



22 January 2015

CAMDEN GAS PROJECT

Independent Environmental Audit - 2012-2014

Submitted to:
AGL Upstream Investments Pty Ltd
PO Box 67
Menangle NSW 2568

REPORT

Report Number. 147624059-001-R-Rev1





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Executive Summary

This report presents the Independent Environmental Audit (IEA) for selected elements of the Camden Gas Project (CGP) for the period 1 July 2012 to 30 June 2014 (audit period). This report has been prepared for AGL Upstream Investments Pty Ltd (AGL) by Mr. Tom Carmichael of Golder Associates Pty Ltd (Golder). This IEA Report will be provided by AGL to the New South Wales (NSW) Department of Planning & Environment (DoPE, previously the NSW Department of Planning and Infrastructure) in fulfilment of certain conditions of the development consents applicable to the CGP.

This IEA Report is based on information disclosed verbally and/or in writing by AGL to Golder. Golder has assumed such information to be correct and complete. Golder does not accept any liability for any such information which may be false or misleading.

The CGP is located 60 km southwest of Sydney in the Wollondilly, Camden and Campbelltown local government areas. The CGP currently consists of 96 operating gas wells, 38 suspended gas wells, low pressure underground gas gathering lines, the Rosalind Park Gas Plant (RPGP) and a high pressure supply line to the NSW gas grid. These assets enable the production, gathering, processing and sale of coal seam gas to the market. Ten former gas wells of the CGP have been plugged and abandoned and are no longer part of the CGP.

The development of the CGP has occurred in a staged manner with exploration activities commencing in 1998 under Sydney Gas (Camden) Operations. The CGP is now owned and operated by AGL.

The CGP is subject to nine development consents and associated modifications issued by DoPE (and its predecessors). A tenth development consent (DA 171-7-2005) has been surrendered by AGL. The development consents each contain a condition requiring AGL to commission a periodic IEA to assess compliance with their conditions of consent. Six of the development consents required an IEA to be undertaken during 2014 for the 2012-2014 period. This IEA Report assesses compliance against the relevant consents required to be audited at this time.

The key requirements for the IEA as specified by condition 58 of Schedule 2 of DA 75-4-2005-1, and similarly referenced in the other conditions, are as follows:

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

This audit comprised the fifth independent environmental audit for the project, and was commissioned within 2 years of completion of the previous audit.

The Independent Environmental Audit shall:

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

The audit was conducted by Mr. Tom Carmichael, Associate of Golder, and a registered Environmental Lead Auditor with Exemplar Global (formerly RABQSA International). Mr. Carmichael was approved as independent auditor by the Director-General for this IEA on 29 August 2014.

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

The audit was conducted in accordance with ISO 19011:2002 – Guidelines for Quality and/or Environmental Management Systems Auditing.



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

This IEA report has assessed the environmental performance of the development and its effects on the surrounding environment. There were a number of environmental incidents recorded by AGL during the audit period, none of which were considered to have, or likely to have, resulted in actual or potential environmental harm.

Environmental control measures were typically implemented and employees demonstrated an understanding of environmental risks and controls.

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

AGL has demonstrated substantial compliance with the relevant standards, performance measures and statutory requirements that apply to the development.

A number of 'Non-Compliances (Level 2)', 'Areas of Concern' and 'Opportunities for Improvement' with regards to the conditions of consent were identified during this Audit. No 'Level 1 Non-Compliances' were identified for the audit period.

During the audit period AGL received three Penalty Infringement Notices (PINs) and entered into an Enforceable Undertaking with the NSW EPA. AGL undertook the measures required by the EPA in relation to the PINs and there are no outstanding matters. The EPA has yet to sign-off on completion of all the actions identified in the Enforceable Undertaking. The EPA has not indicated any intention to pursue matters in relation to the PINs or the Enforceable Undertaking through the legal courts.

A number of non-compliances with the conditions of the CGP's Environment Protection Licence 12003 (EPL) have been identified by AGL and reported in the Annual Returns and the Annual Environmental Performance Reports for the audit period. The scope of this IEA, as instructed by AGL, specifically excluded an assessment of compliance with the conditions of the EPL.

Non-conformances are generally administrative in nature and unlikely to result in actual or potential harm to the environment or human health. Compliance may be improved by ensuring all monitoring requirements are completed in accordance with the EPL, approved management plans and the conditions of consent.

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

The adequacy of CGP's Environmental Management Plan has been reviewed in Section 3.2 of this IEA Report. The EMP and Sub-plans provide detailed reference to the relevant conditions of consent and management measures implemented by AGL to address the conditions of consent. The EMP and Sub-Plans are considered by the Auditor to provide a robust and transparent framework for management of the environmental impacts of the CGP. This IEA identified opportunities for improvement in the content and use of AGL's compliance management system and these opportunities are currently being implemented by AGL.

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

The audit findings and recommendations are detailed in Section 4.0 and in Appendix B of this report.



1.0 INTRODUCTION

This report presents the Independent Environmental Audit (IEA) for selected elements of the Camden Gas Project (CGP) for the period 1 July 2012 to 30 June 2014 (audit period). This report has been prepared for AGL Upstream Investments Pty Ltd (AGL) by Mr. Tom Carmichael of Golder Associates Pty Ltd (Golder) in accordance with proposal P47623059-001-P-RevA, dated 21 July 2014, following acceptance by AGL on 10 September 2014. This IEA Report will be provided by AGL to the New South Wales (NSW) Department of Planning & Environment (DoPE, previously the NSW Department of Planning and Infrastructure) in fulfilment of certain conditions of the development consents applicable to the CGP.

This IEA Report is based on information disclosed verbally and/or in writing by AGL to Golder. Golder has assumed such information to be correct and complete. Golder does not accept any liability for any such information which may be false or misleading.

1.1 Camden Gas Project

The CGP is located 60 km southwest of Sydney in the Wollondilly, Camden and Campbelltown local government areas. The CGP currently consists of 96 operating gas wells, 38 suspended gas wells, low pressure underground gas gathering lines, the Rosalind Park Gas Plant (RPGP) and a high pressure supply line to the NSW gas grid. These assets enable the production, gathering, processing and sale of coal seam gas to the market. Ten former gas wells of the CGP have been plugged and abandoned and are no longer part of the CGP.

The development of the CGP has occurred in a staged manner with exploration activities commencing in 1998 under Sydney Gas (Camden) Operations. The CGP is now owned and operated by AGL.

1.2 Requirement for an IEA

The CGP is subject to ten development consents and associated modifications issued by DoPE (and its predecessors). The development consents each contain a condition requiring AGL to commission a periodic IEA to assess compliance with their conditions of consent. The requirements of six of the development consents required an IEA to be undertaken during 2014 i.e.:

- condition 37 of Schedule 3 of DA 15-1-2002-i (Apap, Joe Stanley, Johndilo, Loganbrae, Lipscombe and Mahon);
- condition 17 of Schedule 3 of DA 246-8-2002-i (Kay Park);
- condition 10 of Schedule 5 of DA 282-6-2003-i (RPGP, Rosalind Park, Wandinong, EMAI (EM01–22, 39, 40));
- condition 25 of Schedule 2 of DA 183-8-2004-i (Mt Taurus and Menangle Park (MP13-17, 25, 30));
- condition 44 of Schedule 2 of DA 9-1-2005-i (Glenlee); and
- condition 58 of Schedule 2 of DA 75-4-2005-i (Sugarloaf).

This IEA Report assesses compliance against the above consents required to be audited at this time.

The key requirements of the above conditions for the IEA are as follows and as specified by condition 58 of Schedule 2 of DA 75-4-2005-I and similarly referenced in the other conditions:

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

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



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

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

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

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

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

The audit was conducted by Mr. Tom Carmichael, Associate of Golder, a registered Environmental Lead Auditor with Exemplar Global (formerly RABQSA International). Mr. Carmichael was approved as independent auditor by the Director-General for this IEA on 29 August 2014.

The findings of this report reflect conditions and audit responses provided by AGL during the period 29 September 2014 to 24 December 2014, including site inspections on 29 September, 2 October, 3 October, 16 October and 29 October 2014.

1.3 Objective

The objective of the IEA as addressed in this report was to complete the IEA for the period 1 July 2012 to 30 June 2014 as required by the consent conditions referenced in Section 1.2 of this report.

1.4 Scope and criteria

The scope of the audit is limited to an assessment of construction and operational activities of the CGP undertaken between 1 July 2012 and 30 June 2014. This IEA Report has adopted a similar format, and makes reference, to the previous IEA Report for the CGP dated 27 August 2013 for the period 1 July 2010 to 30 June 2012 prepared by Treo Environment Pty Ltd. Where consent conditions were closed in the previous audit and there has not been any relevant change to the CGP operations those conditions have not been revisited by the current auditor and are noted as having been previously closed.

1.5 Methodology

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

- **Project Initiation Teleconference:** At the commencement of the project a project initiation teleconference was held with AGL's representative to:
 - confirm the Audit scope;
 - confirm which development consents were relevant to the Audit;
 - obtain contact details for relevant AGL personnel;
 - discuss arrangements for obtaining copies of relevant documentation; and
 - discuss timing for site inspections/document review.
- **Initial Review and Prepare the Audit Protocol:** Reviewed the relevant development consents and prepare the Audit Protocol identifying each compliance document and condition requiring compliance review.
- **Site Visit:** Visit to the CGP site and conducted site inspections and interviews to confirm current site conditions. During the site visit Golder undertook the following:
 - Held an audit opening meeting to discuss schedule and approach to the site visit.



- Discussed the nature of operations at the CGP during the audit period (2012-2014) to ascertain:
 - What development works were undertaken.
 - Were there any other changes in operations relevant to environmental performance.
- Inspected selected elements of CGP’s operations, including new developments undertaken since the most recent prior audit.
- Interviewed appropriate AGL personnel, such as CGP’s environmental representative and operational staff where relevant. AGL personnel interviewed by the Auditor comprised:
 - Aaron Clifton (Environment Manager, Upstream Gas);
 - Tom Lawler (HSE Officer, CGP);
 - Chris Covington (HSE Business Partner, Upstream Gas);
 - Phil Henderson (Maintenance Supervisor, CGP);
 - Dennis Chia (Operations Manager, CGP); and
 - Jenny MacMahon (Head of Environment, AGL).
- Reviewed relevant environmental documentation held on site and not previously provided to Golder for review.
- Obtained copies of relevant documentation for further review and compliance assessment.
- Held daily closing meetings presenting progressive findings of the Audit to AGL.

■ **Compliance Assessment**

The assessment of compliance with each condition of the relevant development approvals would be based on the following criteria provided by AGL and approved by the DoPE on 29 August 2014:

Colour Code	Finding	Definition
	Compliance	The intent and requirements of the condition have been met. The inability to provide formal written verification (letter, fax, email, meeting minutes etc.) that a requirement has been met does not necessarily result in a non-compliance. If verification that a condition has been met can be provided by other means (visual inspection, personal communication, etc.) the operation should be considered in compliance for that condition. Where an opportunity for improvement was identified, this was included in the audit findings.
	Compliance - Improvement Recommended	The intent of the condition has been met; however it is considered that either: <ul style="list-style-type: none"> ■ The issue has the potential to deteriorate to a non-compliance if not further addressed; or ■ Further improvement is recommended.
	Observation	A finding which is not likely to significantly affect the operation, which does not strictly relate to the scope of the audit of compliance and which could lead to performance improvement.



Colour Code	Finding	Definition
	Not triggered	A condition or requirement has an activation or timing requirement which had not been triggered or completed at the time of the audit and therefore an assessment of compliance could not be made.
	Non-Compliance Level 1 (NC1)	Specific requirements of the condition have not been met. A total absence of planning or implementation of a required operations element which presents an immediate risk or an isolated lapse in control in the implementation of an operations element which will lead to a significant risk.
	Non-Compliance Level 2 (NC2)	An isolated lapse or absence of control in the implementation of an operations element which may not be of significant risk.

Use of the above criteria was requested by AGL to align with other audits undertaken by AGL and represent a slight change from the criteria used in the 2010-2012 audit of the CGP.

- **Review and Reporting:** Review of the information provided by AGL or observed on site and preparation of an Audit Report.
- **Submission of Draft Report:** The draft Audit Report was submitted to AGL for factual review prior to finalisation.
- **Preparation of Final Report:** The Audit Report was finalised with consideration of AGL's factual comments and the final copy submitted to AGL.

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

1.6 Structure of this report

The remainder of this report is structured as follows:

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

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

- **Appendix A** (Table 1) lists the development consents, including modifications, which apply to the CGP; and
- **Appendix B** (Table 2 – Table 7) provides an assessment of performance against each of the consent conditions.



2.0 CAMDEN GAS PROJECT OPERATIONS

2.1 Overview of Operations

The CGP currently consists of 96 operating gas wells, 38 suspended gas wells, low pressure underground gas gathering lines, the RGP and a high pressure supply line to the NSW gas grid. These assets enable the production, gathering, processing and sale of coal seam gas to the market. Ten former gas wells of the CGP have been formally abandoned and are no longer part of the CGP. Exploration activities are conducted under Petroleum Exploration Licence (PEL) No. 2 and gas is produced under five Petroleum Production Leases (PPLs) No. 1, No. 2, No. 4, No. 5 and No. 6.

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

Operational activities included in the CGP include:

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

2.2 Audit Period Operations

Within the scope of this audit, development works and operations comprised:

- Operation of selected wells and gas gathering lines.
- Drilling and rehabilitation of one well – MP25 at Menangle Park. Drilling was completed in September 2012.
- Duplication (twinning) of the gas gathering line at Menangle Park. Approximately 2720 metres of gas gathering line was constructed, commissioned and the disturbed areas rehabilitated, across the Menangle Park site for gas well MP03 and MP25.
- One well was plugged and abandoned in March 2014 – JD04.
- Three separate workover activities were undertaken – at MP30, MT05 and SL03.
- Operation of the Rosalind Park Gas Plant (RGP).
- Shutting down of one compressor (Compressor 1) at the RGP for major overhaul in November 2013.

No wells were fracture stimulated during the audit period.

No exploration activities were undertaken during the audit period.



3.0 ENVIRONMENTAL PERFORMANCE

3.1 Introduction

The IEA is required to “assess the environmental performance of the development, and its effects on the surrounding environment”. This assessment has been undertaken with regards to the conditions of consent and the environmental management system implemented by the CGP, including the environmental management plan and sub-plans, and the various environmental monitoring and management reports prepared for the CGP during the audit period. Brief comments are also presented for completeness purposes on compliance with the EPL and other environmental licences.

AGL reports on its environmental performance via the Camden Gas Project: Annual Environmental Performance Reports (AEPR) each financial year, a copy of which is placed on the CGP website. These Reports have been referenced in the following evaluation of environmental performance.

3.2 Environmental Management System

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

- AGL Energy Health, Safety and Environment Policy;
- Environmental Management Plan (EMP) (AGL, July 2014, update approved by DoPE);
- EMP Sub-Plans, including;
 - Rehabilitation & Landscape Management Sub-Plan, updated 28 April 2014
 - Soil & Water Management Sub-Plan, updated 28 April 2014
 - Flora and Fauna Management Sub-Plan, updated 28 April 2014
 - European Heritage Management Sub-Plan, updated 28 April 2014
 - Aboriginal Cultural Heritage Management Plan, updated December 2013
 - Waste Management Sub-Plan, updated 28 April 2014
 - Dangerous Goods and Hazardous Materials Sub-Plan, updated 28 April 2014
 - Noise Management Sub-Plan, updated November 2013
 - Air Quality Management Sub-Plan, updated 10 September 2008, currently being revised
 - Traffic Management Sub-Plan, updated 10 September 2008, currently being revised
- Compliance register; and
- Monitoring and reporting.

The 2010-2012 Independent Environmental Audit identified that the Statement of Commitments associated with the development consents had not been incorporated into the Sub-Plans. AGL has reported that this has now been done within the updated EMP and Sub Plans.

With the exception of the Sub-Plans for Air Quality and Traffic, the updated Sub-Plans have been forwarded to DoPE for review and approval. The Air Quality Management Sub-Plan and the Traffic Management Sub-Plan are currently being updated and when completed will be submitted to DoPE for review and approval. Upon approval by DoPE the EMP and Sub-Plans will be forwarded to the local Councils and the NSW Environment Protection Authority.



The approved versions of the EMP and Sub-Plans have been implemented and are available on the CGP's web-site. It is noted that many of the approved Sub-Plans date back to 2008 and in some instances 2012. The EMP and the Sub-Plans have been undergoing extensive third-party review and update over the last 12 months and as the documents are approved by DoPE they will be placed on CGP's web-site.

The EMP and Sub-plans provide detailed reference to the relevant conditions of consent and management measures implemented by AGL to address the conditions of consent. The EMP and Sub-Plans are considered by the Auditor to provide a robust and transparent framework for management of the environmental impacts of the CGP.

3.3 Compliance Monitoring System

AGL maintains an environmental compliance register detailing key environmental legislative obligations and the conditions of consent. The register includes references to evidence demonstrating compliance with these requirements. The register transitioned during the audit period from Mipela to RCR (Regulatory Compliance Register, in May 2013) and is currently transitioning to CMO-Compliance. CMO-Compliance was commissioned on 30 June 2014 and provides a weekly update of identified non-compliances. RCR and CMO-Compliance are currently both operating.

The Auditor notes that:

- The entries in CMO do not include 'word for word' copy of all environmental obligation. Some obligations have been paraphrased which creates the risk of misunderstanding or excluding some obligations. It is recommended that all obligations in the register be a 'word for word' transcript from the source document. AGL have recognised this and it is being addressed in CMO.
- Evidence of compliance has not been included in CMO-Compliance for all obligations. This undermines the value and effectiveness of the register. It is recommended that links be provided to relevant evidence for each obligation in the register. It is noted that the CMO was commissioned on 30 June 2014 and it is still in a transition phase.

3.4 Environmental Complaints

AGL's AEPRs for the 2012/2013 and 2013/2014 financial years indicates that no environmental complaints were received by AGL during the audit period in relation to the operations and well sites within the scope of this IEA.

3.5 Incident Management System

AGL maintains an incident management system (including environmental complaints) which transitioned from Connect First to MyHSE in August 2014. The incident management system provides a useful means of documenting and facilitating response to environmental incidents and complaints. Review of the list of environmental related incidents for the audit period indicates the following incidents attributable to AGL operations:

- Leak of hydraulic oil from a workover rig on 23 July 2012, resulting in minor contamination of soil, which was removed from the site.
- Minor spill (approximately 2.0 litres) of diesel whilst filling a forklift on 21 August 2012.
- Minor leak of hydraulic oil onto ground at the dairy yard on 20 September 2012.
- Loss of approximately 50 litres of diesel from an air compressor at Spring Farm 08 on 30 November 2012, contained to the well site and resulting in contaminated soil, which was removed from the site.
- Minor spill (less than one litre) of oil from a forklift engine, on 30 July 2013.
- Exceedance of emissions from Unit #1 at RPGP, resulting in the engine being shut-down, on 4 August 2013.



- Loss of contents from the two water storage tanks at RP02 due to a failure of the hose connecting the two tanks, on 2 December 2013.
- Minor leak of diesel from a fuel tank during workover of WG04 onto the grass pad area within the AGL operations area, approximately two metres by two metres, on 26 July 2013.
- Exceedance of NOx emissions from Compressor Engine No. 1 at RPGP on 13 August 2013.
- Noise complaint associated with workover operations at MP03 on 24 October 2013.
- Storage of four oil drums and an open topped Intermediate Bulk Container outside a bunded area at RPGP on 28 March 2014.

This audit report specifically excludes reporting on any environmental compliance matters associated with CGP's EPL under instruction from AGL. Compliance with the EPL is reported by AGL in the Annual Returns submitted to the EPA and in the AEPR for the CGP for each financial year, a copy of which is publicly available on CGP's website.

None of the identified incidents appears to have resulted in harm to the environment. However, the incidents highlight the need for ongoing diligence in management of the operations of the CGP.

3.6 Gas Leak Detection Surveys

AGL undertakes an annual leak detection survey of its gas well heads and gas gathering lines, using third party specialist consultants. AGL's Fugitive Emissions Monitoring Program which ran over 12 weeks during 2013 found that the average methane concentration was 1.8ppm, which is in line with average concentrations generally found in urban areas without coal seam gas production. The monitoring locations were not at the well heads but rather a range of distances and in areas where the community 'work, live and play'.

3.5 Site Observations

As part of the audit, site inspections were undertaken on 29 September 2014 of the following assets:

- MP17 - a single vertical well, drilled in 2003 and currently in production.
- MP16 - a single vertical well, drilled in 2003 and currently in production.
- MP25 – a horizontal well drilled in July 2012 where land rehabilitation was undertaken involving planting of approximately 780 native trees.
- MP13 – a single vertical well, drilled in 2003 and currently suspended.
- MP30 – a single horizontal well, drilled in 2008, currently in production, where workover activities were undertaken in March 2014.
- SL02 – a single vertical well, drilled in 2006, currently in production.
- RPGP.

The sites were inspected to assess the extent of operational footprint, degree of disturbance and status of rehabilitation works.

At all locations the well heads and associated infrastructure were observed to be enclosed within locked man-proof fences, with the exception of some water holding tanks located at MP25. The access areas adjacent to the enclosed areas were observed to be adequately rehabilitated. No evidence of significant leaks, spills or erosion were sighted.

The environmental controls as specified in the CGP Environmental Management Plan and Sub-Plans appeared to be adequately implemented.



The main area of disturbance during the audit period comprised the drilling of MP25 in July 2012, which required significant earthworks to construct the drilling and laydown pads. Upon completion of these works the area was re-contoured and approximately 780 native trees had been planted using local seedstock. The area had also been grassed. The vegetation was observed to be successfully establishing. Some weed species were present and AGL advised that further spraying of weeds would be undertaken.

The twinning of the gas gathering line associated with MP25 was undertaken within an access road alignment and did not involve significant clearing of vegetation or re-contouring of the land surface.

The RGP site was observed to be in a generally clean and tidy condition.

No significant concerns were identified from the Auditor's inspection of the field areas.

3.7 Non-Compliances with Consent Conditions

Detailed findings of performance against each relevant conditions of consent for the audit period are provided in **Appendix B** of this report. The findings identified a number of Level 2 Non-Compliances, Areas of Concern and opportunities for improvement. No Level 1 Non-compliances were identified during this audit.

3.8 Regulatory Action Undertaken by the EPA During the Audit Period

The Auditor notes that the following regulatory action was undertaken by the EPA during the audit period.

- Penalty Infringement Notice (PIN), 'Failure to Maintain Plant and Equipment', issued by the EPA on 13 March 2013 in relation to exceedances of permitted NO_x emission limits from compressor engines 1 and 2 during September 2012, November 2012 and December 2012. The exceedances were attributed to a minor movement in the air fuel ratio potentiometer (set screw) on compressor engine 1 and ash fouling of the exhaust catalyst on compressor engine 2. The PIN resulted in AGL paying a fine of \$1500.
- PIN, 'Failure to Publish Continuous Emission Monitoring System (CEMS) data' in relation to AGL not publishing the required emission data specified by the license from Compressor Engines 1, 2 and 3 within 14 days as required by the Protection of the Environment Operations Act 1997. The PIN resulted in AGL paying a fine of \$1,000.
- PIN, 'Failure to Maintain Plant and Equipment', issued by the EPA on 19 December 2013 in relation to an exceedance of permitted NO_x emission limits from compressor engine 1 in 4 August 2013. The exceedance was attributed to a broken wire from the intake manifold pressure transducer on the Air Fuel Ratio Module. The PIN resulted in AGL paying a fine of \$1,500.
- Official Caution, 'Failure to Maintain Plant and Equipment', issued by the EPA on 19 December 2013 in relation to relation to an exceedance of permitted NO_x emission limits from compressor engine 1 on 13 August 2013. The exceedance was attributed to a cracked engine mount.
- The EPA noted that none of these incidents were considered to have caused significant harm to the environment.

On 8 August 2013, AGL signed an Enforceable Undertaking prepared in cooperation with the EPA in relation to deficiencies in the continuous emissions monitoring of air emissions on compressor engines 1, 2 and 3 during the period October 2009 to 2012. The EU details a number of actions to be taken by AGL. The Camden Gas Project: AEPR 2013-2014 details AGL's actions in relation to the EU.

3.9 Non-Compliances with the EPL

Review of compliance against the conditions of the EPL for the CGP was specifically excluded from the scope of this audit by AGL. It is noted that AGL submits annual returns at the end of each licence year,



reporting compliance with the conditions of the licence. The AEPRs for the CGP also present details of compliance with the EPL for the CGP. These Reports are publicly available on the CGP website.

While it has not been within the scope of this Audit to evaluate compliance against the CGP EPL, for completeness in assessing environmental performance as part of this Audit, the following information is provided in relation to non-compliances with the EPL as reported by AGL in its Annual Returns and AEPRs. The Auditor has not verified the accuracy of this information.

The Annual Return for the 2011/2012 year (ending on 22 December 2012) identified five non-compliances with the EPL. A summary of these non-compliances is also included in the Camden Gas Project: AEPR 2012-2013 prepared by AGL.

The Annual Return for the 2012/2013 year (ending on 22 December 2013) identified fourteen non-compliances with the EPL. A summary of these non-compliances is also included in the Camden Gas Project: AEPR 2013-2014 prepared by AGL (a draft of which was sighted by the Auditor).

The Auditor notes that under Section 64 of the *Protection of the Environment Operations Act 1997*, it is an offence to contravene any condition of an EPL.

3.10 Petroleum Exploration Licence and Petroleum Production Leases

The CGP is subject to the conditions of PEL No. 2 and PPL No.1, No. 2, No. 4, No. 5 and No. 6. The previous audit noted that the requirements of the PPLs and the Pipeline Licence are fully replicated within the development/project approvals. As such, a separate assessment of compliance was not conducted as part of this audit.

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

3.11 Bore Water Licences

The auditor for the 2010-2012 Independent Environmental Audit sighted an example Bore Water Licence Certificate (10BL603867) and noted that conditions that were activated during the audit period were reflected in the "2010/11 Technical Report, Industrial Bore Licences, Dewatering Activities, Camden Gas Project, AGL Energy Ltd" submitted by AGL to the NSW Office of Water (NOW) on 24 August 2011. The auditor noted that the report provides a summary of status against the following conditions:

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

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

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

AGL reported in the Camden Gas Project: AEPRs for the 2012-2013 and 2013-2014 years that its operations complied with the conditions of its bore licenses. The Auditor has not verified this status.



4.0 CONCLUSION

An independent environmental audit was conducted of the CGP for the period 1 July 2012 to 30 June 2014. The scope of the audit, as defined by the development approvals for the project, was focussed on the environmental performance of the development, including supporting systems, and compliance with relevant standards, performance measures and statutory requirements.

The key requirements for the IEA as specified by condition 58 of Schedule 2 of DA 75-4-2005-I, and similarly referenced in the other conditions, are as follows:

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

This audit comprised the fifth independent environmental audit for the project, and was commissioned within 2 years of completion of the previous audit.

The Independent Environmental Audit shall:

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

The audit was conducted by Mr. Tom Carmichael, Associate of Golder, and a registered Environmental Lead Auditor with Exemplar Global (formerly RABQSA International). Mr. Carmichael was approved as independent auditor by the Director-General for this IEA on 29 August 2014.

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

The audit was conducted in accordance with ISO 19011:2002 – Guidelines for Quality and/or Environmental Management Systems Auditing.

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

This IEA report has assessed the environmental performance of the development and its effects on the surrounding environment. There were a number of environmental incidents recorded by AGL during the audit period, none of which were considered to have, or likely to have, resulted in actual or potential environmental harm.

Environmental control measures were typically implemented and employees demonstrated an understanding of environmental risks and controls.

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

AGL has demonstrated substantial compliance with the relevant standards, performance measures and statutory requirements that apply to the development.

A number of ‘Non-Compliances (Level 2)’ and ‘Improvement Recommended’ with regards to the conditions of consent were identified during this Audit. No ‘Level 1 Non-Compliances’ were identified for the audit period.

During the audit period AGL received three PINs and entered into an Enforceable Undertaking with the EPA. AGL undertook the measures required by the EPA in relation to the PINs and there are no outstanding matters. The EPA has yet to sign-off on completion of all actions identified in the Enforceable Undertaking. The EPA has not indicated any intention to pursue matters in relation to the PINs or the Enforceable Undertaking through the legal courts.

A number of non-compliances with the conditions of the CGP’s EPL have been identified by AGL and reported in the Annual Returns and the AEPRs for the audit period. The scope of this IEA, as instructed by AGL, specifically excluded an assessment of compliance with the conditions of the EPL.



Non-conformances are generally administrative in nature and unlikely to result in actual or potential harm to the environment or human health. Compliance may be improved by ensuring all monitoring requirements are completed in accordance with the EPL, approved management plans and the conditions of consent.

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

The adequacy of CGP's EMP has been reviewed in Section 3.2 of this IEA Report. The EMP and Sub-plans provide detailed reference to the relevant conditions of consent and management measures implemented by AGL to address the conditions of consent. The EMP and Sub-Plans are considered by the Auditor to provide a robust and transparent framework for management of the environmental impacts of the CGP. There remains room for improvement in the content and use of AGL's compliance management system.

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

The audit findings and recommendations are detailed in Section 4.0 and in Appendix B of this report.



