construction activities. During the audit period, workover maintenance was conducted of well sites MP23 and SF05 and decommissioning was conducted of well site MP05. As such, the noise monitoring requirements were triggered.</p> <p>The auditor determined that noise monitoring was not undertaken during the workover maintenance of well site MP23 or during the decommissioning of well site MP05.</p> <p>It is recommended that the Pre-Mobilisation Hazard Identification Form (DCS_GN_FM_HSE_003) be reviewed and revised to include a requirement to identify noise monitoring requirements (as detailed in the Noise Management Sub Plan) prior to commencement of works.</p>	Non-Compliant 1820-NC-07
Location	Day	Evening	Night	Saturday 1pm-8pm																																																	
(nearest residential dwelling)				Sunday 7am-8pm																																																	
MP02, MP03, MP04	49	47	41	47																																																	
MP05, MP06	40	40	40	40																																																	
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SF10, SF17, SF20	43	41	36	43																																																	
<b>Construction Noise Management Plan</b>																																																					
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 (July 2019). The requirement to submit the Director-General was closed in a previous audit.	Closed																																																		
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 (July 2019) and noted compliance with the requirements of this condition.	Compliant																																																		
3.4(b)	A community notification protocol for the proposed construction activities (including any redrilling or re-fracing of wells).	Implementation of the Sub Plan was demonstrated through Environmental Walks, Critical Control Verifications, monitoring records and the induction program.	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.	There were no reported noise complaints during the audit period.	Compliant																																																		
<b>Operational Noise Criteria</b>																																																					

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status																												
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="329 432 943 730"> <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<sub>Aeq</sub>(15 minute)</td> <td>L<sub>Aeq</sub>(15 minute)</td> <td>L<sub>Aeq</sub>(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"> <li>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.</li> <li>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).</li> <li>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.</li> <li>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.</li> <li>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.</li> </ul>	Location	Day	Evening	Night	(nearest residential dwelling)	L <sub>Aeq</sub> (15 minute)	L <sub>Aeq</sub> (15 minute)	L <sub>Aeq</sub> (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>In accordance with the Noise Management Sub Plan (July 2019), attended noise monitoring to be undertaken at the receiver locations within the first week of production and again after three months for each well, then if the well status changes.</p> <p>Workover maintenance and decommissioning is defined as a construction activity in the Sub Plan and is not considered to be a change in well status. As such, the noise monitoring requirements were not triggered during the reporting period.</p>	Not Triggered
Location	Day	Evening	Night																												
(nearest residential dwelling)	L <sub>Aeq</sub> (15 minute)	L <sub>Aeq</sub> (15 minute)	L <sub>Aeq</sub> (15 minute)																												
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MP02, MP03, MP04, MP22, MP23	49	45	40																												
	<b>Continuous Improvement</b>																														
3.6	The Proponent shall, to the satisfaction of the Director-General:	The auditor sighted the Noise Management Sub Plan (July 2019) 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	Evidence Collected, Independent Audit Findings & Recommendations	Status
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
<b>Noise Monitoring Program</b>			
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>In accordance with the Noise Management Sub Plan (July 2019), workover maintenance and decommissioning are defined as construction activities. During the audit period, workover maintenance was conducted of well sites MP23 and SF05 and decommissioning was conducted of well site MP05. As such, the noise monitoring requirements were triggered.</p> <p>The auditor determined that noise monitoring was not undertaken during the workover maintenance of well site MP23 or during the decommissioning of well site MP05.</p> <p>It is recommended that the Pre-Mobilisation Hazard Identification Form (DCS_GN_FM_HSE_003) be reviewed and revised to include a requirement to identify noise monitoring requirements (as detailed in the Noise Management Sub Plan) prior to commencement of works.</p>	Non-Compliant 1820-NC-07
<b>AIR QUALITY</b>			
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 2019). There were no dust complaints associated with this development consent during the audit period.	Compliant
<b>WATER</b>			
<b>Soil and Water Management Plan</b>			
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 2019). The Sub Plan is compliant with the requirements of this condition.	Compliant
3.9(a)	Be consistent with the requirements in <i>Managing Urban Stormwater: Soils and Construction, Volume 1, 4th Edition, 2004</i> (Landcom).	Implementation of the Sub Plan was demonstrated through Environmental Walks and Critical Control Verifications to assess performance and identify improvement opportunities.	Compliant
3.9(b)	Identify construction and operation activities that could cause soil erosion and generate sediment.		Compliant

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
3.9(c)	Describe measure to minimise soil erosion and the potential for the transport of sediment to downstream waters.	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.  It was reported by AGL (AEPR 2018-2019 and AEPR 2019-2020) that there were no incidents recorded during the audit period associated with the offsite movement of sediment.	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
	<b>Gas Gathering System</b>		
3.10	The Proponent shall, to the satisfaction of the Director-General, ensure that:		
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).	The current POP (Version 13, June 2020), 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.  It is noted that AS 4645.3: 2018 has superseded AS 3723-1989, which is referenced in PA06_0291 Schedule 3 Condition 10(a).  AGL advised no further pipelines were designed or constructed during the audit period.	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

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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
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
	<b>FLOOD MANAGEMENT</b>		
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.	The auditor sighted the Field Production Flood Management Procedure (August 2019) and noted the inclusion of controls to minimise and mitigate flooding impacts.  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.	Compliant
	<b>WASTE MANAGEMENT</b>		

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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>The auditor sighted the AGL Environmental Footprint spreadsheet for the financial years 2018/19 and 2019/20 which notes that produced water was disposed to an appropriately licenced facility. 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> <p>It is noted that a waste audit was not within the scope of this independent audit.</p>	Compliant
	<b>HAZARD AND RISK</b>		
	<b>Safety and Risk Management</b>		
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 (October 2019) and Safety Management Plan (May 2020) 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
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:	<p>The Auditor sighted the Emergency Response Plan (October 2019) and Safety Management Plan (May 2020) 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
3.15 (a)	Cover all operations on the wells and gas gathering system	<p>The Auditor sighted the Safety Management Plan, Camden Project NSW (May 2020) and noted compliance with the requirements of this condition. Implementation was demonstrated through the following documents/processes:</p> <ul style="list-style-type: none"> <li>• Induction program (Rapid Induct)</li> <li>• HSE audit action tracking (SAP)</li> <li>• Standards and Critical Controls.</li> </ul>	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 (October 2019) applies to the entirety of the Camden Gas Project.	Compliant

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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 (October 2019) 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
<b>Compliance Report</b>			
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
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	
<b>LANDSCAPE AND REHABILITATION</b>			

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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 inspected nominated well sites which had been subject to rehabilitation works during the audit period and associated reports submitted to DPIE (Rehabilitation and Relinquishment Report and the ESF2 Form). The site conditions and documents demonstrate compliance with the requirements of this condition.	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 2019) and noted compliance with the requirements of this condition.	Compliant
3.18 (a)	Be prepared in consultation with the landowner by suitably qualified experts.	The auditor inspected well site MP05 which was rehabilitated during the audit period. Due to the operation of the adjacent well site, rehabilitation works were not triggered.  The 2018 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 expertise and experience. Amendments to the Sub Plan in 2019 were administrative in nature.	Compliant
3.18 (b)	Be submitted to the Director-General for approval prior to commissioning.	Condition closed in previous audit.	Not Triggered
3.18 (c)	Describe in detail the short, medium and long term measures that would be implemented to: 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.	The auditor sighted the Rehabilitation and Landscape Management Plan (June 2019) and noted compliance with the requirements of this condition.	Compliant
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.		Compliant

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	<b>ABORIGINAL HERITAGE</b>		
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).  It is noted that there were no construction works undertaken during the audit period.	Compliant
3.20 (b)	A description of the measures that would be implemented if any new Aboriginal objects are discovered during the project.		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
	<b>TRAFFIC AND TRANSPORT</b>		
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,	Condition closed in a previous audit.	Not Triggered

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	and shall ensure that under-boring of the Freeway, Menangle Road, is conducted to the satisfaction of the RTA.		
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
<b>ONGOING OPERATIONS</b>			
<b>Community Notification</b>			
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_0291. The auditor sighted a sample of community notification records and noted compliance against the requirements of this condition.	Compliant
3.24(a)	Information explaining the maintenance procedures to be undertaken.		Compliant
3.24 (b)	An estimate of the length of works at each site.		Compliant
3.24 (c)	Contact details for a representative of the Proponent.		Compliant
3.24 (d)	Information regarding a 24 hour telephone contact number.		Compliant
<b>Redrilling and Re-fracking</b>			



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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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.	Condition not triggered during the audit period.  It was reported by AGL (AEPR 2018-2019 and AEPR 2019-2020) that there were no redrilling or re-fracing works undertaken during the audit period.	Not Triggered
	<b>Reporting</b>		
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
<b>SCHEDULE 4 ENVIROMENTAL MANAGEMENT AND MONITORING</b>			
<b>ENVIRONMENTAL MANAGEMENT PLAN</b>			
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 (May 2020) and noted that the content conforms to 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 Daily Workover Reports, Critical Control Checks, Critical Control Verifications, Environmental Walks and monitoring. The auditor sighted a sample of monitoring controls and noted compliance with the requirements of the EMP.	
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.		
4.1(d)	Describe in general how the environmental performance of the project would be monitored and managed.		
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).		

