

CAMDEN GAS PROJECT

Environmental Management Plan





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1. Introduction

1.1. Scope of Environmental Management Plan (EMP)

This document is the AGL Upstream Investments Pty Limited (**AGL**) Environmental Management Plan (**EMP**) for the Camden Gas Project ('the project' or **CGP**) and describes AGL's system to manage potential environmental issues associated with the Project.

The CGP has now ceased production operations and consists of:

- 17 shut in CSG wells that will be decommissioned throughout FY24 and FY25;
- gas gathering lines and associated infrastructure which has been purged and decommissioned;
- the Rosalind Park Gas Plant (**RPGP**) which has ceased operations and will be decommissioned and rehabilitated throughout FY24 and FY25;
- the Glenlee laydown yard; and
- the Camden office for personnel working on the decommissioning and rehabilitation phase of the Project.

This EMP has been updated to focus on the decommissioning and rehabilitation of the CGP. References to construction, drilling, commissioning, production, and maintenance activities have been removed from this version of the EMP where no longer applicable.

1.2. Background to EMP

In the past separate environmental management plans were prepared to address specific requirements under the various approvals. A decision was made to consolidate these activities or site-specific management plans into one EMP (and Sub Plans) to facilitate uniform implementation of environmental management across the Project. The Environmental Management System (**EMS**) for the CGP includes:

- This EMP and the Sub Plans;
- Monitoring and reporting; and
- Independent Environmental Audits.

The requirements for the EMP are provided in Section 2.3 of this EMP. In summary:

- There are nine current development consents for the CGP, and each requires the preparation and implementation of either, or both, a Construction Environmental Management Plan (**CEMP**) and an Operational Environmental Management Plan (**OEMP**). Some of the consents require the OEMP to be reviewed and updated annually.
- Whilst not all the consents have the same requirements, through this updated EMP AGL has identified and included the most stringent requirements from all the consents across the project to simplify the requirements and as part of best practice environmental management.
- This EMP has been developed to satisfy the requirements of the development consents for EMPs.
- There are also environmental management requirements under the Petroleum Production Leases (**PPLs**) for the project (PPL 1, 2, 4, 5 and 6), the Petroleum Operations Plan (**POP**), and the Environment Protection Licence (**EPL**), which are addressed in this EMP.

1.3. Objectives and Targets of EMP

The objective of this EMP is to describe the overall environmental management framework for the CGP, setting out what we are required to do, how we will do it and the monitoring we use to ensure compliance and improve operations.

It identifies the petroleum titles, development consents, EPL and relevant legislation. The EMP describes our activities, contains specific environmental management plans (Sub Plans) for key aspects of our operations,

and sets out the processes for implementation, monitoring and review. Detailed site-specific information is provided in site specific plans which are referenced in the Sub Plans as applicable.

A POP is required to satisfy the conditions of PPLs 1, 2, 4, 5 and 6. Some of the requirements of the POP overlap with requirements of the development consents, so this EMP aims to also address the ongoing environmental management, rehabilitation and monitoring requirements of the POP.

Environmental compliance obligations relating to the CGP are incorporated in AGL's Compliance Management System, known as SAP Compliance (SAP). SAP manages regulatory compliance obligations across the CGP, and provides a summary of all the approval, licence and lease conditions for the project.

The EMP incorporates the environmental management requirements of the AGL Health Safety and Environment (HSE) Management System (**HSEMS**) which is based on the requirements of ISO 14001: 2015.

1.4. HSEMS and EMP Mapping

The AGL HSEMS provides standards and requirements to be referenced when developing business-specific HSE management systems and plans. AGL is developing HSE Standards and where possible or relevant, the EMP has been developed in accordance with the requirements of the HSEMS Standards and Standard Methodologies. The mapping of this EMP against HSEMS Standards and Standard Methodologies is provided in Table 1:1.

Table1:1 EMP and HSEMS Mapping

EMP Section	HSEMS Standard	HSEMS Standard Methodology/ Procedure
<ul style="list-style-type: none"> 1.6 Health, Safety and Environment Policy 2 Legislative Requirements 5.1 Structure and Responsibility 	1 HSE Management System	1 HSE Governance and Compliance Procedure
<ul style="list-style-type: none"> 4 Risk Management, Objectives and Targets 	4.1 Risk Management	4.1 Risk Management Standard Methodology
<ul style="list-style-type: none"> 4.2 Objectives and Targets 6 Monitoring and Checking 	2 HSE Planning, Goals and Targets	2 HSE Planning, Goals and Targets Standard Methodology
<ul style="list-style-type: none"> 5.2 Training and Competence 	12 Training and Competency	12 Training and Competency Standard Methodology
<ul style="list-style-type: none"> 5.3 Internal and External Communication 	6 Consultation and Communication	6 Consultation and Communication Standard Methodology
<ul style="list-style-type: none"> 5.4 Reporting 	Not yet developed	12.3 HSE Corporate Reporting Procedure
<ul style="list-style-type: none"> 5.5 Document Control 	5 Document Management	5 Document Management Standard Methodology
<ul style="list-style-type: none"> 5.6 Technical Assurance 	Not yet developed	Not yet developed
<ul style="list-style-type: none"> 5.8 Contractors 	3 Contractor HSE Management	3 Contractor HSE Management Standard Methodology
<ul style="list-style-type: none"> 5.9 Emergency Response 	9 Emergency Preparedness and Response	9 Emergency Preparedness and Response Standard Methodology

EMP Section	HSEMS Standard	HSEMS Standard Methodology/ Procedure
<ul style="list-style-type: none"> 6.1 Environmental Monitoring and Measurement 7.1 Environmental Performance Review 	Not yet developed	14.2 HSE Action Management Standard Methodology 14.1 HSE Inspections Standard Methodology
<ul style="list-style-type: none"> 6.5 Incident, Near Miss and Hazard Management 	11 Hazard and Incident Management	11.1.1 HSE Incident, Near Miss and Hazard Management Procedure 11.1 HSE Incident, Near Miss and Hazard Management Standard Methodology
<ul style="list-style-type: none"> 6.6 Change Management 	10 HSE Management of Change	10 HSE Management of Change Standard Methodology
<ul style="list-style-type: none"> Appendix D Noise Management Sub Plan 	8.5 Noise	8.5 Noise Standard Methodology
<ul style="list-style-type: none"> Appendix E Flora and Fauna Management Sub Plan 	8.6 Biodiversity	8.6 Biodiversity Standard Methodology
<ul style="list-style-type: none"> Appendix F Soil and Water Management Sub Plan 	8.1 Land 8.3 Surface Water	8.1 Land Standard Methodology 8.3 Surface Water Standard Methodology
<ul style="list-style-type: none"> Appendix G Aboriginal Cultural Heritage Management Sub Plan 	8.8 Cultural Heritage	8.8 Cultural Heritage Standard Methodology
<ul style="list-style-type: none"> Appendix H European Cultural Heritage Management Sub Plan 	8.8 Cultural Heritage	8.8 Cultural Heritage Standard Methodology
<ul style="list-style-type: none"> Appendix I Landscape and Rehabilitation Management Sub Plan 	8.1 Land	8.1 Land Standard Methodology
<ul style="list-style-type: none"> Appendix J Air Quality Sub Plan 	8.4 Air Emissions 8.9 Greenhouse Gas Emissions	8.4 Air Emissions Standard Methodology 8.9 Greenhouse Gas Emissions Standard Methodology
<ul style="list-style-type: none"> Appendix K Waste Management Sub Plan 	8.7 Waste	8.7 Waste Standard Methodology
<ul style="list-style-type: none"> Appendix M Dangerous Goods and Hazardous Materials Management Sub Plan 	7.9 Hazardous Chemicals and Substances	7.9 Hazardous Chemicals and Substances Standard Methodology
<ul style="list-style-type: none"> Appendix N Emergency Response Plan (including Bushfire and Flood) 	9 Emergency Preparedness and Response	9 Emergency Preparedness and Response Standard Methodology

EMP Section	HSEMS Standard	HSEMS Standard Methodology/ Procedure
<ul style="list-style-type: none"> Appendix O Groundwater Management Plan 	8.2 Groundwater	8.2 Groundwater Standard Methodology

1.5. Layout of EMP

This EMP for the CGP comprises the following key elements (generally in accordance with our target to build towards compliance with the requirements of the Environmental Management System ISO14001:2004):

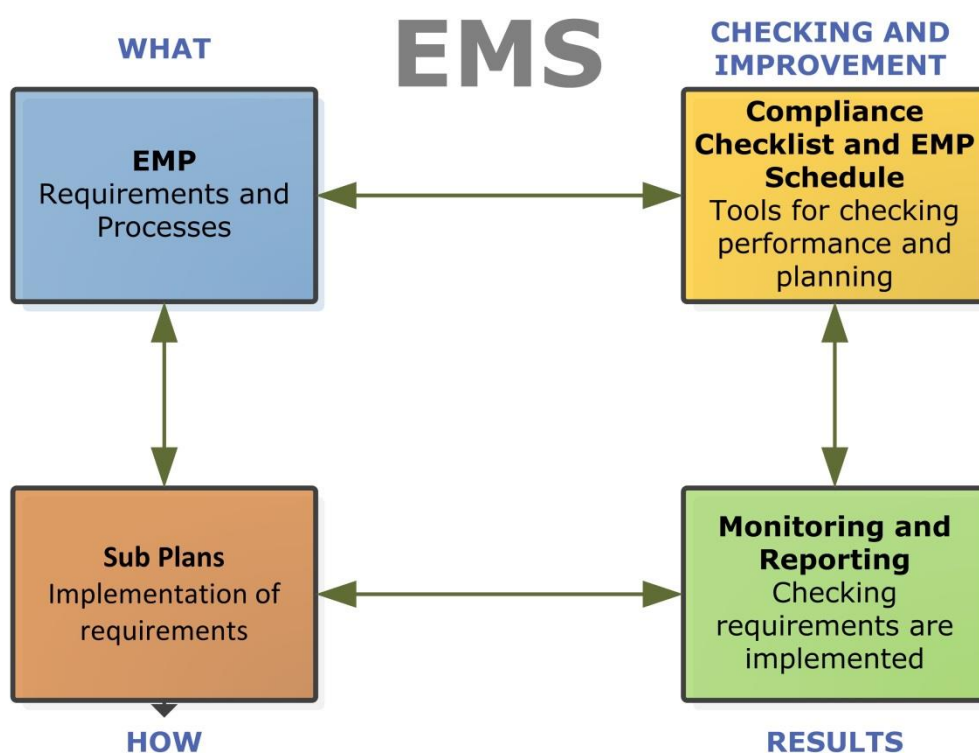
- Health, Safety and Environmental Policy (Section 1.6);
- Summary of Legislative Requirements (Section 2);
- Description of Activities and Potential Environmental Impacts (Section 3);
- Risk Management, Objectives and Targets (Section 4);
- Implementation and Operation (Section 5);
- Monitoring and Checking (Section 6);
- Management Review (Section 7); and
- Environmental Management Sub Plans (in Appendices to this EMP).

Figure 1 assists in describing the context of this EMP.

1.6. Health, Safety and Environmental Policy

All activities will be undertaken in accordance with the AGL Energy Health, Safety and Environment Policy (refer **Appendix A**) that outlines our commitment to ongoing sound management of environmental aspects and performance.