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Table 1: Development approvals and project approvals

Approval	Issue Date	Description	Audit Period Works	Previous Audit?
DA 15-1-2002-I (Apap, Joe Stanley, Johndilo, Loganbrae, Lipscombe and Mahon)	23/07/2002	Project approval granted for the continued operation of the Camden Coalbed Methane project, including: <ul style="list-style-type: none"> • Operation of the existing 20 production wells; • Operation of 5 additional wells not yet completed and/or drilled; • Operation of the existing and proposed gas gathering system; • Operation of the existing gas treatment plant; • Production of up to 93,000 GJ/month from the treatment plant; • Sale and distribution of gas to the AGL gas network; and • Operation of the existing site office and pipe yard depot. 	<ul style="list-style-type: none"> • Operation of selected wells and gas gathering line. • Plug and abandon JD04 	Yes
MOD 53-4-2006	16/05/2006	Modification of DA 15-1-2002-i granted for: <ul style="list-style-type: none"> • Construction, drilling and operation of a directional well from LB09. 	<ul style="list-style-type: none"> • Operation of well. 	Yes
	9/02/2007	Modification granted for: <ul style="list-style-type: none"> • Re-drilling of wells Apap 01 and Mahon 01. 	<ul style="list-style-type: none"> • N/A 	Yes
MOD24-3-2007	4/07/2007	Modification of DA 15-1-2002-i granted for: <ul style="list-style-type: none"> • Construction, drilling and operation of two surface to in-seam wells (AP02/AP03) at AP01. 	<ul style="list-style-type: none"> • N/A 	Yes
MOD3	1/07/2008	Modification of DA 15-1-2002-i granted for: <ul style="list-style-type: none"> • Modification Application DA 15-1-2002-i MOD 3 and “Camden Gas Project: Kay Park and Loganbrae Gas Gathering Line Modification Project Statement of Environmental Effects”, dated July 2008. 	<ul style="list-style-type: none"> • Operation of gas gathering line. 	Yes
DA 246-8-2002-I (Kay Park)	20/09/2002	Project approval granted for: <ul style="list-style-type: none"> • Connection of 3 existing wells (KP1, KP2, and KP3) to the Ray Beddoe Treatment Plant (in accordance with the attached plan); and • Continued production and sale of methane gas from the 3 wells. 	<ul style="list-style-type: none"> • Operation of wells. 	Yes



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MOD25-3-2007	4/07/2007	<p>Modification of DA 246-8-2002-i granted for:</p> <ul style="list-style-type: none"> Construction, drilling and operation of 2 Surface to in-seam wells (KP05 and KP06) from KP01. 	<ul style="list-style-type: none"> Operation of KP05. 	Yes
MOD29-3-2007	4/08/2008	<p>Modification of DA 246-8-2002-i granted for:</p> <ul style="list-style-type: none"> Kay Park and Loganbrae gas gathering line modification project. 	<ul style="list-style-type: none"> Operation of gas gathering line. 	Yes
	3/12/2008	<p>Modification of DA 246-8-2001i was issued for:</p> <ul style="list-style-type: none"> Construction and operation of one SIS well (KP05) and one direction well (KP06) from KP01. 	<ul style="list-style-type: none"> Operation of KP05. 	Yes
	20/04/2011	<p>Modification of DA 246-8-2001i was issued for:</p> <ul style="list-style-type: none"> Construction, drilling and operation of 2 surface to in-seam wells (KP05 and KP06). 	<ul style="list-style-type: none"> Operation of KP05 and KP06. 	Yes
DA 282-6-2003-I (RPGP, Rosalind Park, Wandinong, EMAI (EM01-20, 40))	16/06/2004 (expires 05/10/2025)	<p>Project approval for the Camden Gas Project Stage 2, including:</p> <ul style="list-style-type: none"> Construction and drilling of 20 wells located on the EMAI Site; Operation and production of gas from the existing (drilled) 23 wells and 20 wells to be constructed (a total of 43 wells); Construction and operation of the gas gathering system; Construction and operation of the gas treatment plant, associated workshop and office facilities; and Production of up to 14.5 petajoules per annum from the gas treatment plant. 	<ul style="list-style-type: none"> Operation of wells, gas gathering line and RPGP 	Yes
MOD72-7-2004-i	26/08/2004	<p>Modification of DA 282-6-2003-i granted for:</p> <ul style="list-style-type: none"> Limiting term of production lease approval to 21-years; Land omitted from development consent; Requirement for EMP for works in Campbelltown City Council road reserve; and Works to commence prior to granting of production lease. 	<ul style="list-style-type: none"> N/A 	Yes
MOD5-1-2005	1/02/2005	<p>Modification of DA 282-6-2003-i granted for:</p> <ul style="list-style-type: none"> Amendment to EMAI Access Road (refer Figure 3 - Sydney Gas Camden Gas Project Stage 2 (18-11-2004 Map Ref M240329); and Amendment to EMAI Gathering System – refer Figure 4 - Sydney Gas Camden Gas Project Stage 2 (18-11-2004 Map Ref M240328). 	<ul style="list-style-type: none"> N/A 	Yes



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MOD42-3-2005	1/06/2005	<p>Modification of DA 282-6-2003-i granted for:</p> <ul style="list-style-type: none"> Modification Application 42-3-2005 and the letter from Sydney Gas Operations Pty Ltd to the Department dated 14 March 2005 titled Camden Gas Project Stage I&I – Modification Application, and the accompanying attachments. 	<ul style="list-style-type: none"> N/A 	Yes
MOD52-4-2006	16/05/2006	<p>Modification of DA 282-6-2003-i granted for:</p> <ul style="list-style-type: none"> Construction, drilling and operation of 1 directional well from GL07 and two directional wells from GL10. 	<ul style="list-style-type: none"> Operation of wells. 	Yes
MOD119-10-2006	22/10/2006	<p>Modification of DA 282-6-2003-i granted for:</p> <ul style="list-style-type: none"> Construction, drilling and operation of 1 directional well (GL16) from GL7 and 1 directional well (GL15) and 1 Surface to in-seam well (GL14) from GL10; and Additional limits on hours of operation and sound pressure levels. 	<ul style="list-style-type: none"> Operation of wells. 	Yes
MOD124-10-2006	1/11/2006	<p>Modification of DA 282-6-2003-i granted for:</p> <ul style="list-style-type: none"> Construction, drilling and operation of 1 directional well (GL16) from GL7, and 2 Surface to in-seam wells (GL14 and GL15) from GL10. 	<ul style="list-style-type: none"> Operation of wells. 	Yes
MOD11-2-2007	2/05/2007	<p>Modification of DA 282-6-2003-i granted for:</p> <ul style="list-style-type: none"> Relocation of an Existing Internal Road at Rosalind Park Gas Plant (RPGP) off Medhurst Road, Menangle, dated February 2007. 	<ul style="list-style-type: none"> Use of road. 	Yes
MOD26-3-2007	4/07/2007	<p>Modification of DA 282-6-2003-i granted for:</p> <ul style="list-style-type: none"> Construction, drilling and operation of 1 Surface to in-seam well (EM38) at EM20; and Upgrading (twinning) of the gas gathering line between MP14-GL10, GL10-GL05, GL05-GL07 and RP03-RP08. 	<ul style="list-style-type: none"> Operation of well and gas gathering lines. 	Yes
MOD9	11/04/2008	<p>Modification of DA 282-6-2003-i granted for:</p> <ul style="list-style-type: none"> Construction, drilling and operation of 2 Surface to in-seam wells - EM39 (from EM02) and GL17 (from GL05); Upgrading (twinning) of the gas gathering line from EM39 to the junction of the gas gathering line and road to the EM03 well; and Connection of the new wells to the existing gas gathering system. 	<ul style="list-style-type: none"> Operation of well and gas gathering lines. 	Yes



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MOD10	16/03/2009	<p>Modification of DA 282-6-2003-i granted for:</p> <ul style="list-style-type: none"> Construction of an access road to the existing RP09 gas well; and Twinning of a small section of the existing gas gathering line between RP08 and RPPG. 	<ul style="list-style-type: none"> Operation of gas gathering line. 	Yes
MOD11	18/09/2009	<p>Modification of DA 282-6-2003-i granted for:</p> <ul style="list-style-type: none"> Rerouting damaged gas gathering line at Glenlee-06. 	<ul style="list-style-type: none"> Operation of gas gathering line. 	Yes
MOD12	25/11/2010	<p>Modification of DA 282-6-2003-i granted for:</p> <ul style="list-style-type: none"> Modification of RPPG noise monitoring requirements, air emission concentration limits and waste storage and generation volumes. 	<ul style="list-style-type: none"> N/A 	Yes
DA 183-8-2004-I (Mt Taurus and Menangle Park)	16/12/2004	<p>Project approval granted for:</p> <ul style="list-style-type: none"> Connection of 15 existing coal seam methane wells to the Rosalind Park Gas Plant from the Mount Taurus and Menangle Park properties, for the production of methane gas; and Construction of a dam at the MT1 gas well site. 	<ul style="list-style-type: none"> Operation of wells and gas gathering lines. 	Yes
MOD27-3-2007	4/07/2007	<p>Modification of DA 183-8-2004-i granted for:</p> <ul style="list-style-type: none"> Construction, drilling and operation of 1 Surface to in-seam well (MP30) at MP13 and upgrading (twinning) of the gas gathering line between MP13 and MP14. 	<ul style="list-style-type: none"> Operation of well and gas gathering lines. 	Yes
MOD13-10-2011	09/07/2012	<p>Modification of DA 183-8-2004-i granted for:</p> <ul style="list-style-type: none"> 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. 	<ul style="list-style-type: none"> Drilling and operation of MP25. Construction and operation of gas gathering line 	No
DA 9-1-2005 (Glenlee Wells)	26/05/2005	<p>Project approval granted for:</p> <ul style="list-style-type: none"> Construction and drilling of well GL11; Construction of a gas gathering system between four wells at Glenlee and two wells at EMA1; Connection of 6 coal seam methane wells to the previously approved Stage 2 Camden Gas Project – Gas Treatment Plant, for the production of methane gas. 	<ul style="list-style-type: none"> Operation of wells and gas gathering line. 	Yes
MOD51-4-2006	16/05/2006	<p>Modification of DA 9-2005 granted for:</p> <ul style="list-style-type: none"> Construction, drilling and operation of a directional well from each of GL02 and GL11. 	<ul style="list-style-type: none"> Operation of wells. 	Yes



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MOD28-3-2007	4/07/2007	Modification of DA 9-1-2005 granted for: <ul style="list-style-type: none"> Upgrading (twinning) of gas gathering line between GL02 and GL05. 	<ul style="list-style-type: none"> Operation of gas gathering line. 	Yes
	16/11/2010	Modification of DA 9-1-2005 granted for: <ul style="list-style-type: none"> Modification of Schedule 2, Condition 26 	<ul style="list-style-type: none"> N/A 	Yes
DA 75-4-2005 (Sugarloaf Farm)	7/10/2005	Project approval granted for: <ul style="list-style-type: none"> Construction and drilling of 7 wells; Construction of a gas gathering system and access roads; Connection of the wells to the Stage 2 Camden gas Project – Gas Treatment Plant; and Production of methane gas. 	<ul style="list-style-type: none"> Operation of wells and gas gathering lines. 	Yes
MOD29-3-2007	4/07/2007	Modification of DA 75-4-2005 granted for: <ul style="list-style-type: none"> Construction and drilling of 9 wells, including 2 Surface to in-seam wells (SL08 and SL09) at SL03. 	<ul style="list-style-type: none"> Operation of wells. 	Yes
MOD2	10/01/2010	Modification of DA 75-4-2005 granted for: <ul style="list-style-type: none"> Twinning of a gas gathering line from well surface locations SL03 and SL09 to the RPGP. 	<ul style="list-style-type: none"> Operation of gas gathering line. 	Yes

Note: N/A = not applicable



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Table 2: DA 15-1-2002-I (Apap, Joe Stanley, Johndilo, Loganbrae, Lipscombe and Mahon)

No.	Consent Condition	Evaluation	Finding
	Schedule 3		
	Obligation to Minimise Harm to the Environment		
1.	<p>The Applicant shall implement all practicable measures to prevent or minimise any harm to the environment that may result from the construction or operation of the development.</p>	<p>An Environmental Management System (EMS) has been established to manage environmental risks and drive improvements in performance. The EMS consists of an Environmental Management Plan (EMP), related sub-plans and a Compliance Register.</p> <p>Various management tools have been implemented to monitor and measure implementation of the EMS.</p> <p>The Environmental Compliance Register (ECR) was sighted and found to be effective for monitoring compliance against project approval obligations. During the audit period the ECR transitioned from Mipela to Regulatory Compliance Register to CMO-Compliance. CMO was commissioned only on 30 June 2014 and is still in a transition phase. However, supporting documents were not included for all conditions to verify compliance status. It is recommended that each Consent Condition in the Compliance Register be checked to ensure that relevant supporting documentation is referenced (Opportunity for Improvement).</p> <p>It is also noted that the consent conditions contained in CMO-Compliance are not consistently a 'word for word' representation of the relevant condition, which presents a risk of misinterpretation and inability to fully comply with the condition. It is recommended that each condition in CMO-Compliance be checked to ensure it is a 'word for word' representation of the consent conditions (Opportunity for Improvement).</p> <p>There were no reported environmental incidents or non-</p>	<p>Compliance – Improvement Recommended</p>



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No.	Consent Condition	Evaluation	Finding
		compliances during the audit period.	
	Terms of Approval		
2.	The Applicant shall carry out the development generally in accordance with the:	AGL reported that the development is being undertaken in accordance with the EMS, which incorporates the requirements of Consent Conditions and the supporting documentation. The Sub-Plans have been going through a process of review and upgrade during 2013/2014 and have been submitted to DoPE, with the exception of the Sub-Plans for air quality and traffic which are still undergoing the revision process.	Compliance
	(a) DA submitted to the Department on 31 January 2002;		Compliance
	(b) Camden Coalbed Methane Project Petroleum Production Operations – Environmental Impact Statement for the Sydney Gas Company (four volumes), dated December 2001 and prepared by Harvest Scientific Services;		Compliance
	(c) Letter from Sydney Gas Company dated 4 April 2002 to the EPA in relation to community complaints, lot and DP details of the treatment plant, wells and infrastructure, and map showing existing well locations;		Compliance
	(d) Letter from Sydney Gas Company dated 8 April 2002 to the EPA in relation to background noise level monitoring;		Compliance
	(e) Letter from Sydney Gas Company dated 11 April 2002 to the EPA in relation to achievable noise levels, operational flaring noise, and ongoing maintenance issues;		Compliance
	(f) Letter from Sydney Gas Company dated 11 April 2002 to the EPA in relation to nitrogen dioxide impact assessment and odour issues;		Compliance
	(g) Letter from Sydney Gas Company dated 12 April 2002 to the EPA in relation to the 3 additional wells, and maintenance activities;		Compliance
	(h) Letter from Sydney Gas Company dated 16 April 2002 to the EPA in relation to noise monitoring, noise levels, operational flaring noise, construction and maintenance activities, nitrogen dioxide assessment, and odour impact assessment;		Compliance
	(i) Letter from Sydney Gas Company dated 29 May 2002 to Planning NSW in relation to the risk assessments and drawings for the Westbrook Road to Camden Pipeline;		Compliance
	(j) The Modification Application submitted to the Department on 11 April 2006 and the accompanying document “Camden Gas Project Joint Venture Proposed Multiple Gas Well Modifications” prepared by AGL Gas Production		Compliance



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No.	Consent Condition	Evaluation	Finding
	(Camden) Pty Ltd and Sydney Gas (Camden) Operations Pty Ltd, dated April 2006;		
	(k) Modification Application MOD 24-3-2007 and "Camden Gas Project Joint Venture Gas Well and Gathering Line Modification Project Statement of Environmental Effects" dated March 2007; and		
	(l) Conditions of this consent If there is any inconsistency between the above documents, the latter document shall prevail over the former to the extent of the inconsistency. However, the conditions of this consent shall prevail over all other documents to the extent of any inconsistency.	Refer to relevant conditions for an assessment of compliance.	
	Period of Approval		
3.	This approval is for a period of twenty one (21) years from the date of granting of the production lease.	Condition not activated during the audit period.	Not Triggered
	Special Conditions of Approval		
4.	The Applicant shall submit a development application for a new treatment plant within two (2) years of the date of this consent. Upon the commissioning of the new treatment plant the Applicant shall cease production from the Ray Beddoe Treatment Plant and proceed to rehabilitate the site in accordance with the Site Rehabilitation Management Plan.	Condition closed in a previous audit.	Not Triggered
5.	If after five (5) years of the date of this consent any well that is the subject of this consent has not yet been drilled or completed, then the Applicant shall surrender the approval for that well.	Condition noted. AGL reported that no wells were drilled during the audit period and no wells required surrendering during the audit period.	Compliance
6.	At the expiration of ten (10) years from the date of this consent, the Applicant shall submit to the Director General a reserve report covering the petroleum production lease (PPL) area. The report shall be prepared by an independent petroleum expert in accordance with relevant definitions approved by the Society of Petroleum Engineers and/or the World Petroleum Congress. In the absence of a proven reserve, the Applicant shall make a further submission to the Director-General justifying why production should continue. After reviewing this report, the Director-General may direct the Applicant to carry out certain actions (including the closure and rehabilitation of certain wells).	Closed out in a previous audit.	Not Triggered.



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No.	Consent Condition	Evaluation	Finding
	Note: The Production Lease to be granted by the DOPE will apply to the PAL 1 area, which is a much larger area than that which the development consent applies to. This consent applies to the land and structures identified in Schedule 1, being the wells, treatment plant, site depot, gas gathering system and pipeline. To minimize the impact of the development on the area, the Production Lease will include a condition which requires the Applicant to relinquish areas that have not been tested for gas production within 10 years of the granting of the lease. The Production Lease would include a condition which requires the Applicant to submit a development application for development of the Stage II production area within 3 years of the date of the production lease.		
	Further Approvals		
7.	Nothing in this consent permits the drilling and operation of any additional wells (beyond the approved 26 wells) or a new treatment plant. These shall be the subject of another development consent or development consents. Note: The drilling of new gas wells within the production lease area and the production of gas from them, and a new treatment plant would require development consent under the Environmental Planning and Assessment Act, 1979.	The auditor reviewed the gas wells reported in the Annual Environmental Performance Report (AEPR) against the Development Consent and confirmed that no additional wells were drilled or operated during the audit period.	Compliance
	Redrilling and Refracting Management Plan		
8.	For the purposes of this consent the redrilling and/or additional fracing of a well does not constitute wellhead maintenance.	Condition not activated during the audit period. AGL advised that there were no re-drilling or fracing activities during the audit period.	Not Triggered
9.	The Applicant shall obtain the approval of the Director-General for the redrilling and/or additional fracing of a well.	Condition not activated during the audit period. AGL advised that there were no re-drilling or fracing activities during the audit period.	Not Triggered
10.	The Applicant shall prepare a Redrilling and Refracting Management Plan in consultation with the DOPE for redrilling and/or refracting of an existing well. The Plan shall be submitted to the Director-General no later than one month prior to the commencement of the work or within such period as	Condition not activated during the audit period. AGL advised that there were no re-drilling or fracing activities during the audit period.	Not Triggered



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No.	Consent Condition	Evaluation	Finding
	agreed by the Director-General. The Plan shall include, but not necessarily be limited to:		
	(a) A description of all the activities to be undertaken on the well site during the redrilling and/or refracing work;		Not Triggered
	(b) Details of how the environmental performance of the work will be monitored and what actions will be taken to address identified adverse environmental impacts;		Not Triggered
	(c) reference to the relevant parts of the Environmental Management Plan required under condition 15 of this consent;		Not Triggered
	(d) compliance with all the relevant environmental performance requirements of this consent; and arrangements for complaints handling procedures during the redrilling/refracing work. The Applicant shall give written notification of the proposed redrilling/refracing work to potentially affected residences and other noise sensitive receivers at least fourteen days prior to work commencing.		Not Triggered
	Compliance		
11.	Throughout the life of the development, the Applicant shall secure, renew, maintain, and comply with all the relevant statutory approvals applying to the development.	<p>An EMS has been established to manage environmental risks and drive improvements in performance. The EMS consists of an EMP, related sub-plans and a Compliance Register.</p> <p>Various management tools have been implemented to monitor and measure implementation of the EMS.</p> <p>The ECR was sighted and found to be effective for monitoring compliance against project approval obligations. During the audit period the ECR transitioned from Mipela to Regulatory Compliance Register to CMO-Compliance. CMO was commissioned only on 30 June 2014. However, supporting documents were not included for all conditions to verify compliance status. It is recommended that each Consent Condition in the Compliance Register be checked to ensure that relevant supporting documentation is referenced</p>	Compliance – Opportunity for Improvement



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No.	Consent Condition	Evaluation	Finding
		<p>(Opportunity for Improvement).</p> <p>It is also noted that the consent conditions contained in CMO-Compliance are not consistently a 'word for word' representation of the relevant condition, which presents a risk of misinterpretation and inability to fully comply with the condition. It is recommended that each condition in CMO-Compliance be checked to ensure it is a 'word for word' representation of the consent conditions (Opportunity for Improvement).</p> <p>There were no reported environmental incidents or non-compliances during the audit period.</p>	
12.	<p>The Applicant shall take all reasonable steps to ensure that all of its employees, contractors and subcontractors are made aware of, and comply with, the conditions of this consent relevant to their respective activities.</p>	<p>The Auditor sighted the EMP (February 2014) which notes that employees and contractors must attend an induction prior to commencing operation, maintenance and construction works. In addition, job specific training is delivered in response to identified needs.</p> <p>The auditor sighted the site specific and role-specific induction program that is delivered to AGL employees and contractors. The online system includes a module that is aligned with the EMP and the specific risks and controls.</p> <p>Examples of training programs sighted by the Auditor included:</p> <ul style="list-style-type: none"> ■ AGL Environmental Legal Obligations Training 2013 ■ AGL Upstream Gas Environmental Compliance Training ■ Lunch & Learn: PIRMP presentation 	Compliance



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No.	Consent Condition	Evaluation	Finding
13.	The Applicant must, in the opinion of the EPA, be a fit and proper person to hold a licence under the Protection of the Environment Operations Act, 1997, having regard to the matters in section 83 of that Act.	<p>It was noted by the Auditor that during the audit period AGL received three Penalty Infringement Notices (PINs) and an Enforceable Undertaking. AGL undertook the measures required by the New South Wales Environment Protection Authority (EPA) and there are no outstanding matters. The EPA has yet to sign-off on the Enforceable Undertaking as it is ongoing. The EPA has not indicated any intention to pursue matters through the legal courts.</p> <p>However, it is noted that the criteria contained in Section 83 are broad and a non-compliance with a statutory obligation does not automatically lead to a conclusion that a party is not a fit and proper person to hold a licence. On balance, the Auditor considers AGL to be a fit and proper person within the terms of this condition.</p>	Compliance
PRODUCTION OPERATIONS PLAN			
14.	The Applicant shall prepare a Production Operations Plan (POP) for the approval of the DOPE. The POP shall have regard to the conditions of this consent and the licence under the POEO Act. The POP will form the basis for the:	<p>AGL reported that meetings occurred with DTIRS (now Office of CSG) on 14 July 2011 and 5 June 2013 to discuss the revised POP (v7). The Auditor sighted correspondence from the Office of CSG (8/8/2013) stating that compliance has been achieved due to the currency of the previous version (POP, v6) and submission of a revised version (POP, v7, dated 19/11/2013). A letter of approval was issued by NSW Government Trade & Investment on 20 December 2013. The POP was updated on 17 December 2014, approved via letter by the Office of CSG on 23 December 2014 and a copy forwarded to DOPE on 24 December 2014.</p>	Compliance
(a) ongoing operations and environmental management; and			Compliance
(b) ongoing monitoring of the development. A copy of the POP shall be forwarded to the Department within fourteen days of the DMR's acceptance.			Compliance



CAMDEN GAS PROJECT - INDEPENDENT ENVIRONMENTAL AUDIT 2012 - 2014

No.	Consent Condition	Evaluation	Finding
ENVIRONMENTAL MANAGEMENT			
Environmental Management Plan			
15.	<p>The Applicant shall prepare and implement an Environmental Management Plan (EMP) to provide an environmental management framework, practices and procedures to be followed during the drilling and operation of the development. The EMP shall be prepared in consultation with the relevant authorities (EPA, DMR, DLWC). The EMP shall include, but not necessarily be limited to:</p>	<p>AGL advised that the original EMP was developed by Sydney Gas in consultation with the respective agencies in 2002. However, the documented evidence of this consultation was not available for the Auditor.</p> <p>The Auditor sighted the current EMP (February 2014). Although the current EMP references the Consent Conditions it was not updated in consultation with all of the nominated authorities. The Auditor notes that it is not an explicit requirement of this condition that the nominated authorities be consulted during updates of the EMP.</p> <p>The current EMP Sub-Plans are still subject to regulatory consultation.</p> <p>Feedback was received from the NSW EPA with respect to Noise Management Sub-Plan. The Traffic Management Sub-Plan has been forwarded to the NSW Roads and Maritime Services for comment. Other Sub-Plans have been forwarded to DoPE for review (in May 2014). However, no response has been received as yet and therefore the Sub-Plans have not been forwarded to the NSW EPA.</p> <p>It is noted that the DMR is now part of the NSW Office of Coal Seam Gas and that the DLWC is now part of the NSW Office of Water.</p> <p>AGL should ensure that each of these organisations are provided with a copy of the updated EMP for review and comment.</p>	<p>Compliance – Improvement Recommended</p>



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No.	Consent Condition	Evaluation	Finding
	(a) identification of all statutory and other obligations that the Applicant is required to fulfil in relation to operation of the development, including all consents, licences, approvals and consultations;	The Auditor sighted the EMP (February 2014) and associated Sub-Plans and noted that the content complies with this condition.	Compliance
	(b) a description of the roles and responsibilities for all key personnel involved in the drilling and operation of the development;		Compliance
	(c) the overall environmental policies and principles to be applied to the operation of the development;		Compliance
	(d) standards and performance measures to be applied to the development, and a means by which environmental performance can be periodically reviewed and improved;		Compliance
	(e) management policies to ensure that environmental performance goals are met and to comply with conditions of this consent; and		Compliance
	(f) include the following detailed plans: <ul style="list-style-type: none"> ■ Noise Management Plan; ■ Soil and Water Management Plan; ■ Water Quality Management Plan; ■ Traffic Management Plan; ■ Vegetation and Landscape Management Plan; ■ Waste Management Plan; and ■ Site Rehabilitation Management Plan 		Compliance
16.	The EMP shall be submitted for the approval of the Director-General within three months of the date of this consent, or within such period otherwise agreed by the Director-General.	Condition closed in a previous audit.	Not Triggered.
17.	The Applicant shall supply a copy of the EMP to the EPA, DLWC, DMR, Wollondilly Council and Camden Council within fourteen days of the Director-General's approval. The Applicant shall ensure that a copy of the EMP is publicly available.	Condition closed in a previous audit.	
18.	The Applicant shall review and update the EMP regularly, or as directed by the Director-General. Note: Submission of a copy of the approved Plan to other Government agencies does not mean that their approval is required. The Plan is for the information of the agency.	It was noted by the auditor that the EMP was revised in February 2014. The revision history is recorded within the document and it was noted that the previous revision occurred in June 2012.	Compliance



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No.	Consent Condition	Evaluation	Finding
	Noise Management Plan		
19.	The Applicant shall prepare and implement a Noise Management Plan for the whole site. The Plan shall include, but not necessarily be limited to:	The Auditor sighted the Noise Management Sub-Plan (November 2013) and noted that the Sub-Plan conforms to the requirements of this condition.	Compliance
	(a) identification of the potential sources of noise during drilling and operation;		Compliance
	(b) the noise criteria for these activities;		Compliance
	(c) details of what actions and measures would be implemented to ensure that these operations would comply with the relevant noise criteria;		Compliance
	(d) describe how the effectiveness of these actions and measures would be monitored during the life of the development, clearly indicating who would conduct the monitoring, how often this monitoring would be conducted, how the results of this monitoring would be recorded and reported to the Director-General, and if any non-compliance is detected; And		Compliance
	(e) describe what procedures would be followed to ensure compliance.		Compliance
	Soil and Water Management Plan		
20.	The Applicant shall prepare and implement a Soil and Water Management Plan (SWMP) for the whole site. This plan shall include, but not necessarily be limited to:	The Auditor sighted the Soil and Water Management Sub-Plan (April 2014) and noted that the Sub-Plan conforms to the requirements of this condition.	Compliance
	(a) the measures to be implemented to minimise the potential for soil erosion and the discharge of sediment and other pollutants to lands and/or waters during drilling activities;		Compliance
	(b) the measures to be implemented to mitigate the impacts of stormwater run-off from and within the site following the completion of drilling activities;		Compliance
	(c) demonstrate that erosion and sedimentation control measures will conform with, or exceed, the relevant requirements and guidelines contained in the Department of Housing's Managing Urban Stormwater: Soils and Construction;		Compliance
	(d) consistency with the stormwater management plan for the catchment, should one exist, or with the EPA's Managing Urban Stormwater: Council Handbook should a stormwater management plan for the catchment not exist;		Compliance



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No.	Consent Condition	Evaluation	Finding
	(e) measures to rehabilitate erosion-affected areas and areas the subject of excavation, including tree, shrub and/or cover crop species and implementation; and		Compliance
	(f) management procedures for all surface and groundwater collection and storage structures on the site, including a maintenance program for associated infrastructure (e.g. pipes, pumps, dam walls, etc.) and a program for desilting of those structures, where relevant.		Compliance
	Water Quality Management Plan		
21.	The Applicant shall prepare and implement a Water Quality Management Plan for the whole site. This plan shall include, but not necessarily be limited to:	<p>The Auditor sighted the Soil and Water Management Sub-Plan (April 2014) and noted that the Sub-Plan conforms to the requirements of this condition. There was no reported application of wastewater to land and therefore the water quality testing program was not warranted during the audit period. Evidence was sighted of wastewater disposal to licensed facilities.</p> <p>The Auditor sighted the Groundwater Management Plan for the Camden Gas Project, 16 November 2012, and sighted well construction records for JD05 which recorded the cementing of well casing as part of well construction methods to protect aquifers.</p>	Compliance
	(a) provide details of an appropriate soil sampling and monitoring program to ensure that areas used for waste water application do not lead to an unacceptable build-up of salts within the soil profile;		Compliance
	(b) implement a program of regular testing of waste water quality for compounds, nutrients and metals, as outlined in Table 7.8 of the EIS; and		Compliance
	(c) details of the well maintenance procedures to ensure the integrity of the well isolation components to prevent the cross contamination of groundwater aquifers.		Compliance
	Traffic Management Plan		
22.	The Applicant shall prepare and implement a Traffic Management Plan for the whole site. This plan shall include, but not necessarily be limited to:	The Auditor sighted the Traffic Management Sub-Plan (August 2013) and noted that the Sub-Plan conforms to the requirements of this condition.	Compliance
	(a) Identification of the potential traffic and transport impacts associated with the development and measures to limit traffic movements in the PAL 1 area;	PAL 1 area did not exist during the audit period.	Not Triggered
	(b) restrictions on the movement of heavy vehicles during school pick-up/drop-off times;	The Auditor sighted the Traffic Management Sub-Plan (August 2013) and noted that the Sub-Plan conforms to the requirements of this condition.	Compliance
	(c) details of traffic management measures associated with the construction of pipelines within public roads; and	The Auditor sighted the Traffic Management Sub-Plan (August 2013) and noted that the Sub-Plan conforms to the requirements of this condition.	Compliance