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
4.1(f)	Describe the role, responsibility, authority and accountability of all the key personnel involved in the environmental management of the project.		
	<b>INCIDENT REPORTING</b>		
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 (2018-2019 and 2019-2020) and noted there were no exceedances of goals/limits/performance criteria or environmental incidents 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
	<b>ANNUAL REPORTING</b>		
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 evidence of submission of the 2018/2019 AEPR and the 2019/2020 AEPR to DPIE.	Compliant
4.3(a)	Identify the standards, performance measures and statutory requirements that apply to the project.	The auditor sighted the AEPRs for the audit period (2018-2019 and 2019-2020) and noted compliance with the requirements of this condition.	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
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

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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 2018/2019 AEPR and the 2019/2020 AEPR to the nominated agencies. It is noted that a copy of each AEPR is also available on the CGP website.	Compliant
<b>INDEPENDENT ENVIRONMENTAL AUDIT</b>			
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 2018-2020 IEA satisfies the requirements of 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
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> <ul style="list-style-type: none"> <li>• Letter from DPIE to AGL (4 October 2010) approving the nominated auditor to conduct the hazard audit</li> <li>• Hazard Audit Report for the Camden Gas Project, Pinnacle Risk Management (9 January 2019)</li> <li>• Email correspondence from AGL to DPIE (4 February 2019) submitting the Hazard Audit Report.</li> </ul>

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
4.5(e)	Assess whether the project is complying with the relevant standards, performance measures and statutory requirements.	The scope and conduct of this 2018-2020 IEA satisfies the requirements of 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 2015-2018 Independent Environmental Audit was finalised on 20 December 2018 and submitted to the Director-General of the NSW Department of Planning and Infrastructure on 21 December 2018. As such, the requirements of this condition were satisfied.	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.	The previous IEA pertaining to this approval was completed by Treo Environment (20 December 2018). The auditor sighted email correspondence from AGL to the DPIE dated 29 March 2019 with the revised EMP attached, demonstrating compliance to this requirement.	Compliant
<b>COMMUNITY CONSULTATIVE COMMITTEE</b>			
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 Community Consultative Committee meeting minutes and verified compliance with the requirements of this condition.	Compliant
<b>ACCESS TO INFORMATION</b>			
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 Community Consultative Committee.	Compliant

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No.	Consent Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
4.9(b)	Ensure that a copy of the relevant document(s) is made publicly available on its website.	<p>The auditor sighted the AGL Camden Gas Project website (<a href="https://www.agl.com.au/about-agl/how-we-source-energy/camden-gas-project#environment">https://www.agl.com.au/about-agl/how-we-source-energy/camden-gas-project#environment</a>) and noted the inclusion of all environmental management plans, strategies and programs with the exception of the following documents:</p> <ul style="list-style-type: none"> <li>Aboriginal Cultural Heritage Management Sub Plan (December 2013)</li> <li>Emergency Response Plan (October 2019).</li> </ul> <p>It was advised by AGL that the above plans contain sensitive and/or confidential information and as such, are not included on the project website.</p>	Compliant
4.10	During the project, the Proponent shall:	<p>During the audit period, environmental monitoring requirements were limited to attended noise monitoring during workover maintenance of well site MP23 and decommissioning of well site MP05. As detailed in the assessment of Conditions 3.2 and 3.7, the auditor determined that noise monitoring was not undertaken as required. The monitoring results are therefore not publicly available on the website.</p> <p>It is recommended that the Pre-Mobilisation Hazard Identification Form (DCS_GN_FM_HSE_003) be reviewed and revised to include a requirement to identify noise monitoring requirements (as detailed in the Noise Management Sub Plan) prior to commencement of works.</p>	Non-Compliant 1820-NC-08
4.10 (a)	Make a summary of all environmental monitoring results required under this approval publicly available on the website.		Non-Compliant 1820-NC-08
4.10 (b)	Update these results on a regular basis (at least every 6 months) or as required.		
	<b>Reporting</b>		
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.	

## Appendix C

## Licences

### C1: EPL 12003

No	Licence Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status						
	<b>What the licence authorises and regulates</b>								
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>&gt; 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 December 2018 and December 2019 Annual Returns and noted compliance against 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.							
<b>A2</b>	<b>Premises or plant to which this licence applies</b>								
A2.1	The licence applies to the following premises: Rosalind Park Gas Plant, Medhurst Road, Gilead, NSW 2560, Park Lot DP 230946	Condition noted.							
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.							
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.							
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> <ul style="list-style-type: none"> <li>CGP Well Details 160421 (gas well locations and well head configuration)</li> <li>Camden Gas Project POP, Version 13 (June 2020) (details of all gas gathering lines).</li> </ul>	Compliant						

**C1: EPL 12003**

No	Licence Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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.	At the time of the site inspection, plug and abandonment works were in progress for well site MP05A. It was estimated by the auditor that the works occupied an area of approximately 50m by 40m and as such demonstrated compliance with the requirements of this condition.	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.	
<b>A3</b>	<b>Information supplied to the EPA</b>		
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 Triggered
<b>2</b>	<b>Discharges to Air and Water and Applications to Land</b>		
<b>P1</b>	<b>Location of monitoring/discharge points and areas</b>		
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.	
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.	
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 (July 2018) and noted the inclusion of these points as groundwater monitoring locations.	Compliant
<b>3</b>	<b>Limit Conditions</b>		
<b>L1</b>	<b>Pollution of Waters</b>		

**C1: EPL 12003**

No	Licence Condition	Evidence Collected, Independent Audit Findings & Recommendations		Status
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 2019) and the Groundwater Management Plan (July 2018). The plans detail adequate controls to prevent the pollution of water.</p> <p>The auditor sighted a number of active and rehabilitated sites during the site inspection and noted that environmental controls were effective and there was no evidence of erosion or uncontrolled releases to the environment.</p> <p>There were no water pollution incidents during the audit period.</p>		Compliant
<b>L2</b>	<b>Load Limits</b>			
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>	The auditor sighted the December 2018 and December 2019 Annual Returns and noted compliance against the requirements of this condition. It was observed that AGL achieved conformance during the audit period with each specified limit.		Compliant



**C1: EPL 12003**

No	Licence Condition	Evidence Collected, Independent Audit Findings & Recommendations		Status																																
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="331 408 1055 1134"> <thead> <tr> <th data-bbox="340 421 831 453">Assessable Pollutant</th> <th data-bbox="831 421 1046 453">Load limit (kg)</th> </tr> </thead> <tbody> <tr> <td data-bbox="340 461 831 493">Benzene (Air)</td> <td data-bbox="831 461 1046 493">47.00</td> </tr> <tr> <td data-bbox="340 501 831 533">Benzo(a)pyrene (equivalent) (Air)</td> <td data-bbox="831 501 1046 533">0.27</td> </tr> <tr> <td data-bbox="340 541 831 572">BOD (Enclosed Water)</td> <td data-bbox="831 541 1046 572"></td> </tr> <tr> <td data-bbox="340 580 831 612">Fine Particulates (Air)</td> <td data-bbox="831 580 1046 612">460.00</td> </tr> <tr> <td data-bbox="340 620 831 652">Hydrogen Sulfide (Air)</td> <td data-bbox="831 620 1046 652">1.60</td> </tr> <tr> <td data-bbox="340 660 831 692">Nitrogen Oxides - Summer (Air)</td> <td data-bbox="831 660 1046 692"></td> </tr> <tr> <td data-bbox="340 700 831 732">Nitrogen Oxides (Air)</td> <td data-bbox="831 700 1046 732">103000.00</td> </tr> <tr> <td data-bbox="340 740 831 772">Oil and Grease (Enclosed Water)</td> <td data-bbox="831 740 1046 772"></td> </tr> <tr> <td data-bbox="340 780 831 812">Salt (Enclosed Water)</td> <td data-bbox="831 780 1046 812"></td> </tr> <tr> <td data-bbox="340 820 831 852">Sulfur Oxides (Air)</td> <td data-bbox="831 820 1046 852">3000.00</td> </tr> <tr> <td data-bbox="340 860 831 892">Total PAHs (Enclosed Water)</td> <td data-bbox="831 860 1046 892"></td> </tr> <tr> <td data-bbox="340 900 831 932">Total Phenolics (Enclosed Water)</td> <td data-bbox="831 900 1046 932"></td> </tr> <tr> <td data-bbox="340 940 831 971">Total suspended solids (Enclosed Water)</td> <td data-bbox="831 940 1046 971"></td> </tr> <tr> <td data-bbox="340 979 831 1011">Volatile organic compounds - Summer (Air)</td> <td data-bbox="831 979 1046 1011"></td> </tr> <tr> <td data-bbox="340 1019 831 1051">Volatile organic compounds (Air)</td> <td data-bbox="831 1019 1046 1051">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 2018 and 2019 Annual Returns. A sample review indicates the calculations to have been completed in accordance with the <i>Load Calculation Protocol</i> (NSW EPA June 2009).</p>		Compliant
Assessable Pollutant	Load limit (kg)																																			
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L3	Concentration limits																																			

**C1: EPL 12003**

No	Licence Condition	Evidence Collected, Independent Audit Findings & Recommendations		Status
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 air monitoring results prepared by Ektimo and noted compliance with the requirements of this condition:</p> <ul style="list-style-type: none"> <li>• Annual Emission Testing, Report R006497 (12 November 2018) (includes September 2018 quarterly monitoring)</li> <li>• Quarterly Emission Testing, Report R006724 (17 December 2018)</li> <li>• Quarterly Emission Testing, Report R007285 (5 April 2019)</li> <li>• Quarterly Emission Testing, Report R007600 (15 July 2019)</li> <li>• Quarterly Emission Testing, Report R008177 (30 October 2019)</li> <li>• Quarterly Emission Testing, Report R008415 (10 January 2020)</li> <li>• Quarterly Emission Testing, Report R008823 (26 March 2020)</li> <li>• Quarterly Emission Testing, Report R009153 (25 May 2020).</li> </ul>		Compliant
L3.2	Air Concentration Limits [Refer to EPL 12003]	Condition noted.		
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> <p>a) The revised emission limit is representative of the proper and efficient maintenance and operation of the equipment;</p> <p>b) The equipment is designed to minimise emissions as far as is practicable and consistent with best practice considering the type of equipment and application;</p> <p>c) The revised emission limit is supported by Manufacturers Design Specification; and</p> <p>d) The revised emission limit does not cause adverse impacts on local air quality.</p> <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>	Condition not triggered during the audit period.		Not Triggered
L4	Waste			

**C1: EPL 12003**

No	Licence Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status															
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="327 643 1070 940"> <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 2018/19 and 2019/20 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	<b>Noise Limits</b>																	