Figure 1 Camden Gas Project Environmental Management System Framework



1.7. Table of Acronyms/Abbreviations

Table 1:2 Table of Acronyms/Abbreviations

Acronym	Definition
AEL	AGL Enterprise Library
AEPR	Annual Environmental Performance Report
AGL	AGL Upstream Investments Pty Limited
ARTC	Australian Rail and Track Corporation
BCA	NSW Biodiversity Conservation Act 2016
CAA	Controlled Activity Approval
CCC	Community Consultation Committee
CEMP	Construction Environmental Management Plan
CGP	Camden Gas Project
CO2	Carbon Dioxide
CP	Cathodic Protection
CSG	Coal Seam Gas
DA	Development Approval
DECCW	NSW Department of Environment, Climate Change and Water (now Office of Environment and Heritage)
DG	Director General
DP	Deposited Plan
DPI Water	Department of Primary Industries Water (formerly NSW Office of Water)
DP&E	NSW Department of Planning and Environment
DRN-MEG	NSW Department of Regional NSW – Mining, Exploration and Geoscience
EA	Environmental Assessment
EIS	Environmental Impact Statement
EMAI	Elizabeth McArthur Agricultural Institute
EMP	Environmental Management Plan
EMS	Environmental Management System
EP&A Act	NSW Environmental Planning and Assessment Act 1979
EPBC Act	Commonwealth Environment Protection and Biodiversity Conservation Act 1999
EPA	NSW Environment Protection Authority
EPL	Environment Protection Licence
ERP	Emergency Response Plan
GPS	Geographic Positioning System
GSP	Gas Sales Pipeline
HSE	Health Safety and Environment
JSEA	Job Safety and Environmental Analysis
KPI	Key Performance Indicator

Acronym	Definition
kL	Kilolitre
mm	Millimetre
MP	Management Plan
NES	National Environmental Significance
NPI	National Pollutant Inventory
OEH	NSW Office of Environment and Heritage
OEMP	Operational Environmental Management Plan
PE	Polyethylene
PEL	Petroleum Exploration Licence
PEL2	Petroleum Exploration Licence 2
PIMP	Pipeline Integrity Management Plan
PIRMP	Pollution Incident Response Management Plan
POA	Petroleum (Onshore) Act 1991
POEO Act	NSW Protection of the Environment Operations Act 1997
POP	Petroleum Operations Plan
PPL	Petroleum Production Lease
PPM	Parts per million
QRA	Quantitative Risk Assessment
REF	Review of Environmental Factors
RMS	NSW Roads and Maritime Services
RPGP	Rosalind Park Gas Plant
SCA	Sydney Catchment Authority
SCADA	Supervisory Control and Data Acquisition
SEE	Statement of Environmental Effects
SIS	Surface to in-seam
SOP	Safety and Operating Plan
SWMP	Soil and Water Management Plan
TEG	Tri-ethylene glycol
WHS Reg	Work Health and Safety Regulation 2017

2. Legislative Requirements

2.1. Environmental Legislative Reporting Requirements

Table B:1 in **Appendix B** provides a summary of the primary environmental legislation applicable to the Project, the requirements of this legislation and how it may apply to AGL CGP.

2.2. Approvals, Licences, Permits and Leases

The standards, performance measures and statutory requirements with which the CGP are required to comply with are outlined in the consents, leases and licences listed in **Table B:2** in **Appendix B**.

The requirements of these controls are summarised in the Camden Gas Environmental Management Compliance Register (**refer to Section 6.2**) and incorporated into this EMP.

2.3. Requirements for an Environmental Management Plan

Table 2:1 lists the Development Consents, Project Approvals, Leases and Licences that require the preparation of an EMP as well as other relevant conditions. This EMP has been prepared to address these requirements.

Table 2:1 Preparation of EMP Requirements

Requirement for EMPs	Consent/ Lease/ Licence	Condition No.	EMP Section or Sub Plan
Operational Environmental Management Plan	DA 15-1-2002i	15 (Sch 3)	Whole EMP Document including Sub Plans
	DA 246-8-2002-i	11 (Sch 3)	
	DA 282-6-2003-i	2 (Sch 5)	
	DA 183-8-2004-i	21, 21A (Sch 2)	
	DA 9-1-2005	41 (Sch 2)	
	DA 171-7-2005	2 (Sch 4)	
	DA 75-4-2005	52 (Sch 2)	
	PA6_0137	1 (Sch 4) SoC 19	
	PA6_0138	1 (Sch 4) SoC 22	
Construction Environmental Management Plan	DA 282-6-2003-i	1 (Sch 5)	Whole EMP Document including Sub Plans
	DA 9-1-2005	39, 40 (Sch 2)	
	DA 171-7-2005	1 (Sch 4)	
	DA 75-4-2005	51 (Sch 2)	
	Pipeline Licence No. 30	7.3 (Annexure B)	
Environmental Management Plan (EMP) for construction and operation	PA 06_0291 DA 183-8-2004-i	1 (Sch 4) SoC 4	Whole EMP Document including Sub Plans

Requirement for EMPs	Consent/ Lease/ Licence	Condition No.	EMP Section or Sub Plan
Road Reserve Environmental Management Plan	DA 171-7-2005	31 (Sch 3)	Road Reserve Environmental Management Plan
Annual OEMP update and review	DA 282-6-2003-i	4 (Sch 5)	Section 7.1
	DA 183-8-2004-i	23 (Sch 2)	
OEMP update and review after Independent Audit	PA6_0138	7 (Sch 4)	Section 7.1
	PA6_0137	7 (Sch 4)	
	PA 06_0291	7 (Sch 4)	
Regular update and review of EMP	DA 15-1-2002i	18 (Sch 3)	Section 7.1
Petroleum Operations Plan (POP)	PPL 1, 2, 4, 5, 6	2 (Schedule A)	A separate POP has been prepared and is referenced in this EMP. The environmental requirements of a POP are addressed in this EMP.
	DA 15-1-2002-i	14 (Sch 3)	
	DA 246-8-2002-i	10 (Sch 3)	
	DA 183-8-2004 MOD	SoC 3	
Environment Protection Licence (EPL) - Licensed activities must be carried out in a competent manner	EPL No. 12003 DA 183-8-2004 MOD	Condition O1 SoC 2	Whole EMP Document including Sub Plans
Petroleum Production Lease - Implement all practicable measures to prevent and/ or minimise environmental harm	PPL 1, 2, 4, 5, 6	1 (Schedule A)	Whole EMP Document including Sub Plans
Petroleum Production Lease - Management and Rehabilitation of Lands (General)	PPL 1, 2, 4, 5, 6	5 (Schedule A)	Whole EMP Document including Sub Plans
Implement all practicable measures to prevent and/ or minimise harm to the environment	PA 06_0291 PA 06_0137 PA 06_0138 DA 183-8-2004 MOD DA 9-1-2005 DA 15-1-2002i 75-4-2005 DA 171-7-2005 DA 246-8-2002i DA 282-6-2003	1 (Sch 2) & SoC 1 (Appendix 3) 1 (Sch 2) & SoC 1 1 (Sch 2) & SoC 1 1 (Sch 2) & SoC 1 1 (Sch 2) 1 (Sch 3) 1 (Sch 2) 1 (Sch 2) 1 (Sch 3) 1 (Sch 3)	Whole EMP Document including Sub Plans
Commitments Register	DA 282-6-2003-i	18 (Sch 3)	Section 6.2

Table 2:2 lists the information required to be addressed in the EMP as required under the Development Consents, Project Approvals, Leases and Licences. This EMP has been prepared to address these requirements.

Table 2:2 Requirements of EMP (OEMP)

Requirement for EMP	Consent / Lease / Licence	Condition No.	EMP Section
Incorporate the various environmental management plans, monitoring plans, monitoring programs and other requirements set out in Schedule 3 of this approval.	PA6_0137 PA6_0138 PA 0291 DA 15-1-2002	1 (Sch 4) & SoC 19 1 (Sch 4) & SoC 22 1 (Sch 4) 15 (Sch 3)	Appendix D - O
Identify Statutory and other obligations that the Proponent is required to fulfil during the operation of this project.	PA6_0137 PA6_0138 PA 0291 DA 9-1-2005 DA 15-1-2002 DA 75-4-2005 DA 171-7-2005 DA 183-8-2004 DA 282-6-2003i	1 (Sch 4) & SoC 19 1 (Sch 4) & SoC 22 1 (Sch 4) 41 (Sch 2) 15 (Sch 3) 52 (Sch 2) 2 (Sch 4) 21 (Sch 2) 2 (Sch 5)	Table 2-1
Describe environmental policies and principles to be applied to the operation of the project.	PA6_0137 PA6_0138 PA 0291 DA 9-1-2005 DA 15-1-2002 DA 75-4-2005 DA 171-7-2005 DA 183-8-2004 DA 282-6-2003i	1 (Sch 4) & SoC 19 1 (Sch 4) & SoC 22 1 (Sch 4) 41 (Sch 2) 15 (Sch 3) 52 (Sch 2) 2 (Sch 4) 21 (Sch 2) 2 (Sch 5)	Section 5.7
Describe in general how the environmental performance of the project would be monitored and managed.	PA6_0137 PA6_0138 PA 0291	1 (Sch 4) & SoC 19 1 (Sch 4) & SoC 22 1 (Sch 4)	Section 4.2 Section 6.1
Describe the procedures that would be implemented to:	PA6_0137 PA6_0138 PA 0291	1 (Sch 4) & SoC 19 1 (Sch 4) & SoC 22 1 (Sch 4)	- Section 5.3.2 Section 5.4
- Keep the local community and relevant agencies informed about environmental performance of the project;			
- Receive, handle, respond to, and record complaints;			Section 5.3.4

Requirement for EMP	Consent / Lease / Licence	Condition No.	EMP Section
- Resolve any disputes that may arise during the course of the project;			Section 5.3.4
- Respond to any non-compliance;			Section 6.5
- Manage cumulative impacts; and			Section 3
- Respond to emergencies (including bushfires).			Appendix N (Emergency Response Plan)
Describe the role, responsibilities, authority and accountability of all the key personnel involved in environmental management of the project.	PA6_0137	1 (Sch 4) & SoC 19	Section 5.1
	PA6_0138	1 (Sch 4) & SoC 22	Table 5-1
	PA 0291	1 (Sch 4)	
	DA 9-1-2005	41 (Sch 2)	
	DA 15-1-2002	15 (Sch 3)	
	DA 75-4-2005	52 (Sch 2)	
	DA 171-7-2005	2 (Sch 4)	
DA 183-8-2004	21 (Sch 2)		
DA 282-6-2003i	2 (Sch 5)		
Standards and performance measures to be applied to the development, and a means by which environmental performance can be periodically reviewed and improved.	DA 9-1-2005	41 (Sch 2)	Section 4.2
	DA 15-1-2002	15 (Sch 3)	
	DA 75-4-2005	52 (Sch 2)	
	DA 171-7-2005	2 (Sch 4)	
	DA 183-8-2004	21 (Sch 2)	
DA 282-6-2003i	2 (Sch 5)		
Management policies to ensure that environmental performance goals are met and to comply with the conditions of consent.	DA 9-1-2005	41 (Sch 2)	Section 6.2 Appendix A
	DA 15-1-2002	15 (Sch 3)	
	DA 75-4-2005	52 (Sch 2)	
	DA 171-7-2005	2 (Sch 4)	
	DA 183-8-2004	21 (Sch 2)	
DA 282-6-2003i	2 (Sch 5)		

2.4. Requirements for Environmental Sub Plans

Table 2:3 lists the Development Consents, Project Approvals, Leases, Licences and Codes of Practice that require the preparation of environmental Sub Plans. These Sub Plans are discussed further in Section 5.7.2.