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No.	Consent Condition	Evaluation	Finding
	(d) measures to reduce the transportation of plant material and/or dirt off site.	The Auditor sighted the Traffic Management Sub-Plan (August 2013) and noted that this matter is not addressed.	Non-Compliance – Level 2
	Vegetation and Landscape Management Plan		
23.	The Applicant shall prepare and implement a Vegetation and Landscape Management Plan for the whole site. This plan shall include, but not necessarily be limited to:	The Auditor sighted the Flora and Fauna Management Sub-Plan (April 2014) and the Rehabilitation & Landscape Management Sub-Plan (April 2104) and noted that the Sub-Plans conform to the requirements of this condition. It was noted that there were no landscaping works undertaken under this Development Consent during the audit period.	Compliance
	(a) measures to protect mature trees as part of the well drilling or gas gathering pipeline construction activities;		Compliance
	(b) details of all landscaping to be undertaken on the site;		Compliance
	(c) ensure that tree and shrub species used for landscaping of the site are indigenous to the locality; and		Compliance
	(d) details of a program to ensure that all landscaped areas are maintained in a tidy, healthy state.		Compliance
	Waste Management Plan		
24.	The Applicant shall prepare and implement a Waste Management Plan for the whole site. This plan shall include, but not necessarily be limited to:	The Auditor sighted the Waste Management Sub-Plan (April 2014) and noted that the Sub-Plan conforms to the requirements of this condition.	Compliance
	(a) Measures to minimise the production and impact of waste produced at the site during drilling and operation;	The Auditor sighted the Waste Management Sub-Plan (April 2014) and noted that the Sub-Plan conforms to the requirements of this condition.	Compliance
	(b) implementation of waste reduction, reuse and recycling principles;	The Auditor sighted the Waste Management Sub-Plan (April 2014) and noted that the Sub-Plan conforms to the requirements of this condition.	Compliance
	(c) details of the reuse and recycling of waste water produced/collected on the site, including collection and handling procedures;	The Auditor sighted the Waste Management Sub-Plan (April 2014) and noted that the Sub-Plan does not address details of the reuse and recycling of wastewater produced on site, including collection and handling procedures. However, AGL's Vacuum Truck Operations Procedure (dated 1/9/2014) addresses these	Compliance – Opportunity for Improvement



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No.	Consent Condition	Evaluation	Finding
		requirements. It is recommended that the link between the Sub-Plan and the Procedure be identified to ensure compliance.	
	(d) details of appropriate disposal methods in the event that reuse and recycling are not available or are not practicable; and	The Auditor sighted the Waste Management Sub-Plan (April 2014) and noted that the Sub-Plan conforms to the requirements of this condition.	Compliance
	(e) programs for involving and encouraging employees and contractors to minimise domestic waste production on the site and reuse/recycle where appropriate.	The Auditor sighted the Waste Management Sub-Plan (April 2014) and noted that the Sub-Plan conforms to the requirements of this condition.	Compliance
	Site Rehabilitation Management Plan		
25.	The Applicant shall prepare and implement a Site Rehabilitation Management Plan for the whole site. This plan shall include, but not necessarily be limited to:	The Auditor sighted the Rehabilitation and Landscape Management Sub-Plan (April 2014) and noted that the Sub-Plan conforms to the requirements of this condition.	Compliance
	(a) details of the staging and timing for rehabilitation works;	It was noted that there were no rehabilitation works undertaken under this approval during the audit period.	Compliance
	(b) ongoing management strategies to ensure the success of rehabilitation works;	It is noted that the Sub-Plan does not include details of flora species or the mature height and width	Compliance
	(c) details of the establishment of vegetation and all landscaping to be undertaken including flora species, location of grassed areas, garden beds and other vegetated areas, and mature height and width measurements of all flora species; and	measurements of all flora species as required by Condition 25(c). However, the flora species are selected on a case by case basis in consultation with the land owner using local native species and it is considered that it is not practicable to include the information	Compliance
	(d) the measures to remediate sites following the decommissioning of the wells, pipelines and treatment plant.	required by Condition 25(c), such status does not detract from the intent of the Condition.	Compliance
	PERFORMANCE REPORTING		
	Condition Report		
26.	The Applicant shall prepare a Condition Report on residences and structures that may be potentially affected by drilling/fracking work, including the redrilling and refracking of an existing well. The Applicant shall undertake an inspection of the	Condition closed in a previous audit.	Not Triggered



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No.	Consent Condition	Evaluation	Finding
	residence and/or structure prior to work commencing, and a follow up inspection within one month of the completion of the work. The Applicant shall take immediate action for repair of any damage to the residence or structure as a result of the work and to avoid any further damage. A copy of the Condition Report shall be submitted to the Director-General and the DMR after completion of the work.		
	Incident Reporting		
27.	The Applicant shall notify the EPA, DMR and the Director-General of any incident with significant off-site impacts on people or the biosphere environment as soon as practicable after the occurrence of the incident. The Applicant shall provide written details of the incident to the Director-General, the EPA, DMR, Wollondilly Council and Camden Council within seven days of the date on which the incident occurred.	The Auditor sighted the Emergency Response Plan (November 2013) and noted that the Plan conforms to the requirements of this condition. An extract from the Environmental Incidents Report Register for the 2013-2014 financial year and the AEPR for the 2012-2013 also confirmed compliance with this condition.	Compliance
28.	The Applicant shall meet the requirements of the Director-General to address the cause or impact of any incident, as it relates to this consent, reported in accordance with condition 27 of this consent, within such period as the Director-General may agree.	There were no reported environmental incidents associated with this Development Consent during the audit period.	Compliance
	Complaints Register		
29.	The Applicant shall record details of all complaints received in an up-to-date Complaints Register. The Register shall record, but not necessarily be limited to:	During the audit period, in 2013, the Camden Gas Project transitioned from one complaints register (Complaints Register) to another register (Consultation Manager, a communications database). The complaints registers addressed the requirements of this condition. No complaints were received within the scope of this Development Consent during the audit period.	Compliance
	(a) the date and time, where relevant of the complaint;		Compliance
	(b) the means by which the complaint was made;		Compliance
	(c) any personal details of the complainant that were provided, or if no details were provided, a note to that effect;		Compliance
	(d) the nature of the complaints;		Compliance
	(e) any action(s) taken by the Applicant in relation to the complaint, including any follow-up contact with the complainant; and		Compliance
	(f) if no action was taken by the Applicant in relation to the complaint, the reason(s) why no action was taken.		Compliance



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No.	Consent Condition	Evaluation	Finding
	The Complaints Register shall be made available for inspection by the EPA or the Director-General upon request. The Applicant shall also make summaries of the register, without details of the complainants, available for public inspection.		Compliance
	Risk Assessment		
30.	Within six months from the date of this consent, the Applicant shall submit a compliance report to the Director-General confirming that the recommendations (1 to 17) made in the Quantified Risk Assessment dated September 2000 by McCracken Consulting have been satisfactorily implemented. Where a recommendation has not been implemented or completed, justification must be provided in the compliance report.	Condition closed in a previous audit.	Not Triggered
31.	Within six months from the date of this consent, the Applicant shall submit a compliance report to the Director-General confirming that the actions (1 to 66 and A to SS) arising from the HAZOP study report dated May 2001 by McCracken Consulting have been satisfactorily implemented. Where an action has not been implemented or completed, justification must be provided in the compliance report.	Condition closed in a previous audit.	Not Triggered.
32.	Within six months from the date of this consent, the Applicant shall submit for approval by the Director-General, a document setting out a comprehensive Safety Management System, covering all operations on site and associated transport activities involving hazardous materials. The document shall clearly specify all safety related procedures, responsibilities and policies, along with details of mechanisms for ensuring adherence to procedures. Records shall be kept on site and shall be available for inspection by the Director-General on request. The Safety Management System shall be developed in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 9 Guidelines for the Development of Safety Management Systems.	The Auditor sighted the Emergency Response Plan (November 2013) and the Health and Safety Management Plan, Camden Project NSW (3 August 2011) and noted that the Plans conform to the requirements of this condition.	Compliance
	EPA Annual Return		
33.	The applicant shall provide an Annual Return to the EPA in relation to the development as required by any licence under the POEO Act. In the return the Applicant shall report on the annual monitoring undertaken (where the activity results in pollutant discharges), provide a summary of complaints	The Auditor sighted the Annual Returns dated December 2012 and December 2013 for Environment Protection Licence (EPL) 12003 and noted compliance with the requirements of this condition.	Compliance



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No.	Consent Condition	Evaluation	Finding
	relating to the development, report on compliance with licence conditions and provide a calculation of fees (administrative fees and where relevant, load based fees) that are payable. If load based fees apply to the activity the Applicant will be required to submit load based fee calculation worksheets with the return.	The Annual Return dated December 2013 noted that there were two noise complaints in 2013. However these did not relate to the Development Consents within the scope of this Audit.	
	Annual Environmental Performance Reporting		
34.	Within twelve months of the date of this consent, and annually thereafter during the life of the development, the Applicant shall submit an Annual Environmental Performance Report to the Director-General. This report shall include, but not be limited to:	The Auditor sighted the AEPR for July 2013 and the draft AEPR for July 2014 and noted compliance with the requirements of this condition.	Compliance
	(a) the standards, performance measures and statutory requirements the development is required to comply with;		Compliance
	(b) an assessment of the environmental performance of the development to determine whether it is complying with these standards, performance measures, and statutory requirements;		Compliance
	(c) copy of the Complaints Register for the preceding twelve month period and indicating what actions were (or are being) taken to address these complaints;		Compliance
	(d) indication of what actions were taken to address any issue and/or recommendation raised by the Community Consultative Committee;		Compliance
	(e) provision of the detailed results of all the monitoring required by this consent; and		Compliance
	(f) review of the results of this monitoring, identifying any non-compliance and any significant trends in the data and if any non-compliance is detected, describe what actions and measures would be carried out to ensure compliance, clearly indicating who would carry out these actions and measures, when they would be carried out, and how the effectiveness of these measures would be monitored over time.		Compliance
35.	The Director-General may require the Applicant to address certain matters identified in the Annual Environmental Performance Report. Any action required to be undertaken shall be completed within such period as the Director-General may agree.	There were no matters identified by the Director-General during the audit period.	Compliance



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No.	Consent Condition	Evaluation	Finding
36.	The Applicant shall also submit a copy of the Annual Environmental Performance Report to the EPA, DMR, DLWC, Wollondilly Council and Camden Council. The Applicant shall make a copy of the Report publicly available.	The auditor sighted evidence of submission of the AEPR for the 2012/2013 year to each of the entities (in their then form) required by this condition. It is noted that the 2012/2013 Report is available on AGL's website. The Report for the 2013/2014 year was completed on 15 December 2014 and is available on AGL's website.	Compliance
	Independent Environmental Audit		
37.	Within two years of the date of this consent and every two years thereafter, unless the Director-General directs otherwise, the Applicant shall commission and pay the full costs of an Independent Environmental Audit. The Independent Environmental Audit shall:	The scope of this 2012-2014 Independent Environmental Audit (IEA) addresses the requirements of this condition.	Compliance
	(a) be conducted by a suitably qualified, experienced, and independent person(s) whose appointment has been approved by the Director-General;		Compliance
	(b) be consistent with <i>ISO 14010 – Guidelines and General Principles for Environmental Auditing</i> , and <i>ISO 14011 – Procedures for Environmental Auditing</i> , or updated versions of these guidelines/manuals;		Compliance
	(c) assess the environmental performance of the development, and its effects on the surrounding environment;		Compliance
	(d) assess whether the development is complying with the relevant standards, performance measures, and statutory requirements;		Compliance
	(e) review the adequacy of the Applicant's Environmental Management Plan; and		Compliance
	(f) recommend measures or actions to improve the environmental performance of the development, and/or its environmental management and monitoring systems.		Compliance
	Within two months of commissioning the audit, the Applicant must submit a copy of the audit report to the Director-General and the EPA and the DMR. The Director-General may require the Applicant to address certain matters identified in the report and any comments received from the EPA and DMR. Any action required to be undertaken shall be completed within such period as the Director-General may agree.	DoPE approved an extension to this condition to provide consistency with other similar Development Consent conditions, and now require submission of the audit report within three months of completion.	Not Triggered.



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No.	Consent Condition	Evaluation	Finding																				
ENVIRONMENTAL PERFORMANCE																							
Noise Limits																							
38.	<p>The Applicant shall comply with the noise criteria specified in the table below.</p> <p>Table 1 – Noise Limits (dB(A))</p> <table border="1"> <thead> <tr> <th>Location (identified in Fig. 10.1 of the EIS)</th> <th>Day L_{Aeq}15min</th> <th>Evening L_{Aeq}15min</th> <th>Night L_{Aeq}15min</th> </tr> </thead> <tbody> <tr> <td>Receiver Location A</td> <td>40</td> <td>40</td> <td>40</td> </tr> <tr> <td>Receiver Locations B, C and F</td> <td>37</td> <td>37</td> <td>37</td> </tr> <tr> <td>Receiver Locations D, E and G to M</td> <td>37</td> <td>37</td> <td>35</td> </tr> <tr> <td>Any other residential receiver</td> <td>35</td> <td>35</td> <td>35</td> </tr> </tbody> </table>	Location (identified in Fig. 10.1 of the EIS)	Day L _{Aeq} 15min	Evening L _{Aeq} 15min	Night L _{Aeq} 15min	Receiver Location A	40	40	40	Receiver Locations B, C and F	37	37	37	Receiver Locations D, E and G to M	37	37	35	Any other residential receiver	35	35	35	<p>The noise monitoring locations identified in this condition are in the vicinity of the former Ray Beddoe Treatment Plant site. AGL did not conduct any activity within this area during the audit period.</p>	Not Triggered.
Location (identified in Fig. 10.1 of the EIS)	Day L _{Aeq} 15min	Evening L _{Aeq} 15min	Night L _{Aeq} 15min																				
Receiver Location A	40	40	40																				
Receiver Locations B, C and F	37	37	37																				
Receiver Locations D, E and G to M	37	37	35																				
Any other residential receiver	35	35	35																				
39.	<p>For the purposes of assessment of noise levels specified in this consent, noise from the development shall be: more than 30m from the boundary, at the most affected point within 30m of the dwelling to determine compliance with the L_{Aeq}15min, L_{Aeq} day, L_{Aeq} evening and L_{Aeq} night noise limits;</p> <p>(a) measured at the most affected point on or within the residential boundary or, where the dwelling is</p> <p>(b) subject to the modification factors provided in Section 4 of the <i>NSW Industrial Noise Policy</i>; and</p> <p>(c) measured using the FAST response on the sound level meter.</p>	Condition closed in a previous audit.	Not Triggered																				
			Not Triggered																				
			Not Triggered																				
			Not Triggered																				
40.	Notwithstanding condition 39 of this consent, should direct measurement of noise from the site be impractical, the Applicant may employ an alternative noise assessment method deemed acceptable by the EPA (refer to Chapter 11 of the <i>NSW Industrial Noise Policy</i>). Details of such an alternative noise assessment method accepted by the EPA shall be submitted to the Director-	Condition closed in a previous audit.	Not Triggered																				



CAMDEN GAS PROJECT - INDEPENDENT ENVIRONMENTAL AUDIT 2012 - 2014

No.	Consent Condition	Evaluation	Finding
	General prior to the implementation of the assessment method.		
41.	All noise limits specified as part of this consent apply under: (a) wind speeds up to 3m/s at 10 metres above ground level; and	Condition closed in a previous audit.	Not Triggered
	(b) temperature inversion conditions of up to 30C/100m.	Condition closed in a previous audit.	Not Triggered
	Noise – Well Maintenance		
42.	The Applicant shall apply all feasible and reasonable noise mitigation measures to planned well maintenance activities in order to achieve the noise limits specified by this consent. Where the noise limits are not achievable the Applicant shall implement management practices as necessary to minimise the potential noise impacts. These management practices are to include, but not be limited to:	The Auditor sighted the Noise Management Sub-Plan (November 2013) and noted that the Sub-Plan conforms to the requirements of this condition.	Compliance
	(a) appropriately informing affected residences and other relevant parties at least two weeks in advance of any planned well maintenance activities and updating the information as required;		Compliance
	(b) documenting and implementing any specific work practices the Applicant will employ to limit noise;		Compliance
	(c) documenting the feasible and reasonable noise mitigation measures that will be undertaken to reduce noise impacts from planned well maintenance activities; and		Compliance
	(d) conducting noise monitoring where appropriate.		Compliance
	Noise – Drilling Impacts		
43.	The Applicant shall implement management practices as necessary to minimise the potential noise impacts from drilling work at wells LB-1, LB-2 and LB-3. These management practices are to include, but not be limited to:	The Auditor sighted the Noise Management Sub-Plan (November 2013) and noted that the Sub-Plan conforms to the requirements of this condition. AGL reported that no drilling works were undertaken during the audit period.	Not Triggered
	(a) identifying all potentially affected noise sensitive receivers (including residences, schools, commercial premises and noise sensitive equipment) that may be affected by drilling work at these wells;		Not Triggered
	(b) predicting potential noise levels from the proposed well drilling methods where appropriate;		Not Triggered



CAMDEN GAS PROJECT - INDEPENDENT ENVIRONMENTAL AUDIT 2012 - 2014

No.	Consent Condition	Evaluation	Finding
	(c) identifying and implementing all reasonable and feasible noise mitigation measures to reduce any drilling noise impacts;		Not Triggered
	(d) documenting and implementing any specific work practices the Applicant will employ to limit noise; conducting noise monitoring where appropriate; and		Not Triggered
	(e) appropriately informing affected residences and other relevant parties at least two weeks in advance of any drilling work at wells LB-1, LB-2 and LB-3 and updating the information as required.		Not Triggered
	Hours of Operation		
44.	<p>The Applicant shall ensure that all construction work, except:</p> <ul style="list-style-type: none"> a) for the drilling (including well casing and grouting) of SIS wells; or b) where the Applicant has reached an agreement with all potentially affected residences and other noise sensitive receivers to conduct drilling works outside these hours. <p>Shall only be conducted between 7.00 am and 6.00 pm Monday to Friday and between 8.00am and 1.00pm Saturdays, unless inaudible at any residential receiver.</p> <p>Note: Inaudible means that the construction activity cannot be heard by the human ear at the nearest affected residential receiver.</p>	The Auditor sighted the Noise Management Sub-Plan (November 2013) and noted that the Sub-Plan conforms to the requirements of this condition. AGL reported that no construction activities were undertaken during the audit period.	Not Triggered
45.	Notwithstanding condition 44 of this consent, the specified hours of operation also apply to:	Condition not activated during the audit period.	Not Triggered
	(a) planned maintenance activities at any of the wells;		Not Triggered
	(b) planned deliveries to the treatment plant; and		Not Triggered
	(c) planned maintenance activities at the treatment plant; except where the Applicant has reached an agreement with all potentially affected residences and other noise sensitive receivers, to conduct maintenance works outside these hours.		Not Triggered
46.	Condition 44 of this consent does not apply to the delivery of materials outside the specified hours of operation if that delivery is required by, the police or other authorities for safety reasons, and/or the operation or personnel or equipment are endangered. In such circumstances, prior notification is provided to the EPA and affected residences as soon as	Condition not activated during the audit period.	Not Triggered



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No.	Consent Condition	Evaluation	Finding										
	possible, or within a reasonable period in the case of an emergency.												
47.	The hours of operation specified in condition 44 of this consent may be varied with the written consent of the Director-General, if the EPA is satisfied that the amenity of the residents in the locality will not be adversely affected.	Condition not activated during the audit period.	Not Triggered										
47A	Noise from the drilling and construction of AP02 and AP03 shall not exceed the sound pressure (noise) limits in the table below: Table 1A – Construction Noise Limits in dB(A) L _{Aeq}	Condition not activated during the audit period.	Not Triggered										
	<table border="1"> <thead> <tr> <th>Receiver Location</th> <th>Weekday (7.00am-6.00pm) Saturday (7.00am-1.00pm)</th> <th>Saturday (1.00pm-6.00pm) Sunday (7.00am-6.00pm)</th> <th>Evening (6.00pm-10.00pm)</th> <th>Night (10.00pm-7.00am)</th> </tr> </thead> <tbody> <tr> <td>Receivers A1, A2, A3, A4</td> <td>45</td> <td>40</td> <td>40</td> <td>35</td> </tr> </tbody> </table>	Receiver Location	Weekday (7.00am-6.00pm) Saturday (7.00am-1.00pm)	Saturday (1.00pm-6.00pm) Sunday (7.00am-6.00pm)	Evening (6.00pm-10.00pm)	Night (10.00pm-7.00am)	Receivers A1, A2, A3, A4	45	40	40	35		
Receiver Location	Weekday (7.00am-6.00pm) Saturday (7.00am-1.00pm)	Saturday (1.00pm-6.00pm) Sunday (7.00am-6.00pm)	Evening (6.00pm-10.00pm)	Night (10.00pm-7.00am)									
Receivers A1, A2, A3, A4	45	40	40	35									
Ray Beddoe Treatment Plant – Reduction of Noise													
48.	The Applicant shall prepare and submit to the Department and the EPA a Pollution Reduction Program (PRP) for noise designed to meet the following levels at receiver Locations A to M (identified in Fig. 10.1 of the EIS)	Condition closed in a previous audit.	Not Triggered										
	(a) an L _{Aeq} 15min level of 37 dB(A) for the day time period;		Not Triggered										
	(b) an L _{Aeq} 15min level of 37 dB(A) for the evening period; and		Not Triggered										
	(c) an L _{Aeq} 15min level of 35 dB(A) for the night time period. These levels are to apply at the most affected point on or within the residential boundary of each nominated receiver or, where the dwelling is more than 30m from the boundary, at the most affected point within 30m of the dwelling.		Not Triggered										
49.	If the Applicant determines that the levels set out in condition 48 of this consent cannot be achieved after all feasible and reasonable mitigation	Condition closed in a previous audit.	Not Triggered										



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No.	Consent Condition	Evaluation	Finding
	measures have been implemented, then the Applicant is to advise the Department and EPA of the levels that can be feasibly and reasonably achieved.		
50.	The PRP is to be submitted to the Department and the EPA within six months of the date of the consent for the development. PRP implementation is to be undertaken in the period from six months to eighteen months from the date of development consent.	Condition closed in a previous audit.	Not Triggered
51.	The PRP shall include a timetable for the implementation of mitigation measures. If the implementation of mitigation measures is to progress in stages, then the PRP is to specify the noise levels that will be achieved following the implementation of each intermediate stage.	Condition closed in a previous audit.	Not Triggered
	Odour		
52.	In accordance with section 129 of the <i>Protection of the Environment Operations Act 1997</i> , the Applicant shall not cause or permit any offensive odours to be emitted from the site. For the purposes of this condition, offensive odour has the same meaning as provided for by the <i>Protection of the Environment Operations Act 1997</i> .	It is noted that the gas associated with the operations is odourless. No other significantly odorous materials are handled at the sites subject to this Development Consent.	Compliance
	Water Quality Impacts		
53.	Except as may be expressly provided for by a licence under the <i>Protection of the Environment Operations Act 1997</i> , the Applicant shall comply with section 120 of the <i>Protection of the Environment Operations Act 1997</i> in carrying out the development.	The Auditor sighted the EMP for the Camden Gas Project, including the Soil and Water Management Sub-Plan (April 2014) and the Waste Management Sub-Plan (April 2014). The Sub-Plans detail a number of controls to prevent the pollution of water. AGL's incident database and Annual Returns for its environment protection licence indicate that there were no incidents of polluting waters during the audit period.	Compliance
	Waste Water		
54.	Waste water from the construction, installation and operation of wells and associated infrastructure shall only be applied to the following areas:	AGL reported that wastewater from the construction, installation and operation of wells is transported from the RPKG to a third party EPA licensed facility for treatment	Not Triggered
	(a) dust suppression on any unsealed roads within PAL1;		Not Triggered



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No.	Consent Condition	Evaluation	Finding
	(b) irrigated onto pastures within PAL 1;	and beneficial reuse or disposal. Reinjection of wastewater (produced water) is not proposed and as such this condition was not activated during the audit period.	Not Triggered
	(c) evaporation dam; and		Not Triggered
	(d) reinjection into gas wells. The Applicant shall prepare a detailed feasibility study of reinjection of waste water into a gas well if this method of disposal of waste water is proposed. The approval of the Director-General shall be obtained for reinjection of waste water into a gas well. Note: Section 120 of the <i>Protection of the Environment Operations Act 1997</i> applies to the disposal of waste water. This section refers to the pollution of waters.		Not Triggered
55.	Spray from waste water application shall not drift beyond the boundary of the waste water utilisation area to which it is applied.	Condition closed in a previous audit.	Not Triggered
56.	The Applicant shall ensure that areas proposed to be used for waste water application can effectively utilise the waste water. This includes the use for pasture or crop production, as well as ensuring the soil is able to absorb the nutrients, salts, hydraulic load and organic materials in the liquids. The Applicant may be required to undertake monitoring of land and receiving waters to determine the impact of waste water application.	Condition closed in a previous audit.	Not Triggered
57.	The Applicant shall ensure that all waste water that is used for dust suppression and/or irrigation has a salinity measure that does not exceed 800 µS/cm.	Condition closed in a previous audit.	Not Triggered
	Dust		
58.	The Applicant shall ensure that activities are carried out in a manner that will minimise the emission of dust from the site, including traffic generated dust from the site access roads.	It was noted by the Auditor that a number of dust mitigation measures are detailed in the Air Quality Management Sub-Plan (September 2008). No dust complaints were received by AGL during the audit period in relation to this condition.	Compliance
59.	The Applicant shall take all practicable measures to ensure that all vehicles entering or leaving a site, carrying a load that may generate dust, are covered at all times, except during loading and unloading. Any such vehicles shall be covered or enclosed in a manner that will prevent emissions of dust from the vehicle at all times.	It was noted by the Auditor that a number of dust mitigation measures are detailed in the Air Quality Management Sub-Plan (September 2008). No dust complaints were received by AGL during the audit period in relation to this condition.	Compliance



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No.	Consent Condition	Evaluation	Finding
60.	The Applicant shall take all practicable measures to minimise the generation of wind-blown dust from soil stockpiles.	The Soil and Water Management Sub-Plan (April 2014) requires stockpiles to be revegetated if they are to be stored on site for a long period of time. AGL reported that topsoil stockpiles tend to naturally vegetate through the seed bank. Water carts are also employed to minimise the generation of wind-blown dust.	Compliance
	Threatened Species		
60A	The Applicant shall ensure that, during the drilling and construction of AP02 and AP03, impacts on threatened species are minimized by implementing actions including, but not limited, to the following: <ul style="list-style-type: none"> a) The recommendations outlined in Sections 6 and 7 of the Ecosearch Environmental Consultants Pty Ltd report titled "Flora and Fauna Assessment, AGL – Gas Well and Gathering Line Project Modifications", and b) Marking the boundaries of endangered ecological communities (EECs) and locations of other known threatened species and, where possible, avoiding construction activities within these areas. 	The works identified in this condition pre-dated the audit period.	Not Triggered
	Waste		
61.	The Applicant shall not cause, permit or allow any waste generated outside the site to be received at the site for storage, treatment, processing, reprocessing or disposal or any waste generated at the site, to be disposed of at the site, except as expressly permitted by a licence under the <i>Protection of the Environment Operations Act 1997</i> . This condition only applies to the storage, treatment, processing, reprocessing or disposal of waste at the site, if it requires a licence under the <i>Protection of the Environment Operations Act 1997</i> .	The Auditor sighted the AGL Environmental Footprint spread sheet for the financial years 2012/13 and 2013/14. These spreadsheets provided a detailed record of waste streams generated, recycled/reused and disposed, including concrete and steel, water, hazardous waste, non-hazardous waste and ozone-depleting substances, and indicate compliance with this condition.	Compliance
62.	Notwithstanding condition 61 of this consent, the Applicant may dispose of waste water generated on the site in accordance with condition 54 of this consent.	AGL reported that wastewater from the construction, installation and operation of wells is either disposed to a licensed waste transfer facility or reused during drilling and workover activities. ReInjection of wastewater (produced water) is not proposed and as such this condition was not activated during the audit period.	Not triggered.