**C1: EPL 12003**

No	Licence Condition	Evidence Collected, Independent Audit Findings & Recommendations		Status															
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="331 440 1057 576"> <thead> <tr> <th>Receiver Location</th> <th>Day L<sub>Aeq</sub>(15 minute)</th> <th>Evening L<sub>Aeq</sub>(15 minute)</th> <th>Night L<sub>Aeq</sub>(15 minute)</th> <th>Flaring (night) L<sub>Aeq</sub>(15 minute)</th> </tr> </thead> <tbody> <tr> <td>R1 Medhurst Road, Gilead</td> <td>35</td> <td>35</td> <td>35</td> <td>45</td> </tr> <tr> <td>R7 Mt. Gilead, Gilead</td> <td>37</td> <td>36</td> <td>36</td> <td>45</td> </tr> </tbody> </table>	Receiver Location	Day L <sub>Aeq</sub> (15 minute)	Evening L <sub>Aeq</sub> (15 minute)	Night L <sub>Aeq</sub> (15 minute)	Flaring (night) L <sub>Aeq</sub> (15 minute)	R1 Medhurst Road, Gilead	35	35	35	45	R7 Mt. Gilead, Gilead	37	36	36	45	<p>The auditor sighted the following Quarterly Compliance Noise Monitoring reports prepared by Wilkinson Murray for the RGP which demonstrate compliance with the requirements of this condition:</p> <ul style="list-style-type: none"> <li>September 2018 (monitoring conducted 12 September 2018)</li> <li>December 2018 (monitoring conducted 5 December 2018)</li> <li>March 2019 (monitoring conducted 4 March 2019)</li> <li>May 2019 (monitoring conducted 31 May 2019)</li> <li>October 2019 (monitoring conducted 18 October 2019)</li> <li>December 2019 (monitoring conducted 9 December 2019)</li> <li>March 2020 (monitoring conducted 18 March 2020)</li> <li>May 2020 (monitoring conducted 5 May 2020).</li> </ul>		Compliant
Receiver Location	Day L <sub>Aeq</sub> (15 minute)	Evening L <sub>Aeq</sub> (15 minute)	Night L <sub>Aeq</sub> (15 minute)	Flaring (night) L <sub>Aeq</sub> (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:                      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.																	
L5.3	<b>Incidence of flaring events</b>	N/A																	

**C1: EPL 12003**

No	Licence Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status																																			
L5.4	<p>Noise for flaring event, must not exceed the noise limits in the table below:</p> <table border="1" data-bbox="327 371 1099 802"> <thead> <tr> <th data-bbox="327 371 450 416">Receiver Location</th> <th data-bbox="456 371 622 416">Type &amp; Duration of Flare event</th> <th data-bbox="629 371 779 416">Day L<sub>Aeq</sub>(15 minute)</th> <th data-bbox="786 371 936 416">Evening L<sub>Aeq</sub>(15 minute)</th> <th data-bbox="943 371 1099 416">Night L<sub>Aeq</sub>(15 minute)</th> </tr> </thead> <tbody> <tr> <td data-bbox="327 421 450 488">R1 Medhurst Road, Gilead</td> <td data-bbox="456 421 622 488">Spill valve &gt;2.5 hours</td> <td data-bbox="629 421 779 488">35</td> <td data-bbox="786 421 936 488">35</td> <td data-bbox="943 421 1099 488">35</td> </tr> <tr> <td></td> <td data-bbox="456 493 622 544">Compressor blowdown (ESD) 15-60 minutes</td> <td data-bbox="629 493 779 544">40</td> <td data-bbox="786 493 936 544">40</td> <td data-bbox="943 493 1099 544">35</td> </tr> <tr> <td></td> <td data-bbox="456 549 622 624">Compressor blowdown (shut down and unload) 6-15 minutes</td> <td data-bbox="629 549 779 624">42</td> <td data-bbox="786 549 936 624">42</td> <td data-bbox="943 549 1099 624">37</td> </tr> <tr> <td data-bbox="327 628 450 660">R7 Mt. Gilead, Gilead</td> <td data-bbox="456 628 622 660">Spill valve &gt;2.5 hours</td> <td data-bbox="629 628 779 660">37</td> <td data-bbox="786 628 936 660">36</td> <td data-bbox="943 628 1099 660">36</td> </tr> <tr> <td></td> <td data-bbox="456 665 622 722">Compressor blowdown (ESD) 15-60 minutes</td> <td data-bbox="629 665 779 722">42</td> <td data-bbox="786 665 936 722">41</td> <td data-bbox="943 665 1099 722">40*</td> </tr> <tr> <td></td> <td data-bbox="456 727 622 802">Compressor blowdown (shut down and unload) 6-15 minutes</td> <td data-bbox="629 727 779 802">44</td> <td data-bbox="786 727 936 802">43</td> <td data-bbox="943 727 1099 802">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) L<sub>Aeq</sub> (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 L <sub>Aeq</sub> (15 minute)	Evening L <sub>Aeq</sub> (15 minute)	Night L <sub>Aeq</sub> (15 minute)	R1 Medhurst Road, Gilead	Spill valve >2.5 hours	35	35	35		Compressor blowdown (ESD) 15-60 minutes	40	40	35		Compressor blowdown (shut down and unload) 6-15 minutes	42	42	37	R7 Mt. Gilead, Gilead	Spill valve >2.5 hours	37	36	36		Compressor blowdown (ESD) 15-60 minutes	42	41	40*		Compressor blowdown (shut down and unload) 6-15 minutes	44	43	37	<p>Flaring events did not coincide with monitoring undertaken by external consultants and as such there were no measurements obtained.</p> <p>It was reported by AGL that noise from flaring events was monitored following commissioning of the plant. The results were reportedly compliant with this condition and as such, no further monitoring was undertaken.</p> <p>It was noted that the use of the flare has decreased since commissioning and there have been no noise complaints received during the audit period.</p>	Compliant
Receiver Location	Type & Duration of Flare event	Day L <sub>Aeq</sub> (15 minute)	Evening L <sub>Aeq</sub> (15 minute)	Night L <sub>Aeq</sub> (15 minute)																																		
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L5.5	Noise measurements																																					

**C1: EPL 12003**

No	Licence Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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 Quarterly Compliance Noise Monitoring reports prepared by Wilkinson Murray for the RGP which demonstrate compliance with the requirements of this condition:</p> <ul style="list-style-type: none"> <li>• September 2018 (monitoring conducted 12 September 2018)</li> <li>• December 2018 (monitoring conducted 5 December 2018)</li> <li>• March 2019 (monitoring conducted 4 March 2019)</li> <li>• May 2019 (monitoring conducted 31 May 2019)</li> <li>• October 2019 (monitoring conducted 18 October 2019)</li> <li>• December 2019 (monitoring conducted 9 December 2019)</li> <li>• March 2020 (monitoring conducted 18 March 2020)</li> <li>• May 2020 (monitoring conducted 5 May 2020).</li> </ul>	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 10m height or rainfall 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

**C1: EPL 12003**

No	Licence Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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 Murray advised that noise generated by the site under those conditions complied with the relevant noise limits at both monitoring conditions.	Compliant
<b>L5.9</b>	<b>Well, Gathering System and Trunk Line Maintenance noise management protocol</b>		
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 (July 2019) 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
<b>L6</b>	<b>Hours of Operation</b>		
L6.1	Planned maintenance activities at any of the wells must only be conducted between:	The auditor sighted the Noise Management Sub Plan (July 2019) and noted compliance with the requirements of this condition.	Compliant
L6.1a)	7am and 6pm on weekdays; and		Compliant
L6.1b)	8am and 1pm on Saturdays (excluding Public Holidays).	The auditor sighted the Site Induction Program, a sample of Daily Workover Reports prepared by AGL and community notification letters. The documents demonstrate compliance with the specified hours.	Compliant

**C1: EPL 12003**

No	Licence Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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
<b>L7</b>	<b>Potentially offensive odour</b>		
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.	
<b>L8</b>	<b>Other limit conditions</b>	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
<b>L8.2</b>	<b>Hydraulic Fracturing</b>		
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 by AGL (AEPR 2018-2019 and AEPR 2019-2020) that there were no fracing activities undertaken during the audit period.	Not Triggered
<b>4</b>	<b>Operating Conditions</b>		
<b>O1</b>	<b>Activities must be carried out in a competent manner</b>		



**C1: EPL 12003**

No	Licence Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
O1.1	Licensed activities must be carried out in a competent manner. This includes:	<p>Competence is demonstrated through defined roles and responsibilities, training, assurance and records as detailed below:</p> <ul style="list-style-type: none"> <li>• Roles and responsibilities – Defined in the EMP (March 2020) and position descriptions.</li> <li>• Training – The auditor sighted the induction program that is delivered to all AGL employees and contractors (Rapid Induct).</li> <li>• Audit and inspection – Environmental Walks and Critical Control Verifications were undertaken to assess implementation of control measures.</li> <li>• Waste records – The auditor sighted the AGL Environmental Footprint Spreadsheet for the 2019 and 2020 and a sample of waste disposal records.</li> </ul>	Compliant
O1.1a)	the processing, handling, movement and storage of materials and substances used to carry out the activity; and		Compliant
O1.1b)	the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.		Compliant
<b>O2</b>	<b>Maintenance of plant and equipment</b>		
O2.1	All plant and equipment installed at the premises or used in connection with the licensed activity:	<p>The following evidence was sighted by the auditor to demonstrate the maintenance of plant and equipment in a proper and efficient manner:</p> <ul style="list-style-type: none"> <li>• Preventative Maintenance – The preventative maintenance of plant and equipment is managed through SAP. The system effectively monitors maintenance requirements based on the use of plant and equipment. The auditor sighted a sample of look ahead reports, preventative workorders and corrective workorders.</li> <li>• Monitoring – Regular documented checks are undertaken of plant and equipment.</li> <li>• Procedures – Standard Operating Procedures have been developed to guide commonly undertaken activities.</li> <li>• Leak Detection and Repair Program (refer to EPL 12003).</li> </ul>	Compliant
O2.1a)	must be maintained in a proper and efficient condition; and		
O2.2b)	must be operated in a proper and efficient manner.		
<b>O3</b>	<b>Dust</b>		
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 (June 2019) 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

**C1: EPL 12003**

No	Licence Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
<b>O4</b>	<b>Emergency Response</b>		
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.	<p>The auditor sighted the Pollution Incident Response Management Plan (PIRMP) for the Camden Gas Project and noted compliance with the requirements of this condition.</p> <p>There were no environmental incidents reported during the audit period.</p>	Compliant
<b>O5</b>	<b>Process and management</b>		
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.	<p>The auditor sighted the AGL Environmental Footprint spreadsheet for the financial years 2018/19 and 2019/20 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> <p>It is noted that a waste audit was not within the scope of this independent audit.</p>	Compliant
O5.2	The licensee must ensure that waste identified for recycling is stored separately from other waste.	<p>The auditor sighted the Waste Management Sub Plan (June 2019) and noted relevant procedures pursuant to this condition.</p> <p>The auditor inspected the RPGP and observed the separation of waste for recycling, including oil filters, batteries, scrap metal, paper, cardboard and plastics.</p>	Compliant
<b>5</b>	<b>Monitoring and Recording Conditions</b>		
<b>M1</b>	<b>Monitoring Records</b>		
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