Table 2:3 List of Sub Plans included as Appendices to this EMP

Environmental Management Sub Plan	Relevant EMP Appendix	Relevant Requirement
Noise Management Sub Plan	Appendix D	DA 15-1-2002-i: 19 (Sch 3) DA 282-6-2003-i: 34, 38 & 42 (Sch 4) DA 75-4-2005: 19 & 20 (Sch 2) DA 171-7-2005: 4, 5 (Sch 3) PA 06_0137: 3 & 6 (Sch 3) & SoC 11 PA 06_0138: 3 & 6 (Sch 3) & SoC 11 PA 06_0291: 4 & 7 (Sch 3) & SoC 13 (App)
Flora & Fauna Management Sub Plan	Appendix E	No specific requirement
Soil and Water Management Sub Plan	Appendix F	DA 15-1-2002-i: 20 & 21 (Sch 3) DA 282-6-2003-i: 84 & 84A (Sch 4) DA 183-8-2004-i: 14, 16 & 16A (Sch 2) & SoC 5 DA 75-4-2005: 25 (Sch 2) DA 171-7-2005: 11 (Sch 3) PA 06_0137: 8 (Sch 3) & SoC 15 PA 06_0138: 8 (Sch 3) & SoC 18 PA 06_0291: 9 (Sch 3) & SoC 16 (App 3)
Aboriginal Cultural Heritage Management Sub Plan	Appendix G	DA 171-7-2005: 41 (Sch 3) PA 06_0137: 13 (Sch 3) & SoC 16 PA 06_0138: 15 (Sch 3) & SoC 19 PA 06_0291: 20 (Sch 3) & SoC 17
European Heritage Management Sub Plan	Appendix H	No specific requirement
Landscape and Rehabilitation Management Sub Plan (including Weed Management Plan)	Appendix I	DA 15-1-2002-i: 23 & 25 (Sch 3) DA 282-6-2003-i: 13 (Sch 4) & 19A (Sch 4) PA 06_137: 17 (Sch 3) & SoC 8 PA 06_138: 19 (Sch 3) PA 06_0291: 18 (Sch 3) & SoC 8 (App 3) DA 75-4-2005: 42 (Sch 2) DA 183-8-2004-i: 17, (Sch 2) DA 9-1-2005: 29 (Sch 2) DA 171-7-2005: 37 (Sch 3)
Air Quality Management Sub Plan	Appendix J	DA 282-6-2003i: 57 (Sch 4)
Waste Management Sub Plan	Appendix K	DA 15-1-2002-i: 24 (Sch 3) DA 282-6-2003-i: 106 (Sch 4)
Traffic Management Sub Plan	Appendix L	DA 15-1-2002i: 22 (Sch 3) DA 171-7-2005: 31 (Sch 3) DA 282-6-2003i: 112 (Sch 4) PA 06_0291: 22 (Sch 3)

Environmental Management Sub Plan	Relevant EMP Appendix	Relevant Requirement
Dangerous Goods and Hazardous Materials Storage Sub Plan	Appendix M	No specific requirement.
Emergency Response Plan (including bushfire and flood management)	Appendix N	EPL 12003 O4.1 DA 282-6-2003-i: 92(a) & 119 (Sch 4) DA 183-8-2004i: 15 (Sch2) DA 9-1-2005: 20 & 32 (Sch 2) DA 75-4-2005: 29 & 44 (Sch 2) DA 171-7-2005: 12, 16 & 39 (Sch 3) PA 06_0137: 10 (Sch 3) & SoC 17 PA 06_0138: 9 & 11 (Sch 3) & SoC 20, 16 & 17 PA 06_0291: 12 & 14 (Sch 3) & SoC 15 & 18 Code of Practice for CSG – Fracture stimulation activities: Section 11 Code of Practice for CSG – Well Integrity: Section 2.2.5
Pollution Incident Response Management Plan (PIRMP)	Under separate cover	PPL 1, 2, 4, 5, 6: 4 (Schedule A) Part 5.7 POEO Act 2011 Code of Practice for CSG – Fracture stimulation activities: Section 11.3 Code of Practice for CSG – Well Integrity: Section 2.2.5.1
Groundwater Management Plan	Appendix O	WAL 24856, WAL 24736 WUA 10WA112288, 10WA112294
Sales Gas Pipeline Standard Operating Procedure	Under separate cover	Pipeline Licence No. 30 Condition 7.5

3. Description of Activities and Potential Environmental Impacts

3.1. Camden Gas Project Overview

The Camden Gas Project is located in the Macarthur region 60 km southwest of Sydney, in the Wollondilly, Camden and Campbelltown Local Government Areas. The Project produced gas for the Sydney region from 2001 until 28 August 2023 and consisted of 144 gas wells (including wells that have been decommissioned), low-pressure underground gas gathering pipes and gas plant facilities.

AGL holds five PPLs in the area under the *Petroleum (Onshore) Act 1991* (POA) enabling the production, gathering and sale of CSG (refer to Appendix C for figures). PPLs include:

- PPL 1;
- PPL 2;
- PPL 4;
- PPL 5; and
- PPL 6.

Produced gas was gathered from wells through a low-pressure gas gathering system and transported to the RPPG to be cleaned and compressed. The gas was then transported by a 500 metre Sales Pipeline into the Moomba to Sydney Natural Gas pipeline.

3.2. Well Surface Locations

The well surface locations or well sites are scattered throughout the PPLs and have been determined following extensive geological exploration and analysis.

Once the preferred geological target areas have been identified, the well site selection process then considers the environmental and social constraints of the area. These include land use (existing and future), topography, subsurface geology, flora and fauna, archaeology and noise. This detailed design information becomes part of the environmental assessment and approvals process for new gas fields and facilities.

Wells are named and numbered according to a two-letter abbreviation of the well field so that each well, even if it is co-located with a number of other wells, has its own unique name, for example EM17 or MP30.

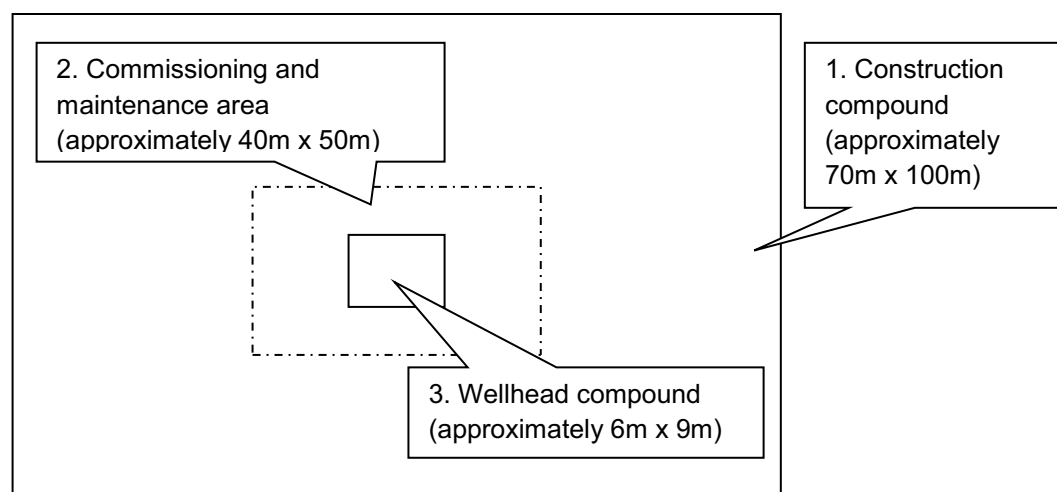
A well generally has 4 main stages in its life which are outlined below:

1. Drilling (construction, includes civil construction);
2. Commissioning (includes initial rehabilitation of the surplus construction area);
3. Production (operation and maintenance);
4. Well decommissioning and final rehabilitation.

A fenced construction compound is established for the drilling of the well. Once the well has been drilled and completed, the surplus construction area is rehabilitated, and a well commissioning area is retained.

When the construction compound has been fully rehabilitated and the well has reached a steady state of production, the fenced construction area is typically reduced either to a fenced commissioning area or to the wellhead compound for the operational phase of the well. The commissioning area is also used as required for periodic maintenance and final well decommissioning. These stages are illustrated in **Figure 2**.

Figure 2 Typical Well Footprint



As the CGP has now ceased production operations, all remaining wells have been shut in and will be decommissioned throughout FY24 and FY25.

3.2.1. Rehabilitation of Well Sites

Rehabilitation is generally undertaken in two stages; initial rehabilitation of surplus construction area following the commencement of gas production, and closure and final rehabilitation following well decommissioning. On completion of operations, all well sites are decommissioned and rehabilitated to return the land to pre-existing use and condition, or better, as agreed with the landholder.

Initial rehabilitation work involves:

- Emptying pit of water and backfill;
- Reshape the land if required (cut and fill works);
- Spread topsoil;
- Revegetation by spreading seed or planting native trees; and
- Remove compound fence and sediment controls

Final rehabilitation work involves:

- Sealing/ plugging and abandonment of wells in accordance with the NSW Code of Practice for Coal Seam Gas Well Integrity and the PPL conditions;
- Removing plant and equipment from wellheads and removal of fenced compounds;
- Filling in excavation; and
- Rehabilitation, contouring, and revegetation.

Table 3*Error! No text of specified style in document.:1 Summary of Potential Environmental Issues for Rehabilitation of Well Sites*

Potential Environmental Issues	Refer to Sub Plan
<i>Potential Environmental Issues - Initial Rehabilitation of Well Sites</i>	
Waste generation/disposal	Waste Management Sub Plan
Erosion and sedimentation and water issues	Soil and Water Management Sub Plan
Rehabilitation	Rehabilitation and Landscape Management Sub Plan
Emergency / pollution incident	Emergency Response Plan and Pollution Incident Response Management Plan
Dust emissions	Air Quality Management Sub Plan
<i>Potential Environmental Issues - Final Rehabilitation of Well Sites</i>	
Community issues	Section 5.3.2 of Environmental Management Plan
Erosion and sedimentation and water issues	Soil and Water Management Sub Plan
Groundwater	Groundwater Management Plan
Dust emissions	Air Quality Management Sub Plan
Noise emissions	Noise Management Sub Plan
Waste generation/disposal	Waste Management Sub Plan
Rehabilitation	Rehabilitation and Landscape Management Sub Plan
Emergency / pollution incident	Emergency Response Plan and Pollution Incident Response Management Plan

3.3. Gas Gathering System

The gas gathering system route is designed, constructed and operated in accordance with the requirements of Australian Standard AS 4645.3:2008 Gas Distribution Networks – Plastic pipe systems. The gas gathering system is generally buried to a minimum depth of 750 mm and up to 1,200 mm in some areas, including unsealed and sealed road crossings, and creek and drainage line crossings.

3.3.1. Final Rehabilitation of the Gas Gathering System

The preferred method of final rehabilitation for the gas gathering system is to purge with air or water to remove remaining gas, seal the pipes and then leave the valuable infrastructure in position for future beneficial use and to prevent any further environmental disturbance. This method is subject to consultation with the landowner and should removal of the gas gathering system be required, the excavated trench is backfilled and rehabilitated, including contouring and revegetating.

3.4. Gas Sales Pipeline

The Gas Sales Pipeline (GSP) commences at the RGP metering skid and runs approximately 545 m to the Menangle Creek Receipt Point on the Wilton to Horsley Licence 1 Pipeline. The GSP was commissioned in December 2004 pursuant to Pipeline Licence No 30 under the NSW Pipelines Act 1967.

The GSP was designed, constructed, tested, and is operated in accordance with the requirements of Australian Standard 2885.1 and Australian Standard 2885.3. The GSP is constructed of electric resistance welded pipe of 250 mm diameter and is 100% radiographed.

From the RPPG to the Menangle Creek Receipt Point the GSP is contained within a 20-metre-wide easement.

The GSP is cathodically protected using an ethane type cathodic protection (CP) system with sacrificial silicon-iron anodes applied to mitigate corrosion. There are three CP test points, permanently fitted with miniature stray log data loggers.

A Pipeline Management System (PMS), has been prepared for the GSP (under separate cover) and considers controls for general operation/maintenance and safety, in accordance with the Pipeline Licence No. 30.

3.5. Summary of Environmental Aspects and Relevant Environmental Management Sub Plans

Environmental Sub Plans have been developed to facilitate the management of issues summarised in Table 3-6, and to satisfy the requirements of various Consent Conditions for Management Plans to be developed, implemented and reported against (refer to Section 5.7.2 of this EMP).

Each Sub Plan includes the following information:

- The objectives and targets (from the KPIs table) for the specific aspect;
- Identification of key personnel responsible for major tasks;
- A summary of relevant statutory obligations including consent conditions and other requirements;
- A description of the mitigation measures to be implemented, including site specific details;
- An outline of monitoring requirements; and
- Reference to specific records that will be maintained.

The Environmental Sub Plans are designed to be applied across the whole Project and include the general management measures for each issue and the relevant site-specific information and data to allow them to be used in different well fields to satisfy the requirements of different consents.

The issues listed in **Table 3:2** are those generally associated with the activity.