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No.	Consent Condition	Evaluation	Finding
	Lighting		
63.	The Applicant shall ensure that all external lighting associated with the development is mounted, screened and directed in such a manner so as to not create a nuisance to surrounding land uses. The lighting must be the minimum level of illumination necessary, and in general accordance with the <i>Australian Standard 4282 – 1997 Control of the Obtrusive Effects of Outdoor Lighting</i> .	AGL advised that no external lighting is used at the well sites or along the gas gathering lines.	Not triggered.
	Gas Flare		
64.	The gas flare located at the treatment plant shall be ground-level (i.e. Less than 6.1 metres in height), shrouded, provided with automatic combustion air control, automatic shut-off gas valve and automatic restart system. Note: This condition confirms the existing gas flare structure and specifications.	Condition closed in a previous audit. The Ray Beddoe Treatment Plant no longer exists.	Not Triggered
	Activated Carbon Filter		
65.	The activated carbon filter on the odour control system shall be replaced prior to breakthrough occurring.	Condition closed in a previous audit.	Not Triggered
	Steel Pipeline		
66.	The 200 mm steel pipeline shall not be operated above a pressure of 1.05 MPa.	Condition closed in a previous audit.	Not Triggered
67.	The Director-General's approval shall be obtained to operate the steel pipeline pressure above 1.05 MPa. An application to operate the steel pipeline at a higher pressure shall be accompanied by:	Condition closed in a previous audit.	Not Triggered
	(a) a Final Hazard Analysis of the proposal including the entire steel pipeline and those sections of the plant where the operating pressure will be increased. The analysis shall be prepared in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 6 Guidelines for Hazard Analysis. The existing land use and compliance with NSW criteria shall be clearly demonstrated. Where further risk reduction could be required as a result of changes in land use, additional risk reduction measures shall be outlined; and		Not Triggered



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No.	Consent Condition	Evaluation	Finding
	(b) a Hazard and Operability Study for the proposal, chaired by an independent qualified person approved by the Director-General prior to the commencement of the study. The study shall be carried out in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 8 Hazard and Operability Studies.		Not Triggered
	Gas Gathering System Pipeline		
68.	The Applicant shall comply with the following in the construction of the gas gathering system pipeline:	Condition closed in a previous audit. No new gas gathering system pipelines were constructed during the audit period.	Not Triggered
	(a) excavated trenches shall not be left uncovered overnight, unless adequate fencing and warning lights are erected;		Not Triggered
	(b) signs stating the presence of a buried gas pipeline shall be erected periodically along the length of the trench once the pipeline has been laid;		Not Triggered
	(c) trenches are to be restored and reseeded with local grass seeds on completion of the work;		Not Triggered
	(d) local council traffic guidelines in respect of work carried out on road verges and underneath roads shall be implemented;		Not Triggered
	(e) the pipeline shall be constructed in accordance with the AS 3723-1989; and		Not Triggered
	(f) the Department shall be notified on the completion of any trenching works.		Not Triggered
	LPG Storage		
69.	The LPG storage and handling system and procedures shall be in accordance with AS 1596-2002 and industry guidelines.	Condition closed in a previous audit.	Not Triggered
	Indigenous Heritage		
70.	Prior to the commencement of site preparation works for the three (3) additional wellheads and the associated gas gathering system, the Applicant shall clearly indicate the locations of known aboriginal relics on the site, and ensure that all employees and contractors are aware of these locations, to prevent the known relics being impacted upon during site preparation and construction.	Condition closed in a previous audit.	Not Triggered



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No.	Consent Condition	Evaluation	Finding
	Cultural Heritage		
71.	If, during the site preparation and/or drilling phases of the development, an unexpected archaeological relic is uncovered, excavation shall cease and an excavation permit under the <i>Heritage Act 1977</i> , shall be obtained from the NSW Heritage Office. Note: a relic is defined under the Heritage Act as any deposit, object or material evidence: (a) which relates to the settlement of the area that comprises NSW, not being Aboriginal settlement; and (b) which are more than 50 years old.	Condition closed in a previous audit.	Not Triggered
	Site Rehabilitation		
72.	The Applicant shall ensure the prompt and effective rehabilitation of all disturbed areas of the site following the completion of construction, operations and associated activities and/or the decommissioning of plant, to minimise the generation of wind erosion dust.	One well (JD-04) was plugged and abandoned and handed back to the land owner during the audit period. A photograph of the well location confirmed satisfactory rehabilitation was undertaken.	Compliance
73.	The Applicant shall carry out rehabilitation of the site in accordance with the requirements of the DMR and the Site Rehabilitation Management Plan.	One well (JD-04) was plugged and abandoned and handed back to the land owner during the audit period. A photograph of the well location confirmed satisfactory rehabilitation was undertaken in accordance with the Rehabilitation & Landscape Management Sub-Plan.	Compliance
	ENVIRONMENTAL MONITORING		
	Land Subsidence		
74.	The Applicant shall implement a program to monitor any potential land subsidence effects of long term extraction of gas (and water) on the groundwater resource in the PAL 1 area. The Applicant shall consult with the DLWC over the implementation of the monitoring program. The monitoring program shall be submitted for the Director-General's approval.	No subsidence monitoring was performed and no monitoring program was prepared during the audit period. However, DoPE advised AGL in writing that subsidence monitoring is not required.	Not triggered
	Vibration Impacts		
75.	The Applicant shall carry out monitoring of ground vibrations from well drilling activities (including percussion drilling, casing perforation, hydrofracturing operations and air blasts), as recommended by Coffey Geosciences report	AGL reported that no drilling works were undertaken during the audit period.	Not triggered



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No.	Consent Condition	Evaluation	Finding																				
	<p>itled Camden Coalbed Methane Project Geotechnical Impact Assessment and dated 5 December 2001. The results of the monitoring shall be submitted to the Director-General.</p>																						
	<p>Air Emissions</p>																						
76.	<p>For the purposes of this consent air discharge monitoring points, shall be identified as provided in Table 2 below.</p> <p>Table 2 – Identification of Air Discharge Monitoring Points</p> <table border="1" data-bbox="230 592 1106 1326"> <thead> <tr> <th data-bbox="230 592 436 689">Discharge Monitoring Point Identification Number</th> <th data-bbox="436 592 645 689">Type of Monitoring Point</th> <th data-bbox="645 592 853 689">Type of Discharge</th> <th data-bbox="853 592 1106 689">Description of Location</th> </tr> </thead> <tbody> <tr> <td data-bbox="230 689 436 842">1</td> <td data-bbox="436 689 645 842">Air emissions monitoring</td> <td data-bbox="645 689 853 842">Discharge to air</td> <td data-bbox="853 689 1106 842">TEG reboiler exhaust <i>(located on the dehydrator unit as shown in Fig. 3.9 of the EIS)</i></td> </tr> <tr> <td data-bbox="230 842 436 995">2</td> <td data-bbox="436 842 645 995">Air emissions monitoring</td> <td data-bbox="645 842 853 995">Discharge to air</td> <td data-bbox="853 842 1106 995">Flare <i>(located on the southern corner of the Treatment Plant as shown in Fig. 3.9 of the EIS)</i></td> </tr> <tr> <td data-bbox="230 995 436 1171">3</td> <td data-bbox="436 995 645 1171">Air emissions monitoring</td> <td data-bbox="645 995 853 1171">Air</td> <td data-bbox="853 995 1106 1171">Coal seam methane gas supply to TEG reboiler <i>(located on the dehydrator unit as shown in Fig 3.9. of the EIS)</i></td> </tr> <tr> <td data-bbox="230 1171 436 1326">4</td> <td data-bbox="436 1171 645 1326">Air emissions monitoring</td> <td data-bbox="645 1171 853 1326">Discharge to air</td> <td data-bbox="853 1171 1106 1326">Odour control system exhaust <i>(located between the dehydrator unit and final gas filter as shown in Fig 3.9. of the EIS)</i></td> </tr> </tbody> </table>	Discharge Monitoring Point Identification Number	Type of Monitoring Point	Type of Discharge	Description of Location	1	Air emissions monitoring	Discharge to air	TEG reboiler exhaust <i>(located on the dehydrator unit as shown in Fig. 3.9 of the EIS)</i>	2	Air emissions monitoring	Discharge to air	Flare <i>(located on the southern corner of the Treatment Plant as shown in Fig. 3.9 of the EIS)</i>	3	Air emissions monitoring	Air	Coal seam methane gas supply to TEG reboiler <i>(located on the dehydrator unit as shown in Fig 3.9. of the EIS)</i>	4	Air emissions monitoring	Discharge to air	Odour control system exhaust <i>(located between the dehydrator unit and final gas filter as shown in Fig 3.9. of the EIS)</i>	<p>Condition closed in a previous audit. The nominated monitoring locations were at the former Ray Beddoe Treatment Plant.</p>	<p>Not Triggered</p>
Discharge Monitoring Point Identification Number	Type of Monitoring Point	Type of Discharge	Description of Location																				
1	Air emissions monitoring	Discharge to air	TEG reboiler exhaust <i>(located on the dehydrator unit as shown in Fig. 3.9 of the EIS)</i>																				
2	Air emissions monitoring	Discharge to air	Flare <i>(located on the southern corner of the Treatment Plant as shown in Fig. 3.9 of the EIS)</i>																				
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4	Air emissions monitoring	Discharge to air	Odour control system exhaust <i>(located between the dehydrator unit and final gas filter as shown in Fig 3.9. of the EIS)</i>																				



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No.	Consent Condition	Evaluation	Finding																
Load Limits																			
77.	<p>The Applicant will be required to pay load based licensing fees once a licence under the POEO Act has been issued. The licence will identify the assessable pollutants and load limits for each fee-based activity classification. These assessable pollutants will be required to be monitored and pollutant loads calculated in accordance with the EPA's Load Calculation Protocol. The assessable pollutants and load limits applicable to this development are given in Table 3 below.</p> <p>Table 3 – Assessable Pollutant Load Limit</p> <table border="1" data-bbox="232 646 1117 1157"> <thead> <tr> <th>Assessable Pollutant</th> <th>Load Limit (kg)</th> </tr> </thead> <tbody> <tr> <td>Benzene</td> <td>Applicant to negotiate with the EPA prior to issue of the licence</td> </tr> <tr> <td>Benzo (a) pyrene</td> <td>Applicant to negotiate with the EPA prior to issue of the licence</td> </tr> <tr> <td>Fine particles</td> <td>Applicant to negotiate with the EPA prior to issue of the licence</td> </tr> <tr> <td>Hydrogen sulfide</td> <td>Applicant to negotiate with the EPA prior to issue of the licence</td> </tr> <tr> <td>Nitrogen oxides</td> <td>Applicant to negotiate with the EPA prior to issue of the licence</td> </tr> <tr> <td>Sulfur oxides</td> <td>Applicant to negotiate with the EPA prior to issue of the licence</td> </tr> <tr> <td>VOC's</td> <td>Applicant to negotiate with the EPA prior to issue of the licence</td> </tr> </tbody> </table>	Assessable Pollutant	Load Limit (kg)	Benzene	Applicant to negotiate with the EPA prior to issue of the licence	Benzo (a) pyrene	Applicant to negotiate with the EPA prior to issue of the licence	Fine particles	Applicant to negotiate with the EPA prior to issue of the licence	Hydrogen sulfide	Applicant to negotiate with the EPA prior to issue of the licence	Nitrogen oxides	Applicant to negotiate with the EPA prior to issue of the licence	Sulfur oxides	Applicant to negotiate with the EPA prior to issue of the licence	VOC's	Applicant to negotiate with the EPA prior to issue of the licence	<p>Condition closed in a previous audit. This condition related to the former Ray Beddoe Treatment Plant.</p>	Not Triggered
Assessable Pollutant	Load Limit (kg)																		
Benzene	Applicant to negotiate with the EPA prior to issue of the licence																		
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Sulfur oxides	Applicant to negotiate with the EPA prior to issue of the licence																		
VOC's	Applicant to negotiate with the EPA prior to issue of the licence																		
<p>Note – An assessable pollutant is a pollutant which affects the licence fee payable for the licence. The actual load of an assessable pollutant discharged from the premises during the reporting period must not exceed the load limit specified for the assessable pollutants in Table 3.</p>		<p>Condition closed in a previous audit. This condition related to the former Ray Beddoe Treatment Plant.</p>	Not Triggered																



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No.	Consent Condition	Evaluation	Finding												
	Testing Method – Load Limits														
78.	Clause 17(1) and (2) of the <i>Protection of the Environment Operations (General) Regulation 1998</i> requires that monitoring of actual loads of assessable pollutants listed in Table 3 of condition 78 of this consent shall be carried out in accordance with the testing method set out in the relevant load calculation protocol for the fee-based activity classification.	Condition closed in a previous audit. This condition related to the former Ray Beddoe Treatment Plant.	Not Triggered												
	Concentration Limits														
79.	<p>The Applicant shall ensure that the concentration of each pollutant listed in Table 4 below does not exceed the concentration limits specified for that pollutant at discharge monitoring point 1. This condition does not authorise the discharge or emission of any other pollutants.</p> <p>Table 4 – Point 1 : Concentration Limits</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr style="background-color: #000080; color: white;"> <th>Pollutant</th> <th>Units of measure</th> <th>100 percentile limit</th> <th>Reference conditions</th> </tr> </thead> <tbody> <tr> <td>Nitrogen oxides</td> <td style="text-align: center;">g/m³</td> <td style="text-align: center;">0.35</td> <td>Dry, 273 K, 101.3 kPa, 7% O₂</td> </tr> <tr> <td>Sulphuric acid mist and/or sulphur trioxide</td> <td style="text-align: center;">g/m³</td> <td style="text-align: center;">0.1</td> <td>Dry, 273 K, 101.3 kPa</td> </tr> </tbody> </table>	Pollutant	Units of measure	100 percentile limit	Reference conditions	Nitrogen oxides	g/m ³	0.35	Dry, 273 K, 101.3 kPa, 7% O ₂	Sulphuric acid mist and/or sulphur trioxide	g/m ³	0.1	Dry, 273 K, 101.3 kPa	Condition closed in a previous audit. This condition related to the former Ray Beddoe Treatment Plant.	Not Triggered
Pollutant	Units of measure	100 percentile limit	Reference conditions												
Nitrogen oxides	g/m ³	0.35	Dry, 273 K, 101.3 kPa, 7% O ₂												
Sulphuric acid mist and/or sulphur trioxide	g/m ³	0.1	Dry, 273 K, 101.3 kPa												
	Destruction Efficiency														
80.	<p>30. The Applicant shall ensure that each parameter listed in Table 5 below are equal to or greater than the lower limits specified for that parameter at discharge monitoring point 1.</p> <p>Table 5 – Discharge Monitoring Point 1: Destruction Efficiency</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr style="background-color: #000080; color: white;"> <th>Parameter</th> <th>Units of measure</th> <th>Lower limit</th> <th>Reference conditions</th> </tr> </thead> <tbody> <tr> <td>Volatile organic compound (VOC) destruction efficiency</td> <td style="text-align: center;">%</td> <td style="text-align: center;">98</td> <td>N/A</td> </tr> </tbody> </table>	Parameter	Units of measure	Lower limit	Reference conditions	Volatile organic compound (VOC) destruction efficiency	%	98	N/A	Condition closed in a previous audit. This condition related to the former Ray Beddoe Treatment Plant.	Not Triggered				
Parameter	Units of measure	Lower limit	Reference conditions												
Volatile organic compound (VOC) destruction efficiency	%	98	N/A												



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No.	Consent Condition	Evaluation	Finding															
Combustion Parameters																		
81.	<p>The Applicant shall ensure that each parameter listed in Table 6 below (over the averaging period) is equal to or greater than the lower limit specified for that parameter at discharge monitoring point 2.</p> <p>Table 6 – Discharge Monitoring Point 2 : Combustion Parameter</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr style="background-color: #000080; color: white;"> <th>Parameter</th> <th>Units of measure</th> <th>Lower limit</th> <th>Averaging period</th> </tr> </thead> <tbody> <tr> <td>Residence time</td> <td style="text-align: center;">s</td> <td style="text-align: center;">0.6</td> <td style="text-align: center;">Instantaneous</td> </tr> <tr> <td>Temperature</td> <td style="text-align: center;">°C</td> <td style="text-align: center;">760</td> <td style="text-align: center;">Instantaneous</td> </tr> </tbody> </table>	Parameter	Units of measure	Lower limit	Averaging period	Residence time	s	0.6	Instantaneous	Temperature	°C	760	Instantaneous	<p>Condition closed in a previous audit. This condition related to the former Ray Beddoe Treatment Plant.</p>	Not Triggered			
Parameter	Units of measure	Lower limit	Averaging period															
Residence time	s	0.6	Instantaneous															
Temperature	°C	760	Instantaneous															
Site Specific Emission Concentration Limit																		
82.	<p>The Applicant shall submit a report to the EPA, which includes a site specific emission concentration limit for sulfuric acid mist and/or sulfur trioxide (as SO₃) and sulfur dioxide for discharge monitoring point 1. The date of submission of the report shall be negotiated with the EPA prior to the issue of the licence.</p>	<p>Condition closed in a previous audit. This condition related to the former Ray Beddoe Treatment Plant.</p>	Not Triggered															
83.	<p>The emission concentration limits shall be developed in accordance with the <i>Approved Methods and Guidance for the Modelling and Assessment of Air Pollutants in NSW</i> and utilise the ground-level concentration criteria specified in Table 7 below.</p> <p>Table 7 – Site Specific Emission Concentration Limit</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr style="background-color: #000080; color: white;"> <th>Pollutant</th> <th>Design Ground-Level Concentration Criteria (ug/m³)</th> <th>Averaging Time</th> <th>Percentile</th> </tr> </thead> <tbody> <tr> <td>Sulfuric acid mist and/or sulfur trioxide (as SO₃)</td> <td style="text-align: center;">27</td> <td style="text-align: center;">3 minutes</td> <td style="text-align: center;">99.9</td> </tr> <tr> <td rowspan="2">Sulfur dioxide</td> <td style="text-align: center;">712</td> <td style="text-align: center;">10 minutes</td> <td style="text-align: center;">100</td> </tr> <tr> <td style="text-align: center;">570</td> <td style="text-align: center;">1 hour</td> <td style="text-align: center;">100</td> </tr> </tbody> </table>	Pollutant	Design Ground-Level Concentration Criteria (ug/m ³)	Averaging Time	Percentile	Sulfuric acid mist and/or sulfur trioxide (as SO ₃)	27	3 minutes	99.9	Sulfur dioxide	712	10 minutes	100	570	1 hour	100	<p>Condition closed in a previous audit. This condition related to the former Ray Beddoe Treatment Plant.</p>	Not Triggered
Pollutant	Design Ground-Level Concentration Criteria (ug/m ³)	Averaging Time	Percentile															
Sulfuric acid mist and/or sulfur trioxide (as SO ₃)	27	3 minutes	99.9															
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	570	1 hour	100															



CAMDEN GAS PROJECT - INDEPENDENT ENVIRONMENTAL AUDIT 2012 - 2014

No.	Consent Condition	Evaluation	Finding
	Monitoring Records		
84.	The Applicant shall record and retain the details of any monitoring required as a condition of this consent or a licence under the POEO Act, in relation to the development or in order to comply with the load calculation protocol.	The only monitoring required under this condition is the Leak Detection and Repair monitoring undertaken as required by Condition M7.3 of EPL 12003 and as detailed in the <i>Annual Leak Detection and Repair Summary Report, Reporting Period 13 May 2013 to 21 December 2013, Camden Gas Project, dated 17 February 2014, AGL Upstream Investments Pty Ltd, and the Gas Leakage Audit, 2013, Final Report for Camden (NSW) by Heath Pipeline Services Pty Ltd.</i> Records were available for inspection by the Auditor.	Compliance
85.	The monitoring required under this consent for the concentration of a pollutant emitted to the air, shall be carried out in accordance with:		
	(a) any methodology which is required under the POEO Act to be used for the testing of the concentration of the pollutant; or	The leak detection monitoring adopts the methodology specified in the operation's environment protection licence.	Compliance
	(b) if no such requirement is imposed by or under the POEO Act or by the consent or a condition of the licence or the protocol (as the case may be) requires to be used for that testing; or	Meaning of condition is unclear.	Not Triggered
	(c) if no such requirement is imposed by or under the POEO Act or by the consent or a condition of the licence or the protocol (as the case may be), any methodology approved in writing by the EPA for the purposes of that testing prior to the testing taking place. Note: The <i>Clean Air (Plant and Equipment) Regulation 1997</i> requires testing for certain purposes to be conducted in accordance with test methods contained in the publication <i>Approved Methods for the Sampling and Analysis of Air Pollutants in NSW</i> .	Condition not activated as the operation's EPL specifies the methodology for the leak detection monitoring.	Not Triggered
86.	All records required to be kept by the licence shall be:	The only monitoring required under this condition is the Leak Detection and Repair monitoring undertaken as required by Condition M7.3 of EPL 12003 and as	Compliance
	(a) in a legible form, or in a form that can readily be reduced to a legible form;		Compliance



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No.	Consent Condition	Evaluation	Finding
	(b) kept for at least four years after the monitoring or event to which they relate took place; and	detailed in the <i>Annual Leak Detection and Repair Summary Report, Reporting Period 13 May 2013 to 21 December 2013, Camden Gas Project, dated 17 February 2014, AGL Upstream Investments Pty Ltd, and the Gas Leakage Audit, 2013, Final Report for Camden (NSW) by Heath Pipeline Services Pty Ltd.</i> Records were available for inspection by the Auditor.	Compliance
	(c) produced in a legible form to any authorised officer of the EPA who asks to see them.		Compliance
87.	The following records shall be kept in respect of any samples required to be collected:	The only monitoring required under this condition is the Leak Detection and Repair monitoring undertaken as required by Condition M7.3 of EPL 12003 and as detailed in the <i>Annual Leak Detection and Repair Summary Report, Reporting Period 13 May 2013 to 21 December 2013, Camden Gas Project, dated 17 February 2014, AGL Upstream Investments Pty Ltd, and the Gas Leakage Audit, 2013, Final Report for Camden (NSW) by Heath Pipeline Services Pty Ltd.</i> Records were available for inspection by the Auditor.	Compliance
	(a) the date(s) on which the sample was taken;		Compliance
	(b) the time(s) at which the sample was taken;		Compliance
	(c) the point at which the sample was taken; and		Compliance
	(d) the name of the person who collected the sample.		Compliance
	Requirement to Monitor Concentrations of Pollutants Discharged		
88.	The Applicant shall determine the relevant pollutant concentrations and emission parameters specified in Table 8 below, at the discharge monitoring points indicated and employing the sampling and analysis method specified. All relevant pollutant concentrations and emission parameters for each discharge monitoring point shall be determined concurrently and at the frequency specified in the table. The discharge monitoring points are specified in condition 76 of this consent.	Condition closed in a previous audit. This condition related to the former Ray Beddoe Treatment Plant.	Not Triggered



CAMDEN GAS PROJECT - INDEPENDENT ENVIRONMENTAL AUDIT 2012 - 2014

No.	Consent Condition	Evaluation	Finding																																																																																			
	<p>Table 8 – Discharge Monitoring Point Pollutant and Parameter Monitoring</p> <table border="1"> <thead> <tr> <th data-bbox="232 341 495 411">Pollutant</th> <th data-bbox="501 341 636 411">Discharge Monitoring Point</th> <th data-bbox="642 341 777 411">Unit of Measure</th> <th data-bbox="784 341 918 411">Frequency</th> <th data-bbox="925 341 1088 411">Sampling Method</th> </tr> </thead> <tbody> <tr> <td>carbon dioxide in stack gases</td> <td>1 and 3</td> <td>%</td> <td>Annual</td> <td>TM-24</td> </tr> <tr> <td>carbon monoxide</td> <td>1</td> <td>ppm</td> <td>Annual</td> <td>OM-1</td> </tr> <tr> <td>dry gas density</td> <td>1 and 3</td> <td>kg/m³</td> <td>Annual</td> <td>TM-23</td> </tr> <tr> <td>moisture content in stack gases</td> <td>1 and 3</td> <td>%</td> <td>Annual</td> <td>TM-22</td> </tr> <tr> <td>molecular weight of stack gases</td> <td>1 and 3</td> <td>g/gmole</td> <td>Annual</td> <td>TM-23</td> </tr> <tr> <td>nitrogen oxides</td> <td>1</td> <td>g/m³</td> <td>Annual</td> <td>TM-11</td> </tr> <tr> <td>oxygen in stack gases</td> <td>1 and 3</td> <td>%</td> <td>Annual</td> <td>TM-25</td> </tr> <tr> <td>sulfur dioxide</td> <td>1</td> <td>g/m³</td> <td>Annual</td> <td>TM-4</td> </tr> <tr> <td>sulfuric acid mist and/or sulfur trioxide</td> <td>1</td> <td>g/m³</td> <td>Annual</td> <td>TM-3</td> </tr> <tr> <td rowspan="2">temperature</td> <td>1 and 3</td> <td>°C</td> <td>Annual</td> <td>TM-2</td> </tr> <tr> <td>2</td> <td>°C</td> <td>Continuous</td> <td>TM-2</td> </tr> <tr> <td>tertiary butyl mercaptan</td> <td>4</td> <td>Note¹</td> <td>Note¹</td> <td>Note¹</td> </tr> <tr> <td>velocity</td> <td>1 and 3</td> <td>m/s</td> <td>Annual</td> <td>TM-2</td> </tr> <tr> <td>volatile organic compounds (VOC)</td> <td>1 and 3</td> <td>ppm</td> <td>Annual</td> <td>OM-2</td> </tr> <tr> <td rowspan="2">volumetric flow rate</td> <td>1 and 3</td> <td>m³/s</td> <td>Annual</td> <td>TM-2</td> </tr> <tr> <td>2</td> <td>m³/s</td> <td>Continuous</td> <td>CEM-6</td> </tr> </tbody> </table> <p>Note: Units of measure, frequency and sampling method to be approved by the EPA in writing.</p>	Pollutant	Discharge Monitoring Point	Unit of Measure	Frequency	Sampling Method	carbon dioxide in stack gases	1 and 3	%	Annual	TM-24	carbon monoxide	1	ppm	Annual	OM-1	dry gas density	1 and 3	kg/m ³	Annual	TM-23	moisture content in stack gases	1 and 3	%	Annual	TM-22	molecular weight of stack gases	1 and 3	g/gmole	Annual	TM-23	nitrogen oxides	1	g/m ³	Annual	TM-11	oxygen in stack gases	1 and 3	%	Annual	TM-25	sulfur dioxide	1	g/m ³	Annual	TM-4	sulfuric acid mist and/or sulfur trioxide	1	g/m ³	Annual	TM-3	temperature	1 and 3	°C	Annual	TM-2	2	°C	Continuous	TM-2	tertiary butyl mercaptan	4	Note ¹	Note ¹	Note ¹	velocity	1 and 3	m/s	Annual	TM-2	volatile organic compounds (VOC)	1 and 3	ppm	Annual	OM-2	volumetric flow rate	1 and 3	m ³ /s	Annual	TM-2	2	m ³ /s	Continuous	CEM-6		
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89.	The selection of sampling positions is to be carried out in accordance with test method TM-1.	Condition closed in a previous audit. This condition related to the former Ray Beddoe Treatment Plant.	Not Triggered																																																																																			



CAMDEN GAS PROJECT - INDEPENDENT ENVIRONMENTAL AUDIT 2012 - 2014

No.	Consent Condition	Evaluation	Finding
	Community Consultative Committee		
90.	The Applicant shall establish a Community Consultative Committee to oversee the environmental performance of the development. This Committee shall:	The Auditor sighted the minutes of the Community Consultative Committee (CCC) meetings confirming that the Committee was in existence.	Compliance
	(a) be chaired by an independent chairperson approved by the Director-General in consultation with the Applicant, Wollondilly Council and Camden Council;	Condition closed in a previous audit.	Compliance
	(b) have four community representatives residing in the PAL 1 area;	PAL 1 did not exist during the audit period.	Not Triggered
	(c) have one representative from each council;	The minutes of the CCC meetings during the audit period confirmed compliance with this condition.	Compliance
	(d) two representatives appointed by the Applicant (including the environmental officer);	The minutes of the CCC meetings during the audit period confirmed compliance with this condition.	Compliance
	(e) two (2) representatives from a recognized environmental group;	One representative is from the Scenic Hills Association. The other representative is from the Thirlmere Wetlands Landcare Group.	Compliance
	(f) meet at least quarterly;	The Committee did not meet in the first quarter of 2014, however, met during every other quarter of the audit period and there have been four meetings per calendar year.	Compliance
	(g) take minutes of the meeting; and	The minutes of the CCC meetings during the audit period confirmed compliance with this condition.	Compliance
	(h) make comments and recommendations about the implementation of the development and environmental management plans, monitor compliance with conditions of this consent and other matters relevant to the operation of the development during the term of the consent.	The minutes of the CCC meetings during the audit period confirmed compliance with this condition.	Compliance
	Representatives from relevant government agencies or other individuals may be invited to attend meetings as required by the Chairperson.	The minutes of the CCC meetings during the audit period confirmed compliance with this condition.	Compliance
91.	The Applicant shall:		
	(a) provide the Committee with regular information on the environmental performance and management of the development;	The Auditor reviewed documentation including	Compliance



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No.	Consent Condition	Evaluation	Finding
	(b) ensure that the Committee has reasonable access to the necessary plans to carry out its functions;	Committee meeting minutes and presentations and verified compliance with the requirements of these conditions. The Committee minutes are publicly available on the Camden Gas Project website and AGL reported that they are emailed to Committee members and DoPE.	Compliance
	(c) consider the recommendations and comments of the Committee and provide a response to the Committee and Director-General;		Compliance
	(d) provide access for site inspections by the Committee;		Compliance
	(e) make the minutes available for public inspection at Camden and Wollondilly Councils within fourteen days of the Committee meeting, or as agreed by the Committee; and		Compliance
	(f) forward a copy of the minutes of each Committee meeting, and any responses to the Committee's recommendations to the Director-General and the DMR within a month of the Committee meeting.		Compliance –
92.	If required by the Committee, the Applicant shall establish a trust fund or other funding arrangement that may be agreed between the Applicant and Committee, to be managed by the Chair of the Committee to facilitate the functioning of the Committee, and pay \$5000 per annum to the fund or other arrangement, for the duration of operation in the PAL 1 area, or as otherwise directed by the Director-General. The monies are to be used only if required for the engagement of consultants to interpret technical information and the like. The annual payment shall be indexed according to the Consumer Price Index (CPI) at the time of payment. The first payment shall be made by the date of the first Committee meeting. A record of the finances of the trust fund during each year shall be provided to the Director-General and Applicant by the Chair on each anniversary of the first payment. Any unspent monies shall be returned to the Applicant each year.	Condition not activated during the audit period.	Not Triggered



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No.	Consent Condition	Evaluation	Finding
	<p>SCHEDULE 4 MANDATORY CONDITIONS FOR ALL EPA LICENCES ADMINISTRATIVE CONDITIONS</p>		
	<p>Other activities</p>		
	<p>(To be used on licences with ancillary activities) This licence applies to all other activities carried on at the premises, including:</p> <ul style="list-style-type: none"> ■ Gas wells and gathering system. 	<p>The activities undertaken under this consent are consistent with this requirement.</p>	<p>Compliance</p>
	<p>OPERATING CONDITIONS</p>		
	<p>Activities must be carried out in a competent manner</p>		
	<p>Licensed activities must be carried out in a competent manner. This includes: activity; and</p>	<p>The operation of the gas wells and gathering system appear to be being carried out in a competent manner in compliance with this condition. AGL's incident register indicates that no significant incidents occurred and no complaints were received during the audit period.</p>	<p>Compliance</p>
	<p>(a) the processing, handling, movement and storage of materials and substances used to carry out the</p>		<p>Compliance</p>
	<p>(b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.</p>		<p>Compliance</p>
	<p>Maintenance of plant and equipment</p>		
	<p>All plant and equipment installed at the premises or used in connection with the licensed activity:</p>	<p>The plant and equipment installed or used in connection with licensed activities appear to be being maintained and operated in compliance with this condition. AGL's incident register indicates that no significant incidents occurred and no complaints were received during the audit period.</p>	<p>Compliance – Improvement Recommended</p>
	<p>(a) must be maintained in a proper and efficient condition; and</p>		
	<p>(b) must be operated in a proper and efficient manner.</p>	<p>However, a search of the Camden Gas Project's planning maintenance system indicated that 40% of currently pending planned maintenance tasks are overdue. Details of the nature and environmental significance of these tasks were not viewed by the auditor. The Auditor recommends that AGL review the</p>	<p>Compliance</p>



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No.	Consent Condition	Evaluation	Finding
		nature and significance of the outstanding tasks and implements corrective action where appropriate. The Auditor also notes the EPA's regulatory action in relation to two PINs and an official caution, each relating to a "failure to maintain plant and equipment".	
	MONITORING AND RECORDING CONDITIONS		
	Recording of pollution complaints		
	The licensee must keep a legible record of all complaints made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this licence applies.	During the audit period, in 2013, the Camden Gas Project transitioned from one complaints register (Complaints Register) to another register (Consultation Manager, a communications database). The complaints registers addressed the requirements of this condition. No complaints were received within the scope of this Development Consent during the audit period.	Compliance
	The record must include details of the following:		Compliance
	(a) the date and time of the complaint;		Compliance
	(b) the method by which the complaint was made;		Compliance
	(c) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect;		Compliance
	(d) the nature of the complaint;		Compliance
	(e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and		Compliance
	(f) if no action was taken by the licensee, the reasons why no action was taken.		Compliance
	The record of a complaint must be kept for at least 4 years after the complaint was made.		Compliance
	The record must be produced to any authorised officer of the EPA who asks to see them.		Compliance
	Telephone complaints line		
	The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted at the premises or by the vehicle or mobile	AGL maintains a telephone complaints line, the details of which are contained on AGL's website as well as at	Compliance