**C1: EPL 12003**

No	Licence Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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
<b>M2</b>	<b>Requirement to monitor concentration of pollutants discharged</b>		
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:	<p>The auditor sighted the following air monitoring results prepared by Ektimo:</p> <ul style="list-style-type: none"> <li>• Annual Emission Testing, Report R006497 (12 November 2018) (includes September 2018 quarterly monitoring)</li> <li>• Quarterly Emission Testing, Report R006724 (17 December 2018)</li> <li>• Quarterly Emission Testing, Report R007285 (5 April 2019)</li> <li>• Quarterly Emission Testing, Report R007600 (15 July 2019)</li> <li>• Quarterly Emission Testing, Report R008177 (30 October 2019)</li> <li>• Quarterly Emission Testing, Report R008415 (10 January 2020)</li> <li>• Quarterly Emission Testing, Report R008823 (26 March 2020)</li> <li>• Quarterly Emission Testing, Report R009153 (25 May 2020).</li> </ul> <p>There were no errors noted in the above reports and compliance was demonstrated against the sampling method, units of measure and frequency as defined in this condition.</p> <p>As detailed in the Annual Return for the reporting period 22 December 2018 to 21 December 2019, a mechanical failure of Compressor 3 occurred in mid-2019 resulting in an extended shut down for the remainder of the audit period. As such scheduled quarterly monitoring was not undertaken for the nominated period. There are no recommended corrective actions.</p>	Non-Compliant 1820-NC-09
M2.2	Air Monitoring Requirements [Refer to the Tables in EPL 12006]		Non-Compliant 1820-NC-09

**C1: EPL 12003**

No	Licence Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status																								
M2.3	<p>Point 1</p> <table border="1" data-bbox="327 373 1088 560"> <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>The auditor sighted all monthly Air Quality Monitoring Validated Reports prepared by Ecotech, 7 August 2018 to 7 July 2020. There were no errors or omissions noted in the sample of reports reviewed by the auditor.</p>	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>The auditor sighted the following documents:</p> <ul style="list-style-type: none"> <li>• Air Quality Monitoring Validated Reports prepared by Ecotech, 7 August 2018 to 7 July 2020 (monthly)</li> <li>• Correspondence from AGL to the EPA (15 October 2013) requesting confirmation that the Ecotech Method 9.1 -</li> <li>• Stack emission monitoring by Differential Optical Absorption</li> <li>• Spectroscopy is acceptable to the EPA</li> <li>• Licence Variation notice issued by the EPA on 22 October 2013 noting that AGL had advised the EPA that it undertakes continuous moisture monitoring and validates the data against TM-22 on a regular basis.</li> </ul> <p>On the basis of the above documents, the auditor noted compliance with the requirements of this condition.</p>	Compliant																								

**C1: EPL 12003**

No	Licence Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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 the following air monitoring results prepared by Ektimo:</p> <ul style="list-style-type: none"> <li>• Annual Emission Testing, Report R006497 (12 November 2018) (includes September 2018 quarterly monitoring)</li> <li>• Quarterly Emission Testing, Report R006724 (17 December 2018)</li> <li>• Quarterly Emission Testing, Report R007285 (5 April 2019)</li> <li>• Quarterly Emission Testing, Report R007600 (15 July 2019)</li> <li>• Quarterly Emission Testing, Report R008177 (30 October 2019)</li> <li>• Quarterly Emission Testing, Report R008415 (10 January 2020)</li> <li>• Quarterly Emission Testing, Report R008823 (26 March 2020)</li> <li>• Quarterly Emission Testing, Report R009153 (25 May 2020).</li> </ul> <p>There were no errors noted in the above reports and compliance was demonstrated against the sampling method, units of measure and frequency as defined in this condition.</p> <p>As detailed in the Annual Return for the reporting period 22 December 2018 to 21 December 2019, a mechanical failure of Compressor 3 occurred in mid-2019 resulting in an extended shut down for the remainder of the audit period. As such scheduled quarterly monitoring was not undertaken for the nominated period. There are no recommended corrective actions.</p>	<p>Non-Compliant 1820-NC-09</p>
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 the following air monitoring results prepared by Ektimo and noted compliance with the requirements of this condition:</p> <ul style="list-style-type: none"> <li>• Annual Emission Testing, Report R006497 (12 November 2018) (includes September 2018 quarterly monitoring)</li> <li>• Quarterly Emission Testing, Report R006724 (17 December 2018)</li> <li>• Quarterly Emission Testing, Report R007285 (5 April 2019)</li> <li>• Quarterly Emission Testing, Report R007600 (15 July 2019)</li> <li>• Quarterly Emission Testing, Report R008177 (30 October 2019)</li> <li>• Quarterly Emission Testing, Report R008415 (10 January 2020)</li> <li>• Quarterly Emission Testing, Report R008823 (26 March 2020)</li> <li>• Quarterly Emission Testing, Report R009153 (25 May 2020).</li> </ul>	<p>Compliant</p>

**C1: EPL 12003**

No	Licence Condition	Evidence Collected, Independent Audit Findings & Recommendations		Status
M2.7	Water and/ or Land Monitoring Requirements (refer to EPL 12003 for table)	<p>The auditor sighted the following monitoring reports prepared by EMM for the audit period:</p> <ul style="list-style-type: none"> <li>• Annual Groundwater Report, Produced Water Quality Monitoring, Camden Gas Project, January 2020 (for the period 22 December 2018 to 21 December 2019)</li> <li>• Six-Monthly Produced Water Quality Monitoring Report, August 2018 (sampling conducted between 30 August 2018 and 19 September 2018)</li> <li>• Six-Monthly Produced Water Quality Monitoring Report, February 2019 (sampling conducted 20 February 2019)</li> <li>• Six-Monthly Produced Water Quality Monitoring Report, September 2019 (sampling conducted 27 August 2019)</li> <li>• Six-Monthly Produced Water Quality Monitoring Report, February 2020 (sampling conducted 20 February 2020).</li> </ul> <p>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.</p>		Compliant
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 December 2018 and December 2019 Annual Returns and noted compliance against the requirements of this condition.		Compliant

**C1: EPL 12003**

No	Licence Condition	Evidence Collected, Independent Audit Findings & Recommendations		Status
M2.9	<p>For the purposes of Condition M2.7 EPA has approved the following method of analysis for the following pollutants only:</p> <ul style="list-style-type: none"> <li>• Methane - ALS "Static Headspace GC/FID technique"</li> <li>• Phenols - USEPA method 8270D.</li> <li>• Polycyclic aromatic hydrocarbons - USEPA method 8270D</li> </ul> <p>All other monitoring must be undertaken in accordance with Condition M3.2.</p>	<p>The auditor sighted the following monitoring reports prepared by EMM for the audit period:</p> <ul style="list-style-type: none"> <li>• Annual Groundwater Report, Produced Water Quality Monitoring, Camden Gas Project, January 2020 (for the period 22 December 2018 to 21 December 2019)</li> <li>• Six-Monthly Produced Water Quality Monitoring Report, August 2018 (sampling conducted between 30 August 2018 and 19 September 2018)</li> <li>• Six-Monthly Produced Water Quality Monitoring Report, February 2019 (sampling conducted 20 February 2019)</li> <li>• Six-Monthly Produced Water Quality Monitoring Report, September 2019 (sampling conducted 27 August 2019)</li> <li>• Six-Monthly Produced Water Quality Monitoring Report, February 2020 (sampling conducted 20 February 2020).</li> </ul> <p>The reports comply with the requirements of this condition.</p>		Compliant
<b>M3</b>	<b>Testing methods - concentration limits</b>			
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)	<p>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.</p> <p>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".</p>			Compliant

**C1: EPL 12003**

No	Licence Condition	Evidence Collected, Independent Audit Findings & Recommendations		Status
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.	<p>The auditor sighted the following monitoring reports prepared by EMM for the audit period and noted compliance with the requirements of this condition:</p> <ul style="list-style-type: none"> <li>• Annual Groundwater Report, Produced Water Quality Monitoring, Camden Gas Project, January 2020 (for the period 22 December 2018 to 21 December 2019)</li> <li>• Six-Monthly Produced Water Quality Monitoring Report, August 2018 (sampling conducted between 30 August 2018 and 19 September 2018)</li> <li>• Six-Monthly Produced Water Quality Monitoring Report, February 2019 (sampling conducted 20 February 2019)</li> <li>• Six-Monthly Produced Water Quality Monitoring Report, September 2019 (sampling conducted 27 August 2019)</li> <li>• Six-Monthly Produced Water Quality Monitoring Report, February 2020 (sampling conducted 20 February 2020).</li> </ul> <p>The auditor also sighted a sample of Monthly Flare Pit Water Quality Monitoring Reports and associated laboratory analytical reports. Monitoring was undertaken in accordance with M2.7 the EPA approved methods.</p>		Compliant
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.		
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 2018-19 and 2019-20 which detail the load calculations based on quarterly or annual monitoring results. In all cases, the load calculation method of source monitoring was applied.		Compliant
M5	<b>Recording of pollution complaints</b>			



**C1: EPL 12003**

No	Licence Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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 the Complaints Register and noted compliance with the requirements of this condition. There were no complaints during the audit period.	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 the Complaints Register and noted compliance with the requirements of this condition. There were no complaints during the audit period.	Compliant
M5.4	The record must be produced to any authorised officer of the EPA who asks to see them.	Condition not triggered during the audit period.	Not Triggered
<b>M6</b>	<b>Telephone complaints line</b>		
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.		Compliant
M6.3	The preceding two conditions do not apply until 3 months after: the date of the issue of this licence.		Compliant
<b>M7</b>	<b>Other monitoring and recording conditions</b>		
<b>M7.1</b>	<b>Leak Detection and Repair Program</b>		