Table 3:2 Summary of Activities and Relevant Environmental Sub Plan

Relevant Sub Plans →	Air quality Management	Noise Management	Soil and Water Management	Flora and Fauna Management	Community Management (Section 5.3.2 of EMP)	Rehabilitation and Landscape	Traffic Management	Aboriginal Heritage Management and European Heritage Management	Groundwater Management	Waste Management	Emergency Response (incl. bushfire and flood)	Dangerous Goods and Hazardous Materials Sub Plan
Activity ↓												
Decommissioning of gas gathering system and gas sales pipeline												
Trenching and pipe removal	X	X	X	X	X	X	X	X		X	X	
Backfilling and rehabilitation	X	X	X		X	X	X			X	X	
Final well rehabilitation												

Relevant Sub Plans →	Air quality Management	Noise Management	Soil and Water Management	Flora and Fauna Management	Community Management (Section 5.3.2 of EMP)	Rehabilitation and Landscape	Traffic Management	Aboriginal Heritage Management and European Heritage Management	Groundwater Management	Waste Management	Emergency Response (incl. bushfire and flood)	Dangerous Goods and Hazardous Materials Sub Plan
Activity↓												
Sealing/plugging and abandoning of wells		X			X				X	X	X	X
Filling in excavation	X	X	X		X						X	
Rehabilitation, contouring and vegetation	X	X	X		X	X					X	
Gas Plant decommissioning and rehabilitation												
Decommissioning and rehabilitation	X	X	X	X	X	X	X	X	X	X	X	X

4. Risk Management and Objectives and Targets.

4.1. Environmental Risk Management

4.1.1. AGL Risk Management

AGL has a risk management system that utilises the Fully Integrated Risk Management and Assessment Matrix (FIRM) and is aligned with the risk management standards and methodologies recommended by the Australian and New Zealand Risk Management Standard AS/NZS 31000:2009. Environmental risk assessment is undertaken in accordance with the AGL FIRM and HSEMS Risk Management Standard (AGL-HSE-STD-004.1) and Standard Methodology (AGL-HSE-SDM-004.1).

4.1.2. CGP Risk Register

The CGP project risk register shall incorporate environmental risks and shall be developed, updated and reviewed by the CGP Operations Superintendent or nominee. The CGP Environment Manager or nominee shall participate in risk workshops as appropriate to identify material environmental risks associated with the CGP. The CGP Operations Superintendent shall be responsible for the identification and management of project risks which shall be recorded in the CGP risk register.

4.1.3. CGP Environmental Risk Register

Environmental risks are identified, and control measures identified in an environmental aspects and impacts register (referred to as the environment risk register). A CGP Tier 3 environment risk register has been developed for CGP activities.

Environmental risks shall be assessed using the AGL FIRM risk assessment methodology.

The Environment Manager shall:

- manage and maintain the CGP environmental risk register.
- review the CGP environmental risk register on an annual basis in consultation with relevant CGP personnel and technical specialists, as required, taking into account changes to activities, legislation, codes of practice, materials and environmental incidents.
- following update of the environment risk register, provide an updated environmental risk register to the CGP Operations Superintendent for inclusion in revisions to the Project Risk Register.

4.1.4. Operations

Project specific environmental risks are typically identified and mitigated at the following stages:

- prior to approval: an environmental assessment (EA) is completed;
- when a change is proposed: an assessment of project approval concerns and environmental impacts is undertaken;
- during works: inspections and monitoring are carried out; and
- during works: Job Safety and Environmental Analysis (JSEA), site inductions and toolbox meetings.

4.2. Objectives, Targets and Key Performance Indicators

The environmental objectives and targets developed for the CGP are summarised in **Table 4:1**. Environmental Key Performance Indicators (**KPIs**) have been set by AGL to provide AGL with information to assess environmental performance.

4.2.1. Monitoring of Environmental Targets

The targets listed in Table 4:1 shall be monitored and EMP performance reported on annually within the Annual Environmental Performance Report.

Table 4:1 Objectives, Targets and Key Performance Indicators

Aspect	Objective	Targets and KPIs
Land use	To avoid unauthorised disturbance to land use or damage to infrastructure.	Zero incidents or complaints received concerning land disturbance or infrastructure
Soils and Terrain	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.	Zero incidents or complaints received concerning land disturbance, contamination or soil stability.
Noise	<ul style="list-style-type: none"> To comply with the construction standards for noise control. To minimise noise. 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. Best available practice noise management measures. 	Zero exceedances of noise criteria. Zero non-conformances with work hours. Zero complaints received from sensitive receivers.
Air Emissions	To adequately protect air quality by: <ul style="list-style-type: none"> Minimising the quantity of vehicle exhaust emissions. Minimising dust generation during rehabilitation activities. Ensuring that any uncontrolled air emissions are reported, and corrective actions promptly implemented. 	Zero non-conformances with statutory air conditions. Zero incidents or complaints received concerning air emissions.
Water Protection	To minimise negative impacts on groundwater and surface water resources.	Zero non-conformances with statutory water conditions. Zero incidents or complaints concerning water levels or water quality.
Noxious Weeds, Pathogens and Pest Species	To prevent the introduction and dispersal of noxious weeds, pathogens and pest species.	Close out identified weed introduction issues as soon as reasonably practicable.

Aspect	Objective	Targets and KPIs
Flora	<p>To minimise the loss of remnant native vegetation and promptly carry out rehabilitation activities.</p> <p>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 non-conformances with statutory native flora conditions.</p> <p>Zero incidents or complaints received concerning native vegetation disturbance.</p>
Fauna	<p>To ensure habitat disturbance is avoided and to protect fauna from physical harm.</p>	<p>Zero non-conformances with statutory native fauna conditions.</p> <p>Zero incidents or complaints received concerning native fauna disturbance.</p>
Cultural Heritage	<p>To protect and preserve cultural heritage in the project area.</p>	<p>Zero non-conformances with statutory cultural heritage conditions.</p> <p>Zero incidents or complaints received concerning cultural heritage.</p>
Visual Amenity	<p>To minimise the impacts to the visual characteristics of the project area and avoid unauthorised disturbance to land use or damage to infrastructure.</p>	<p>Zero incidents or complaints received concerning visual impacts.</p>
Waste	<p>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>	<p>Zero non-conformances with statutory waste conditions.</p> <p>Zero incidents or complaints received concerning waste.</p>
Dangerous Goods and Hazardous Materials	<p>To manage the purchasing, storage, transport, handling and disposal of Dangerous Goods and Hazardous Materials (including waste Dangerous Goods and Hazardous Materials) so as to minimise risk to the environment (soil, surface water, groundwater, or atmosphere).</p>	<p>Zero non-conformances with statutory dangerous goods and hazardous materials conditions.</p> <p>Zero incidents or complaints received concerning dangerous goods and hazardous materials.</p>
Resource Use	<p>To ensure the efficient use of water, electricity, fuel and gas resources.</p>	<p>Resource usage records are accurately maintained for Environmental Footprint Report and reviewed annually for reduction opportunities.</p>
Public Risk	<p>To protect the health, safety and welfare of the public.</p>	<p>Zero incidents or complaints concerning public safety.</p> <p>Zero missed landowner notifications prior to maintenance activities.</p>
Emergency Response	<p>To quickly and effectively minimise adverse environmental impacts associated with an emergency.</p>	<p>Minimal impacts from emergency events.</p>
Traffic	<p>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 non-conformances with statutory traffic conditions.</p> <p>Zero incidents or complaints received concerning traffic disruption.</p>

5. Implementation and Operation

5.1. Structure and Responsibility

AGL is responsible for overall environmental management of the project through the implementation of this EMS and the leadership of the Operations Superintendent. However, all personnel and contractors are accountable through conditions of employment or contracts. Each individual is responsible for ensuring that their work complies with all regulatory requirements, AGL commitments and the appropriate procedures.

The position descriptions provided in Table 5:1 are listed in the relevant Environmental Management Sub Plans as applicable.

The positions and accountabilities are shown in Table 5:1.

Table 5:1 Organisation and Accountabilities

Position	Accountabilities
Programme Director – Site Transition	Accountable for environmental performance of the CGP. Directly responsible for implementation of environmental management. Reports to the Chief Operating Officer.
Operations Superintendent	Accountable for: <ul style="list-style-type: none"> • authorisation of the EMP; and • implementation of this EMP. Reports to the Programme Director – Site Transition.
Environment Manager	Accountable for: <ul style="list-style-type: none"> • leading and /or attending investigations of environmental incident or near misses, as required; • recognising successful achievement of the CGP environmental KPI targets; and • tracking and reporting environmental performance. Directly responsible for the overseeing the implementation of this EMP, fulfilment of commitments contained in this EMP and reporting on EMP performance to the Operations Superintendent and Senior Manager - Environment Operations. Provides advice to the workforce, through the Operations Superintendent regarding the implementation of the EMP. Coordinates the monitoring, audit program and reporting program. Responsible for organising the review of the EMP as required or annually. Reports to the Senior Manager - Environment Operations.
Field and Rehabilitation Operator	Responsible for landowner consultation and the fulfilment of all applicable commitments contained in this EMP and Sub Plans. Reports to the Operations Superintendent.
Manager Corporate Affairs	Responsible for community consultation and notification.
All Contractors	Responsible for ensuring that works are undertaken in line with the EMP compliance obligations, meeting regulatory requirements, and ensuring that all environmental objectives contained in the contracts are attained.

Position	Accountabilities
All other Supervisors, Field Engineers and Field Operators.	Field based personnel responsible for ensuring compliance with the environmental objectives of the EMP.

5.2. Training and Competence

Employees and contractors are required to complete an induction prior to commencing work at each site to ensure that all personnel are aware of their HSE responsibilities and have the necessary knowledge and skills to fulfil them.

The inductions cover general environmental issues where applicable, including:

- Management of sensitive areas;
- Erosion control;
- Water quality;
- Air quality;
- Cultural heritage management;
- Weed, pathogen and pest species control;
- Fauna and flora preservation;
- Bushfire management;
- Traffic and access;
- Noise;
- Chemical storage and handling;
- Emergency and Spill response;
- Pollution incident response;
- Waste management; and
- Protecting the amenity of landowners.

In addition, and where required, job specific training is conducted prior to the commencement of the work activities.

It is the responsibility of the contractors to consult with AGL to prepare and implement an induction and job specific training program applicable to their work scope.

AGL HSE staff are provided with a combination of internal and external training resources to ensure they are competent in correct use of environmental field monitoring equipment (such as noise loggers and water monitoring test kits) and keep up to date with environmental legislation requirements and best practice environmental management.

All specialist environmental consultants working on the CGP have been selected based on their experience, industry certification/ accreditation, skills base, and knowledge of AGL business requirements, ensuring professional quality service is continually provided particularly in the acoustic, archaeology, ecology and air quality areas.

5.3. Internal and External Communication

5.3.1. Key Communication Requirements

The key communication requirements are summarised in Table 5:2.

Table 5:2 Key Communication Requirements

Key Communication Requirement	Condition / Licence No.
Prior to the commencement of activities, AGL must make efforts to provide notice of disturbing activities, in particular drilling operations, to immediate neighbours.	DA 183-8-2004-i: SoC 50
Notification of activities prior to the commencement of activities on each site. For notification requirements of adjoining landowners where relevant see the Noise Management Sub Plan (Appendix D)	PPL 1, 2, 4, 5 and 6: 8 (Sch A)
Prior to planned works (including maintenance) notification shall be given to potentially affected residences and identified sensitive noise receivers at least 14 days prior to work commencing.	DA 9-1-2005: 38 (Sch 2) DA 246-8-2002i: 7 (Sch 3) PA 06_0291: 24 (Sch 3)
A Community Consultative Committee to oversee the environmental performance of the development shall be established. Regular information is to be provided on the environmental performance and management with the minutes to be available for public inspection at Camden Council, Campbelltown City Council and Wollondilly Shire Council and copies to DP&E and DRN-MEG.	DA 15-1-2002i: 90 - 92 (Sch 3) DA 246-8-2002-i: 31 (Sch 3) DA 282-6-2003-i: 17 - 18 (Sch 5) DA 171-7-2005: 11 (Sch 4) DA 75-4-2005: 61 (Sch 2) PA 06_0137: 8 (Sch 4) PA 06_0138: 8 (Sch 4) PA 06_0291: 8 (Sch 4)
Copy of the Environmental Management Plan to be provided to EPA, DRN-MEG, DPI Water, Campbelltown Council, Wollondilly Council and Camden Council.	DA 15-1-2002i: 17 (Sch 3) DA 282-6-2003-i: 3 (Sch 5) DA 183-8-2004-i: 22 (Sch 2)
The Geographical Positioning System (GPS) co-ordinates and digital survey data for gas well sites and gas gathering systems and the wellhead configurations is to be provided to Camden, Campbelltown and Wollondilly Councils within their respective Local Government Area.	DA 282-6-2003-i: 15 - 17 (Sch 3) DA 183-8-2004-i: 6 - 8 (Sch 2) DA 9-1-2005: 7 - 9 (Sch 2) DA 75-4-2005: 13 -15 (Sch 2) DA 171-7-2005: 18-20 (Sch 2) PA 06_137: 8 (Sch 2) & SoC 2 & 3 PA 06_138: 8 (Sch 2) & SoC 2 & 3 PA 06_291: 13 (Sch 2) & SoC 2 & 3
<p>During the life of the project copies of the following documents and information (and any subsequent revisions) are to be placed on website:</p> <ul style="list-style-type: none"> (a) all current environmental management plans, strategies and programs; (b) all Independent Environmental Audits; (c) all AEPRs; (d) environmental monitoring data required under EPL 12003 within 14 days of receipt; (e) a copy of the PIRMP; and (f) a summary of all environmental monitoring results <p>Plans (a) – (c) are also to be given to relevant agencies and CCC.</p>	PA 06_137: 9 (Sch 4) PA 06_138: 9 (Sch 4) PA 06_291: 9 - 10 (Sch 4) EPL 12003