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No.	Consent Condition	Evaluation	Finding
	plant, unless otherwise specified in the licence.	well sites, access roads and gas gathering lines. The Auditor telephoned the complaints line during the Audit and was satisfied with the complaints handling process.	
	The licensee must notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint.		Compliance
	This condition does not apply until 3 months after this condition takes effect.		Compliance
	REPORTING CONDITIONS		
	Annual Return documents		
	What documents must an Annual Return contain? The licensee must complete and supply to the EPA an Annual Return in the approved form comprising:	The Annual Returns for the audit period (2012/2013 and 2013/2014) addressed the requirements of this condition.	Compliance
	(a) a Statement of Compliance; and		Compliance
	(b) a Monitoring and Complaints Summary.		Compliance
	A copy of the form in which the Annual Return must be supplied to the EPA accompanies this licence. Before the end of each reporting period, the EPA will provide to the licensee a copy of the form that must be completed and returned to the EPA.		Compliance
	Period covered by Annual Return		
	An Annual Return must be prepared in respect of each reporting, except as provided below. Note: The term <i>reporting period</i> is defined in the dictionary at the end of this licence. Do not complete the Annual Return until after the end of the reporting period.	The Annual Returns for the audit period (2012/2013 and 2013/2014) addressed the requirements of this condition.	Compliance
	Where this licence is transferred from the licensee to a new licensee, (a) the transferring licensee must prepare an annual return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted; and (b) the new licensee must prepare an annual return for the period commencing on the date the application for the transfer of the licence is	No licence transfers occurred during the audit period.	Not Triggered



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No.	Consent Condition	Evaluation	Finding
	granted and ending on the last day of the reporting period. Note: An application to transfer a licence must be made in the approved form for this purpose.		
	Where this licence is surrendered by the licensee or revoked by the EPA or Minister, the licensee must prepare an annual return in respect of the period commencing on the first day of the reporting period and ending on (a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or (b) in relation to the revocation of the licence – the date from which notice revoking the licence operates.	No licences were surrendered or revoked by the EPA or the Minister during the audit period.	Not Triggered
	Deadline for Annual Return		
	The Annual Return for the reporting period must be supplied to the EPA by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date').	The 2011/2012 Annual Return was submitted after the 60 day period. It was due on 20 February 2013 and was submitted on 24 February, four days late. This was noted as a non-compliance in the Annual Return and no further action is required. The 2012/2013 Annual Return was submitted on 18 February 2014 within the 60 day period.	Non-Compliance Level 2
	Notification where actual load cannot be calculated		
	(Licences with assessable pollutants) Where the licensee is unable to complete a part of the Annual Return by the due date because the licensee was unable to calculate the actual load of a pollutant due to circumstances beyond the licensee's control, the licensee must notify the EPA in writing as soon as practicable, and in any event not later than the due date.	AGL was not unable to calculate the actual load of a pollutant due to circumstances beyond its control during the audit period.	Not Triggered
	The notification must specify:		Not Triggered
	(a) the assessable pollutants for which the actual load could not be calculated; and		Not Triggered
	(b) the relevant circumstances that were beyond the control of the licensee.		Not Triggered



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No.	Consent Condition	Evaluation	Finding
	Licensee must retain copy of Annual Return		
	The licensee must retain a copy of the annual return supplied to the EPA for a period of at least 4 years after the annual return was due to be supplied to the EPA.	Copies of the Annual Return for the last four years have been retained by AGL.	Compliance
	Certifying of Statement of Compliance and Signing of Monitoring and Complaints Summary		
	Within the Annual Return, the Statement of Compliance must be certified and the Monitoring and Complaints Summary must be signed by:	The requirements of this condition were satisfied for the 2012/2013 and 2011/2012 Annual Returns.	Compliance
	(a) the licence holder; or		Compliance
	(b) by a person approved in writing by the EPA to sign on behalf of the licence holder. A person who has been given written approval to certify a Statement of Compliance under a licence issued under the Pollution Control Act 1970 is taken to be approved for the purpose of this condition until the date of first review this licence.		Compliance
	Notification of environmental harm		
	Note: The licensee or its employees must notify the EPA of incidents causing or threatening material harm to the environment as soon as practicable after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act	AGL advised that no incidents of environmental harm occurred during the audit period.	Not Triggered
	Notifications must be made by telephoning the EPA's Pollution Line service on 131 555.		Not Triggered
	The licensee must provide written details of the notification to the EPA within 7 days of the date on which the incident occurred.		Not Triggered
	Written report		
	Where an authorised officer of the EPA suspects on reasonable grounds that:	AGL advised that there have not been any events during the audit period, within the scope of this audit, where the EPA has advised it that it suspects that an "event has caused, is causing or is likely to cause material harm to the environment" and thereby requesting provision of a written report into the event. Hence, the Auditor	Not Triggered
	(a) where this licence applies to premises, an event has occurred at the premises; or		Not Triggered
	(b) where this licence applies to vehicles or mobile plant, an event has occurred in connection with the carrying out of the activities authorised by		Not Triggered



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No.	Consent Condition	Evaluation	Finding
	this licence, and the event has caused, is causing or is likely to cause material harm to the environment (whether the harm occurs on or off premises to which the licence applies), the authorised officer may request a written report of the event.	considers that this condition was not triggered during the audit period.	
	The licensee must make all reasonable inquiries in relation to the event and supply the report to the EPA within such time as may be specified in the request.		Not Triggered
	The request may require a report which includes any or all of the following information:		Not Triggered
	(a) the cause, time and duration of the event;		Not Triggered
	(b) the type, volume and concentration of every pollutant discharged as a result of the event;		Not Triggered
	(c) the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event; and		Not Triggered
	(d) the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort;		Not Triggered
	(e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants;		Not Triggered
	(f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and		Not Triggered
	(g) any other relevant matters.		Not Triggered
	The EPA may make a written request for further details in relation to any of the above matters if it is not satisfied with the report provided by the licensee. The licensee must provide such further details to the EPA within the time specified in the request.		Not Triggered



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No.	Consent Condition	Evaluation	Finding
	GENERAL CONDITIONS		
	Copy of licence kept at the premises or on the vehicle or mobile plant		
	A copy of this licence must be kept at the premises or on the vehicle or mobile plant to which the licence applies.	A copy of the licence is available in electronic form at the RPPG site and was available to the EPA during an unannounced audit in July 2013.	Compliance
	The licence must be produced to any authorised officer of the EPA who asks to see it.		Compliance
	The licence must be available for inspection by any employee or agent of the licensee working at the premises or operating the vehicle or mobile plant.		Compliance



Table 3: DA 246-8-2002-I (Kay Park)

No.	Consent Condition	Evaluation	Finding
	<p>Schedule 3 Conditions of Consent</p>		
	<p>Obligation to Minimise Harm to the Environment</p>		
<p>1.</p>	<p>The Applicant shall implement all practicable measures to prevent or minimise any harm to the environment that may result from the construction or operation of the development.</p>	<p>An EMS has been established to manage environmental risks and drive improvements in performance. The EMS consists of an EMP, related sub-plans and a Compliance Register.</p> <p>Various management tools have been implemented to monitor and measure implementation of the EMS.</p> <p>The ECR was sighted and found to be effective for monitoring compliance against project approval obligations. During the audit period the ECR transitioned from Mipela to Regulatory Compliance Register to CMO-Compliance. CMO was commissioned only on 30 June 2014. However, supporting documents were not included for all conditions to verify compliance status. It is recommended that each Consent Condition in the Compliance Register be checked to ensure that relevant supporting documentation is referenced (Opportunity for Improvement).</p> <p>It is also noted that the consent conditions contained in CMO-Compliance are not consistently a 'word for word' representation of the relevant condition, which presents a risk of misinterpretation and inability to fully comply with the condition. It is recommended that each condition in CMO-Compliance be checked to ensure it is a 'word for word' representation of the consent conditions (Opportunity for Improvement).</p> <p>There were no reported environmental incidents or non-compliances during the audit period.</p>	<p>Compliance – Improvement Recommended</p>



CAMDEN GAS PROJECT - INDEPENDENT ENVIRONMENTAL AUDIT 2012 - 2014

No.	Consent Condition	Evaluation	Finding
	Terms of Approval		
2.	The Applicant shall carry out the development generally in accordance with the:	AGL reported that the development is being undertaken in accordance with the EMS, which incorporates the requirements of Consent Conditions and the supporting documentation. The Sub-Plans have been going through a process of review and upgrade during 2013/2014 and have been submitted to DoPE, with the exception of the Sub-Plans for air quality and traffic which are still undergoing the revision process.	Compliance
	(a) DA submitted to the Department on 2 August 2002; and	This document was not available for review and confirmation of compliance. Compliance is assumed based on findings of previous audits and minimum change in activities during the audit period.	Compliance
	(b) Sydney Gas Operations Pty Ltd Kay Park CBM Project Prospecting Exploration Licence 2 Statement of Environmental Effects Exploration Drilling & Gas Gathering Operations, dated 15/4/02 and prepared by Harvest Scientific Services;	This document was not available for review and confirmation of compliance. Compliance is assumed based on findings of previous audits and minimum change in activities during the audit period.	Compliance
	(c) Addendum to Report Camden Coal Bed Methane Project – Kay Park Pipeline Archaeological and Heritage Assessment, dated May 2002 and prepared by New South Wales Archaeology;	This document was not available for review and confirmation of compliance. Compliance is assumed based on findings of previous audits and minimum change in activities during the audit period.	Compliance
	(d) Conditions of the consent for DA No. 15-1-2002-I dated 23 July 2002;	This condition was assessed via this audit. Refer to each condition for assessment of compliance.	Not Triggered
	(e) Modification Application MOD 25-3-2007 and Camden Gas Project Joint Venture Gas Well and Gathering Line Modification Project Statement of Environmental Effects, dated March 2007; and	The appendices of the Statement of Environmental Effects were not available for review and confirmation of compliance. Compliance is assumed based on findings of previous audits and minimum change in activities during the audit period.	Compliance
	(f) Modification Application DA246-8-2002-I MOD2 and ‘Camden Gas Project: Kay Park and Loganbrae Gas Gathering Line Modification Project Statement of Environmental Effects’, dated July 2008; and	Compliance is assumed based on findings of previous audits and minimum change in activities during the audit period.	Compliance



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No.	Consent Condition	Evaluation	Finding
	(g) Modification Application DA 246-8-2002i MOD 3 titled "Camden Gas Project – Modification KP06 SIS to Directional", dated October 2008; and	Compliance is assumed based on findings of previous audits and minimum change in activities during the audit period.	Compliance
	(h) Modification Application DA 246-8-2002-I MOD 4 titled "Camden Gas Project: Proposed modification for Development Consent 246-8-2002-i-KP06 SIS well", dated February 2011		
	(i) Conditions of this consent. If there is any inconsistency between the above documents, the latter document shall prevail over the former to the extent of the inconsistency. However, the conditions of this consent shall prevail over all other documents to the extent of any inconsistency.	Refer to each condition for assessment of compliance.	
	Period of Approval		
3.	This approval is for a period of twenty one (21) years from the date of granting of the production lease.	Condition was not activated during the audit period.	Not Triggered
	Special Condition of Approval		
3A.	The Applicant shall not produce gas from any well until a Production Lease under the Petroleum (Onshore) Act 1991 has been obtained for the full length of the well.	Condition closed in a previous audit.	Not Triggered
	Redrilling and Refracking Management Plan		
4.	For the purposes of this consent the redrilling and/or additional fracing of a well does not constitute wellhead maintenance.	Condition was not activated during the audit period. AGL reported that no re-drilling or fracing activities were undertaken during the audit period.	Not Triggered
5.	The Applicant shall obtain the approval of the Director-General for the redrilling and/or additional fracing of a well.	Condition was not activated during the audit period. AGL reported that no re-drilling or fracing activities were undertaken during the audit period.	Not Triggered
6.	The Applicant shall prepare and submit to the Director-General a Redrilling and Refracking Management Plan (in accordance with Condition 10 of the consent for DA No. 15-1-2002-i dated 23 July 2002) for the redrilling and refracking of an existing well.	Condition was not activated during the audit period. AGL reported that no re-drilling or fracing activities were undertaken during the audit period.	Not Triggered
7.	The Applicant shall give written notification of the proposed redrilling/refracking work to potentially affected residences and other noise sensitive receivers at least fourteen days prior to work commencing.	Condition was not activated during the audit period. AGL reported that no re-drilling or fracing activities were undertaken during the audit period.	Not Triggered



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No.	Consent Condition	Evaluation	Finding
Compliance			
8.	Throughout the life of the development, the Applicant shall secure, renew, maintain, and comply with all the relevant statutory approvals applying to the development.	<p>An EMS has been established to manage environmental risks and drive improvements in performance. The EMS consists of an EMP, related sub-plans and a Compliance Register.</p> <p>Various management tools have been implemented to monitor and measure implementation of the EMS.</p> <p>The ECR was sighted and found to be effective for monitoring compliance against project approval obligations. During the audit period the ECR transitioned from Mipela to Regulatory Compliance Register to CMO-Compliance. CMO was commissioned only on 30 June 2014. However, supporting documents were not included for all conditions to verify compliance status. It is recommended that each Consent Condition in the Compliance Register be checked to ensure that relevant supporting documentation is referenced (Opportunity for Improvement).</p> <p>It is also noted that the consent conditions contained in CMO-Compliance are not consistently a 'word for word' representation of the relevant condition, which presents a risk of misinterpretation and inability to fully comply with the condition. It is recommended that each condition in CMO-Compliance be checked to ensure it is a 'word for word' representation of the consent conditions (Opportunity for Improvement).</p> <p>There were no reported environmental incidents or non-compliances during the audit period.</p>	Compliance – Improvement Recommended
9.	The Applicant shall take all reasonable steps to ensure that all of its employees, contractors and subcontractors are made aware of, and comply with, the conditions of this consent relevant to their respective activities.	The Auditor sighted the EMP (February 2014) which notes that employees and contractors must attend an induction prior to commencing operation, maintenance and construction works. In addition, job specific training	Compliance



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No.	Consent Condition	Evaluation	Finding
		<p>is delivered in response to identified needs. The auditor sighted the site specific and role-specific induction program that is delivered to AGL employees and contractors. The online system includes a module that is aligned with the EMP and the specific risks and controls.</p> <p>Examples of training programs sighted by the Auditor included:</p> <ul style="list-style-type: none"> ■ AGL Environmental Legal Obligations Training 2013 ■ AGL Upstream Gas Environmental Compliance Training ■ Lunch & Learn: PIRMP presentation 	
	Production Operations Plan		
10.	<p>The Applicant shall prepare a Production Operations Plan (POP) for the approval of the DOPE. The POP shall have regard to the conditions of this consent and the Environment Protection Licence under the Protection of the Environment Operations Act 1997. The POP will form the basis for the:</p> <p>(a) ongoing operations and environmental management; and</p> <p>(b) ongoing monitoring of the development. A copy of the POP shall be forwarded to the Department within fourteen days of the DOPE's acceptance.</p>	<p>AGL reported that meetings occurred with DITIRS (now Office of CSG) on 14 July 2011 and 5 June 2013 to discuss the revised POP (v7). The Auditor sighted correspondence from the Office of CSG (8/8/2013) stating that compliance has been achieved due to the currency of the previous version (POP, v6) and submission of a revised version (POP, v7, dated 19/11/2013). A letter of approval was issued by NSW Government Trade & Investment on 20 December 2013. The POP was updated on 17 December 2014, approved via letter by the Office of CSG on 23 December 2014 and a copy forwarded to DOPE on 24 December 2014.</p>	Compliance
			Compliance
			Compliance
	Environmental Management Plan		
11.	<p>The Applicant shall amend the Environmental Management Plan required under Condition 15 of the consent for DA No. 15-1-2002-i dated 23 July 2002, to include the operation of KP1, KP2, KP3, KP05 and KP06 and the associated gas gathering system.</p>	<p>Condition closed in a previous audit.</p>	Not Triggered



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No.	Consent Condition	Evaluation	Finding
	Condition Report		
12.	The Applicant shall prepare a Condition Report on residences and structures that may be potentially affected by drilling/fracking work, including the redrilling and refracking of an existing well. The Applicant shall undertake an inspection of the residence and/or structure prior to work commencing, and a follow up inspection within one month of the completion of the work. The Applicant shall take immediate action for repair of any damage to the residence or structure as a result of the work and to avoid any further damage. A copy of the Condition Report shall be submitted to the Director-General and the DOPE after completion of the work.	AGL reported that no drilling or fracking work was undertaken during the audit period.	Not Triggered
	Incident Reporting		
13.	The Applicant shall notify the DECC, DOPE and the Director- General of any incident with significant off-site impacts on people or the biosphere environment as soon as practicable after the occurrence of the incident. The Applicant shall provide written details of the incident to the Director-General, the DECC, DOPE, and Wollondilly Council within seven days of the date on which the incident occurred.	The Auditor sighted the Emergency Response Plan (November 2013) and noted that the Plan conforms to the requirements of this condition. An extract from the Environmental Incidents Report Register for the 2013-2014 financial year and the AEPR for the 2012-2013 also confirmed compliance with this condition. No incidents required reporting in accordance with this condition during the audit period.	Compliance
14.	The Applicant shall meet the requirements of the Director- General to address the cause or impact of any incident, as it relates to this consent, reported in accordance with Condition 13 of this consent, within such period as the Director-General may agree.	Condition was not activated during the audit period.	Not Triggered
	Complaints Register		
15.	The Applicant shall record details of all complaints received in an up-to-date Complaints Register. The Register shall record, but not necessarily be limited to:	During the audit period, in 2013, the Camden Gas Project transitioned from one complaints register (Complaints Register) to another register (Consultation Manager, a communications database). The complaints registers addressed the requirements of this condition. No complaints were received within the scope of this Development Consent during the audit period.	Compliance
	(a) the date and time, where relevant of the complaint;		Compliance
	(b) the means by which the complaint was made;		Compliance
	(c) any personal details of the complainant that were provided, or if no details were provided, a note to that effect;		Compliance



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No.	Consent Condition	Evaluation	Finding
	(d) the nature of the complaints;		Compliance
	(e) any action(s) taken by the Applicant in relation to the complaint, including any follow-up contact with the complainant; and		Compliance
	(f) if no action was taken by the Applicant in relation to the complaint, the reason(s) why no action was taken.		Compliance
	The Complaints Register shall be made available for inspection by the DECC or the Director-General upon request. The Applicant shall also make summaries of the register, without details of the complainants, available for public inspection.		Compliance
	Annual Environmental Performance Reporting		
16.	The Applicant shall include the operation of KP 1, KP2, KP3, KP05 and KP06 and the associated gas gathering system, and the conditions of this consent, in the Annual Environmental Performance Report required under Condition 34 of the consent for DA No. 15-1-2002-i dated 23 July 2002.	The Auditor sighted the AEPRs for July 2013 (final) and July 2014 (draft) and noted a number of references in relation to the operation of KP1, KP02, KP03, KP05 and KP06 and associated gas gathering system.	Compliance
	Independent Environmental Audit		
17.	The Applicant shall include the operation of KP 1, KP2, KP3, KP05 and KP06 and the associated gas gathering system, and the conditions of this consent, in the Independent Environmental Audit required under Condition 35 of the consent for DA No. 15-1-2002-i dated 23 July 2002.	The scope of this IEA satisfies this condition.	Compliance
	Noise – Well Maintenance		
18.	The Applicant shall apply all feasible and reasonable noise mitigation measures to planned well maintenance activities Department of Planning DA No. 246-8-2002-I Page 7 of 11 in order to achieve the noise limits specified by Condition 38 of the consent for DA No. 15-1-2002-i dated 23 July 2002. Where the noise limits are not achievable the Applicant shall implement management practices as necessary to minimise the potential noise impacts. These management practices are to include, but not be limited to:	The Auditor sighted the Noise Management Sub-Plan (November 2013) and noted that the Sub-Plan conforms to the requirements of this condition. It is also noted that Kay Park is located approximately five kilometres away from the noise receivers referred to in Condition 38. It is therefore considered that this condition is not triggered.	Not Triggered
	(a) appropriately informing affected residences and other relevant parties at least two weeks in advance of any planned well maintenance activities and updating the information as required;	The Auditor sighted the Noise Management Sub-Plan (November 2013) and noted that the Sub-Plan includes a requirement to notify affected receivers 14 days prior to planned maintenance activities. AGL reported that there	Compliance



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No.	Consent Condition	Evaluation	Finding
		are no sensitive receivers within proximity of the area and therefore notifications are made.	
	(b) documenting and implementing any specific work practices the Applicant will employ to limit noise;	The Auditor sighted the Noise Management Sub-Plan (November 2013) and noted that the Sub-Plan conforms to the requirements of this condition.	Compliance
	(c) documenting the feasible and reasonable noise mitigation measures that will be undertaken to reduce noise impacts from planned well maintenance activities; and	The Auditor sighted the Noise Management Sub-Plan (November 2013) and noted that the Sub-Plan conforms to the requirements of this condition.	Compliance
	(d) conducting noise monitoring where appropriate.	No noise monitoring was undertaken as it was not considered required during the audit period.	Not Triggered
Noise and Fracture Stimulation Impacts			
19.	The Applicant shall implement management practices as necessary to minimise the potential noise impacts from any drilling and fracture stimulation works. These management practices are to include, but not be limited to:	The Auditor sighted the Noise Management Sub-Plan (November 2013) and noted that the Sub-Plan conforms to the requirements of this condition. No redrilling or refracturing work was undertaken during the audit period.	Not Triggered
	(a) identifying all potentially affected noise sensitive receivers (including residences, schools, commercial premises and noise sensitive equipment) that may be affected by drilling work at these wells;		Not Triggered
	(b) predicting potential noise levels from the proposed well drilling and fracture stimulation methods where appropriate;		Not Triggered
	(c) identifying and implementing all reasonable and feasible noise mitigation measures to reduce any drilling noise impacts;		Not Triggered
	(d) documenting and implementing any specific work practices the Applicant will employ to limit noise;		Not Triggered
	(e) conducting noise monitoring where appropriate; and		Not Triggered
	(f) appropriately informing affected residences and other relevant parties at least two weeks in advance of any drilling and fracture stimulation works with a view to negotiating a mutually beneficial time to schedule fracture stimulation works.		Not Triggered



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No.	Consent Condition	Evaluation	Finding										
Construction Hours													
19A.	<p>The Applicant shall ensure that all construction work (except for the drilling (including well casing and grouting) of SIS wells), shall only be conducted between 7.00am and 6.00pm Monday to Friday and between 8.00am and 1.00pm Saturdays, unless inaudible at any residential receiver.</p> <p>Note: Inaudible means that the construction activity cannot be heard by the human ear at the nearest affected residential receiver.</p>	The Auditor sighted the Noise Management Sub-Plan (November 2013) and noted that the Sub-Plan conforms to the requirements of this condition. No construction work was undertaken during the audit period.	Not Triggered										
Construction Noise Criteria for SIS and Directional Wells													
19B.	<p>Noise from the drilling and construction of KP05 and KP06 shall not exceed the sound pressure level (noise) limits in the table below:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center;">Receiver Location</th> <th style="text-align: center;">Weekday (7.00am-6.00pm) Saturday (7.00am-1.00pm)</th> <th style="text-align: center;">Saturday (1.00pm-6.00pm) Sunday (7.00am-6.00pm)</th> <th style="text-align: center;">Evening (6.00pm-10.00pm)</th> <th style="text-align: center;">Night (10.00pm-7.00am)</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">Nearest Receiver</td> <td style="text-align: center;">53</td> <td style="text-align: center;">48</td> <td style="text-align: center;">41</td> <td style="text-align: center;">35</td> </tr> </tbody> </table>	Receiver Location	Weekday (7.00am-6.00pm) Saturday (7.00am-1.00pm)	Saturday (1.00pm-6.00pm) Sunday (7.00am-6.00pm)	Evening (6.00pm-10.00pm)	Night (10.00pm-7.00am)	Nearest Receiver	53	48	41	35	The Auditor sighted the Noise Management Sub-Plan (November 2013) and noted that the Sub-Plan conforms to the requirements of this condition. No drilling or construction work was undertaken at KP05 or KP06 during the audit period.	Not Triggered
Receiver Location	Weekday (7.00am-6.00pm) Saturday (7.00am-1.00pm)	Saturday (1.00pm-6.00pm) Sunday (7.00am-6.00pm)	Evening (6.00pm-10.00pm)	Night (10.00pm-7.00am)									
Nearest Receiver	53	48	41	35									
Water Quality Impacts													
20.	<p>Except as may be expressly provided for by a licence under the Protection of the Environment Operations Act 1997, the Applicant shall comply with section 120 of the Protection of the Environment Operations Act 1997 in carrying out the development.</p>	The Auditor sighted the EMP for the Camden Gas Project, including the Soil and Water Management Sub-Plan (April 2014) and the Waste Management Sub-Plan (April 2014). The Sub-Plans detail a number of controls to prevent the pollution of water. AGL reported that there were no water pollution incidents during the audit period.	Compliance										
Waste Water													
21.	<p>Waste water from the construction, installation and operation of wells and associated infrastructure shall only be applied to the following areas:</p> <p>(a) dust suppression on any unsealed roads within the site;</p> <p>(b) irrigated onto pastures within the site;</p>	AGL reported that all production wastewater generated during the audit period was transported from the RGP to a third party EPA licensed facility for treatment and beneficial reuse or disposal.	Not Triggered										
			Not Triggered										
			Not Triggered										



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No.	Consent Condition	Evaluation	Finding
	(c) evaporation dam; and		Not Triggered
	(d) reinjection into gas wells.		Not Triggered
	The Applicant shall prepare a detailed feasibility study of reinjection of waste water into a gas well if this method of disposal of waste water is proposed. The approval of the Director-General shall be obtained for reinjection of waste water into a gas well.		Not Triggered
22.	Spray from waste water application shall not drift beyond the boundary of the waste water utilisation area to which it is applied.	AGL reported that all production wastewater generated during the audit period was transported from the RGP to a third party EPA licensed facility for treatment and beneficial reuse or disposal.	Not Triggered
23.	The Applicant shall ensure that areas proposed to be used for waste water application can effectively utilise the waste water. This includes the use for pasture or crop production, as well as ensuring the soil is able to absorb the nutrients, salts, hydraulic load and organic materials in the liquids. The Applicant may be required to undertake monitoring of land and receiving waters to determine the impact of waste water application.	AGL reported that all production wastewater generated during the audit period was transported from the RGP to a third party EPA licensed facility for treatment and beneficial reuse or disposal.	Not Triggered
24.	The Applicant shall ensure that all waste water that is used for dust suppression and/or irrigation has a salinity measure that does not exceed 800 µS/cm.	AGL reported that all production wastewater generated during the audit transported from the RGP to a third party EPA licensed facility for treatment and beneficial reuse or disposal.	Not Triggered
	Dust		
25.	The Applicant shall ensure that activities are carried out in a manner that will minimise the emission of dust from the site, including traffic generated dust from the site access roads.	The Auditor sighted the Air Quality Management Sub-Plan (September 2008) and noted that the Sub-Plan conforms to the requirements of this condition. AGL reported that no dust complaints were received during the audit period in relation to this condition.	Compliance
26.	The Applicant shall take all practicable measures to ensure that all vehicles entering or leaving a site, carrying a load that may generate dust, are covered at all times, except during loading and unloading. Any such vehicles shall be covered or enclosed in a manner that will prevent	The Auditor sighted the Air Quality Management Sub-Plan (September 2008) and noted that the Sub-Plan conforms to the requirements of this condition. AGL reported that no dust complaints were received during	Compliance



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No.	Consent Condition	Evaluation	Finding
	emissions of dust from the vehicle at all times.	the audit period in relation to this condition and AGL reported that vehicles were covered as required.	
27.	The Applicant shall take all practicable measures to minimise the generation of wind-blown dust from soil stockpiles.	The Soil and Water Management Sub-Plan (April 2014) requires stockpiles to be vegetated if they are to be stored on site for a long period of time. AGL reported that topsoil stockpiles tend to naturally vegetate through the seed bank. Water carts are also employed to minimise the generation of wind-blown dust.	Compliance
	Gas Gathering System Pipeline		
28.	The Applicant shall comply with the following in the construction of the gas gathering system pipeline:	This condition is addressed in a number of documents including the EMP (Section 3.3) (March 2014) and the Flora and Fauna Management Sub-Plan (April 2014). There was no gas gathering line constructed during the audit period and hence this condition was not activated.	Not Triggered
	(a) excavated trenches shall not be left uncovered overnight, unless adequate fencing and warning lights are erected;		Not Triggered
	(b) signs stating the presence of a buried gas pipeline shall be erected periodically along the length of the trench once the pipeline has been laid;		Not Triggered
	(c) trenches are to be restored and reseeded with local grass seeds on completion of the work;		Not Triggered
	(d) local council traffic guidelines in respect of work carried out on road verges and underneath roads shall be implemented;		Not Triggered
	(e) the pipeline shall be constructed in accordance with the AS 3723-1989; and		Not Triggered
	(f) the Department shall be notified on the completion of any trenching works.		Not Triggered
	Threatened Species		
28A.	The Applicant shall ensure that, during the drilling and construction of KP05 and KP06, impacts on threatened species are minimised by implementing actions including, but not limited, to the following:	These works pre-dated the audit period and hence this condition was not triggered.	Not Triggered
	(a) The recommendations outlined in Sections 6 and 7 of the Ecosearch Environmental Consultants Pty Ltd report titled Flora and Fauna Assessment, AGL –Gas Well and Gathering Line Project Modifications ; and		Not Triggered



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No.	Consent Condition	Evaluation	Finding
	(b) Marking the boundaries of endangered ecological communities (EECs) and locations of other known threatened species and, where possible, avoiding construction activities within these areas.		Not Triggered
	Heritage		
28B.	The Applicant shall ensure that, if any historical archaeological relics within the meaning of the Heritage Act 1977 are disturbed, the Heritage Council of NSW shall be notified in accordance with section 146 of the Heritage Act 1977.	Condition not activated during the audit period.	Not Triggered
	Site Rehabilitation		
29.	The Applicant shall ensure the prompt and effective rehabilitation of all disturbed areas of the site following the completion of construction, operations and associated activities and/or the decommissioning of plant, to minimize the generation of wind erosion dust.	There was no land disturbance and therefore no rehabilitation undertaken in the area subject to this Development Consent during the audit period. Therefore this condition was not activated during the audit period.	Not Triggered
30.	The Applicant shall carry out rehabilitation of the site in accordance with the requirements of the DOPE and the Site Rehabilitation Management Plan.	There was no land disturbance and therefore no rehabilitation undertaken in the area subject to this Development Consent during the audit period. Therefore this condition was not activated during the audit period.	Not Triggered
	Community Consultative Committee		
31.	The Applicant shall include the operation of KP1, KP2, KP3, KP05 and KP06 and the associated gas gathering system, and the conditions of this consent, as a matter for the consideration of the Community Consultative Committee (established under Condition 90 of the consent for DA No. 15-1-2002-i dated 23 July 2002).	The Auditor sighted the minutes of the CCC meetings that occurred during the audit period and noted compliance with the requirements of this condition. It is noted that minimal activity was undertaken by AGL in the Kay Park area during the audit period.	Compliance
	Environment Protection Licence		
32.	The Applicant shall seek a variation to the Environment Protection Licence issued by the DECC for the Petroleum Production Lease No.1 area, to include the operation of the Kay Park wells (KP1, KP2, KP3, KP05 and KP06) and associated gas gathering system.	Condition closed in a previous audit.	Not Triggered