**C1: EPL 12003**

No	Licence Condition	Evidence Collected, Independent Audit Findings & Recommendations		Status
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 documents and noted compliance with the requirements of this condition: <ul style="list-style-type: none"> <li>• Annual Leak Detection and Repair Summary Report (22 December 2017 to 21 December 2018)</li> <li>• Annual Leak Detection and Repair Summary Report (22 December 2019 to 21 December 2019)</li> <li>• Gas Leakage Audit, Camden Gas Project 2019 (Health Pipeline Services)</li> <li>• Gas Leakage Audit, High Pressure Pipeline 2019 (Health Pipeline Services).</li> </ul>		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.		Compliant
<b>6</b>	<b>Reporting Conditions</b>			
<b>R1</b>	<b>Annual return documents</b>			
R1.1	The licensee must complete and supply to the EPA an Annual Return in the approved form comprising: <ol style="list-style-type: none"> <li>1. a Statement of Compliance,</li> <li>2. a Monitoring and Complaints Summary,</li> <li>3. a Statement of Compliance - Licence Conditions,</li> <li>4. a Statement of Compliance - Load based Fee,</li> <li>5. a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan,</li> <li>6. a Statement of Compliance - Requirement to Publish Pollution Monitoring Data,</li> <li>7. a Statement of Compliance - Environmental Management Systems and Practices; and</li> <li>8. a Statement of Compliance - Environmental Improvement Works.</li> </ol> At the end of each reporting period, the EPA will provide to the licensee a copy of the form that must be completed and returned to the EPA.	The auditor sighted the December 2018 and December 2019 Annual Returns and noted compliance against the requirements of this condition.		Compliant

**C1: EPL 12003**

No	Licence Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
R1.2	An Annual Return must be prepared in respect of each reporting period, except as provided below. Note: The term "reporting period" is defined in the dictionary at the end of this licence. Do not complete the Annual Return until after the end of the reporting period.	The auditor sighted the December 2018 and December 2019 Annual Returns and noted compliance against the requirements of this condition.	Compliant
R1.3	Where this licence is transferred from the licensee to a new licensee:	Condition not triggered during the audit period.	Not Triggered
R1.3a)	the transferring licensee must prepare an Annual Return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted; and	Condition not triggered during the audit period.	Not Triggered
R1.3b)	the new licensee must prepare an Annual Return for the period commencing on the date the application for the transfer of the licence is granted and ending on the last day of the reporting period. Note: An application to transfer a licence must be made in the approved form for this purpose.	Condition not triggered during the audit period.	Not Triggered
R1.4	Where this licence is surrendered by the licensee or revoked by the EPA or Minister, the licensee must prepare an Annual Return in respect of the period commencing on the first day of the reporting period and ending on:	Condition not triggered during the audit period.	Not Triggered
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 NSW Environmental Protection Authority Public Register and noted that the 2018 and 2019 Annual Returns were submitted in compliance with this condition.	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

**C1: EPL 12003**

No	Licence Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
R1.7	The licensee must retain a copy of the Annual Return supplied to the EPA for a period of at least 4 years after the Annual Return was due to be supplied to the EPA.	The auditor sighted Annual Returns submitted in the previous four years and noted compliance with the requirements of this condition.	Compliant
R1.8	Within the Annual Return, the Statements of Compliance must be certified and the Monitoring and Complaints Summary must be signed by:	The auditor sighted the December 2018 and December 2019 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
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 Annual Noise Compliance Monitoring Reports prepared by Wilkinson Murray to accompany the annual returns. The reports demonstrate compliance with the requirements of this condition.	Compliant
<b>R2</b>	<b>Notification of environmental harm</b>		
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
<b>R3</b>	<b>Written report</b>		
R3.1	Where an authorised officer of the EPA suspects on reasonable grounds that:	Condition not triggered during the audit period.	Not Triggered
R3.1a)	where this licence applies to premises, an event has occurred at the premises; or		Not Triggered
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.		Not Triggered
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 not triggered during the audit period.	Not Triggered

**C1: EPL 12003**

No	Licence Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status												
R3.3	The request may require a report which includes any or all of the following information:	Condition not triggered during the audit period.	Not Triggered												
R3.3a)	the cause, time and duration of the event;		Not Triggered												
R3.3b)	the type, volume and concentration of every pollutant discharged as a result of the event;		Not Triggered												
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;		Not Triggered												
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;		Not Triggered												
R3.3e)	action taken by the licensee in relation to the event, including any follow-up contact with any complainants;		Not Triggered												
R3.3f)	details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and		Not Triggered												
R3.3g)	any other relevant matters.		Not Triggered												
R3.4	The EPA may make a written request for further details in relation to any of the above matters if it is not satisfied with the report provided by the licensee. The licensee must provide such further details to the EPA within the time specified in the request.	Condition not triggered during the audit period.	Not Triggered												
<b>R4</b>	<b>Other reporting conditions</b>														
<b>R4.1</b>	<b>Leak Detection and Repair Program Summary Report</b>														
R4.2	<p>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:</p> <table border="1" data-bbox="324 1098 1093 1238"> <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 - &lt; 10,000 (Minor)</td> <td></td> <td></td> </tr> <tr> <td>&gt;=10,000 - &lt;50,000 (Major)</td> <td></td> <td></td> </tr> <tr> <td>&gt;=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)			<p>The auditor sighted the following documents and noted compliance with the requirements of this condition:</p> <ul style="list-style-type: none"> <li>Annual Leak Detection and Repair Summary Report (22 December 2017 to 21 December 2018)</li> <li>Annual Leak Detection and Repair Summary Report (22 December 2019 to 21 December 2019)</li> <li>Gas Leakage Audit, Camden Gas Project 2019 (Health Pipeline Services)</li> <li>Gas Leakage Audit, High Pressure Pipeline 2019 (Health Pipeline Services).</li> </ul>	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												

**C1: EPL 12003**

No	Licence Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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
R4.3	Where a leak is identified, AGL should aim to have the component repaired as follows: <ul style="list-style-type: none"> <li>• 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</li> <li>• 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</li> <li>• 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 &gt; 50,000 ppmv), as methane, above background.</li> </ul>	The auditor sighted the following documents and noted compliance with the requirements of this condition: <ul style="list-style-type: none"> <li>• Annual Leak Detection and Repair Summary Report (22 December 2017 to 21 December 2018)</li> <li>• Annual Leak Detection and Repair Summary Report (22 December 2019 to 21 December 2019)</li> <li>• Gas Leakage Audit, Camden Gas Project 2019 (Health Pipeline Services)</li> <li>• Gas Leakage Audit, High Pressure Pipeline 2019 (Health Pipeline Services).</li> </ul>	Compliant
<b>R4.4</b>	<b>Groundwater Monitoring Report</b>		
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 following monitoring reports prepared by EMM for the audit period and noted compliance with the requirements of this condition:	Compliant
R4.5a)	an analysis and interpretation of monitoring results and		Compliant
R4.5b)	actions to correct identified adverse trends.	<ul style="list-style-type: none"> <li>• Annual Groundwater Report, Produced Water Quality Monitoring, Camden Gas Project, January 2020 (for the period 22 December 2018 to 21 December 2019)</li> <li>• Six-Monthly Produced Water Quality Monitoring Report, August 2018 (sampling conducted between 30 August 2018 and 19 September 2018)</li> <li>• Six-Monthly Produced Water Quality Monitoring Report, February 2019 (sampling conducted 20 February 2019)</li> <li>• Six-Monthly Produced Water Quality Monitoring Report, September 2019 (sampling conducted 27 August 2019)</li> <li>• Six-Monthly Produced Water Quality Monitoring Report, February 2020 (sampling conducted 20 February 2020).</li> </ul>	Compliant
<b>R4.6</b>	<b>Spatial information</b>		

**C1: EPL 12003**

No	Licence Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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 December 2018 and December 2019 Annual Returns and noted compliance against the requirements of this condition.	Compliant
<b>7</b>	<b>General Conditions</b>		
G1	Copy of licence kept at the premises or plant	The auditor sighted evidence to demonstrate that a copy of the licence is kept at the premises.	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
<b>G2</b>	<b>Signage</b>		
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 RPGP and noted compliance with the requirements of this condition.	Compliant
<b>G3</b>	<b>Other general conditions</b>		
G3.1	Completed Programs	Condition noted.	

## C2: Industrial Bore Licences

No.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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.	<p>The auditor sighted the following documents which demonstrate compliance with the requirements of this condition:</p> <ul style="list-style-type: none"> <li>• AGL Environmental Footprint Spreadsheet for the 2019 and 2020</li> <li>• 2019/2020 Annual Compliance Report, 24 September 2020 (EMM)</li> <li>• 2018/2019 Annual Compliance Report, 23 September 2019 (EMM).</li> </ul> <p>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.</p>	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.	<p>As part of the previous IEA, 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.</p> <p>The auditor sighted Table B1 in the following reports which satisfies this condition:</p> <ul style="list-style-type: none"> <li>• 2019/2020 Annual Compliance Report, 24 September 2020 (EMM)</li> <li>• 2018/2019 Annual Compliance Report, 23 September 2019 (EMM).</li> </ul>	Compliant



## C2: Industrial Bore Licences

No.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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> <ul style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>Disposal Records – The auditor sighted the AGL Environmental Footprint spreadsheet for the 2019 and 2020 financial years which notes that produced water was disposed by an appropriately licenced facility.</li> </ul> <p>There were no 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.	<p>Condition not triggered during the audit period.</p> <p>It was reported by AGL (AEPR 2018-2019 and AEPR 2019-2020) that there were drilling activities undertaken during the audit period.</p>	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	Evidence Collected, Independent Audit Findings & Recommendations	Status
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) as part of the previous IEA 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>	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 RGP 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 ('Footprint Workbook FY 19' and 'Footprint Workbook FY20'). 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 following monitoring reports prepared by EMM for the audit period and noted compliance with the requirements of this condition:</p> <ul style="list-style-type: none"> <li>• 2018-2019 Groundwater and Surface Water Monitoring Report, Camden Gas Project, 23 September 2019</li> <li>• 2019-2020 Groundwater and Surface Water Monitoring Report, Camden Gas Project, 24 September 2020.</li> </ul>	Compliant