Key Communication Requirement	Condition / Licence No.
AGL must keep a legible record of all complaints made in relation to pollution arising from any activity to which the EPL applies.	EPL 12003: M5.1 to M5.4 DA 15-1-2002i: 29 (Sch 3), Dot point 4 (Sch 4) (addressed in EPL 12003 condition M5.1 to M5.4) DA 75-4-2005: 59 (Sch 2) DA 171-7-2005: 9 (Sch 4) DA 282-6-2003-i: 19 (Sch 5) DA 246-8-2002-i: 15 (Sch 3)
A telephone complaints line must operate for the purposes of receiving any complaints in relation to activities at the premises or by vehicle or mobile plant.	EPL 12003: M6.1 to M6.3 DA 75-4-2005: 60 (Sch 2) DA 171-7-2005: 10 (Sch 4) DA 15-1-2002i: Dot point 5 (Sch 4) (addressed in EPL 12003 condition M6.1 to M6.3)

5.3.2. External Communication

AGL has an extensive external communication program to proactively communicate with the community, local councils and regulatory authorities.

Community

AGL pro-actively engages the community, in order to keep landowners, neighbours, residents, local councils and relevant Government agencies informed of the CGP and ensure that the interests of the community are addressed. AGL has raised awareness of its activities and created a strong relationship with the community through a range of community engagement initiatives which include:

- Regular and ongoing consultation with landholders;
- Numerous site tours and Community Open Days;
- Distribution of newsletters and other community consultation material;
- Operation of a project website (www.agl.com.au/camdengasproject);
- Operation of an emergency hotline; and
- Ongoing operation of the Community Consultation Committee.

Significant consultation takes place in person directly with each landowner. This ensures that their interests can be quickly understood and specifically addressed.

Telephone contact details are provided to surrounding residences during work and displayed at each well in the event that members of the public have further questions or issues regarding the project.

A Community Notification Protocol is included in the Pollution Incident Response Management Plan to advise nearby residents in the event that an incident occurs which causes actual or potential material harm to the environment.

The Community Consultation Committee (CCC) was formed in early 2003 from the base of a community advisory panel formed under the Petroleum Assessment Lease in 2001. The CCC is a forum to oversee the environmental performance of the CGP. The committee meets four times per year, with meetings held more often if necessary and consists of:

- An independent Chairperson;
- A representative of Camden Council;
- A representative of Campbelltown City Council;

- A representative of Wollondilly Shire Council;
- Four Community Members;
- Two representatives of Local Environment groups; and
- Two representatives of AGL.

Minutes of the CCC are maintained by AGL and forwarded to the CCC participants which includes the local councils and government agencies. Minutes are also uploaded to the project website [Documents | Camden Gas Project | How We Source Energy | About AGL](#).

Councils

The CGP is within the Campbelltown, Camden and Wollondilly local council areas. AGL communicates with Council representatives through the CCC (refer above), through consultation on new development areas of the Project, by providing update briefings to senior Council staff and copies of the Annual Environmental Performance Reports and Independent Audits. There is also communication with Council staff in relation to ongoing operations with appropriate staff members on issues such as roads.

Regulatory authorities

AGL reports to the various regulatory authorities as required by its Consent and Title conditions, Environment Protection Licence (refer Section 5.4 for details on reporting requirements), and Water Licences (refer Section 5.4 for details on reporting requirements).

In addition, AGL communicates with staff of the DP&E, DRN-MEG, EPA, and DPI Water through regular update meetings and informal discussions on an ongoing basis throughout the year.

Incident (Material Harm) Notification

In the event of an actual or potential incident of material harm to the environment, the Camden Environment Manager and/or the Camden Operations Superintendent will notify the relevant stakeholders as per the PIRMP. The relevant stakeholders include fire bridge (in the event of fire), EPA, NSW Ministry of Health (Camperdown), Camden Council, Campbelltown City Council, Wollondilly Shire Council and SafeWork NSW.

5.3.3. Internal Communication

AGL communicates internally through the following forums:

- Daily Tool Box Meetings; and
- HSE meetings where field personnel meet to discuss site level issues including environmental issues.

5.3.4. Complaints Management

Complaints can be received through the following channels:

- via the community hotline number (1800 039 600);
- Through the Project website [Camden Gas Project | About AGL](#) , or via email AGLCommunity@agl.com.au; and
- Directly to personnel on site.

Complaints are recorded and may also be listed on the incident management database (refer Section 6.5) if it relates to an incident.

5.4. Reporting

AGL has a number of environmental reporting requirements specified by its Conditions of Consent, Licences and other approvals and internal practices. A summary of the ongoing reporting requirements is provided in **Table 5:3**. Other one-off reporting requirements are tracked using the SAP Compliance system.

AEPRs are prepared to meet the requirements of the DP&E and fulfil the requirement of the DRN-MEG for an Annual Environmental Management Report and are submitted to both the Director General of the DP&E and the Deputy Director General of the DRN-MEG.

In addition, AGL fulfils its internal reporting requirements relating to the reporting of incidents and non-conformances as required (discussed in **Section 6.5**).

Table 5:3 Key Environmental Reporting Requirements

Key Reporting Requirement	To Who	Condition / Licence No.	Reporting Period	Responsibility	Timing
Prepare and submit Annual Environmental Performance Report (AEPR)	Director General of DP&E Copies to: EPA, DRN-MEG, Camden, Campbelltown, Wollondilly Councils and publicly available.	DA 15-1-2002i: 34 – 36 (Sch 3) DA 246-8-2002-i: 16 (Sch 3) DA 282-6-2003-i: 5, 7 (Sch 5) DA 183-8-2004-i: 24 (Sch 2) DA 9-1-2005: 42 (Sch 2) DA 171-7-2005: 4 (Sch 4) DA 75-4-2005: 54 – 56 (Sch 2) PA 06_0137: 3, 4 (Sch 4) & SoC 20 PA 06_0138: 3, 4 (Sch 4) & SoC 23 PA 06_0291: 3, 4 (Sch 4)	Financial year	Environment Manager	Annually Financial year
Prepare and submit Annual Environmental Management Report (submitted by AGL as the AEPR above)	DRN-MEG	PPL 1, 2, 4, 5, 6: 3 (Sch A)	Financial year	Environment Manager	Annually Financial year

Key Reporting Requirement	To Who	Condition / Licence No.	Reporting Period	Responsibility	Timing
Prepare and submit Annual Return at the end of each reporting period. The Annual Return must include a: <ul style="list-style-type: none"> - Noise compliance monitoring report; - Leak Detection and Repair Program summary report; - Groundwater Monitoring Report; and - Updated spatial information. 	EPA	DA 15-1-2002-i: 33 (Sch 3), 6 (Sch 4) DA 282-6-2003-i: 40 (Sch 4), 16 (Sch 5) DA 171-7-2005: 3 (Sch 4) DA 75-4-2005: 53 (Sch 2) EPL 12003: R1.1 to R4.6	22 December to 21 December	Environment Manager	Annually Submit Annual Return within 60 days of reporting period.
Commission and submit an Independent Environmental Audit – Operation	DP&E EPA DRN-MEG	DA 15-1-2002-i: 37 (Sch 3) DA 246-8-2002-i: 17 (Sch 3) DA 282-6-2003-i: 10, 11 (Sch 5) DA 183-8-2004-i: 25 (Sch 2) DA 9-1-2005: 44 (Sch 2) DA 171-7-2005: 7 (Sch 4) DA 75-4-2005: 58 (Sch 2)	Bi-annually for two financial years	Environment Manager	Every two years Submit within 2 months of commissioning the audit
Commission and submit an Independent Environmental Audit – Operation	DP&E EPA DRN-MEG	PA 06_0137: 5, 6 (Sch 4), SoC 21 & 22 PA 06_0138: 5, 6 (Sch 4), SoC 24 & 25 PA 06_0291: 5, 6 (Sch 4)	Tri-annually for three financial years	Environment Manager	Every three years Submit within 3 months of completing the audit
Hazard Audit	DP&E	DA 282-6-2003-i: 95 (Sch 4) DA 9-1-2005: 34, 35 (Sch 2) DA 75-4-2005: 31 (Sch 2)	Submit to DG within one month of completing the audit.	Health and Safety Business Partner	Every three years

Key Reporting Requirement	To Who	Condition / Licence No.	Reporting Period	Responsibility	Timing
Independent Audit - Vegetation and Landscape Management Plan / Landscape Planting Plan	DP&E Site owner	DA 282-6-2003-i: 18, 19B (Sch 4)	Bi-annually for two financial years	Environment Manager	Every two financial years
National Pollution Inventory Report	EPA	Protection of the Environment Operations (General) Regulation 1998, Clause 57	Submit by 30 September each year	Environment Manager	Annually Financial year
Publish all EPL monitoring data on the AGL website within 14 days of obtaining it.	AGL Website	Section 66(6) of the Protection of the Environment Operations (POEO) Act EPL 12003	Various reporting periods	Environment Manager	Within 14 days of obtaining monitoring data.
Report immediately any incidents that cause or have the potential to cause material harm to the environment (refer to PIRMP and EPL).	DG of DP&E, and EPA Deputy DG of DRN-MEG EPA, Ministry for Health, SafeWork NSW, local council, Fire and Rescue, Community	DA 15-1-2001-l: 27 DA 246-8-2002-i: 13 (Sch 3) DA 282-6-2003-i: 94 (Sch 4) Part 5.7 of the Protection of the Environment Operations (POEO) Act EPL 12003: R2 PPL 1, 2, 4, 5, 6: 4 (Sch A)		Environment Manager	Immediately
Report any exceedance of goals / limits / performance criteria in approval within 7 days	DG of DP&E and any relevant authorities	PA 06_0137: 2 (Sch 4) PA 06_0138: 2 (Sch 4) PA 06_0291: 2 (sch 4)		Environment Manager	Within seven days

Key Reporting Requirement	To Who	Condition / Licence No.	Reporting Period	Responsibility	Timing
Annual AGL Sustainability Report which includes sections on environmental management, greenhouse, greenhouse footprint and community performance	Publicly available	Internal requirement	Financial year	Environment Manager	Annually

5.5. Document Control

Documents prepared for the CGP will be prepared in accordance with the Gas Operations Document Control Procedure and Document Management Methodology (AGL_HSE_SDM_005).

The procedure was developed to ensure that only current, relevant documents are available where essential and that accurate document control is performed. Under this procedure, documents must be authorised and include the correct issue number, revision of work instructions, specifications, procedures and other key documents and data.

5.6. Technical Assistance

The Executive and HSE Reporting Sign-off Procedure provides the process for management of Environment reports that are required to be submitted annually to relevant regulatory authorities, in accordance with legislative requirements and other requirements prescribed by regulatory licenses held by AGL.

The Annual Return for EPL 12003 must be reviewed by an independent third party prior to sign-off by AGL's Company Secretary and Director and submission to the EPA.

5.7. Operational Controls

5.7.1. General Operating Principles

AGL endeavours to minimise the environmental impact of its activities. The following general operating principles are implemented as part of the CGP:

- Locations for wells, access roads and gas gathering lines are chosen to avoid areas of significant vegetation and heritage items, with infrastructure usually placed in areas that are already cleared and degraded in consultation with the landowner;
- Wells and gas gathering lines are sited on the periphery of the land and along existing tracks and road verges to fit as much as possible with the primary land use.
- Operations are managed in ongoing consultation with the landowner.