Table 4: DA 282-6-2003-I (RPGP, Rosalind Park, Wandinong, EMAI (EM01-20,40))

No.	Consent Condition	Evaluation	Finding
	<p>Schedule 3</p> <p>Administrative Conditions</p>		
	<p>Obligation to Minimise Harm to the Environment</p>		
1.	<p>The Applicant shall implement all practicable measures to prevent or minimise any harm to the environment that may result from the construction or operation of the development.</p>	<p>An EMS has been established to manage environmental risks and drive improvements in performance. The EMS consists of an EMP, related sub-plans and a Compliance Register.</p> <p>Various management tools have been implemented to monitor and measure implementation of the EMS.</p> <p>The ECR was sighted and found to be effective for monitoring compliance against project approval obligations. During the audit period the ECR transitioned from Mipela to Regulatory Compliance Register to CMO-Compliance. CMO was commissioned only on 30 June 2014. However, supporting documents were not included for all conditions to verify compliance status. It is recommended that each Consent Condition in the Compliance Register be checked to ensure that relevant supporting documentation is referenced (Opportunity for Improvement).</p> <p>It is also noted that the consent conditions contained in CMO-Compliance are not consistently a 'word for word' representation of the relevant condition, which presents a risk of misinterpretation and inability to fully comply with the condition. It is recommended that each condition in CMO-Compliance be checked to ensure it is a 'word for word' representation of the consent conditions (Opportunity for Improvement).</p> <p>There were no reported environmental incidents or non-compliances during the audit period.</p>	<p>Compliance – Improvement Recommended</p>



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No.	Consent Condition	Evaluation	Finding
	Terms of Approval		
2.	The Applicant shall carry out the development generally in accordance with the:	AGL reported that the development is being undertaken in accordance with the EMS, which incorporates the requirements of Consent Conditions and the supporting documentation. The Sub-Plans have been going through a process of review and upgrade during 2013/2014 and have been submitted to DoPE, with the exception of the Sub-Plans for air quality and traffic which are still undergoing the revision process.	Compliance
	(a) DA submitted to the Department on 20 June 2003;	This document was not available for review and confirmation of compliance. Compliance is assumed based on findings of previous audits and minimum change in activities during the audit period.	Compliance
	(b) <i>Camden Gas Project Stage II – Environmental Impact Statement for the Sydney Gas Company</i> (four volumes), dated 19 June 2003;	This document was available to the Auditor. Compliance is assumed based on findings of previous audits and minimum change in activities during the audit period.	Compliance
	(c) All other documents listed in Appendix C;	Many documents listed in Appendix C were not available for review and confirmation of compliance. Compliance is assumed based on findings of previous audits and minimum change in activities during the audit period.	Compliance
	(d) Drawings No. 32339 SK010 Issue 17 and SK014 Issue 1 ; and URS Plan LC-0100 Revision G dated 16 June 2004;	This document was not available for review and confirmation of compliance. Compliance is assumed based on findings of previous audits and minimum change in activities during the audit period.	Compliance
	(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;	These conditions are included in the consolidated Development Consent and addressed where relevant in this audit.	Compliance
	(f) The modification application submitted to the Department on 11 April 2006 and the accompanying document <i>Camden Gas Project Joint</i>	These conditions are included in the consolidated Development Consent and addressed where relevant in	Compliance



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No.	Consent Condition	Evaluation	Finding
	<i>Venture Proposed Multiple Gas Well Modifications</i> prepared by AGL Gas Production (Camden) Pty Ltd and Sydney Gas (Camden) Operations Pty Ltd, dated April 2006;	this audit.	
	(g) The modification application submitted to the Department on 29 September 2006 and the accompanying document <i>Camden Gas Project Joint Venture Statement of Environmental Effects Proposed SIS Well Project</i> prepared by AGL Gas Production (Camden) Pty Ltd and Sydney Gas (Camden) Operations Pty Ltd, and dated September 2006;	These conditions are included in the consolidated Development Consent and addressed where relevant in this audit.	Compliance
	(h) The modification application submitted to the Department on 16 October 2006 and the accompanying document <i>Camden Gas Project Joint Venture Statement of Environmental Effects Proposed SIS Well Project (GL15)</i> prepared by AGL Gas Production (Camden) Pty Ltd and Sydney Gas (Camden) Operations Pty Ltd, and dated October 2006;	These conditions are included in the consolidated Development Consent and addressed where relevant in this audit.	Compliance
	(i) Modification Application MOD 11-2-2007 and <i>Statement of Environmental Effects Section 96AA Modification of DA No 282-6-2003-1 Relocation of an Existing Internal Road at Rosalind Park Gas Plant (RPGP) off Medhurst Road, Menangle</i> , dated February 2007;	These conditions are included in the consolidated Development Consent and addressed where relevant in this audit.	Compliance
	(j) Modification Application MOD 26-3-2007 and <i>Camden Gas Project Joint Venture Gas Well and Gathering Line Modification Project Statement of Environmental Effects</i> , dated March 2007;	These conditions are included in the consolidated Development Consent and addressed where relevant in this audit.	Compliance
	(k) Modification Application 282-6-2003 MOD 9, the Statement of Environmental Effects titled <i>Camden Gas Project Joint Venture – EM39 and GL17 Modification Project</i> dated February 2008, letter from AGL Gas Production (Camden) Pty Limited to the Department, dated 19 March 2008, and letter from Wilkinson Murray Pty Limited to AGL Gas Production (Camden) Pty Limited, dated 31 March 2008;	These conditions are included in the consolidated Development Consent and addressed where relevant in this audit.	Compliance
	(l) Modification Application 282-6-2003 MOD 10, the Statement of Environmental Effects titled, <i>Camden Gas Project: Rosalind Park Access Road and Gas Gathering Line Modification</i> dated December 2008 and letter from Cubbitch Barta Native Title Claimants Aboriginal	These conditions are included in the consolidated Development Consent and addressed where relevant in this audit.	Compliance



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	Corporation to Biosis Research Pty Ltd, dated 22 October, 2008; and		
	(m) Modification Application 282-6-2003 MOD 11, the letter titled, <i>Camden Gas Project – AGL Modification to Gas Gathering Line</i> dated September 2009 and letter from Biosis Research Pty Ltd, dated 12 June, 2009;	These conditions are included in the consolidated Development Consent and addressed where relevant in this audit.	Compliance
	(n) the modification application DA 282-6-2003i MOD 12 and accompanying letter prepared by AGL Energy Limited, dated 31 May 2010; and	These conditions are included in the consolidated Development Consent and addressed where relevant in this audit.	Compliance
	(o) Conditions of this consent.	Refer to relevant conditions for an assessment of compliance.	
3.	If there is any inconsistency between the above documents, the most recent document shall prevail to the extent of the inconsistency. However, the conditions of this consent shall prevail to the extent of any inconsistency.	Condition is noted.	Not Triggered
4.	The Applicant shall comply with any reasonable requirement/s of the Director-General arising from the Department's assessment of:	Condition was not activated during the audit period.	Not Triggered
	(a) Any reports, plans or correspondence that are submitted in accordance with this consent; and		Not Triggered
	(b) The implementation of any actions or measures contained in these reports, plans or correspondence		Not Triggered
	Limits of Approval		
5.	This approval shall lapse twenty one (21) years from the granting of the production lease.	Condition was not activated during the audit period.	Not Triggered
6.	The Applicant shall not exceed the maximum production capacity of 14.5 petajoules per annum, from the gas treatment plant.	The Auditor sighted the Annual Return spread sheet for the periods ending 21 December 2012 and 21 December 2013 and noted compliance with the requirements of this condition.	Compliance
6A.	The Applicant shall not produce gas from GL14 until a Production Lease	Condition closed in a previous audit.	Not Triggered



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	under the <i>Petroleum (Onshore) Act 1991</i> has been obtained for the entirety of the well.		
	Special Conditions of Approval		
7.	The Applicant must in the opinion of the DECCW be a fit and proper person to hold a licence under the <i>Protection of the Environment Operations Act 1997</i> , having regard to the matters in s83 of that Act.	<p>It was noted by the Auditor that during the audit period AGL received three PINs and an entered into an Enforceable Undertaking. AGL undertook the measures required by the New South Wales EPA and there are no outstanding matters. The EPA has yet to sign-off on the Enforceable Undertaking. The EPA has not indicated any intention to pursue matters through the legal courts.</p> <p>However, it is noted that the criteria contained in Section 83 are broad and a non-compliance with a statutory obligation does not automatically lead to a conclusion that a party is not a fit and proper person to hold a licence. On balance, the Auditor considers AGL to be a fit and proper person within the terms of this condition.</p>	Compliance
8.	Within one month of consent being issued and in any case before the commencement of any construction works causing the Gas Treatment Plant to become scheduled under the <i>Protection of the Environment Operations Act 1997</i> , the Applicant must submit, to the DECCW's Manager Sydney Industry PO Box 668 Parramatta NSW 2124, a written report containing actual dates for submission of reports where specified in Conditions 126, 56, 62, 63, 43, 60, 85, 86, 71 and 61 of Schedule 4.	Condition was not activated during the audit period.	Not Triggered
9.	If after five (5) years of the date of this consent any well that is the subject of this consent has not yet been drilled or completed, then the Applicant shall surrender the approval for that well.	<p>Based on a review of the dates of the Development Consent and Modifications, it is noted that no further wells are permitted to be drilled.</p> <p>AGL reported that no drilling works were undertaken during the audit period. Activities were limited to the operation of gas wells, gas gathering lines and the Rosalind Park Gas Plant.</p>	Compliance
10.	At the expiration of ten (10) years from the date of this consent, the Applicant shall submit to the Director-General a reserve report covering	PPL 4 Decennary Report for the Period 31 May 2004 to 31 May 2014, 30 June 2013, prepared by SRK	Compliance



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No.	Consent Condition	Evaluation	Finding
	<p>the petroleum production lease (PPL) area. The report shall be prepared by an independent petroleum expert in accordance with relevant definitions approved by the Society of Petroleum Engineers and/or the World Petroleum Congress.</p> <p>In the absence of a proven reserve, the Applicant shall make a further submission to the Director-General justifying why production should continue.</p> <p>After reviewing this report, the Director-General may direct the Applicant to carry out certain actions (including the closure and rehabilitation of certain wells).</p>	Consulting, addressed this requirement. The expert who prepared the report was an independent petroleum expert.	
11.	<p>The Applicant shall run verticality logs for new gas wells located within coal exploration titles.</p> <p>Note: The Petroleum Production Lease that may be granted by the DII will apply to the PEL 2 area, which is a much larger area than that which the development consent applies to. This consent applies to the land and structures identified in Schedule 1, being the gas wells, gas treatment plant, associated workshop and office facilities and gas gathering system.</p> <p>Further Approvals</p>	Condition was not activated during the audit period. No new wells were drilled during the audit period.	Not Triggered
12.	<p>Nothing in this consent permits the drilling and operation of any additional wells (beyond the approved 49 wells for gas production) or gas gathering lines.</p> <p>Structural Adequacy</p>	The auditor reviewed the list of gas wells provided by AGL against the Development Consent and Modifications and confirmed that no additional wells have been drilled or operated during the audit period.	Compliance
13.	<p>The Applicant shall ensure that all new buildings and structures, and any alterations or additions to existing buildings and structures, are constructed in accordance with the relevant requirements of the BCA.</p> <p>Note:</p> <p>(a) Under Part 4A of the EP&A Act, the Applicant is required to obtain</p>	Condition was not activated during the audit period. No new structures, buildings or alterations or additions were constructed.	Not Triggered



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



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No.	Consent Condition	Evaluation	Finding
16.	The Applicant shall provide Camden Council, Campbelltown City Council and Wollondilly Shire Council with the wellhead configurations of each gas well within two months of the gas well being completed or two months from the date of this consent, whichever is the later.	Condition closed in a previous audit.	Not Triggered
17.	The Applicant shall provide written notification to the Director-General that it has fulfilled the requirements of Conditions 15 and 16, within two weeks of the information being provided to the Councils.	Condition closed in a previous audit.	Not Triggered
Compliance			
18.	The Applicant shall prepare a Project Commitments Register (PCR) within six months of the date of this consent. The Project Commitments Register shall be submitted to the Director-General for approval. The PCR shall include all commitments and initiatives referred to in the documents listed in Condition 2(c) (Appendix C) and all other documents and supplementary information provided to the Department from the time of DA lodgement to the date of this consent. The PCR shall include, but not necessarily be limited to:	Condition closed in a previous audit.	Not Triggered
	(a) All commitments and initiatives (environmental, social, economic or project related) that the Applicant has agreed or suggested to implement for this development;		Not Triggered
	(b) Timeframe for implementation of the commitment or initiative;		Not Triggered
	(c) The responsibility for ensuring that the commitment or initiative is implemented in the manner and timeframe provided by the Applicant; and		Not Triggered
	(d) A reference to the document or correspondence that the commitment or initiative was stated by the Applicant.		Not Triggered
19.	The Applicant shall prior to the commencement of substantial construction certify in writing to the Director-General that all the relevant conditions applicable to construction have been complied with.	Condition closed in a previous audit.	Not Triggered



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No.	Consent Condition	Evaluation	Finding
20.	The Applicant shall submit for the approval of the Director-General two weeks prior to the commissioning of the development or within such other period that the Director-General may agree, a compliance report detailing compliance with all the relevant conditions that apply prior to the commissioning of the development.	Condition closed in a previous audit.	Not Triggered
SCHEDULE 4			
SPECIFIC ENVIRONMENTAL CONDITIONS			
VISUAL AMENITY			
Visual Performance			
1.	The Applicant shall implement visual mitigation measures as depicted on the plan Camden Gas Project Stage 2: Vegetation and Landscape Management Plan Drawing No LC-0100 Revision G prepared by URS for Sydney Gas dated 16 June 2004 (the Landscape Design).	The Auditor sighted the plan "Camden Gas Project Stage 2: Vegetation and Landscape Management Plan" Drawing NO. Lc-0100 Revision G (16 June 2004) prepared by URS Australia Pty Ltd for Sydney Gas. An inspection was conducted of the RPGP and it was noted that vegetation is largely maintained in accordance with the Plan. An independent audit report titled AGL Rosalind Park Gas Plant Landscape and Lighting Audit Report, September 2014, by Distinctive Living Design for AGL found that the visual mitigation measures were adequate.	Compliance
2.	<p>Prior to the commencement of construction of the workshop, office, plant and associated facilities at Rosalind Park, the Applicant shall submit for the approval of the Director-General, a colour scheme (paint colour specifications) for all proposed buildings, fences and associated structures. Colours selected for the facilities (in particular the Workshop and Offices) shall aim to minimise the visual impact of the facility on surrounding land uses and maximise the ability of the facilities to blend into the local landscape.</p> <p>Note: The Applicant where practicable should aim to use darker paint colours on the facilities (such as a dark grey colour). Wherever practical,</p>	Condition closed in a previous audit.	Not Triggered



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No.	Consent Condition	Evaluation	Finding
	the Applicant shall ensure that ground surfaces and stabilisation materials for the facilities at Rosalind Park utilise material in dark shades of colour (such as blue metal and dark coloured mulch).		
3.	The Applicant shall implement reasonable measures to screen gas wells GL 4, GL 5 and GL 10 and the interconnecting gas gathering line from the Banksia Garden picnic area within the Mount Annan Botanic Garden. The Applicant shall undertake such measures to the satisfaction of the Director-General.	Condition closed in a previous audit.	Not Triggered
	Lighting Performance		
4.	The Applicant shall take all practicable measures to minimise any off-site lighting impacts from the development.	<p>AGL reported that lighting surveys were prepared at the commissioning of the RPKG and revised in response to Phase II works. Lighting was reported to be facing inward to the Plant and away from the Mt Gilead Homestead. Visual barriers and directional screens have been installed as necessary. Further, lighting is limited or controlled (e.g. motion sensors or time switches) in sensitive areas.</p> <p>An independent audit report titled AGL Rosalind Park Gas Plant Landscape and Lighting Audit Report, September 2014, by Distinctive Living Design for AGL found that the visual mitigation measures were adequate.</p> <p>The Plant reportedly complies with the Australian Standard 4282-1997 Control of the Obtrusive Effects of Outdoor Lighting.</p> <p>AGL reported that no lighting complaints were received during the audit period.</p>	Compliance
5.	The Applicant shall ensure that all external lighting associated with the development is mounted, screened and directed in such a manner so as to achieve the minimum level of illumination necessary, and in accordance with the <i>Australian Standard 4282 – 1997 Control of the</i>	Refer to Condition 4 above.	Compliance



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No.	Consent Condition	Evaluation	Finding
	<i>Obtrusive Effects of Outdoor Lighting.</i>		
6.	The Applicant shall ensure that measures to minimise lighting effects from the operation of the proposed development and the operation of the flare (including under emergency conditions) are implemented as recommended in the following reports (except where inconsistent with the Landscape Design or these conditions):	Refer to Condition 4 above.	Compliance
	(a) Report titled Camden Gas Plant Stage 2 – Lighting Review with Respect to Obtrusive Effects from Methane Gas Flare prepared by Bassett Consulting Engineers Pty Ltd for Sydney Gas dated 17 October 2003;		Compliance
	(b) Report titled Camden Gas Plant Stage 2 – Lighting Review with Respect to Obtrusive Effects prepared by Bassett Consulting Engineers Pty Ltd for Sydney Gas dated 14 October 2003;		Compliance
	(c) Plan titled Lighting Review to Minimise Obtrusive Light to Mount Gilead Homestead – Drawing No. S5397-E001 prepared by Bassett dated October 2003;		Compliance
	(d) Plan titled Camden Gas Plant Phase II proposed Area and Perimeter Lighting Layout-Drawing No. 03-1212-84-301 Revision 2 prepared by Simon Engineering and dated 15 October 2003;		Compliance
	(e) Report titled Lighting Scope Camden Gas Phase II prepared by Simon Engineering, Document Reference No 03 1212 LS-02 dated 13 October 2003; and		Compliance
	(f) Report titled Sydney Gas Proposal Stage 2 Coal Seam Methane Project Visual Assessment of Lighting and Flare prepared by URS for Sydney Gas dated 6 November 2003.		Compliance
7.	Prior to the commencement of construction of the Gas Treatment Plant, the Applicant must submit to the Director-General or the certifying authority a revised area and perimeter lighting layout and electrical services lighting review to replace the two plans of this name in the document referred to in condition 6(b) above, taking into account the	Condition closed in a previous audit.	Not Triggered



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No.	Consent Condition	Evaluation	Finding
	revisions to the development plans for the Gas Treatment Plant as approved in this consent. The lighting design under these revised plans shall be designed to minimise the effect of obtrusive light on the Mount Gilead Homestead from the Gas Treatment Plant.		
8.	The Applicant must ensure that wherever possible, any scheduled use of the flare occurs during daylight hours.	AGL reported that there is no scheduled use of the flare. Field to flare events are reportedly minimised during the course of operations and occur 1-2 times per year, as reported in the AEPR for the 2012/2013 and 2013/2014 years.	Compliance
9.	The design of the flare pit must be amended by installing an opaque barrier to a height of 7.5m above the flare tip as depicted on the Landscape Design. The Applicant may remove this barrier with the consent of the owner of Lot 1 DP 807555.	Condition closed in a previous audit. AGL advised that no changes were made to the barrier during the audit period.	Not Triggered
10.	The Applicant shall report on the effectiveness of the lighting controls in the AEPR.	<p>AGL reported that lighting surveys were prepared at the commissioning of the RPKG and revised in response to Phase II works. Lighting was reported to be facing inward to the Plant and away from the Mt Gilead Homestead. Visual barriers and directional screens have been installed as necessary. Further, lighting is limited or controlled (e.g. motion sensors or time switches) in sensitive areas.</p> <p>An independent audit report titled AGL RPKG Landscape and Lighting Audit Report, September 2014, by Distinctive Living Design for AGL found that the visual mitigation measures were adequate.</p> <p>The Plant reportedly complies with the Australian Standard 4282-1997 Control of the Obtrusive Effects of Outdoor Lighting.</p> <p>AGL reported that no lighting complaints were received during the audit period.</p>	Compliance
11.	The Applicant shall record the frequency of the operation of the flare and shall make this information available for inspection by the Director-	The Auditor sighted the 2012/2013 and 2013/2014	Compliance



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No.	Consent Condition	Evaluation	Finding
	General on request. The records shall include but not be limited to the following:	<p>AEPRs and noted the inclusion of relevant information on the operation of the flare. This information is derived from the SCADA system that records the inlet pressure. In the event that the inlet pressure exceeds 400 KPA during plant shutdown, a flaring event occurs. The Auditor sighted the SCADA system records and verified the information is publicly reported.</p> <p>AGL reported that there were two flare events in 2012/2013 and one flare event in 2013/2014.</p> <p>The information required by Condition 11(f) is not recorded, however, can be generated if required based on data which is recorded.</p>	
	(a) date and time of each flare event;		Compliance
	(b) duration of each flare event;		Compliance
	(c) whether the flare operated during daylight or night-time hours;		Compliance
	(d) the cause for the operation of the flare;		Compliance
	(e) the number of compressor engines that have been commissioned and operating during the period; and		Compliance
	(f) comparison of the frequency, night-time frequency, duration and estimated light level of each type of flare event with the flare events predicted in Table 2 of the following report: URS (2003) Sydney Gas Proposal Stage 2 Coal Seam Methane Project Visual Assessment of Lighting and Flare prepared by URS for Sydney Gas dated 6 November 2003.	Compliance	
	Landscaping design		
12.	The site shall be landscaped as shown on the Landscape Design and this landscaping shall be maintained for the life of the development.	An independent audit report titled AGL Rosalind Park Gas Plant Landscape and Lighting Audit Report, September 2014, by Distinctive Living Design for AGL found that the landscaping measures were adequate.	Compliance
	Vegetation and Landscape Management Plan		
13.	The Applicant shall prepare and implement a Vegetation and Landscape Management Plan for the Gas Treatment Plant site and the gas well sites. The plan shall include, but not necessarily be limited to:	<p>An independent audit report titled AGL RPGP Landscape and Lighting Audit Report, September 2014, by Distinctive Living Design for AGL found that the landscaping measures were adequate.</p> <p>No well drilling or construction activities occurred during</p>	Compliance
	(a) reasonable measures to protect mature trees as part of the well drilling, gas gathering system and Treatment Plant Site construction		Compliance



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No.	Consent Condition	Evaluation	Finding
	activities;	the audit period. No new buildings were constructed and no irrigation activities were undertaken.	
	(b) a landscape strategy detailing the design and proposed planting of trees and shrubs to be undertaken;		Compliance
	(c) ensuring that tree and shrub species used for landscaping of the site are indigenous to the locality;		Compliance
	(d) details of a program to ensure that all landscaped areas are maintained in a tidy, healthy state;		Compliance
	(e) measures intended to maximise the screening of infrastructure from views from the Mt Gilead property through planting and other measures;		Compliance
	(f) details of the visual appearance of all new buildings, structures and facilities (including paint colours and specifications). New buildings shall be constructed so as to present a neat and orderly appearance and to blend as far as practicable with the surrounding landscape;		Compliance
	(g) Details of any necessary irrigation system to ensure that adequate supplies of water are made available to all landscaping on site, the trees between the site and Menangle Creek and the trees located on the southern boundary of the Gas Treatment Plant site;		Compliance
	(h) Details of any necessary methods to be employed in the establishment of trees on cut batters in the event that the excavated surface is not conducive to the planting of vegetation of the type displayed in the Landscape Design;		Compliance
	(i) provision for assessing and regularly monitoring the health of the trees in the Menangle Creek riparian zone adjacent to the Gas Treatment Plant site. The objective of the monitoring is to determine the health of the trees and to recommend measures (if required) to improve the health of the trees;		Compliance
	(j) reasonable measures to ensure that mature trees within the riparian corridor along Menangle Creek are retained and protected;		Compliance



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No.	Consent Condition	Evaluation	Finding
	(k) details of proposed screening works including supplementary planting along the border of the site with Menangle Creek;		Compliance
	(l) reasonable measures to minimise the impacts of the gas wells on the cultural heritage landscape of the EMAI;		Compliance
	(m) details of a monitoring program to assess the effectiveness of all visual impact mitigation measures, particularly the measures used to minimise the visual impacts on the Mount Gilead Homestead; and		Compliance
	(n) reporting the results of the visual impact monitoring in the Annual Environmental Performance Report. The monitoring results will specifically identify any remedial measures required.		Compliance
	The Vegetation and Landscape Management Plan must be submitted and approved by the Director-General prior to commencement of construction on the Gas Treatment Plant site.		Compliance
14.	As part of an independent audit required under condition 18, the Vegetation and Landscape Management Plan must make provision for ensuring that landscaping of the Gas Treatment Plant site and surrounds is maintained in an adequate condition by providing details of a monitoring program. Monitoring must be carried out pursuant to the monitoring program every 6 months for the first two years from the commencement of planting and thereafter every 2 years by an independent and suitably qualified and experienced arborist whose appointment has been approved for the purposes of this condition by the Director-General. The monitoring program must include the following features:	An independent audit report titled AGL RGP Landscape and Lighting Audit Report, September 2014, by Distinctive Living Design for AGL found that the landscaping measures were adequate. The Report would benefit by providing greater clarity as to how it addresses each of the sub-sections of Condition 14. (Opportunity for Improvement)	Compliance – Improvement Recommended
	(a) identification of mature trees surrounding the site which afford screening of the Gas Treatment Plant from Mt Gilead Homestead;		Compliance
	(b) provision for assessing and regularly monitoring the health of landscaping on the site and the trees in the Menangle Creek riparian zone adjacent to the Gas Treatment Plant site. The objective of the monitoring is to determine the health of the trees and to recommend		Compliance



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No.	Consent Condition	Evaluation	Finding
	measures (if required) to improve the health of the trees;		
	(c) Description of the health of each tree identified under condition (a);		Compliance
	(d) Recommendation of reasonable measures to ensure that mature trees within the riparian corridor along Menangle Creek are retained and protected, including trees that lie within the transmission line easement to the East of the site;		Compliance
	(e) Recommendation of any watering or fertilising that needs to be implemented to maintain the landscaping and surrounding trees;		Compliance
	(f) Recommendation of how to manage the landscaping to promote the maximisation of growth to maturity. The results and recommendations of the monitoring program must be submitted to the Director-General at the conclusion of each stage of monitoring.	The results and recommendations arising from the independent audit conducted by Distinctive Living Design (September 2014) were submitted to the Director-General and approved on 29/09/2014.	Compliance
15.	(a) The existing trees shown on the Landscape Design adjacent to the southern boundary of the Gas Treatment Plant site, must be retained. They must not be lopped or trimmed except on the advice of an independent arborist whose appointment has been approved for the purposes of this condition by the Director-General that the proposed work is reasonably necessary for safety reasons. The trees must be maintained in a healthy condition.	AGL reported that the trees adjacent to the southern boundary of the RPGP site were not lopped or trimmed during the audit period. The Auditor sighted the trees that provide screening of the premises from the Mt Gilead Homestead and noted that there were no obvious signs of tree removal.	Compliance
	(b) If any of the trees described in this condition ceases to provide screening of the quarry from the Mount Gilead Homestead, as a result of the Applicant's activities (other than trimming or lopping undertaken on the advice of the arborist), the Applicant must provide alternative screening to the satisfaction of the Director-General.		Compliance
16.	Prior to the commencement of construction on the Gas Treatment Plant site the Applicant must secure the right to implement on land outside the Gas Treatment Plant site for the life of the development any necessary mitigative or screening measures proposed for the Gas Treatment Plant as part of the Vegetation and Landscape Management Plan or as	Condition closed in a previous audit.	Not Triggered



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No.	Consent Condition	Evaluation	Finding
	required by this Consent.		
17.	For the purpose of avoiding possible detrimental impact on vegetation screening of the Gas Treatment Plant from the Mt Gilead Homestead due to any clear felling of trees in the area marked A on the Applicant's Plan Map Ref M240212 dated 16 June 2004 (Applicant's Plan) by the holder of the electricity transmission line easement over Lot 1 DP 807555 (Holder), the Applicant shall carry out any reasonable and necessary trimming and lopping of those trees provided the Holder requests the Applicant in writing to carry out this trimming and lopping and undertakes in return to refrain from the clear felling of those trees within 5 years of the date of this Consent.	AGL reported that the trees adjacent to the southern boundary of the RPGP site were not lopped or trimmed during the audit period. The Auditor sighted the trees that provide screening of the premises from the Mt Gilead Homestead and noted that there were no obvious signs of tree removal.	Compliance
	Independent Audit		
18.	The Applicant shall commission and pay the full cost of an Independent Audit of the performance of the mitigation measures implemented to prevent and minimise visual impacts of the proposal including landscaping, preservation of existing trees, and night-lighting effects. The audit must be conducted within 6 months of the commissioning of the proposed development and every 2 years thereafter, unless the Director-General directs otherwise. This audit must:	An independent audit report titled AGL RPGP Landscape and Lighting Audit Report, September 2014, by Distinctive Living Design for AGL found that the mitigation measures to prevent and minimise visual impacts were adequate. The Auditor reviewed the Report and confirmed that the requirements of these conditions had been addressed.	Compliance
	(a) Be conducted by an independent landscape expert who is suitably qualified and experienced and whose appointment has been approved by the Director-General;		Compliance
	(b) Assess the performance of the visual mitigation measures with specific reference to the effectiveness of mitigation measures in screening the development and lighting from the development from the Mount Gilead Homestead;		Compliance
	(c) Review the adequacy of the Vegetation and Landscape Management Plan;		Compliance
	(d) Recommend actions or measures to improve the performance of the visual mitigation measures and the adequacy of the Vegetation and		Compliance