## C2: Industrial Bore Licences

No.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
12	The license holder must install, if and when called upon to do so, monitoring bores to the satisfaction of the NSW Office of Water in respect to location and depth.	It was reported by AGL (AEPR 2018-2019 and AEPR 2019-2020) that 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: <ul style="list-style-type: none"> <li>• 2019 – 2020 Groundwater and Surface Water Monitoring Report Camden Gas Project (EMM)</li> <li>• 2018 – 2019 Groundwater and Surface Water Monitoring Report Camden Gas Project (EMM).</li> </ul>	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 demonstrate compliance with the requirements of this condition: <ul style="list-style-type: none"> <li>• 2019/2020 Annual Compliance Report, 24 September 2020 (EMM)</li> <li>• 2018/2019 Annual Compliance Report, 23 September 2019 (EMM).</li> </ul>	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 demonstrate compliance with the requirements of this condition: <ul style="list-style-type: none"> <li>• 2019/2020 Annual Compliance Report, 24 September 2020 (EMM)</li> <li>• 2018/2019 Annual Compliance Report, 23 September 2019 (EMM).</li> </ul>	Compliant
	A) Activities associated with the project for the preceding operating period, including the installation of new wells, the refurbishment of existing wells, the maintenance of disused wells and the decommissioning of abandoned wells.		Compliant
	B) Volumes of groundwater extracted during the preceding operating period from individual wells and in total from the project wellfield, together with volumes of water transported for disposal or use from individual wells.		Compliant
	C) Reconciliations of the extracted flow measurements with volumes of water transported for disposal or use for individual wells for the preceding operating period and identification of causes of any inconsistencies and rectification measures that will be undertaken.		Compliant

## C2: Industrial Bore Licences

No.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	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.	
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 following reports which demonstrate compliance with the requirements of this condition: <ul style="list-style-type: none"> <li>• 2019/2020 Annual Compliance Report, 24 September 2020 (EMM)</li> <li>• 2018/2019 Annual Compliance Report, 23 September 2019 (EMM).</li> </ul>	Compliant

### C3: Water Access Licences

No.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
MW0029-00001	<b>Take of Water</b> 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.	
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 Compliance Reports (EMM 2019 and 2020) which demonstrates compliance with the requirements of this condition: <ul style="list-style-type: none"> <li>2018/2019 – The total volume of water taken was 1.4 ML and was less than the entitlement amount of 15 ML for each WAL.</li> <li>2019/2020 – The total volume of water taken was 1.54 ML and was less than the entitlement amount of 15 ML for each WAL.</li> </ul>	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	Evidence Collected, Independent Audit Findings & Recommendations	Status
MW2338-00001	<b>Monitoring and Recording</b> 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. The auditor sighted a sample of haulage contractor dockets and reconciled against the logbook maintained by AGL ('Footprint Workbook FY 19' and 'Footprint Workbook FY20'). There were no errors or omissions identified.	Compliant
MW2336-00001	The purpose or purposes for which water is taken, as well as details of the type of crop, area cropped, and dates of planting and harvesting, must be recorded in the logbook each time water is taken.	It was reported by AGL that water associated with the licence is only obtained for the purpose of coal seam production.	Compliant
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 ('Footprint Workbook FY 19' and 'Footprint Workbook FY20') 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 ('Footprint Workbook FY 19' and 'Footprint Workbook FY20') and noted compliance with the requirements of this condition.	Compliant
MW0051-00001	<b>Reporting</b> 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 in the Annual Compliance Reports (EMM 2019 and 2020) that there were no breaches of conditions during the reporting period.	Not Triggered
MW0051-00001, A	email: water.enquiries@dpi.nsw.gov.au, or	Condition noted.	
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.	

#### C4: Works and Usage Approvals

No.	Condition	Compliance Assessment	Finding
MW0655-00001	<b>Take of Water</b> 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.	
MW0097-00001	<b>Water Management Works</b> 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 2018-2019 and AEPR 2019-2020) 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:	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 Compliance Reports (EMM 2019 and 2020).	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 26 wells (JD01, JD11, LB09 LB11, KP03, RP02, RP10, RP12, GL16, EM12, EM21, EM22, EM28, EM31, EM32, EM33, EM34, EM40, MT01, SL09, RB11, RB12, MP10, MP05A, MP23, SF05) was completed in this audit period.  The auditor sighted a sample of Plug and Abandonment Records and evidence of submission to DPIE. The format of the reports is defined by DPIE.	Compliant
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 Compliance Reports (EMM 2019 and 2020).	Compliant

#### C4: Works and Usage Approvals

No.	Condition	Compliance Assessment	Finding
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 ('Footprint Workbook FY 19' and 'Footprint Workbook FY20'). There were no errors or omissions noted.	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 (2018/19 Annual Compliance Report and 2019/20 Annual Compliance Report) that there were no breaches 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 2018-2019 and AEPR 2019-2020) that there were no new wells drilled during the audit period.	Compliant
	<b>Other Conditions (10WA112288 only)</b>		
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 2018-2019 and AEPR 2019-2020) that there were no water management works conducted during the audit period.	Compliant



### C5: Petroleum Production Licences

No.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	<b>SCHEDULE OF CONDITIONS OF PRODUCTION LEASE</b>		
	<b>Operations</b>		
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 13 (June 2020) Section 2 - Areas of Operation and noted compliance with the requirements of this condition.	Compliant
	<b>Management and Rehabilitation of Lands (General)</b>		
2	a) The lease holder must maintain the subject area in a clean and tidy condition at all times.	The auditor inspected the RGP and a sample of well sites on 8 April 2021 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 2019) and noted compliance with the requirements of this condition.  The auditor inspected a sample of well sites rehabilitated during the audit period on 8 April 2021. Rehabilitation works were satisfactory and in compliance with the above plans and Appendix F of the POP (June 2020).	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 2019) and Rehabilitation and Landscape Management Sub Plan (June 2019). 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 (October 2019) and noted compliance with the requirements of this condition.	Compliant

### C5: Petroleum Production Licences

No.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	<p>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.</p>	<p>The auditor sighted the Soil and Water Management Sub Plan (June 2019). The Sub Plan includes adequate and appropriate controls to minimise or prevent soil erosion.</p> <p>Implementation of the Sub Plan was demonstrated through Environmental Walks and Critical Control Verifications to assess performance and identify improvement opportunities.</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>It was reported by AGL (AEPR 2018-2019 and AEPR 2019-2020) that there were no incidents recorded during the audit period associated with the offsite movement of sediment.</p>	Compliant
	<p>f) The lease holder must provide and maintain to the satisfaction of the Minister efficient means to prevent contamination, pollution, erosion and siltation of any river, stream, creek, tributary, lake, dam, reservoir, watercourse or catchment area or any undue interference to fish or their environment and must observe any written instruction given or which may be given by the Minister with a view to preventing 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>	<p>The auditor sighted the EMP (March 2020) and Soil and Water Management Sub Plan (June 2019). The plans detail a number of controls to prevent the pollution of water.</p> <p>Implementation of the Sub Plan was demonstrated through Environmental Walks and Critical Control Verifications to assess performance and identify improvement opportunities.</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>It was reported by AGL (AEPR 2018-2019 and AEPR 2019-2020) that there were no incidents recorded during the audit period associated with the offsite movement of sediment.</p>	Compliant
3	<b>Production Operations plan</b>		
	(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 13 (June 2020) and noted compliance with the requirements of this condition.	Compliant
	(a) ongoing operations and environmental management; and		Compliant

### C5: Petroleum Production Licences

No.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	(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.	
	(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	Adequate correspondence was sighted to demonstrate that the document is reviewed annually and submitted to DPIE for approval. Where appropriate an extension has been sought and obtained from the regulator.	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 13 (June 2020) and noted compliance with the requirements of this condition. The auditor conducted a review of AEPR 2018-2019 and AEPR 2019-2020 and determined that operations were not occurring in sensitive 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
	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.	
	(6) The Director-General may within two (2) months of the lodgement of the Plan, require modification and re-lodgement.	Condition noted.	
	(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.	

### C5: Petroleum Production Licences

No.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	(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 POP (Version 13) and noted compliance with the requirements of this condition. Adequate correspondence was sighted to demonstrate that the document is reviewed annually and submitted to DPIE for approval.	Compliant
4	<b>Annual Environmental Management Report (AEMR)</b>		
	(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 evidence of submission of the 2018/2019 AEPR and the 2019/2020 AEPR to DPIE.	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 2018-2019 and AEPR 2019-2020 indicates that the documents generally meet the requirements of this condition.	Compliant
	(a) the accepted Production Operations Plan;		Compliant
	(b) development consent requirements and conditions;		Compliant
	(c) Environment Protection Authority and Department of Land and Water Conservation licences and approvals;		Compliant
	(d) any other statutory environmental requirements; and		Compliant
	(e) details of any variations to environmental approvals applicable to the lease area,		Compliant
	(3) After considering an AEMR the Director-General may, by notice in writing, direct the lease holder to undertake operations, remedial actions or supplementary studies in such manner and within such period as may be specified in the notice to ensure that operations on the lease area are conducted in accordance with sound environmental practice.	Condition noted.	
	(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.	
5	<b>Catchment Areas</b>		
	(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 2019). The plan details adequate controls to prevent the pollution of	Compliant

**C5: Petroleum Production Licences**

No.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	(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.	water. The auditor inspected a sample of well sites as part of the site inspection and determined that controls were being effectively implemented.	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.	It was reported by AGL (AEPR 2018-2019 and AEPR 2019-2020) that there were no incidents recorded during the audit period associated with the offsite movement of sediment.	Compliant
6	<b>Water</b>		
	(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 RGP site and workover rig facilities. The waste is stored within tanks at the RGP and disposed to an appropriately licensed facility (Environmental Footprint spreadsheet for the 2019 and 2020 financial years).	Compliant
	(b) Operations must be carried out in a manner that avoids the pollution or siltation of any watercourse or waterbody.	<p>The auditor sighted the Soil and Water Management Sub Plan (June 2019). The Sub Plan includes adequate and appropriate controls to prevent pollution or siltation of surface water.</p> <p>Implementation of the Sub Plan was demonstrated through Environmental Walks and Critical Control Verifications to assess performance and identify improvement opportunities.</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>It was reported by AGL (AEPR 2018-2019 and AEPR 2019-2020) that there were no incidents recorded during the audit period associated with the offsite movement of sediment.</p>	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
	<b>Dust</b>		

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No.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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"> <li>• Car park and access road are constructed with asphalt</li> <li>• Plant walkways are constructed with asphalt and concrete</li> <li>• Plant surrounds are sealed with a mix of shale and crushed sandstone (low dust)</li> <li>• Speed limits on the site and access road are limited to 20km/hr.</li> </ul> <p>The auditor sighted the Air Quality Management Sub-Plan (June 2019), 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	<b>Fences</b>		
	(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 April 2021 and noted compliance with the requirements of this condition.	Compliant
9	<b>Vegetation</b>		
	(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 2019) 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