5.7.2. EMP Environmental Management Sub Plans

Specific sub plans have been developed to facilitate the management of issues identified in Table 3-6 which summarises activities by Sub Plan and to satisfy the requirements of various Consent Conditions for Management Plans to be developed, implemented and reported against (Table 2-3).

These Sub Plans are designed to be applied across the whole Project and include the general management measures for each issue and the relevant site-specific information and data to allow them to be used in different well fields to satisfy the requirements of different consents.

Each Sub Plan includes the following information:

- The objectives and targets (from the KPIs table) for the specific aspect
- Identification of key personnel responsible for major tasks;
- A summary of relevant statutory obligations;
- A description of the mitigation measures to be implemented, including site specific details and requirements;
- An outline of monitoring requirements; and
- Reference to specific records that will be maintained.

Table 2:3 lists the sub plans included as Appendices to this EMP.

5.8. Contractors

5.8.1. HSEMS

Contractor Management shall be undertaken in accordance with the HSEMS Contractor Management Standard (AGL_HSE_STD-003) and HSEMS Risk Management Standard (AGL-HSE_STD-004.1).

5.8.2. Environmental Contract Clauses

An Environment Clause Library which contains sample contract clauses for various contracts types across AGL has been prepared by the Environment Team. The purpose of the Library is to provide a systematic and risk-based approach to the development of environment content for a range of contracts.

The aim of the clauses is to establish minimum requirements with the expectation that there will continue to be collaboration and discussion relating to specific environmental liabilities on a case by case basis. It is principally a tool that will be used by AGL's legal team and as such the master document will be controlled by AGL's Corporate Lawyer.

It is acknowledged that there are various personnel within the CGP that may be involved in the drafting of contracts. The library is a working document that is subject to change – the clauses are examples only and will require input from AGL Legal to ensure relevant clauses are incorporated as applicable during contract development.

5.8.3. Contractor CEMP Guidelines

A Contractor CEMP Guideline is available for inclusion in Request for Tender packages to provide the minimum environmental management requirements that must be met or exceeded for proposed works.

5.9. Emergency Response

An Emergency Response Plan (AEL #8610896) has been prepared for the CGP in accordance with the requirements of AGL Emergency Preparedness and Response Standard (AGL-HSE-STD-009) and EPL 12003 Condition O4.

The Emergency Response Plan includes reference the CGP PIRMP. The PIRMP is reviewed and tested annually.

6. Monitoring and Checking

6.1. Environmental Monitoring and Measurement

The following tools are used to monitor and measure environmental performance and compliance with this EMP:

- Environmental Management Sub Plan Compliance Audits;
- Daily workover report by workover Rig Manager (records any spills or other incidents);
- Critical Control Checks;
- Critical Control Verifications; and
- Environment Walks.

Completed forms are maintained at RGP and non-compliance issues which cannot be closed out immediately are dealt with via the non-conformance procedure as appropriate (outlined in **Section 6.5**).

Issue-specific monitoring is discussed in more detail in the Sub Plans.

6.1.1. Monitoring of Environmental Key Performance Indicators

The targets and KPIs listed in **Table 4:1** will be monitored and reported in the AEPR which is prepared to satisfy the requirements of the DP&E and DRN-MEG.

6.2. Legislative Compliance Management (Environmental Compliance Register)

Environmental compliance obligations relating to the CGP are incorporated in AGL's compliance management system, SAP Compliance. The compliance management system manages regulatory compliance obligations across the CGP, and provides a summary of all the approval, licence and lease conditions for the project.

The compliance management system is an important tool for managing and tracking compliance with all of the project's environmental commitments.

The compliance management system is updated each time a new approval, licence or lease is granted or modified.

6.3. Complaints Management

Complaints can be received through the following channels:

- via the community hotline number (1800 039 600);
- through the CGP website <https://www.agl.com.au/about-agl/how-we-source-energy/camden-gas-project> ;
- via email AGLCommunity@agl.com.au; and
- directly to personnel on site.

Complaints are recorded on Consultation Manager and may also be recorded in the incident reporting system if the complaint has been verified as an environmental incident.

Environmental complaints shall be kept in accordance with EPL 12003 requirements and records shall include:

- the date and time of the complaint;
- the method by which the complaint was made;

- any personal details of the complainant which were provided by the complainant, or if no such details were provided, a note to that effect;
- the nature of the complaint;
- the action taken by AGL in relation to the complaint, including any follow-up contact with the complainant; and
- if no action was taken by AGL, the reason why no action was taken.

All complaints shall be investigated to identify the cause of the complaint and corrective actions shall be implemented as necessary. If the complaint is verified by the Environment Manager as an environmental incident, near miss or hazard; the complaint shall also be registered in the incident reporting system.

6.4. Audit Requirements

The following audits are undertaken as means of further assessing the environmental performance of the CGP:

- Independent environmental compliance audits bi-annually or tri-annually;
- Environmental Management Sub Plan Compliance Audits;
- Potential regulatory authority audits; and
- Internal audits in response to incidents, changes, events or non-conformances.

Independent environmental compliance audits are conducted to assess the environmental performance of the project, assess compliance with the relevant standards, performance measures and statutory requirements and review the adequacy of the EMP. These audits are undertaken during the projects operational activities to meet the requirement of the Conditions of Consent (refer Table 5-3).

The audits are undertaken by an independent person whose appointment is approved by the Director General of DP&E. The audit reports are submitted to government authorities and relevant local councils and any non-conformances identified by the audit are included and actions to rectify non-conformances reported in the Annual Environmental Performance Report.

6.5. Incident Management, Non-Conformance, and Corrective/Preventative Action

All incidents including environmental incidents, near misses, hazards and complaints are recorded electronically through the incident reporting system. Incidents shall be managed in accordance with AGL's Incident, Near Miss and Hazard Management Procedure (AGL-HSE-PRO-011.1). The obligations to notify regulatory authorities are included in **Table 5:3** of this EMP.

These on-line reports can be entered by any employee who has witnessed or been part of an incident. A notification is sent to the relevant team leader. The team leader is responsible for carrying out the investigation of the incident and ensuring the corrective actions are completed.

The CGP Environment Manager is informed when environment related hazards, near misses and incidents are entered into the incident reporting system.

Reporting requirements for environmental incidents under regulatory instruments are included in **Table 5:3**.

Any environment related Notices or Orders issued by regulatory authorities are to be forwarded to the Environment Manager (or their delegate). The Environment Manager (or their delegate) will then distribute to all key internal stakeholders for consultation and preparation of an agreed response. All agreed requirements must be adhered to.

6.6. Change Management

Change is an integral part of AGL's business. However, change can introduce new hazards into the workplace if not managed correctly or can even invalidate previous risk assessments and control strategies. Changes must be managed to ensure that environmental risks arising from such changes remain at acceptable levels.

Company personnel, contractors, management or external sources may identify the need to implement a change and as such all contractors and external sources should raise any proposed or suggested changes with an appropriate person and the proposed change should be entered into a Change Request Form.

A Management of Change procedure has been developed titled "Plant Modification and Design Change Request". This procedure ensures:

- All modifications to equipment, systems and procedures are carried out in a manner so as not to produce a hazard to safety, environment, production or plant operability; and
- All modifications to equipment, systems and procedures are reviewed by authorized personnel and approved prior to implementation.

7. Management Review

7.1. Management Review and Continual Improvement

A review of the EMP occurs after the findings of the Independent Environmental Audit or any other relevant audit have been received; however, reviews may also be conducted in response to:

- A new Project Approval and/or modification or changes to licences or permits;
- When directed by the Director-General of the DP&E or Deputy Director-General of DRN-MEG;
- Changes in operation(s);
- Request by a subcontractor;
- Changes in staffing structure;
- Changes in applicable legislation
- Changes in the construction or operational methods;
- Changes in site conditions;
- Changes in working environment;
- Monitoring results;
- Community complaints;
- A corrective or preventative action identified as a result of non-conformance; and
- Any other issue that may affect the accuracy or adequacy of information contained within the EMP.

An annual review of the EMP review is undertaken by the Environment Manager.

AGL recognises that management review is a cornerstone of the management system, providing an opportunity to regularly assess the operation of the system, its continuing suitability and to refine any improvements that are implemented.

AGL is therefore committed to regularly reviewing and continually improving its environmental performance. AGL conducts a review of the Environmental Management System at least every two years to ensure the systems continuing suitability and effectiveness in satisfying the Company's Health, Safety and Environment Policy and objectives. The scope of the review is comprehensive. The Review includes:

- Findings of the independent audit,
- Performance against Key Performance Indicators;
- Major non-conformances or incidents recorded;
- Issues raised by government authorities (if any); and
- Scheduling of internal audits;

Reviews are documented. This includes any observations, conclusions and recommendations. Management shall approve the Company's related procedures, and any subsequent changes or modifications.

The reviews are part of the continuous improvement cycle of:

- Setting performance standards;
- Measurement of performance;
- Comparison against standard; and
- Corrective or remedial actions.



Appendix A: AGL Health, Safety and Environment Policy

AGL Health, Safety and Environment Policy

Vision

We are respected for the care and commitment we demonstrate in prioritising our Health, Safety and Environment (HSE) obligations, managing risk and protecting our people and the environment in which we operate.

Scope

This policy applies to all AGL employees and contractors, and to the products and services that we provide to our customers. Where we do not have direct operational control, we will work productively with our stakeholders to achieve and maintain the standards described in this Policy.

Our Commitment

To conduct our business in a way that causes no harm to people and minimises impact on the environment.

To achieve this AGL will:

1. Understand and meet or exceed our legal and regulatory compliance obligations.
2. Maintain, continuously improve, and adhere to an HSE Management System that sets out how we will implement this Policy.
3. Create a working environment where everyone feels safe to speak up or intervene when they see something that does not seem right or is not consistent with our HSE Management Systems.
4. Provide a wide range of resources that improve the health and wellbeing of our employees.
5. Support employees who are injured at work to return to safe and sustainable work as soon as possible, and make reasonable adjustments, where appropriate, for non-work related injuries and illnesses.
6. Proactively identify and provide the resources to reduce, control, monitor and ensure awareness of the risks that have the potential to cause physical and/or psychosocial harm to people or impact the environment associated with our workplaces.
7. Consult and work collaboratively and transparently with our employees, customers, contractors, partners and the communities in which we operate on HSE matters.
8. Integrate HSE requirements when designing, purchasing, constructing and modifying facilities, equipment and systems for our customers and our own operations.
9. Continuously improve our processes, products and management systems by being curious, keeping current with industry leading practices and capturing lessons from rigorous incident investigations and adapting to meet the changing risks of the business as we transition.

This policy has been approved by the Board of AGL and will be reviewed regularly to ensure it is kept effective.



Damien Nicks

Chief Executive Officer and Managing Director

October 2023

Appendix B: Legislative Reporting Requirements

Table B:1 Summary of Environmental Legislative Reporting Requirements

Legislation and Regulatory Body	Approval/ Licence Requirements	Relevance to Camden Gas Project Activities
<i>Environmental Planning and Assessment Act 1979</i> (EP&A Act) (DP&E)	Part 3A – Environmental Assessment (EA) to obtain Concept Approval and/or Project Approval from Minister for Planning and Infrastructure Part 4 – SEE or EIS and Development Consent from Council / Minister for Planning and Infrastructure	Any project that requires an REF, EIS, SEE or EA. There are currently 10 DAs and Project Approvals related to the CGP.
<i>Petroleum (Onshore) Act 1991</i> (POA) (DRN-MEG)	Requires consideration to be given to protection of the environment before a petroleum lease is granted.	AGL holds 5 petroleum production leases (PPLs) for the CGP. All activities can only be carried out under the authority of a petroleum title.
<i>Protection of the Environment Operations Act 1997</i> (POEO Act) (EPA)	An Environment Protection Licence (EPL No.12003) is held for petroleum refining for RPPG, all well sites and gas gathering lines.	AGL, its employees and agents have an obligation to conform to the requirements of the Act. If operations change a licence variation may be required. If an incident of potential or actual material harm occurs- Monitoring data under the EPL must be published on the AGL website within 14 days of receipt.
<i>Protection of the Environment Operations (General) Regulation 2022</i> (EPA)	The regulation sets out fees in relation to EPLs and notices. Gives effect to the National Pollutant Inventory (NPI).	AGL are required to submit air emission data annually as part of the NPI.
<i>Heritage Act 1977</i> (OEH)	Approval is required to disturb/destroy relics or do certain things that will affect an object subject to an Interim Heritage Order or listed on the State Heritage Register. An excavation permit is required under certain circumstances.	Approval may be required if works will disturb a relic or an object subject to an Interim Heritage Order or listed on the State Heritage Register.
<i>National Parks and Wildlife Act 1974</i> (OEH)	A permit is required to excavate archaeological sites and relics. S87(1) (unless under Part 3A of the EP&A Act). A consent to destroy, deface or damage a relic or Aboriginal place is required under Section 90(2) of the Act (unless consent is provided under Part 3A of the EP&A Act).	The Act is relevant if items, sites or relics are discovered during the course of the works.