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No.	Consent Condition	Evaluation	Finding
	Landscape Management Plan (if required); and		
	(e) Be submitted to the Director-General; and	The results and recommendations arising from the independent audit conducted by Distinctive Living Design (September 2014) were submitted to, and approved by, the Director-General.	Compliance
	(f) Be implemented to the satisfaction of the Director-General.	The recommendations arising from the independent audit conducted by Distinctive Living Design (September 2014) are in progress and hence this condition was not activated during the audit period.	Not Triggered
19.	Within 2 months of commissioning this audit the Applicant shall submit a copy of the audit report to the Director-General and provide a detailed response to any of the recommendations in the audit report. A copy of the Independent Audit, and/or the results and recommendations of any monitoring carried out under condition 14, will be provided to the owner of Lot 1 DP 807555 by the Director-General upon request.	Distinctive Living Design conducted the independent audit in September 2014 and the report was submitted to the Director-General within two months of commissioning.	Compliance
	Landscape Planting Plan – Rosalind Park Access Road		
19A.	The Applicant shall prepare and implement a Landscape Planting Plan for the relocated Rosalind Park access road, to the satisfaction of the Director-General. This plan must be submitted to the Director-General for approval prior to the commencement of construction, and include:	Closed in a previous audit.	Not Triggered
	(a) details of the landscaping measures along the road and visual bund;		Not Triggered
	(b) measures to manage and maintain the landscaping; and		Not Triggered
	(c) describe the construction rehabilitation measures.		Not Triggered
19B.	Within 6 months of completion of the landscaping and every 2 years thereafter, unless the Director-General directs otherwise, the Applicant shall commission and pay the full costs of an Independent Audit of the performance of the mitigation measures. The audit shall:	The Auditor sighted the independent audit of the Landscape Planting Plan by Distinctive Living Design (September 2014). The audit was completed two years after the previous audit.	Compliance
	(a) be conducted by a suitably qualified, experienced and independent person(s) whose appointment has been approved by the Director-	The Auditor sighted the independent audit of the	Compliance



CAMDEN GAS PROJECT - INDEPENDENT ENVIRONMENTAL AUDIT 2012 - 2014

No.	Consent Condition	Evaluation	Finding
	General;	Landscape Planting Plan by Distinctive Living Design (September 2014) and noted compliance with the requirements of this condition.	
	(b) assess the performance of the visual mitigation measures with specific reference to the effectiveness of mitigation measures in screening the road from the Mount Gilead Homestead;		Compliance
	(c) review the adequacy of the Landscape Planting Plan;		Compliance
	(d) recommend actions or measures to improve the performance of the visual mitigation measures and the adequacy of the Landscape Planting Plan (if required); and		Compliance
	(e) be submitted and implemented to the satisfaction of to the Director-General. Note: The Applicant may include this audit in the Independent Audit required under Schedule 4 Condition 18 of development consent Da-282-6-2003-I, dated 16 June 2004. The due date for a combined audit shall be the earlier of the due dates for the separate audits.	The independent audit of the Landscape Planting Plan by Distinctive Living Design (September 2014) was submitted to the Director-General, and approved on 29/09/2014.	Compliance
FLORA AND FAUNA			
Raptor Breeding Zones at EMAI			
20.	The Applicant shall ensure that the drilling of gas wells and the construction of the gas gathering system and any related activities do not occur within 100 metres of the Raptor Breeding zones.	Closed out in a previous audit. No further well drilling or construction works were undertaken during the audit period.	Not Triggered
21.	The Applicant shall only drill and "fracc" wells EM 5, EM 7, EM 8, EM 9, EM 11 and EM12 during the months of February and/or March or such other period as agreed by the Director-General.	Condition not activated during the audit period. AGL reported no drilling or fracing works were conducted during the audit period.	Not Triggered
22.	The Applicant shall ensure that gas gathering lines connecting well sites listed in Condition 21 shall be constructed outside the breeding seasons of raptor species. Note: The above condition provides protection for breeding raptor species on the EMAI, in proximity to the stated wells, through ensuring activities that are likely to generate noise are conducted outside of the breeding season of raptor	Condition not activated during the audit period.	Not Triggered



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No.	Consent Condition	Evaluation	Finding
	species.		
	Flora and Fauna Protection Measures		
23.	The Applicant shall implement best practice flora and fauna management.	The Auditor sighted the Flora and Fauna Management Sub-Plan (April 2014) and noted a number of controls to minimise the impacts to flora and fauna during construction, operation and rehabilitation. The Sub-Plan is supplemented by a Hazard Identification Form prior to undertaking works. AGL reported that no drilling or well construction works were undertaken during the audit period.	Compliance
24.	The Applicant shall take all practicable measures to minimise potential flora and fauna impacts of the proposed development.	Refer to Condition 23 above.	Compliance
25.	The Applicant shall ensure that trenches constructed during the construction of gas gathering lines are not left open overnight unless otherwise agreed by the Director-General.	Condition not activated during the audit period.	Not Triggered
26.	The Applicant shall not remove mature trees as part of this development unless otherwise agreed by the Director-General.	The Auditor sighted the Flora and Fauna Management Sub-Plan (April 2014) and noted the inclusion of this control measure. AGL reported that no mature trees were removed during the audit period.	Compliance
27.	The Applicant shall employ a suitably qualified ecologist with specific experience in identifying the Cumberland Plain Snail, during the construction period of the development. The ecologist shall monitor and examine areas for the presence of the threatened Cumberland Plain Snail, during the clearing for the proposed development.	Condition was not activated during the audit period.	Not Triggered
28.	The Applicant shall prepare a translocation strategy for the threatened Cumberland Plain Snail which will be submitted for the Director-General's approval prior to construction. The Translocation strategy shall be implemented should any individuals or populations of the	Condition closed in a previous audit.	Not Triggered



CAMDEN GAS PROJECT - INDEPENDENT ENVIRONMENTAL AUDIT 2012 - 2014

No.	Consent Condition	Evaluation	Finding
	Cumberland Plain Snail be identified.		
	Threatened Species		
28A.	The Applicant shall ensure that, during the drilling and construction of EM38 and upgrading of the gas gathering lines, impacts on threatened species are minimised by implementing actions including, but not limited, to the following:	The Auditor sighted the Flora and Fauna Management Sub-Plan (April 2014) and noted the inclusion of appropriate controls to minimise impacts on threatened species.	Not Triggered
	(a) The recommendations outlined in Ecosearch Environmental Consultants Pty Ltd's reports titled: Flora and Fauna Assessment, AGL –Gas Well and Gathering Line Project Modifications (Sections 6 and 7); and Flora and Fauna Assessment, Executive Summary for Rosalind Park Gas Field (page 9); and	AGL reported that EM38 was constructed in 2008 and therefore completed prior to the audit period.	Not Triggered
	(b) Marking the boundaries of endangered ecological communities (EECs) and locations of other known threatened species and, where possible, avoiding construction activities within these areas.		Not Triggered
28B.	The Applicant shall ensure that, during the drilling and construction of EM39 and GL17 and upgrading of the gas gathering lines, impacts on threatened species are minimised by implementing actions including, but not limited to the following:	The Auditor sighted the Flora and Fauna Management Sub-Plan (April 2014) and noted the inclusion of appropriate controls to minimise impacts on threatened species.	Not Triggered
	(a) the recommendations outlined in the flora and fauna assessment carried out by Biosis Research Pty Ltd in Appendix A of the Statement of Environmental Effects titled Camden Gas Project Joint Venture – EM39 and GL17 Modification Project; and	AGL reported that EM39 and GL17 completed prior to the audit period.	Not Triggered
	(b) marking the boundaries of endangered ecological communities (EECs) and locations of other known threatened species and, where possible, avoiding construction activities within these areas.		Not Triggered



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No.	Consent Condition	Evaluation	Finding																				
	NOISE																						
	Noise Impact Assessment Criteria																						
29.	<p>The Applicant shall ensure that noise from the normal operation of the premises, excluding flaring events, must not exceed the noise limits in the table below:</p> <table border="1"> <thead> <tr> <th>Receiver Location</th> <th>Day</th> <th>Evening</th> <th>Night</th> <th>Flaring (anytime)</th> </tr> <tr> <td></td> <td>L_{Aeq}(15 minute)</td> <td>L_{Aeq}(15 minute)</td> <td>L_{Aeq}(15 minute)</td> <td>L_{A1}(1minute)</td> </tr> </thead> <tbody> <tr> <td>R1 Medhurst Street Gilead</td> <td>35</td> <td>35</td> <td>35</td> <td>45</td> </tr> <tr> <td>R7 Mt. Gilead Gilead</td> <td>37</td> <td>36</td> <td>36</td> <td>45</td> </tr> </tbody> </table>	Receiver Location	Day	Evening	Night	Flaring (anytime)		L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{A1} (1minute)	R1 Medhurst Street Gilead	35	35	35	45	R7 Mt. Gilead Gilead	37	36	36	45	<p>The Auditor sighted two noise assessment reports prepared by Wilkinson Murray in September 2013 and June 2014 for the RGP. The reports presented a summary of quarterly noise monitoring conducted at the two nominated receivers (R1 and R2 as detailed in the condition). The reports indicate that the plant did not exceed the nominated noise assessment criteria.</p> <p>It was noted that there were no measurements during flaring events as flaring was not occurring during the monitoring periods.</p> <p>No noise complaints were received from the vicinity of the monitoring locations during the audit period.</p>	Compliance
Receiver Location	Day	Evening	Night	Flaring (anytime)																			
	L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{A1} (1minute)																			
R1 Medhurst Street Gilead	35	35	35	45																			
R7 Mt. Gilead Gilead	37	36	36	45																			
29A.	<p>Noise from the operation of EM39 and GL17 shall not exceed the noise limits in the table below:</p> <table border="1"> <thead> <tr> <th rowspan="2">Receiver Location</th> <th rowspan="2">Noise Criteria</th> <th>Day</th> <th>Evening</th> <th>Night</th> </tr> <tr> <th>dBA L_{Aeq}</th> <th>dBA L_{Aeq}</th> <th>dBA L_{Aeq}</th> </tr> </thead> <tbody> <tr> <td>All residential receivers except R22 and R26</td> <td>Project-Specific</td> <td>40</td> <td>40</td> <td>38</td> </tr> <tr> <td>R22 and R26</td> <td>Project-Specific</td> <td>43</td> <td>42</td> <td>37</td> </tr> </tbody> </table>	Receiver Location	Noise Criteria	Day	Evening	Night	dBA L _{Aeq}	dBA L _{Aeq}	dBA L _{Aeq}	All residential receivers except R22 and R26	Project-Specific	40	40	38	R22 and R26	Project-Specific	43	42	37	<p>The Auditor sighted internal noise monitoring reports for monitoring on 16 September 2014 and noted compliance with the requirements of this condition. No such noise monitoring was undertaken during the audit period, however, the well operations are steady state and the noise monitoring results for September are considered to be representative of noise emissions during the audit period.</p> <p>No evening or night-time noise monitoring was undertaken, however, given the large attenuation distance (more than one kilometre) between the monitoring location and the nearest residence, compliance is assumed.</p> <p>No noise complaints were received from the vicinity of the monitoring locations during the audit period.</p> <p>It is recommended that some night-time noise measurements are undertaken for verification purposes.</p>	Compliance – Opportunity for improvement.		
Receiver Location	Noise Criteria			Day	Evening	Night																	
		dBA L _{Aeq}	dBA L _{Aeq}	dBA L _{Aeq}																			
All residential receivers except R22 and R26	Project-Specific	40	40	38																			
R22 and R26	Project-Specific	43	42	37																			



CAMDEN GAS PROJECT - INDEPENDENT ENVIRONMENTAL AUDIT 2012 - 2014

No.	Consent Condition	Evaluation	Finding																												
30.	For the purposes of condition 29, 29A and 31:	The Auditor sighted two noise assessment reports prepared by Wilkinson Murray in September 2013 and June 2014 and noted compliance with the requirements of this condition.	Compliance																												
	(a) Day is defined as the period from 7am to 6pm Monday to Saturday and 8am to 6pm Sundays and Public holidays;		Compliance																												
	(b) Evening is defined as the period 6pm to 10pm;		Compliance																												
	(c) Night is defined as the period from 10pm to 7am Monday to Saturday and 10pm to 8am Sundays and Public Holidays; and		Compliance																												
	(d) The receiver locations R1 and R7 are as shown in Figure 5.1 of the Environmental Noise and Vibration Study by Environmental Resources Management Australia Pty Ltd dated June 2003 which accompanied the Environmental Impact Statement for the project.		Compliance																												
31.	<p>Noise from flaring events, must not exceed the noise limits in the table below:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center;">Location</th> <th style="text-align: center;">Duration of each Event</th> <th style="text-align: center;">Expected Type Of Event (2)</th> <th style="text-align: center;">Daytime L_{Aeq,15min}</th> <th style="text-align: center;">Evening L_{Aeq,15min}</th> <th style="text-align: center;">Night L_{Aeq,15min}</th> </tr> </thead> <tbody> <tr> <td rowspan="2" style="text-align: center;">R1 Medhurst Street</td> <td style="text-align: center;">> 2.5 hours 15 min – 60 min</td> <td style="text-align: center;">Spill Valve Compressor Blowdown (ESD)</td> <td style="text-align: center;">35 40</td> <td style="text-align: center;">35 40</td> <td style="text-align: center;">35 35</td> </tr> <tr> <td style="text-align: center;">6 min – 15 min</td> <td style="text-align: center;">Compressor Blowdown (shutdown and unload)</td> <td style="text-align: center;">42</td> <td style="text-align: center;">42</td> <td style="text-align: center;">37</td> </tr> <tr> <td rowspan="2" style="text-align: center;">R7 Mt. Gilead</td> <td style="text-align: center;">> 2.5 hours 15 min – 60 min</td> <td style="text-align: center;">Spill Valve Compressor Blowdown (ESD)</td> <td style="text-align: center;">37 42</td> <td style="text-align: center;">36 41</td> <td style="text-align: center;">36 40 (1)</td> </tr> <tr> <td style="text-align: center;">6 min – 15 min</td> <td style="text-align: center;">Compressor Blowdown (shutdown and unload)</td> <td style="text-align: center;">44</td> <td style="text-align: center;">43</td> <td style="text-align: center;">37</td> </tr> </tbody> </table> <p>1. Where ESD flare events exceed a frequency of occurrence of 1 per 21 days or duration higher than 15 minutes per event to a reduced flow rate of less than 0.5mmscf/d for each event, a lower limit of 36dB(A) Leq 15 minute applies at night.</p> <p>2. Definition: A flaring event is taken to be any gas flow to the flare greater than that which is necessary to maintain the pilot flame.</p>	Location	Duration of each Event	Expected Type Of Event (2)	Daytime L _{Aeq,15min}	Evening L _{Aeq,15min}	Night L _{Aeq,15min}	R1 Medhurst Street	> 2.5 hours 15 min – 60 min	Spill Valve Compressor Blowdown (ESD)	35 40	35 40	35 35	6 min – 15 min	Compressor Blowdown (shutdown and unload)	42	42	37	R7 Mt. Gilead	> 2.5 hours 15 min – 60 min	Spill Valve Compressor Blowdown (ESD)	37 42	36 41	36 40 (1)	6 min – 15 min	Compressor Blowdown (shutdown and unload)	44	43	37	<p>AGL Reported that noise from flaring events was monitoring following commissioning of the plant. The results reportedly were compliant with this condition and hence no further monitoring was undertaken.</p> <p>It was noted that the use of the flare has decreased since commissioning and no noise complaints were received during the audit period.</p>	Compliance
Location	Duration of each Event	Expected Type Of Event (2)	Daytime L _{Aeq,15min}	Evening L _{Aeq,15min}	Night L _{Aeq,15min}																										
R1 Medhurst Street	> 2.5 hours 15 min – 60 min	Spill Valve Compressor Blowdown (ESD)	35 40	35 40	35 35																										
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No.	Consent Condition	Evaluation	Finding
32.	Noise from the premises is to be measured at the most affected point on or within the residential boundary or at the most affected point within 30m of the dwelling (rural situations) where the dwelling is more than 30m from the boundary to determine compliance with the LAeq(15 minute) and LAeq(period) noise limits in Conditions 29, 29A and 31. Where it can be demonstrated that direct measurement of noise from the premises is impractical, the DECCW may accept alternative means of determining compliance. See Chapter 11 of the NSW Industrial Noise Policy. The modification factors presented in Section 4 of the NSW Industrial Noise Policy shall also be applied to the measured noise levels where applicable.	The Auditor sighted the quarterly noise monitoring reports prepared by Wilkinson Murray (September 2013 and June 2014) and noted compliance with the requirements of this condition.	Compliance
33.	<p>The noise emission limits identified in Conditions 29, 29A and 31 apply under meteorological conditions of:</p> <ul style="list-style-type: none"> ■ Wind speed up to 3m/s at 10 metres above ground level; or ■ Temperature inversion conditions of up to 3^oC/100m and wind speed up to 2m/s at 10 metres above the ground. 	<p>The Auditor sighted the quarterly noise monitoring reports prepared by Wilkinson Murray (September 2013 and June 2014) and noted compliance with the requirements of this condition.</p> <p>The noise monitoring reports note conditions of “no wind” or “low wind”, however, do not quantify these events relative to the criteria in this condition. Inclusion of such information presents an opportunity for improvement.</p>	Compliance – Improvement Recommended
Noise – Construction and Well Maintenance			Compliance
34.	The Applicant shall prepare and implement a Construction and Well Maintenance Noise Management Protocol to be used for the duration of the project. The Protocol must include, but is not necessarily limited to:	The Auditor sighted the EMP and the Noise Management Sub-Plan (November 2013) and noted compliance with the requirements of this condition.	Compliance
	(a) noise compliance standards;	Evidence of implementation of the EMP and Sub-Plan includes quarterly noise monitoring, training and induction programs, Community Consultative Committee minutes and the complaints register.	Compliance
	(b) community consultation;		Compliance
	(c) advance notice to affected members of the community for planned well maintenance activities;	No noise complaints were reported during the audit	Compliance



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No.	Consent Condition	Evaluation	Finding										
	(d) complaints handling monitoring/system;	period in relation to this Development Consent.	Compliance										
	(e) site contact person to follow up complaints;		Compliance										
	(f) mitigation measures;		Compliance										
	(g) the design/orientation of the proposed mitigation methods demonstrating best practice;		Compliance										
	(h) construction times;		Compliance										
	(i) contingency measures where noise complaints are received; and		Compliance										
	(j) monitoring methods and program.		Compliance										
34A.	Noise from the drilling and construction of GL14 and GL15 shall not exceed the sound pressure level (noise) limits presented in the table below: <table border="1" style="margin-top: 10px; width: 100%;"> <thead> <tr> <th style="text-align: center;">Receiver Location</th> <th style="text-align: center;">Night Time Noise Limit dB(A) L_{Aeq}</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">Glenlee House</td> <td style="text-align: center;">35</td> </tr> <tr> <td style="text-align: center;">Menangle Park</td> <td style="text-align: center;">35</td> </tr> </tbody> </table>		Receiver Location	Night Time Noise Limit dB(A) L _{Aeq}	Glenlee House	35	Menangle Park	35	Condition was not activated during the audit period. AGL reported that all construction works were completed prior to the audit period.	Not Triggered			
Receiver Location	Night Time Noise Limit dB(A) L _{Aeq}												
Glenlee House	35												
Menangle Park	35												
34B.	Noise from the drilling and construction of EM38 shall not exceed the sound pressure level (noise) limits in the table below: <table border="1" style="margin-top: 10px; width: 100%;"> <thead> <tr> <th style="text-align: center;">Receiver Location</th> <th style="text-align: center;">Weekday (7.00am-6.00pm) Saturday (7.00am-1.00pm)</th> <th style="text-align: center;">Saturday (1.00pm-6.00pm) Sunday (7.00am-6.00pm)</th> <th style="text-align: center;">Evening (6.00pm-10.00pm)</th> <th style="text-align: center;">Night (10.00pm-7.00am)</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">EM38 – nearest residential receiver</td> <td style="text-align: center;">54</td> <td style="text-align: center;">39</td> <td style="text-align: center;">39</td> <td style="text-align: center;">35</td> </tr> </tbody> </table>	Receiver Location	Weekday (7.00am-6.00pm) Saturday (7.00am-1.00pm)	Saturday (1.00pm-6.00pm) Sunday (7.00am-6.00pm)	Evening (6.00pm-10.00pm)	Night (10.00pm-7.00am)	EM38 – nearest residential receiver	54	39	39	35	Condition was not activated during the audit period. AGL reported that all construction works were completed prior to the audit period.	Not Triggered
Receiver Location	Weekday (7.00am-6.00pm) Saturday (7.00am-1.00pm)	Saturday (1.00pm-6.00pm) Sunday (7.00am-6.00pm)	Evening (6.00pm-10.00pm)	Night (10.00pm-7.00am)									
EM38 – nearest residential receiver	54	39	39	35									
34C.	Noise from the drilling and construction of EM39 and GL17 shall not exceed the sound pressure level (noise) limits in the table below:	Condition was not activated during the audit period. AGL reported that all construction works were completed prior to the audit period.	Not Triggered										



CAMDEN GAS PROJECT - INDEPENDENT ENVIRONMENTAL AUDIT 2012 - 2014

No.	Consent Condition	Evaluation	Finding															
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Receiver Location	Weekday (7.00am-6.00pm) Saturday (7.00am-1.00pm)	Saturday (1.00pm-6.00pm) Sunday (7.00am-6.00pm)	Evening (6.00pm-10.00pm)	Night (10.00pm-7.00am)														
EM39 – R3	40	40	40	38														
GL17 – R3	40	40	40	38														
	Noise – Drilling Impacts																	
35.	The Applicant shall implement management practices as necessary to minimise the potential noise impacts from drilling work at gas wells located on EMAI. These management practices are to include, but are not limited to:	<p>The Auditor sighted the Noise Management Sub-Plan (November 2013) and noted compliance with the requirements of this condition.</p> <p>AGL reported that no drilling works were undertaken during the audit period.</p>	Not Triggered															
	(a) identifying all potentially affected noise sensitive receivers (including residences of EMAI staff) that may be affected by drilling work at these wells;		Not Triggered															
	(b) predicting potential noise levels from the proposed well drilling methods where appropriate;		Not Triggered															
	(c) identifying and implementing all reasonable and feasible noise mitigation measures to reduce any drilling noise impacts;		Not Triggered															
	(d) documenting and implementing any specific work practices the Applicant will employ to limit noise; conducting noise monitoring where appropriate; and		Not Triggered															
	(e) appropriately informing affected residences and other relevant parties at least two weeks in advance of any drilling work at the gas wells and updating the information as required.		Not Triggered															
	Hours of Operation																	
36.	<p>Planned maintenance activities at any of the wells must only be conducted between:</p> <ul style="list-style-type: none"> ■ 7am and 6pm on weekdays; and ■ 8am and 1pm on Saturdays (excluding Public Holidays). 	<p>The Auditor sighted the Noise Management Sub-Plan (November 2013) and noted compliance with the requirements of this condition.</p> <p>AGL reported that this condition is communicated to employees and contractors through the role-specific</p>	Compliance															



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No.	Consent Condition	Evaluation	Finding
	This condition does not apply to the delivery of material outside the hours of operation permitted by the DECCW's licence, if that delivery is required by police or other authorities for safety reasons; and/or the operation or personnel or equipment are endangered. In such circumstances, prior notification is to be provided to the DECCW and affected residents as soon as possible, or within a reasonable period in the case of emergency.	induction program.	
	Construction Hours		
36A.	<p>Except for the drilling (including well casing and grouting) of SIS wells, all construction work shall be conducted between 7.00am and 6.00pm Monday to Friday and between 8.00am and 1.00pm Saturdays and at no time on Sundays and Public Holidays, unless inaudible at any residential receiver.</p> <p>Note: Inaudible means that the construction activity cannot be heard by the human ear at the nearest affected residential receiver.</p>	<p>The Auditor sighted the Noise Management Sub-Plan (November 2013) and noted compliance with the requirements of this condition.</p> <p>AGL reported that this condition is communicated to employees and contractors through the role-specific induction program.</p> <p>AGL reported that no construction work was undertaken within the area subject to this Development Consent during the audit period.</p>	Not Triggered
	Flare – Measures to Reduce Noise		
37.	<p>The Applicant must implement the following noise mitigation options to prevent noise impacts from flare operation:</p> <p>Noise mitigation options 1 through to 9 (exclusive of option 8) must be implemented to prevent undue noise impacts at Receiver Location R7 (Mount Gilead residence) as referred to in Table B.1 titled Flare Mitigation Options – Mt. Gilead (R7) in the Letter Report titled 'Stage 2 Coal Bed Methane Project – Response to the EPA's Request for Flare Noise Details' from Environmental Resources Management Australia to Sydney Gas Ltd dated 22 October 2003.</p> <p>Measures identified in the report Amendment to Statement of Evidence – Compressor Blow Down Systems by Gary Scott dated 11 June 2004.</p>	<p>AGL reported that there were no changes to flare noise mitigation measures during the audit period.</p> <p>The use of the flare has decreased since commencement of operations and there were no noise complaints associated with the use of the flare during the audit period.</p>	Compliance



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No.	Consent Condition	Evaluation	Finding
Operational Noise Management Plan			
38.	The Applicant shall prepare and implement a Noise Management Plan for the whole site. The Plan shall be submitted to the Director-General for approval within six months of the date of this consent. The Plan shall include, but not necessarily be limited to:	The Auditor sighted the Noise Management Sub-Plan (November 2013) and noted compliance with the requirements of this condition.	Compliance
	(a) identification of the potential sources of noise during drilling and operation;	It is recommended that Section 5.4 of the Noise Management Sub-Plan state that the AEPR is submitted to the Director-General. (Opportunity for Improvement)	Compliance
	(b) the noise criteria for these activities;		Compliance
	(c) details of what actions and measures would be implemented to ensure that these operations would comply with the relevant noise criteria;		Compliance
	(d) describe how the effectiveness of these actions and measures would be monitored during the life of the development, clearly indicating who would conduct the monitoring, how often this monitoring would be conducted, how the results of this monitoring would be recorded and reported to the Director-General, and if any non-compliance is detected; and		Compliance - Improvement Recommended
	(e) describe what procedures would be followed to ensure compliance.		Compliance
Operating Conditions			
39.	The Applicant shall undertake the development in a way that minimises the noise generated by the development.	<p>The Auditor sighted the Noise Management Sub-Plan (November 2013) and noted the inclusion of a number of noise mitigation measures. The following controls were identified during an inspection of the RPGP:</p> <ul style="list-style-type: none"> ■ Noise barrier around the flare; ■ Acoustic buildings surrounding the compressors; ■ Sound barriers around Compressor 1; and 	Compliance



CAMDEN GAS PROJECT - INDEPENDENT ENVIRONMENTAL AUDIT 2012 - 2014

No.	Consent Condition	Evaluation	Finding
		<ul style="list-style-type: none">Low noise fan on compressor 2. Compressor 3 had been removed for overhaul at the time of the audit. The Auditor sighted quarterly noise reports prepared by Wilkinson Murray in 2012/2013 and 2013/2014 and noted compliance with defined noise limits.	
	Monitoring		
40.	The Applicant must submit a noise compliance report to the DECCW and the Department within one month of commissioning of the Gas Treatment Plant and on an annual basis with the Annual Return required by the DECCW's licence to assess the project's compliance with the noise limits in Conditions 29 and 31. The noise monitoring must be conducted in accordance with Condition 42.	The Auditor sighted the Annual Returns for the periods ending 21 December 2012 and 21 December 2013 and noted compliance with this condition. An annual noise monitoring report is prepared for the Plant by Wilkinson Murray (e.g. report dated 14/02/2014 sighted by the Auditor).	Compliance



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No.	Consent Condition	Evaluation	Finding
41.	Following the first 12 months of continuous noise monitoring, during the life of the Development or as otherwise agreed by the Director-General, the Applicant shall undertake quarterly attended monitoring at the Mt Gilead Homestead to the satisfaction of the Director-General, in accordance with the NSW Industrial Noise Policy and AS 1055: Acoustics – Description and Measurement of Environmental Noise.	<p>The Noise Management Sub-Plan (November 2013) notes that attended noise monitoring will be conducted quarterly from nominated receivers adjacent to the RPGP. Noise monitoring records were sighted for monitoring undertaken on the following dates during the audit period:</p> <ul style="list-style-type: none"> ■ 16/8/2012 ■ 21/8/2012 ■ 14/12/2012 ■ 3/4/2013 ■ 11/7/2013 ■ 25/09/2013 ■ 11/12/2013 ■ 17/3/2014 ■ 11/6/2014 	Compliance
42.	<p>The Applicant shall, by 31 January 2011, submit for the Director-General's approval an integrated Noise Management Plan for Stage 1 and Stage 2 of the Camden Gas Project, which has been prepared in consultation with DECCW. Following approval, the plan must be implemented to the satisfaction of the Director-General.</p> <p>This Plan must:</p>	Condition closed in a previous audit.	Not Triggered
	(a) fully reflect the requirements of conditions of this consent and all other development consents and project approvals for Stage 1 and Stage 2 of the Camden Gas Project which apply to the management and monitoring of noise emissions; and	The Auditor sighted the Noise Management Sub-Plan (November 2013) and noted compliance with the requirements of this condition.	Compliance



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No.	Consent Condition	Evaluation	Finding
	(b) include a detailed noise monitoring protocol for evaluating compliance with the limits in conditions 29 and 31, which includes consideration of monitoring under meteorological conditions as required by condition 33 and recording of meteorological conditions during monitoring (including wind speed, wind direction and data suitable for quantifying the presence or otherwise of temperature inversions).		Compliance
	Noise Monitoring Report - Flare		
43.	<p>The Applicant must submit to the DECCW's Manager Sydney Industry PO Box 668 Parramatta NSW 2124 within seven months of commissioning of the Gas Treatment Plant, a report on noise from operation of the flare in the first 6 months of operation of the plant. The report must assess the compliance of noise levels during the range of flaring incidents experienced since commissioning, with the noise limits provided in Conditions 29 and 31. The noise monitoring must be undertaken in accordance with the Noise Monitoring Program in condition 42. Where during the first six month period all flare types identified in Condition 31 have not occurred, noise measurements shall be carried out of a simulation of the remaining events by applying the appropriate flow rates in order to assess compliance.</p> <p>The report must contain the following information:</p> <ul style="list-style-type: none"> ■ A listing of each incident when the flare operated including the duration, gas discharge rate and cause of the incident; ■ The temperature and volume data for each flare event, as required by Condition 59; ■ The results of noise measurements for flare operation for each flare type event, as required by Condition 31, ■ The results of noise measurements for flare operation for each flare event for receivers at location R7; and ■ An assessment of compliance with noise limits provided in Condition 31. The noise monitoring must be undertaken in 	Condition closed in a previous audit.	Not Triggered