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No.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	(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 2019) and noted the inclusion of weed control measures. There were no significant weed infestations observed during the site inspection.	Compliant
	<b>Roads</b>		
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
	<b>Transmission Lines, Communication Lines and Other Utilities</b>		
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
	<b>Aboriginal Place or Relic</b>		
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	<b>Safety</b>		

### C5: Petroleum Production Licences

No.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	(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.  The scope of the audit did not include an assessment against the requirements of the "Schedule of Onshore Petroleum Exploration and Production Safety Requirements".	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 April 2021) 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.	The auditor sighted a sample of Plug and Abandonment Records and evidence of submission to DPIE. The Plug and Abandonment Records confirm the removal of steel casing across mineable coal seams (where relevant).	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.	Not Triggered
	<b>Indemnity</b>		
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.	
15	<b>Security Deposit</b>		



### C5: Petroleum Production Licences

No.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	(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
	<b>Well Sealing</b>		
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 Plug and Abandonment Records, including JD01, KP03, RP02, MT01, EM21, SL09, RB11, EM28 and MP05, and evidence of submission to DPIE. The format of the reports is defined by DPIE.	Compliant
17	<b>Restriction to Area</b>		
	(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 April 2021, the auditor sighted plug and abandonment activities on MP05A. The site set-up met the requirements of this condition.	Compliant

### C5: Petroleum Production Licences

No.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	(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	
18	<b>Reporting</b>		
	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 (via the EROL portal).	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
	<b>General</b>		
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 2018-2019 and AEPR 2019-2020) that there were no wells drilled or new exploration activities in this audit period.	Not Triggered
20	<b>Control of Operations</b>		
	(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

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No.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
21	<b>Minister May Make Stop Work Order</b>		
	(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
	<b>SCHEDULE OF SPECIAL CONDITIONS OF APPROVAL</b>		
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
	<b>SCHEDULE A CONDITIONS - ENVIRONMENTAL MANAGEMENT CONDITIONS</b>		
	<b>Environmental Harm</b>		

### C5: Petroleum Production Licences

No.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
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 Walks, Critical Control Verifications, Daily Workover Reports and monitoring. The auditor sighted a sample of records and noted that AGL was generally compliant with the requirements of the EMP.</p> <p>Compliance obligations arising from licences, leases, environmental/ planning approvals and legislation are monitored through web-based database compliance management systems (CMO Compliance and SAP Compliance).</p>	Compliant
<b>2</b>	<b>Petroleum Operations Plan</b>		
	a) Production operations must not be carried out otherwise than in accordance with a Petroleum Operations Plan (POP) which has been approved by the Director-General of the Department of Industry and investment.	The auditor sighted the POP (Version 13) and noted compliance with the requirements of this condition. Adequate correspondence was sighted to demonstrate that the document is reviewed annually and submitted to DPIE for approval.	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	
	c) The Lease Holder may apply to the Director-general to amend an approved POP at any time.	Condition noted.	

### C5: Petroleum Production Licences

No.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	d) It is not a breach of this condition if:	Condition noted.	
	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.	
	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: 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.	
	e) A POP ceases to have affect 7 years after the date of approval or 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	<b>Environment Management Reporting</b>		
	a) The Lease Holder must lodge Environmental Management Reports (EMR) with the Director-General.	The auditor sighted the AEPR 2018-2019 and AEPR 2019-2020 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	<b>Incident reporting</b>		
	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 (May 2020) 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 of potential harm to the health of safety of human beings or to ecosystems that is not trivial, or	A review of the incident register indicated there were no incidents during the audit period.	Compliant
	ii) it results in actual of potential loss of property damage of an amount, or amounts in aggregate, exceeding \$10,000.		Compliant

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No.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	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
	<b>Rehabilitation</b>		
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 2019) 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 DPIE.</p>	Compliant
	<b>SAFETY</b>		
6	<b>Industry Codes and Standards</b>		
	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 2020).</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>	Compliant
	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 POP (Version 13, June 2020) which notes that the gas gathering system route is designed, constructed and operated in accordance with the requirements of Australian Standard AS 4645.3:2018 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>	Compliant
7	<b>Gathering Pipelines</b>		
	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.	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 POP (Version 13, June 2020) which notes that tracer lines are installed within gas gathering pipelines (Section 2.2.2).	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

### C5: Petroleum Production Licences

No.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	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.	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: <ul style="list-style-type: none"> <li>SAP preventative maintenance system for plant and equipment</li> <li>Annual Leak Detection and Repair Summary Report (22 December 2017 to 21 December 2018)</li> <li>Annual Leak Detection and Repair Summary Report (22 December 2019 to 21 December 2019).</li> </ul>	Compliant
	f) Gas gathering pipelines must not be abandoned except in a manner approved by the Director General.	Condition noted.	
	<b>WELLS</b>		
	<b>Notification of Activities</b>		
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.	During the audit period, workover activities were completed of a number well sites. The auditor sighted a sample of community notification records and noted compliance with the requirements of this condition.	Compliant
9	<b>Well Surveying and Logging</b>		
	a) The locations and height (AHD) of the collar of all wells drilled by the Lease Holder within the lease area must be determined to an accuracy of 1 metre, and the position of the hole within any potentially mineable coal seam must also be determined to an accuracy of 1 metre. This information must be supplied to the Director-General.	Condition not triggered during the audit period.  It was reported by AGL (AEPR 2018-2019 and AEPR 2019-2020) that there were no wells drilled during the audit period.	Not Triggered
	b) All vertical wells must be downhole geophysically logged prior to the installation of production casing with logging suite which can accurately determine the location and properties of all production zones, and conventional gas reservoirs. In addition a cement bond log must be run to confirm the integrity of the cement annulus between the wall of the well and the entire length of the casing. All other suites must be run for the entire length of the hole.		Not Triggered

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No.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	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	<b>Well Abandonment</b>		
	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.	The auditor sighted a sample of Plug and Abandonment Records and evidence of submission to DPIE. 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.	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.	The auditor sighted Plug and Abandonment Records for a sample of relevant well sites and evidence of submission to DPIE in the prescribed format.	Compliant
	c) All wells must be fully sealed in accordance with the Department's guidelines.	The scope of this audit did not include an assessment of compliance against the Onshore Exploration and Production Safety Requirements and the Department's guidelines.	Compliant
	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:	The auditor sighted Plug and Abandonment Records for a sample of relevant well sites (JD01, KP03, RP02, MT01, EM21, SL09, RB11, EM28 and MP05) and evidence of submission to DPIE in the prescribed format.	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.	The Plug and Abandonment Records were prepared in compliance with this condition and consistently submitted to DPIE within two weeks of abandonment.	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.		Compliant
	v) The estimated and actual quantities of grout used to seal the drillhole.	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.	Compliant
	vi) Evidence of removal of steel casing from the interval encompassing any potentially mineable coal seam.	The gas and water 'makes and compositions' were routinely recorded in Plug and Abandonment Records.	Compliant
	<b>IMPACT ON COAL SEAMS</b>		
11	<b>Operations not to affect mineability of coal seams</b>		



### C5: Petroleum Production Licences

No.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	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.	The auditor sighted a sample of Plug and Abandonment Records and evidence of submission to DPIE. 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.	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
	<b>Well Casing</b>		
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.	
	<b>OPERATIONS GENERALLY</b>		
13	<b>Commercial Production</b>		
	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	<b>Disruption to utilities</b>		
	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
	<b>GEOLOGICAL &amp; PRODUCTION REPORTING</b>		
15	<b>Well Drilling</b>		

### C5: Petroleum Production Licences

No.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	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. Irrespective, 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
	<b>Well Assessment</b>		
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
	<b>SECURITY</b>		
18	<b>Security</b>		
	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.	During the previous audit, the auditor sighted evidence of lodgement of a security deposit bond for PPL 1, 2, 4, 5 and 6 and correspondence from the DPIE (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

**C5: Petroleum Production Licences**

No.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	<b>COOPERATION</b>		
19	<b>Cooperation Agreement</b>		
	<p>The lease holder must make every reasonable attempt, and be able to demonstrate their attempts, to enter into a cooperation agreement with the holder(s) of any overlapping coal title(s). The cooperation agreement should address but not be limited to issues such as:</p> <ul style="list-style-type: none"> <li>-access arrangements</li> <li>-operational interaction procedures</li> <li>-dispute resolution</li> <li>-information exchange</li> <li>-well location</li> <li>-timing of drilling</li> <li>-potential resource conflicts and</li> <li>-rehabilitation issues</li> </ul>	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
SL02	Operational	24856	Continuing (perpetuity)	10WA112288	22/05/16	N/A	N/A	N/A
SL03	Operational	24856	Continuing (perpetuity)	10WA112288	22/05/16	N/A	N/A	N/A
SL09	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


Declaration of Independence – Auditor	
Project Name	Camden Gas Project
Consent Number	<ul style="list-style-type: none"> <li>• DA 15-1-2002-I (Apap, Joe Stanley, Johndilo, Loganbrae, Lipscombe and Mahon)</li> <li>• DA 246-8-2002-I (Kay Park)</li> <li>• DA 282-6-2003-I [RPGP, Rosalind Park, Wandinong, EMAI (EM01-20, 40)]</li> <li>• DA 183-8-2004-I (Mt Taurus and Menangle Park)</li> <li>• DA 9-1-2005 (Glenlee Wells)</li> <li>• DA 75-4-2005 (Sugarloaf Farm)</li> <li>• PA No. 06_0137 (Razorback)</li> <li>• PA No. 06_0138 (Elizabeth Macarthur);</li> <li>• PA No. 06_0291 (Spring Farm and Menangle Park)</li> <li>• Environment Protection Licence (EPL) 12003</li> <li>• Water Access Licences (WAL) (2)</li> <li>• Works and Usage Approvals (WUA) (2)</li> <li>• Industrial bore licences (8)</li> <li>• Petroleum Production Leases (PPL) (5).</li> </ul>
Description of Project	<p>The Camden Gas Project (<b>CGP</b>) 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 (<b>RPGP</b>), 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 (<b>DPIE</b>).</p>
Project Address	Rosalind Park Gas Plant Medhurst Road Gilead, NSW 2560
Proponent	AGL Upstream Investments Pty Ltd
Date	25 May 2021

I declare that:

- I. I am not related to any proponent, owner, operator or other entity involved in the delivery of the project. Such a relationship includes that of employer/employee, a business partnership, sharing a common employer, a contractual arrangement outside an Independent Audit, or that of a spouse, partner, sibling, parent, or child;
- II. I do not have any pecuniary interest in the project, proponent or related entities. Such an interest includes where there is a reasonable likelihood or expectation of financial gain (other than being reimbursed for performing the audit) or loss to the auditor, or their spouse, partner, sibling, parent, or child;
- III. I have not provided services (not including independent reviews or auditing) to the project with the result that the audit work performed by themselves or their company, except as otherwise declared to the Department prior to the audit;
- IV. I am not an Environmental Representative for the project; and
- V. I will not accept any inducement, commission, gift or any other benefit from auditee organisations, their employees or any interested party, or knowingly allow colleagues to do so.