Legislation and Regulatory Body	Approval/ Licence Requirements	Relevance to Camden Gas Project Activities
<p><i>Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)</i> (DEWSPaC)</p>	<p>All environmental assessment undertaken under the EP&A Act must consider matters of National Environmental Significance (NES) as well as any Commonwealth land. If a significant impact is proposed the approval of the Commonwealth Minister for Sustainability, Environment, Water, Population and Communities is required.</p>	<p>The Act applies if any action that has, will have or is likely to have a significant impact:</p> <ul style="list-style-type: none"> - on a matter of NES; or - on Commonwealth land (whether action takes place inside or outside Commonwealth land).
<p><i>Work, Health and Safety Regulation 2011 (WHS Reg)</i> (SafeWork NSW)</p>	<p>Chapter 7 deals with hazardous chemicals and dangerous goods. Hazardous chemicals and dangerous goods are required to be labelled and placarded and quantities notified to SafeWork NSW when stored above the manifest quantities.</p> <p>The CGP does not currently require a Dangerous Goods Notification.</p>	<p>Hazardous chemicals and dangerous goods are required to be used, handled and stored in accordance with this regulation.</p> <p>If levels of Hazardous chemicals and dangerous goods increase an assessment should be undertaken to confirm whether a Dangerous Goods Notification would be required.</p>
<p><i>Biodiversity Conservation Act 2016 (BCA)</i> (OEH)</p>	<p>The Act provides for the protection of threatened flora and fauna native to NSW and threatened populations, communities and critical habitat.</p>	<p>The Act applies if any threatened species, populations, communities and/or critical habitat listed under the Act is potentially affected by the activity or impacted on or off the work site, as a consequence of the activity.</p>
<p><i>Water Act 1912</i> (DPI Water)</p>	<p>Bore licences are required for all drilling and dewatering activities (under Part V of the <i>Water Act 1912</i>).</p> <p>The licence must be obtained prior to the construction of any bore (or well) that intersects the water table or deeper aquifer zone. Licences are required for core holes, stratigraphic test/pilot holes, production wells and monitoring networks.</p> <p>In addition, the driller who is constructing these bore holes/wells must hold an appropriate class of drillers licence under the <i>Water Act 1912</i>.</p> <p>Water Act licences are being transitioned to Water Access Licences and works approvals under the <i>Water Management Act 2000</i> following commencement of the Greater Metropolitan Region Unregulated River and Groundwater Water Sharing Plans in July 2011.</p>	<p>The production well licences and wellfield allocation authorise the dewatering activities required for gas production. An annual allocation of 30 ML per year applies for the whole CGP.</p> <p>Other licences are mainly registration mechanisms for geological and hydrogeological data to be lodged with the DPI Water.</p> <p>The monitoring data from the monitoring bore network is required to satisfy the compliance conditions on the production well licences.</p>

Legislation and Regulatory Body	Approval/ Licence Requirements	Relevance to Camden Gas Project Activities
<p><i>Water Management Act 2000</i> (DPI Water)</p>	<p>Controlled Activity Approval (CAA) required for controlled activities when working on 'waterfront land' within 40 m of a watercourse – the Act replaces the previous requirement for a Part 3A Permit under the repealed Rivers and Foreshore Improvement Act 1948.</p>	<p>The Act applies if working on or under 'waterfront land' i.e. within 40 m of a watercourse, or extracting water, or undertaking interference activities, then approvals may be required.</p> <p>There are existing Part 3A Permits and CAA's in place for parts of the Camden Gas Project.</p>
<p><i>Roads Act 1993</i> (NSW Roads and – Maritime Service - RMS)</p>	<p>Section 138 of the Roads Act requires authority consent for any activities likely to impact on the operational efficiency of the road network.</p>	<p>Obtain Road Occupancy Licence if construction activities likely to impact on traffic.</p>
<p><i>Contaminated Land Management Act 1997</i> (EPA)</p>	<p>Must report to EPA if land contamination presents "a significant risk of harm". EPL12003 R2 Notification of Environmental Harm</p>	<p>The Act is relevant if contaminated land is found or suspected.</p>
<p><i>Rural Fires Act 1997</i> (NSW Rural Fire Services – RFS)</p>	<p>The district fire control office in charge of the local fire station must be informed before the lighting of any fires.</p> <p>No open flame on total fire ban days.</p> <p>Duty to take steps to prevent bushfires.</p>	<p>The Act is relevant if fires are to be lit or if undertaking fire risk activities.</p>
<p><i>National Greenhouse and Energy Reporting Act 2007</i> (Commonwealth Department of Climate Change and Energy Efficiency)</p>	<p>Must report greenhouse gas emissions, energy consumption and production if the corporate group emits 125 kilotonnes or more greenhouse gases (CO2 equivalent), or produces or consume 500 terajoules or more of energy.</p>	<p>The Act is relevant to the AGL Energy group of companies, including the CGP. The Project is required to report all greenhouse gas emissions, energy consumption and production on a financial year basis. Data reported will also be used under the proposed Commonwealth carbon pricing scheme (Clean Energy Future).</p>
<p><i>Code of Practice for Coal Seam Gas – Well Integrity 2012</i> (DRN-MEG)</p>	<p>This code advises CSG titleholders how to comply with a condition of title for CSG exploration, extraction or production under the Petroleum (Onshore) Act 1991 (PO Act) and the Petroleum (Onshore) Regulation 2007 to ensure that well operations are carried out safely, without risk to health and without detriment to the environment.</p> <p>This code of practice applies to the design, construction, production, maintenance and ultimate abandonment of CSG wells in NSW.</p>	<p>AGL shall undertake petroleum production in compliance with the Code. The Code requires (for example):</p> <ul style="list-style-type: none"> - Risk Management Planning; - Safety Management Plan; - Environmental Management Plan (this can be in the form of an REF); - Emergency Response Plan; - Annual Reporting of operations conducted per year; - Notification to Drill; - Well Completion Reports;

Legislation and Regulatory Body	Approval/ Licence Requirements	Relevance to Camden Gas Project Activities
<p><i>Code of Practice for Coal Seam Gas – Fracture Stimulation Activities 2012</i> (DRN-MEG)</p>	<p>The purpose of this code is to ensure that fracture stimulation activities are conducted in a safe manner and that communities, the environment and water resources are protected.</p> <p>The Code requires a Fracture Stimulation Management Plan (FSMP).</p> <p>The FSMP shall include, among other things, the following key sections:</p> <ul style="list-style-type: none"> - A Risk Assessment identifying the risks, likelihood and consequences, and mitigation measures to deal with the risk; - A detailed description of the design of the fracture stimulation activity, including the characterisation of aquifers and NSW geological formations; - An assessment of impacts on aquifers; - The title-holder must prepare an Emergency Plan and an Environmental Incident Response Plan (EIRP) (or PIRMP), setting out details of responses in the event of an environmental pollution event. 	<p>This Code applies to the conduct of CSG fracture stimulation activities.</p> <p>AGL shall prepare a FSMP, and have it approved by DRN-MEG, prior to conducting fracture stimulation activities.</p> <p>AGL shall prepare a PIRMP in accordance with Part 5.7 of the POEO Act.</p>

Table B:2 Summary of Approvals, Licences, Permits and Leases

Name / No.	Issued by	Description	Date of Issue	Date of Expiry/ Renewal
Petroleum Production Lease (PPL) No.1	DRN-MEG	Lease granted to undertake production operations in lease area shown in Appendix B.	2 September 2002	1 September 2023 (Renewal application submitted 31 August 2022)
PPL No.2	DRN-MEG	Lease granted to undertake production operations in lease area shown in Appendix B.	10 October 2002	9 October 2023 (Renewal application submitted 31 August 2022)
PPL No.4	DRN-MEG	Lease granted to undertake production operations in lease area shown in Appendix B.	6 October 2004	5 October 2025 (Renewal application submitted 31 August 2022)
PPL No.5	DRN-MEG	Lease granted to undertake production operations in lease area shown in Appendix B.	28 February 2007	27 February 2028
PPL No. 6	DRN-MEG	Lease granted to undertake production operations in lease area shown in Appendix B.	29 May 2008	28 May 2029
DA 15-1-2002i Field – RBTP, Apap, Joe Stanley, Johndilo, Loganbrae, Lipscombe, Mahon	DP&E	Approval granted “The Camden Gas Project Stage 1” development described as: - The continued operation of the existing 20 production wells; - Operation of 5 additional wells not yet completed and/or drilled; - Operation of the existing and proposed gas gathering system; - Operation of the existing gas treatment plant (RBTP); - Production of up to 93,000 GL/month from the treatment plant; - Sale and distribution of gas to the AGL gas network; and - Operation of the existing site office and pipe yard depot.	23 July 2002	
MOD 53-4-2006	DP&E	Modification granted for construction, drilling and operation of a directional well (LB11) from LB09	16 May 2006	

Name / No.	Issued by	Description	Date of Issue	Date of Expiry/ Renewal
DP&E letter of approval 9 February 2007	DP&E	Re-drilling Management Plan for the AP01 and MH01 wells.	9 February 2007	
MOD 24-3-2007	DP&E	Modification granted for the construction, drilling and operation of 2 Surface to In-Seam (SIS) wells (AP02/AP03) at AP01.	4 July 2007	
MOD 3	DP&E	Modification granted for the Kay Park and Loganbrae Gas Gathering Line twinning modification Project.	01 July 2008	
DA 246-8-2002i Field – Kay Park	DP&E	Approval granted for the following Development: -The connection of 3 existing wells (KP01, KP02, and KP03) to the Ray Beddoe Treatment Plant, and the continued production and sale of methane gas from the 3 wells.	20 September 2002	
DA 246-8-2002i Field- Kay Park MOD 25-3-2007	DP&E	Modification granted for the following development: - the construction, drilling and operation of 2 SIS wells (KP05 and KP06) at KP01.	04 July 2007	
DA 246-8-2002i Field- Kay Park MOD 2	DP&E	Modification granted for the Kay Park and Loganbrae Gas Gathering Line twinning modification Project.	04 August 2008	
DA 246-8-2002i Field- Kay Park MOD 3	DP&E	Modification granted for the following development: - the construction, drilling and operation of 1 SIS well (KP05) and 1 directional well (KP06) at KP01.	3 December 2008	
DA 246-8-2002i Field – Kay Park MOD 4	DP&E	Modification granted for the following development: - the construction, drilling and operation of 2 SIS wells (KP05 and KP06) at KP01.	20 April 2011	

Name / No.	Issued by	Description	Date of Issue	Date of Expiry/ Renewal
DA 282-6-2003-i Fields – RPGP, Rosalind Park, Wandinong, EMAI (EM01-20, 38-40), Glenlee (GL05, 07-10, 14-17)	Land and Environment Court	Approval granted for Stage 2 Development described as: - construction and drilling of 20 wells on the EMAI site; - Operation and production of gas from the existing (drilled) 23 wells and 20 wells to be constructed (a total of 43 wells); - Construction and operation of the gas gathering system; - Construction and operation of the gas treatment plant (RPGP), associated workshop and office facilities; and - Production of up to 14.5 petajoules per annum from the gas treatment plant.	16 June 2004	
DA 282-6-2003-i MOD 10	DP&E	Modification granted for construction of an access road to well RP09 and twinning a section of the existing gas gathering line between well RP08 and the Rosalind Park Gas Plant.	16 March 2009	
DA 282-6-2003-i MOD 11	DP&E	Modification granted for re-routing of damaged gas gathering line at Glenlee 06.	18 September 2009	
DA 282-6-2003-i MOD 12	DP&E	Modification granted for changes to monitoring and reporting of noise, air quality and waste at the Rosalind Park Gas Plant.	25 November 2010	
DA 282-6-2003-i MOD 13	DP&E	Modification granted for to delete conditions that are replicated in Environment Protection Licence 12003.	27 March 2017	
MOD 72-7-2004	DP&E	Modification granted for the consent to include land omitted from the development consent, a requirement for an EMP for works in the Campbelltown City Council road reserve, and to allow works to commence prior to the granting of a production lease.	20 August 2004	

Name / No.	Issued by	Description	Date of Issue	Date of Expiry/ Renewal
MOD 5-1-2005	DP&E	Modification granted for amendment to EMAI Access Road (18-11-2004 Map Ref M240329) and Gathering System (18-11-2004 Map Ref M240328).	14 February 2005	
MOD 42-3-2005	DP&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.	8 June 2005	
MOD 52-4-2006	DP&E	Modification granted for the construction, drilling and operation of 1 directional well (GL16) from GL07 and 2 directional wells (GL14 and GL15) from GL10.	16 May 2006	
MOD 119-10-2006	DP&E	Modification granted for the construction, drilling and operation of 1 directional well (GL16) from GL07 and 1 directional well (GL15) and 1 Surface to in-seam well (GL14) from GL10.	22 October 2006	
MOD 124-10-2006	DP&E	Modification granted for the construction, drilling and operation of 1 directional well (GL16) from GL07 and 2 Surface to in-seam wells (GL14 and GL15) from GL10.	1 November 2006	
MOD 11-2-2007	DP&E	Modification granted for the relocation of the Rosalind Park Gas Plant access road.	2 May 2007	
MOD 26-3-2007	DP&E	Modification granted for the construction, drilling and operation of 1 SIS well (EM38) at EM20 and upgrading (twinning) of the gas gathering line between MP14-GL10, GL10-GL05, GL05-GL07 and RP03-RP08.	4 July 2007	

Name / No.	Issued by	Description	Date of Issue	Date of Expiry/ Renewal
MOD 9	DP&E	Modification granted for construction, drilling and operation of 2 SIS wells (EM39) at EM02 and (GL17) at GL05 and the upgrading (twinning) of the gas gathering line from EM39 to the junction of the gas gathering line and road to the EM03 well, and connection of the new wells to the existing gas gathering system	11 April 2008	
DA-183-8-2004i Fields – Mount Taurus and Menangle Park (MP13-17, MP30)	DP&E	Approval granted for the following Development: - Connection of 15 existing coal seam methane wells to the Rosalind Park Gas Plant from the Mount Taurus and Menangle Park properties, for the production of methane gas; and - Construction of a Dam at the MT1 gas well site.	16 December 2004	
MOD 27-3-2007	DP&E	Modification granted for the construction, drilling and operation of 1 SIS well (MP30) at MP13 and upgrading (twinning) of the gas gathering line between MP13 and MP14.	4 July 2007	
MOD 13-10-2011	DP&E	Construction, drilling and operation of 1 surface to in-seam well (MP25) adjacent to MP16 and upgrading (twinning) of the gas gathering line between MP16 and MP13/30.	9 July 2012	

Name / No.	Issued by	Description	Date of Issue	Date of Expiry/ Renewal
DA 9-1-2005 Field – Glenlee (incl. EM21/2, GL02, 04, 06, 11-13)	DP&E	Approval granted for: <ul style="list-style-type: none"> – Construction and drilling of well GL11; – Construction of a gas gathering system between four wells at Glenlee and two wells at EMAI; – 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 	26 May 2005	
DA 9-1-2005 Field – Glenlee (incl. EM21/2) MOD 3	DP&E	Modification granted for use of exotic pasture species in rehabilitation at wells in Glenlee and two wells at EMAI.	16 November 2010	
MOD 51-4-2006	DP&E	Modification issued for the construction, drilling and operation of a directional well from each of GL02 (GL12) and GL11 (GL13).	16 May 2006	
MOD 28-3-2007	DP&E	Modification granted for the upgrading (twinning) of the gas gathering line between GL02 and GL05.	4 July 2007	
DA 75-4-2005 Field – Sugarloaf	DP&E	Approval granted for the following Development: <ul style="list-style-type: none"> - Construction and drilling of 7 wells; - Construction of a gas gathering system and access roads; - Connection of the wells to the Stage 2 Camden Gas Project – Gas Treatment Plant; and - Production of methane gas. 	07 October 2005	
MOD 3	DP&E	Modification granted for gas gathering line connection between SL02 and MP22.	20 April 2011	
MOD 29-3-2007	DP&E	Modification granted for the construction, drilling and operation of 2 SIS wells (SL08 and SL09) at SL03.	4 July 2007	

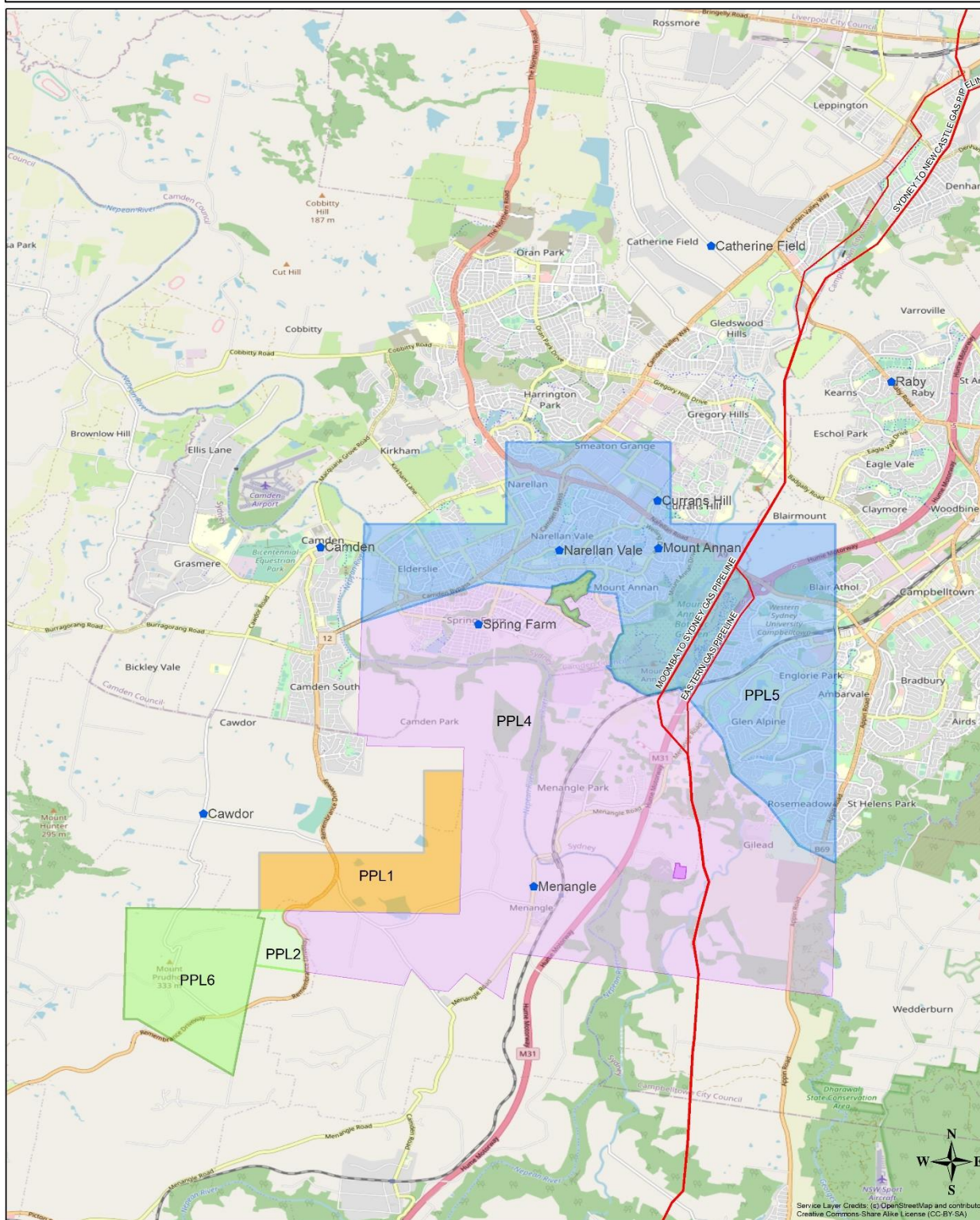
Name / No.	Issued by	Description	Date of Issue	Date of Expiry/ Renewal
MOD 2	DP&E	Twinning of gas gathering line from SL03 and SL09 to Rosalind Park Gas Plant	10 January 2010	
DA 171-7-2005 Field - El Bethel NB. Not commenced	DP&E	Approval granted for the following Development: - Construction and drilling of 10 wells (EB01 – EB10); - Construction of a gas and water gathering system and access roads; - Connection of the wells to the Rosalind Park Gas Plant; and - Production of methane gas.	25 March 2006	
PA 06_0137 Field - Razorback	DP&E	Approval granted for the following Development: - Construction and drilling of wells RB03-RB12 and gas gathering lines.	9 December 2006	
PA 06_0138 Field – EMAI (EM23-37)	DP&E	Approval granted for the following Development: - Construction and drilling of wells EM23-36 and gas gathering lines.	9 December 2006	
PA 06_0138 MOD 1	DP&E	Additional directional well (EM37) at EM30 well surface location.	6 July 2007	
PA 06_0291	DP&E	Approval granted for the drilling and operation of 4 well surface locations in Spring Farm and 12 well surface locations in Menangle Park, with no more than 6 wells at each well surface location. Approval also granted for associated gas gathering lines, access and for the production and sale of gas.	04 September 2008	
PA 06_0291 MOD 1	DP&E	Modification granted for under-boring of the Main Southern Railway Line between wells MP06 and MP11 and relocation of the gas gathering route between wells MP11 and MP23 via MP19.	7 January 2011	

Name / No.	Issued by	Description	Date of Issue	Date of Expiry/ Renewal
PA 06_0291 MOD 2	DP&E	Modification granted for construction and operation of a gas gathering network between wells MP03 and MP05, on the northern side of the Main Southern Railway Line, and for construction of a link from well MP22 to the existing well at SL02.	20 April 2011	
EPL No. 12003	EPA	Premises include all the wells, the gas gathering lines and the Rosalind Park Gas Plant which is licensed for the following activities: - Petroleum refining (>200,000 – 500,000 T).	22 December 2004	Anniversary date 22 December
Pipeline Licence No.30	DTIRIS	Licence to operate a pipeline to convey Coal Seam Methane between Rosalind Park Gas Plant and the Alinta Gas Networks Natural Gas Pipeline Number 1.	19 May 2004	19 May 2024
Works/ Use Approval 10WA112288	DPI Water	Water Supply Works (production well sites licensed at various locations)	1 July 2011	22 May 2026
Works/ Use Approval 10WA112294	DPI Water	Water Supply Works (production well sites licensed at various locations)	1 July 2011	3 April 2026

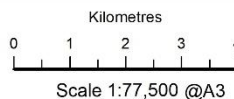


Appendix C: Petroleum Production Lease (PPL) Figures

Camden Gas Project PPL Locations



Author: Gas Operations
 Date: 02/05/2023
 Ref: 1652R4



- Legend**
- PPL1
 - PPL2
 - PPL4
 - PPL5
 - PPL6
 - Towns
 - Rosalind Park Plant
 - Gas Pipelines

Disclaimer: While AGL has taken great care and attention to ensure the accuracy of the data represented on this map, no liability shall be accepted for any errors or omissions. No part of this map may be reproduced without prior permission of AGL.

Approved Date: 20/12/2023

Approved By: Shane Bottin (A949201)

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Appendix D: Noise Management Sub Plan



Appendix E: Flora and Fauna Management Sub Plan



Appendix F: Soil and Water Management Sub Plan



Appendix G: Aboriginal Cultural Heritage Management Sub Plan



Appendix H: European Heritage Management Sub Plan



Appendix I: Landscape and Rehabilitation Management Sub Plan



Appendix J: Air Quality Management Sub Plan



Appendix K: Waste Management Sub Plan



Appendix L: Traffic Management Sub Plan



Appendix M: Dangerous Goods and Hazardous Materials Storage Sub Plan



Appendix N: Emergency Response Plan



Appendix O: Groundwater Management Plan