Notes:

- a) 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
- b) 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)

<b>Name of Auditor</b>	Denise Corish
<b>Signature</b>	
<b>Qualification</b>	Environmental Lead Auditor with Exemplar Global
<b>Company</b>	Treo Environment Pty Ltd

## Appendix F Planning Secretary Approval



Mr David Mudd  
Environmental Business Partner – NSW Gas Operations

Via email: [dmudd@agl.com.au](mailto:dmudd@agl.com.au)

24/12/2020

Dear Mr David Mudd

**Camden Gas Stage 2  
DA282-6-2003-i**

I refer to your submission, dated 30 October 2020, seeking the agreement of the Secretary of the Department of Planning, Industry and Environment (the Department) of a suitably qualified, experienced and independent auditor to undertake an independent audit of the Camden Gas Stage 2 project.

In accordance with Schedule 5, Condition 10 of DA282-6-2003-i (the 'Consent') and the *Independent Audit Post Approval Requirements* (Department 2020), the Secretary has agreed to the following auditor:

- Denise Corish

Please ensure this correspondence is appended to the Independent Audit Report.

It is requested that the Independent Audit be prepared, undertaken and finalised in accordance with the *Independent Audit Post Approval Requirements* (Department 2020).

The Department reserves the right to request an alternate auditor or audit team for future audits.

Notwithstanding the agreement for the above listed auditor for this Project, each respective project approval or consent requires a request for the agreement to the auditor or audit team be submitted to the Department, for consideration of the Secretary. Each request is reviewed and depending on the complexity of future projects, the suitability of a proposed auditor or audit team will be considered.

If you have any questions, please contact Laura Papoulias on (02) 8289 6879 or email to [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au).

Yours sincerely

A handwritten signature in black ink, appearing to read 'R. Sherry'.

Rob Sherry  
Team Leader Compliance - Government Projects  
Compliance

As nominee of the Planning Secretary

## Appendix G Consultation

**Subject:** DPIE Consultation- AGL Camden Gas Project- Independent Environmental Audit 2021  
**Date:** Friday, 30 April 2021 at 3:37:16 pm Australian Eastern Standard Time  
**From:** Alfarid Hussain  
**To:** Denise Corish, Nicola Gardner  
**CC:** Julia Pope, EPA RSD Gas Regulation Mailbox  
**Attachments:** image002.jpg

Dear Denise and Nicola,

I write to you in relation to your email dated 14 April 2021 seeking comments from the Department in relation to the 2021 Independent Environmental Audit (IEA) of Camden Gas Project. The Department requests AGL Upstream Investments Pty Ltd (AGL) to include the following in the 2021 IEA-

1. A review on the adequacy of the management plans. It is reported in AGL Camden's recent Annual Environmental Performance Report that revisions of the Environmental Management Plan were undertaken in the reporting period, however, it is not clear whether these plans were approved by the Planning Secretary.
2. Summary of performance measures in the management plans and any sub-plans and an assessment of whether these requirements are being complied with, preferably in a tabular format. Any non-compliances, inconsistencies, exceedances from criteria or performance measures must be clearly reported.
3. A review of all incidents and complaints received during the reporting during the reporting period. Note that 'incident' is defined in Schedule 4, Condition 94 of DA282-6-2003-I, as modified.
4. Brief description of all activities relating to construction, operation and decommissioning on the sites that are being audited in the 2021 IEA. Any new works undertaken in the reporting period must be reported. Please provide this information in a tabular format consisting of the development approval number, the name of the site and the activities observed.
5. An audit table covering all conditions of the development approvals that are being audited in accordance with *Appendix B- Independent Audit Table Example* in the Department's *Independent Audit Post Approval Requirements (2020) (IAPAR)*.

The IEA report should be prepared in accordance with the IAPAR to the extent that it does not contradict with Schedule 5, Condition 10 of DA282-6-2003-I, as modified. Failure to meet these requirements will require revision and resubmission.

Please attach a copy of this email and the letter of the Planning Secretary's endorsement of the audit team to the IEA Report. Consultation requests and response to consultation from other agencies should also be attached.

If you have any further questions, please contact me.

Regards,

**Alfarid Hussain**  
**Compliance Officer**

Planning Services | Department of Planning, Industry and Environment  
T 02 9274 6456 | M 0436 681 733 | E [Alfarid.Hussain@planning.nsw.gov.au](mailto:Alfarid.Hussain@planning.nsw.gov.au)  
4 Parramatta Square, 12 Darcy St, Parramatta, NSW 2150.  
[www.dpie.nsw.gov.au](http://www.dpie.nsw.gov.au)



*If you are submitting a compliance document or request as required under the conditions of consent or approval, please note that the Department is no longer accepting lodgement via [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au).*

*The Department has recently upgraded the Major Projects Website to improve the timeliness and transparency of its post approval and compliance functions. As part of this upgrade, proponents are now requested to submit all post approval and compliance documents online, via the Major Projects Website. To do this, please refer to the instructions available [here](#).*

*The Department of Planning, Industry and Environment acknowledges that it stands on Country which always was and always will be Aboriginal land. We acknowledge the Traditional Custodians of the land and waters, and we show our respect for elders past, present and emerging. We are committed to providing places in which Aboriginal people are included socially, culturally and economically through thoughtful and collaborative approaches to our work.*



## Denise Corish

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**From:** Curtis Attard <Curtis.Attard@epa.nsw.gov.au>  
**Sent:** Thursday, 6 May 2021 8:45 AM  
**To:** Denise Corish  
**Cc:** Nicola Gardner  
**Subject:** RE: Camden Gas Project Independent Environmental Audit - 2018 to 2020  
**Attachments:** RORW - OUT - Letter - AGL Camden Independent Environmental Audit 2018-20 - Treo Environment - EPL 12003 - Camden Gas ~ 05.05.2021.pdf

Hi Denise

Please find attached a letter with NSW EPA feedback and comments addressed to Treo Environment.

Kind regards

**Curtis Attard**

Operations Officer – Regulatory Operations  
Regulatory Operations Regional West  
NSW Environment Protection Authority  
D 02 6792 9403 | M 0472 814 898



[www.epa.nsw.gov.au](http://www.epa.nsw.gov.au) @NSW\_EPA

*The EPA acknowledges the traditional custodians of the land and waters where we work. As part of the world's oldest surviving culture, we pay our respect to Aboriginal elders past, present and emerging.*

Report pollution and environmental incidents 131 555 or +61 2 9995 5555

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**From:** Denise Corish <denise.corish@treoenvironment.com>  
**Sent:** Tuesday, 27 April 2021 7:49 PM  
**To:** Curtis Attard <Curtis.Attard@epa.nsw.gov.au>  
**Cc:** Nicola Gardner <NGardner2@agl.com.au>  
**Subject:** Camden Gas Project Independent Environmental Audit - 2018 to 2020

Dear Mr. Curtis,

I refer to the attached correspondence from the Department of Planning, Industry and Environment (the Department) granting approval for Denise Corish of Treo Environment to conduct the Independent Environmental Audit of the Camden Gas Project (2018-2020).

In accordance with the Independent Audit Post Approval Requirements (May 2020), feedback is requested from the NSW EPA scope of the audit. To this end, please find attached a letter providing additional information on the scope of the audit. To enable timely completion of the audit and demonstrate compliance with the audit period defined in relevant Development Consents, your feedback (should you have any) is requested by **5 May 2021**.

Thank you in advance for your consideration of this matter.

Sincerely,  
Denise



Denise Corish  
**Manager, Environmental Performance and Assurance**

**M:** 0448 039 552  
78 Denison Street  
Bondi Junction NSW 2022  
[denise.corish@treoenvironment.com](mailto:denise.corish@treoenvironment.com)  
[www.treoenvironment.com](http://www.treoenvironment.com)

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PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL



DOC21/355157

Treo Environment  
78 Denison Street  
Bondi Junction NSW 2022  
Email: [denise.corish@treoenvironment.com](mailto:denise.corish@treoenvironment.com)

Attention: Denise Corish

5 May 2021

Dear Ms. Corish

**AGL Upstream Investments Pty Ltd  
Camden Gas Project Independent Environmental Audit 2018-2020**

I refer to your letter dated 27 April 2021 seeking feedback and comments from the NSW Environment Protection Authority (EPA) on the scope of the 2018-2020 Independent Environmental Audit (the audit) of the Camden Gas Project, owned and operated by AGL Upstream Investments Pty Ltd.

The EPA notes that the audit is required by the development consent DA282-6-2003-i which is administered by the Department of Planning, Industry and Environment ("the Department").

The EPA has reviewed the scope and criteria for the audit proposed by Treo Environment, noting the Secretary of the Department's endorsement letter dated 24 December 2020, and the Department's request for specific inclusions in the audit in their email to you dated 30 April 2021.

The EPA has no further comments or feedback on the scope of the audit at this time.

If you have any questions about this matter or would like to request feedback on specific matters to be addressed in the audit, please contact the EPA's Environment Line on 131 555 or [info@epa.nsw.gov.au](mailto:info@epa.nsw.gov.au).

Yours sincerely

**DUNCAN MCGREGOR**  
Unit Head  
Regulatory Operations Regional

Phone 131 555  
Phone +61 2 9995 5555  
(from outside NSW)

TTY 133 677  
ABN 43 692 285 758

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Dubbo  
NSW 2830 Australia

[info@epa.nsw.gov.au](mailto:info@epa.nsw.gov.au)  
[www.epa.nsw.gov.au](http://www.epa.nsw.gov.au)

## Appendix H Site Photographs



Photo 1: Well Site EM22 (Rehabilitated Site)



Photo 2: Well Site MP05A (Plug and Abandonment Works)



Photo 3: Well Site MT01 (Rehabilitated Site)



Photo 4: Well Site RB11 (Rehabilitated Site)



**Photo 5: Well Site KP05 (Rehabilitated Site)**