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No.	Consent Condition	Evaluation	Finding
	<p>accordance with Condition 42.</p> <ul style="list-style-type: none"> ■ Where noise levels do not comply with Condition 31, noise mitigation measures to ensure compliance. <p>Modification to the control system to reduce gas flow at the flare is considered a practical noise mitigation measure.</p>		
	Redrilling and Refracting Management Plan		
	Note: For the purposes of this consent the redrilling and/or additional fracing of a well does not constitute wellhead maintenance.	Noted.	
44.	The Applicant shall obtain the prior approval of the Director-General for the redrilling and/or additional fracing of a gas well.	AGL reported that no redrilling or fracing works were undertaken within the area subject to this Development Consent during the audit period.	Not Triggered
45.	The Applicant shall prepare a Redrilling and Refracting Management Plan in consultation with the DII for the redrilling and/or refracting of an existing well. The Plan shall be submitted to the Director-General no later than one month prior to the commencement of the work or within such period as agreed by the Director-General. The Plan shall include, but not necessarily be limited to:	AGL reported that no redrilling or fracing works were undertaken within the area subject to this Development Consent during the audit period.	Not Triggered
	(a) a description of all the activities to be undertaken on the well site during the redrilling and/or refracting work;		Not Triggered
	(b) details of how the environmental performance of the work will be monitored and what actions will be taken to address identified adverse environmental impacts;		Not Triggered
	(c) reference to the relevant parts of the Environmental Management Plan required under conditions 1 and 2 (Schedule 5) of this consent;		Not Triggered
	(d) compliance with all the relevant environmental performance requirements of this consent; and		Not Triggered
	(e) arrangements for complaints handling procedures during the redrilling/refracting work.		Not Triggered



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No.	Consent Condition	Evaluation	Finding																					
	The Applicant shall give written notification of the proposed redrilling/refracting work to potentially affected residences and other noise sensitive receivers at least fourteen days prior to work commencing.																							
	VIBRATION																							
	Condition Report																							
46.	<p>The Applicant shall prepare a Condition Report for all residences or structures (including structures on EMAI) within 25 metres of a wellhead.</p> <p>The Applicant shall undertake an inspection of the residence and/or structure prior to work commencing, and a follow up inspection within one month of the completion of the work. The Applicant shall take immediate action for repair of any damage to the residence or structure as a result of the work and to avoid any further damage.</p> <p>A copy of the Condition Report shall be submitted to the Director-General and the DII after completion of the work.</p>	AGL reported that no redrilling or fracing works were undertaken within the area subject to this Development Consent during the audit period.	Not Triggered																					
	AIR QUALITY																							
	Air Emission Criteria																							
47.	<p>The Applicant shall ensure that air pollutant emissions from the development do not exceed the following criteria at any privately owned residence.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center;">Pollutant</th> <th style="text-align: center;">Averaging Period</th> <th style="text-align: center;">Criterion</th> </tr> </thead> <tbody> <tr> <td>Nitrogen Dioxide</td> <td>1 Hour</td> <td>246 µg/m³</td> </tr> <tr> <td>Nitrogen Dioxide</td> <td>Annual</td> <td>62 µg/m³</td> </tr> <tr> <td>Sulphur Dioxide</td> <td>1 Hour</td> <td>570 µg/m³</td> </tr> <tr> <td>Sulphur Dioxide</td> <td>Annual</td> <td>60 µg/m³</td> </tr> <tr> <td>Sulphuric acid mist</td> <td>3 minute</td> <td>33 µg/m³</td> </tr> <tr> <td>Methyl mercaptan</td> <td>3 minute</td> <td>0.84 µg/m³</td> </tr> </tbody> </table>	Pollutant	Averaging Period	Criterion	Nitrogen Dioxide	1 Hour	246 µg/m ³	Nitrogen Dioxide	Annual	62 µg/m ³	Sulphur Dioxide	1 Hour	570 µg/m ³	Sulphur Dioxide	Annual	60 µg/m ³	Sulphuric acid mist	3 minute	33 µg/m ³	Methyl mercaptan	3 minute	0.84 µg/m ³	<p>The Auditor sighted the 'Quarterly Stack Emission Survey, Camden Gas Project Stage 2, Stephenson Environmental Management Australia, June 2006' and noted compliance with the requirements of this condition. The 2006 Survey represents the most recent survey where extrapolation to the nearest residence was undertaken and there are no current residences closer to the Gas Plant than in 2006. Emission rates have been estimated at which compliance is achieved at the nearest residence. The AEPR for the 2012/2013 year reports that comparison of quarterly emission testing with the target emission rates indicates compliance at</p>	Compliance - Improvement Recommended
Pollutant	Averaging Period	Criterion																						
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No.	Consent Condition	Evaluation	Finding																																																												
		the nearest residence. AGL reported that the results of emission testing for 2013/2014 also complied with the criteria for the nearest residence. However, the spreadsheet justifying this advice was not available for the Auditor. It is recommended that the spreadsheet be prepared. (Opportunity for Improvement).																																																													
48.	<p>For each discharge point⁶ specified in the table below, the Applicant shall ensure that the concentration of a pollutant discharged at that point does not exceed the concentration limit specified for that pollutant in the table, and where a pH quality limit is specified in the table, the specified percentage of samples must be within the specified ranges.</p> <p>POINT 1, 2, 3</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Pollutant</th> <th>Units of measure</th> <th>100 percentile limit</th> <th>Reference Conditions</th> <th>Averaging Period</th> </tr> </thead> <tbody> <tr> <td>Oxides of Nitrogen</td> <td>mg/m³</td> <td>461</td> <td>Dry, 273K, 101.3kPa, 7% O₂</td> <td>As per test method</td> </tr> <tr> <td>Sulfur Dioxide</td> <td>mg/m³</td> <td>7</td> <td>Dry, 273 K, 101.3 kPa</td> <td>As per test method</td> </tr> <tr> <td>Sulphuric acid mist and/or sulphur trioxide</td> <td>mg/m³</td> <td>5.0</td> <td>Dry, 273 K, 101.3 kPa</td> <td>As per test method</td> </tr> </tbody> </table> <p>POINT 4</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Pollutant</th> <th>Units of measure</th> <th>100 percentile limit</th> <th>Reference Conditions</th> <th>Averaging Period</th> </tr> </thead> <tbody> <tr> <td>Oxides of Nitrogen</td> <td>mg/m³</td> <td>110</td> <td>Dry, 273K, 101.3kPa, 7% O₂</td> <td>As per test method</td> </tr> <tr> <td>Sulfur Dioxide</td> <td>mg/m³</td> <td>35</td> <td>Dry, 273 K, 101.3 kPa</td> <td>As per test method</td> </tr> <tr> <td>Sulphuric acid mist and/or sulphur trioxide</td> <td>mg/m³</td> <td>5.5</td> <td>Dry, 273 K, 101.3 kPa</td> <td>As per test method</td> </tr> </tbody> </table> <p>POINT 5</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Pollutant</th> <th>Units of measure</th> <th>100 percentile limit</th> <th>Reference Conditions</th> <th>Averaging Period</th> </tr> </thead> <tbody> <tr> <td>Oxides of Nitrogen</td> <td>mg/m³</td> <td>13</td> <td>Dry, 273K, 101.3kPa, 7% O₂</td> <td>As per test method</td> </tr> <tr> <td>Sulfur Dioxide</td> <td>mg/m³</td> <td>1042</td> <td>Dry, 273 K, 101.3 kPa</td> <td>As per test method</td> </tr> <tr> <td>Sulphuric acid mist and/or sulphur trioxide</td> <td>mg/m³</td> <td>35</td> <td>Dry, 273 K, 101.3 kPa</td> <td>As per test method</td> </tr> </tbody> </table> <p>Note 1: Concentration limits at points 1, 2, 3, 4 and 5 in the above Condition may be subject to review after the submission of the Air</p>	Pollutant	Units of measure	100 percentile limit	Reference Conditions	Averaging Period	Oxides of Nitrogen	mg/m ³	461	Dry, 273K, 101.3kPa, 7% O ₂	As per test method	Sulfur Dioxide	mg/m ³	7	Dry, 273 K, 101.3 kPa	As per test method	Sulphuric acid mist and/or sulphur trioxide	mg/m ³	5.0	Dry, 273 K, 101.3 kPa	As per test method	Pollutant	Units of measure	100 percentile limit	Reference Conditions	Averaging Period	Oxides of Nitrogen	mg/m ³	110	Dry, 273K, 101.3kPa, 7% O ₂	As per test method	Sulfur Dioxide	mg/m ³	35	Dry, 273 K, 101.3 kPa	As per test method	Sulphuric acid mist and/or sulphur trioxide	mg/m ³	5.5	Dry, 273 K, 101.3 kPa	As per test method	Pollutant	Units of measure	100 percentile limit	Reference Conditions	Averaging Period	Oxides of Nitrogen	mg/m ³	13	Dry, 273K, 101.3kPa, 7% O ₂	As per test method	Sulfur Dioxide	mg/m ³	1042	Dry, 273 K, 101.3 kPa	As per test method	Sulphuric acid mist and/or sulphur trioxide	mg/m ³	35	Dry, 273 K, 101.3 kPa	As per test method	<p>In September 2012 and November 2012, there were exceedances of average hourly values for the month for NOx emissions from Compressor 2 (Point LDP2) due to ash fouling of the unit's exhaust catalyst.</p> <p>In November 2012 and December 2012, there were exceedances of the average hourly value for the month for NOx emission from Compressor 1 (Point LDP1) due to a minor movement of an air fuel ratio potentiometer (set screw).</p> <p>These two exceedances were reported to the EPA and resulted in the issuance of a PIN.</p> <p>The 2012/2013 Annual Return for the year ending December 2013 indicates the following exceedances in the NOx emissions:</p> <ul style="list-style-type: none"> ■ Compressor 1 (Point 1) on 4 August 2013, from 12.32 pm to 1.04 pm. AGL advised that the gas plant was shut down and the problem rectified. ■ Compressor 1 (Point 1) on 13 August 2013 from 5:00 am to 8:00 am. Advised that the Continuous Emissions Monitoring System (CEMS) should have raised an alarm and shut the gas plant down, however, did not do so. The SCADA on the gas plant was subsequently updated to address this issue. 	Non-Compliance Level 2
Pollutant	Units of measure	100 percentile limit	Reference Conditions	Averaging Period																																																											
Oxides of Nitrogen	mg/m ³	461	Dry, 273K, 101.3kPa, 7% O ₂	As per test method																																																											
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No.	Consent Condition	Evaluation	Finding												
	<p>Emissions Reports in compliance with Conditions 62 and 63.</p> <p>Note 2: Should the proponent seek to revise the concentration limits as specified in condition 48 for oxides of nitrogen, the proponent must demonstrate that:</p> <ul style="list-style-type: none"> ■ the revised emission limit is representative of the proper and efficient maintenance and operation of the equipment; ■ the equipment is designed to minimise emissions as far as is practicable and consistent with best practice considering the type of equipment and application; ■ the revised emission limit is supported by Manufacturers Design Specification; and ■ the revised emission limit does not cause adverse impacts on local air quality. This assessment must be undertaken in accordance with the document: Approved Methods and Guidance for the Modelling and Assessment of <i>Air Pollutants in NSW</i>. 	<p>These two exceedances were reported to the EPA and resulted in the issuance of a PIN.</p> <p>These exceedances were communicated to DoPE through the AEPRs, CCC meeting minutes and regular meetings.</p> <p>The EPA noted that none of these incidents were considered to have caused significant harm to the environment.</p> <p>No further action is warranted.</p>													
49.	To avoid any doubt, the above Condition does not authorise the discharge or emission of any other pollutants.	Condition noted.	Not Triggered												
Combustion Parameters															
50.	<p>For each monitoring/discharge point or utilisation area specified in the table below (by point number), the Applicant shall ensure that the parameter is equal to or greater than the lower limits specified for that parameter in the table.</p> <p>Point 7</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">Parameter</th> <th style="text-align: left;">Units of measure</th> <th style="text-align: left;">Lower limit</th> <th style="text-align: left;">Averaging period</th> </tr> </thead> <tbody> <tr> <td>Residence time</td> <td>S</td> <td>*TBD</td> <td>Instantaneous</td> </tr> <tr> <td>Temperature</td> <td>°C</td> <td>*TBD</td> <td>Instantaneous</td> </tr> </tbody> </table> <p>Note: *TBD = To be determined</p>	Parameter	Units of measure	Lower limit	Averaging period	Residence time	S	*TBD	Instantaneous	Temperature	°C	*TBD	Instantaneous	Condition noted.	Not Triggered
Parameter	Units of measure	Lower limit	Averaging period												
Residence time	S	*TBD	Instantaneous												
Temperature	°C	*TBD	Instantaneous												



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No.	Consent Condition	Evaluation	Finding
	<p>Note: The limits for residence time and temperature for the main flare will be determined after the Applicant has submitted the report specified in Condition 126 based upon flare design of 98% destruction efficiency for VOCs plus methane and a NOx emission rate as determined in the report specified in Condition 126.</p>		
	<p>Operating Conditions</p>		
51.	<p>The Applicant shall undertake the development and maintain the condition of the premises in a way that minimizes or prevents the emission of dust by the development.</p>	<p>The Auditor undertook an inspection of the RPGP and observed various dust mitigation measures including:</p> <ul style="list-style-type: none"> ■ Car park and access road are constructed with asphalt; ■ Plant walkways are constructed with asphalt and concrete; ■ Plant surrounds are sealed with a mix of shale and crushed sandstone; ■ Speed limits on the site and access road are limited to 20 km/hr. <p>The Air Quality Management Sub-Plan (September 2008) includes various dust mitigation measures such as the use of water carts where warranted, use of designated roads and access tracks, adherence to project vehicle speed limits and covering of loads on vehicles.</p> <p>AGL reported that no dust complaints were received in relation to this Development Consent during audit period.</p>	Compliance
52.	<p>The Applicant shall take all practicable measures to ensure that all vehicles entering or leaving a site, carrying a load that may generate dust, are covered at all times, except during loading and unloading. Any</p>	<p>The Auditor sighted the Air Quality Management Sub-Plan (September 2008) and noted a requirement to cover vehicle loads. AGL reported that there had not</p>	Compliance



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No.	Consent Condition	Evaluation	Finding
	such vehicles shall be covered or enclosed in a manner that will minimize the emissions of dust from the vehicles at all times.	been any deliveries of shale or road base to the Rosalind Park Gas Plant during the audit period.	
53.	The Applicant shall take all practicable measures to minimize the generation of wind-blown dust from soil stockpiles.	The Soil and Water Management Sub-Plan (April 2014) requires soil stockpiles to be vegetated if they are to be stored on site for a long period of time. AGL reported that stockpiles tend to naturally vegetated through the seed bank. Water carts are also employed to minimise the generation of wind-blown dust.	Compliance
	Monitoring Locations		
54.	For the purposes of this consent, the points referred to in the table below are identified for the purposes of monitoring and/or setting of limits for the emission of pollutants to air from that point.	<p>The Auditor sighted quarterly monitoring reports prepared by EML Air Pty Ltd and noted that the description of monitoring points 1 to 6 align with this condition. An inspection of the RGP was undertaken and monitoring points 1 to 6 were sighted.</p> <p>The monitoring reports include those by EML Air Pty Ltd (December 2012) and ETC Emission Testing Consultants (21/11/2013).</p> <p>No monitoring is undertaken or required for Point 7.</p>	Compliance



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No.	Consent Condition				Evaluation	Finding
	EPA Identification no.	Type of Monitoring Point	Type of Discharge Point	Description of Location		
	1	Air emissions monitoring	Discharge to air	Compressor Engine 1 marked 'Engine Exhaust Stack 1' as shown on 'Camden Gas Project Site Plan Location of Emission Points' drawing number 4229DG06 (Rev 2) provided to the DECCW.		
	2	Air emissions monitoring	Discharge to air	Compressor Engine 2 marked "Engine Exhaust Stack 2" as shown on 'Camden Gas Project Site Plan Location of Emission Points' drawing number 4229DG06 (Rev 2) provided to the DECCW		
	3	Air emissions monitoring	Discharge to air	Compressor Engine 3 marked "Engine Exhaust Stack 3" as shown on 'Camden Gas Project Site Plan Location of Emission Points' drawing number 4229DG06 (Rev 2) provided to the DECCW..		
	4	Air emissions monitoring	Discharge to Air	TEG Fire Tube marked 'Reboiler Flue' as shown on 'Camden Gas Project Site Plan Location of Emission Points' drawing number 4229DG06 (Rev 2) provided to the DECCW.		
	5	Air emissions monitoring	Discharge to Air	Reboiler Still Column marked 'Reflux Column Vent' as shown on 'Camden Gas Project Site Plan Location of Emission Points' drawing number 4229DG06 (Rev 2) provided to the DECCW.		
	6	Air emissions monitoring	Discharge to Air	Carbon scrubber vent discharge stack as shown on Camden Gas Project Site Plan Location of Emission Points' drawing number 4229DG06 (Rev 2) provided to the DECCW.		
	7	Air emissions monitoring	Discharge to Air	Main Flare marked 'Flare' as shown on 'Camden Gas Project Site Plan Location of Emission Points' drawing number 4229DG06 (Rev 2) provided to the DECCW.		
	Testing Method – Concentration Limits					
55.	The Applicant shall ensure that monitoring for the concentration of a pollutant emitted to the air required to be conducted by the DECCW's General Terms of Approval, or a licence under the <i>Protection of the Environment Operations Act 1997</i> , in relation to the development or in order to comply with a relevant local calculation protocol is done in accordance with:				The Auditor sighted the quarterly air monitoring report prepared by EML Air Pty Ltd and ETC Emission Testing Consultants for the audit period and noted compliance with the requirements of this condition.	Compliance
	(a) any methodology which is required by or under the POEO Act 1997				For example ETC Emission Testing Consultants' Emission Testing Report for March 2013 (dated 3 June 2013) identifies the testing methods and states that all	Compliance



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No.	Consent Condition	Evaluation	Finding	
	to be used for the testing of the concentration of the pollutant; or	sampling and analysis is undertaken in accordance with test methods prescribed for the purposes of the New South Wales Protection of the Environment (Clean Air) Regulation 2010 or other approved methods. However, for measurement of sulphur oxides, method TM-3 was used instead of TM-4, as TM-3 provided lower detection limits. This status was reported to the EPA in the 2012/2013 Annual Return and AGL has since reverted to using method TM-4.		
	b) If no such requirement is imposed by or under the POEO Act 1997, any methodology which the general terms of approval or a condition of the licence or the protocol (as the case may be) requires to be used for that testing;			Compliance
	c) or if no such requirement is imposed by or under the POEO Act 1997 or by the general terms of approval or a condition of the licence or the protocol (as the case may be) any methodology approved in writing by the DECCW for the purposes of that testing prior to the testing taking place. Note: The <i>Clean Air (Plant and Equipment) Regulation 1997</i> requires testing for certain purposes to be conducted in accordance with test methods contained in the publication <i>Approved Methods for the Sampling and Analysis of Air Pollutants in NSW</i> .			Compliance
	Manufacturers Design Specification			
56.	<p>At least 1 month prior to the commissioning of the Gas Treatment Plant, the Applicant shall submit to the DECCW's Manager Sydney Industry PO Box 668 Parramatta NSW 2124, a report containing Manufacturers Design Specifications for air emissions from each of the following:</p> <ul style="list-style-type: none"> ■ compressor engine; ■ TEG Fire tube; and ■ Reboiler still column. <p>The report must compare the Design Specifications with the limits specified in Condition 48 and 50 to demonstrate that compliance can be achieved.</p> <p>Note: The objective of this condition is to verify that the equipment installed is designed to comply with the air emissions limits specified in</p>	Condition closed in a previous audit.	Not Triggered	



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No.	Consent Condition	Evaluation	Finding																								
	Condition 48.																										
	Monitoring																										
57.	<p>Within 6 months of the date of this consent, the Applicant shall submit a detailed Air Quality Monitoring Program for the development to the Director-General, which has been prepared in consultation with the DECCW and includes a detailed air quality monitoring protocol for evaluating compliance of the development with the Air Quality Pollutants in Condition 47. The Applicant shall prepare the Air Quality Monitoring Program in accordance with the NSW DECCW Guideline Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales: 20 July 2001 or its latest version.</p>	Condition closed in a previous audit.	Not Triggered																								
58.	<p>For each monitoring discharge point or utilisation area specified in the tables below (by a point number) the Applicant must monitor (by sampling and obtaining results by analysis) the concentration of each pollutant specified in Column 1. The Applicant must use the sampling method, units of measure, and sample at the frequency, specified opposite in the other columns.</p> <p>Points 1, 2, 3</p> <table border="1" data-bbox="286 976 1115 1126"> <thead> <tr> <th>Pollutant</th> <th>Units of Measure</th> <th>Frequency</th> <th>Sampling Method</th> </tr> </thead> <tbody> <tr> <td>Oxides of Nitrogen</td> <td>mg/m³</td> <td>Continuous</td> <td>CEM-2</td> </tr> <tr> <td>Temperature</td> <td>oC</td> <td>Continuous</td> <td>TM-2</td> </tr> <tr> <td>Moisture</td> <td>%</td> <td>Continuous</td> <td>TM-22</td> </tr> <tr> <td>Volumetric flow rate</td> <td>m³/s</td> <td>Continuous</td> <td>CEM-6</td> </tr> <tr> <td>Oxygen</td> <td>%</td> <td>Continuous</td> <td>CEM-3</td> </tr> </tbody> </table> <p>Note. The requirement for continuous monitoring at Point 1, 2 and 3 in Condition 57 will be reviewed after the submission of the Air Emissions Reports in compliance with Conditions 62 and 63.</p> <p>Points 1, 2, 3, 4, 5</p>	Pollutant	Units of Measure	Frequency	Sampling Method	Oxides of Nitrogen	mg/m ³	Continuous	CEM-2	Temperature	oC	Continuous	TM-2	Moisture	%	Continuous	TM-22	Volumetric flow rate	m ³ /s	Continuous	CEM-6	Oxygen	%	Continuous	CEM-3	<p>Continuous emissions monitoring of sampling points 1, 2 and 3 (Compressors 1, 2 and 3) was not fully performed during the audit period because of technical and mechanical failures of the CEMS. This matter was reported to the EPA on discovery by AGL management on 9 July 2012.</p> <p>AGL recommenced operation of the CEMS on Compressor Engines 1, 2 and 3 in July 2012 for measurement of NOx, temperature and oxygen. Monitoring of moisture and volumetric flow was not undertaken. At monitoring points 1, 4 and 5 only one of two sampling ports was being used at each point. The unused sampling ports were progressively fixed between October 2012 and October 2013.</p> <p>At monitoring points 2 and 3, monitoring is still not being undertaken on the CEMS for moisture or volumetric flow.</p> <p>At monitoring point 1, monitoring of moisture and volumetric flow commenced on 15 March 2013.</p> <p>Monitoring points 2 and 3 are being monitored for only 45 minutes out of every hour.</p>	Non-Compliance Level 2
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CAMDEN GAS PROJECT - INDEPENDENT ENVIRONMENTAL AUDIT 2012 - 2014

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No.	Consent Condition	Evaluation	Finding
59.	Deleted.	Condition removed.	
	Installation of Air Monitoring Points Report		
60.	<p>The Applicant must submit to the <i>DECCW's Manager Sydney Industry PO Box 668 Parramatta NSW 2124</i> one month prior to the completion of construction of the Gas Treatment Plant, a written report containing plans showing the locations of air monitoring points for discharges from:</p> <ul style="list-style-type: none"> (a) the compressor engines; (b) TEG Fire Tube; (c) Reboiler Still Column; and (d) Carbon scrubber vent stack. <p>The report must contain the opinion of a qualified air emissions monitoring consultant advising whether the monitoring points comply with TM-1.</p>	Condition closed in a previous audit.	Not Triggered
	Monitoring Program for Air Based Assessable Pollutants		
61.	The Applicant must submit to the <i>DECCW's Manager Sydney Industry PO Box 668 Parramatta NSW 2124</i> , one month prior to the completion of construction of the Gas Treatment Plant, a written report containing a program for monitoring of assessable pollutants from the start gas vents.	Condition closed in a previous audit.	Not Triggered
	Requirement to Monitor Concentrations of Pollutants Discharged		
62.	The Applicant must submit to the <i>DECCW's Manager Sydney Industry PO Box 668 Parramatta NSW 2124</i> , within six months of the commissioning of the Gas Treatment Plant, a written report detailing the results of post commissioning source air emissions sampling and analysis undertaken in accordance with the requirements specified in Condition 48 and Condition 59. The report must assess compliance with the limit conditions specified in Condition 48 and 50. The report must also include an assessment of flare operations and report on the results	Condition closed in a previous audit.	Not Triggered



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No.	Consent Condition	Evaluation	Finding
	<p>of continuous temperature monitoring and flaring incidents.</p> <p>Note: The objective of this condition is to demonstrate that the actual emissions are consistent with the design and the air emission limits specified in Condition 48.</p>		
	Quarterly Reporting of Air Emissions		
63.	<p>The Applicant must submit the results of quarterly air emissions monitoring as required by Condition 58 on a quarterly basis for the first 12 months of the operation of the Gas Treatment Plant to the DECCW's Manager Sydney Industry at PO Box 668 Parramatta, NSW, 2124. The results must be received by the DECCW within one month of the date on which the sampling was undertaken for that quarter.</p>	Condition was not activated during the audit period.	Not Triggered
	Odour		
64.	<p>The Applicant must not cause or permit the emission of offensive odours from the premises, as defined under Section 129 of the Protection of the Environment Operations Act 1997.</p>	<p>The material presenting the greatest odour source at the RPPG is methyl mercaptan which is stored in a negative pressure building with three stage charcoal air filtration, closed floor drain systems and self-closing doors. The building is entered daily to assess operations. In the event that the methyl mercaptan cylinder is changed, AGL reported that the fire control central and local residents are notified of this activity.</p> <p>Odour monitoring is undertaken every quarter (previously by EML Air Pty Ltd, currently ETC Emission Testing Consultants, at the carbon scrubber vent (Point 6 which services the methyl mercaptan storage room). The Auditor sighted quarterly monitoring reports.</p> <p>There is no concentration limit for methyl mercaptan under EPL 12003 or this Development Consent, however, no significant odour events have been noted by site personnel on the routine inspection reports.</p> <p>The Auditor did not observe any odours at the site</p>	Compliance



CAMDEN GAS PROJECT - INDEPENDENT ENVIRONMENTAL AUDIT 2012 - 2014

No.	Consent Condition	Evaluation	Finding
		during the audit and no odour complaints were reported for the site during the audit period.	
65.	<p>The Applicant must not cause the emission of detectable mercaptan odour from the premises.</p> <p>Note. Should odour emissions become an issue, the DECCW will consider requiring investigation and implementation of further odour control measures.</p>	<p>Methyl mercaptan which is stored in a negative pressure building with three stage charcoal air filtration, closed floor drain systems and self-closing doors. The building is entered daily to assess operations. In the event that the methyl mercaptan cylinder is changed, AGL reported that the fire control central and local residents are notified of this activity.</p> <p>Odour monitoring is undertaken every quarter (previously by EML Air Pty Ltd, currently ETC Emission Testing Consultants, at the carbon scrubber vent (Point 6 which services the methyl mercaptan storage room). The Auditor sighted quarterly monitoring reports.</p> <p>There is no concentration limit for methyl mercaptan under EPL 12003 or this Development Consent, however, no significant odour events have been noted by site personnel on the routine inspection reports.</p> <p>The Auditor did not observe any odours at the site during the audit and no odour complaints were reported for the site during the audit period.</p>	Compliance
	SURFACE WATER TREATMENT		
	Pollution of Waters		
66.	<p>Except as may be expressly provided for by a licence under the Protection of the Environment Operations Act 1997 in relation to the development, the Applicant shall comply with section 120 of the Protection of the Environment Operations Act 1997 in carrying out the development.</p>	<p>The Auditor sighted the EMP for the Camden Gas Plant, including the Soil and Water Management Sub-Plan (April 2014) and the Waste Management Sub-Plan (April 2014). The Sub-Plans detail a number of controls to prevent the pollution of water.</p>	Compliance



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No.	Consent Condition	Evaluation	Finding
Management of Waste Water			
	Note. Section 120 of the Protection of the Environment Operations Act 1997 applies to the disposal of waste water. This section refers to the pollution of waters.	Condition Noted.	
Operating Conditions			
67.	The Applicant shall undertake the development in a way that minimises the potential surface water impacts of the development.	<p>The AEPR notes that surface water is generated from the following sources: drill mud, gas well water, and grey water and septic tank water from the Rosalind Park Gas Plant.</p> <p>The Soil and Water Management Sub-Plan (April 2014) documents a number of controls and monitoring requirements to minimise potential surface water impacts.</p> <p>A diversion drain has been installed around the perimeter of the Rosalind Park Gas Plant site to minimise the volume of surface water flowing onto the site.</p> <p>The Auditor sighted records of removal of grey water, septic water and produced water by EPA licensed liquid waste contractors.</p> <p>The volumes of wastewater removed from site are recorded AGL on an Environmental Footprint spreadsheet.</p> <p>It is noted that a waste audit was not undertaken as part of this independent audit.</p>	Compliance
Monitoring Locations			
68.	For the purposes of this consent, the points referred to in the table below are identified for the purposes of monitoring and/or setting of limits for the emission of pollutants to water from that point:	Noted.	



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No.	Consent Condition				Evaluation	Finding																																								
	EPA Identification no.	Type of Monitoring Point	Type of Discharge Point	Description of Location																																										
	8	Discharge to waste facility Discharge quality monitoring	Discharge (by tanker) to waste processing facility	Pump connection point at evaporation pond as shown on 'Camden Gas Project Site Plan Location of Emission Points' drawing number 4229DG06 (Rev 2) provided to the DECCW.																																										
	9	Discharge to waste facility Discharge quality monitoring	Discharge (by tanker) to sewage treatment plant	Sewage connection point at sewage storage tank as shown on 'Camden Gas Project Site Plan Location of Emission Points' drawing number 4229DG06 (Rev 2) provided to the DECCW.																																										
	10	Discharge to waste facility Discharge quality monitoring	Discharge (by tanker) to waste processing facility	Pump connection point for oily water wastes as shown on 'Camden Gas Project Site Plan Location of Emission Points' drawing number 4229DG06 (Rev 2) provided to the DECCW.																																										
	Monitoring of Effluent Parameters																																													
69.	<p>For each monitoring/discharge point or utilisation area specified (by point number) in the table below, the Applicant must monitor (by sampling and obtaining results by analysis) each parameter specified in Column 1. The Applicant must use the sampling method, units of measure and sample at the frequency specified in the respective columns.</p> <p>Point 8</p> <table border="1" style="width: 100%; border-collapse: collapse; font-size: x-small;"> <thead> <tr> <th>Pollutant</th> <th>Units of Measure</th> <th>Frequency</th> <th>Sampling Method</th> </tr> </thead> <tbody> <tr> <td>Total suspended solids</td> <td>Mg/L</td> <td>Monthly</td> <td>Representative</td> </tr> <tr> <td>Biochemical oxygen demand</td> <td>Mg/L</td> <td>Monthly</td> <td>Representative</td> </tr> <tr> <td>Oil & Grease</td> <td>Mg/L</td> <td>Monthly</td> <td>Representative</td> </tr> <tr> <td>Total polycyclic aromatic hydrocarbons</td> <td>µg/L</td> <td>Monthly</td> <td>Representative</td> </tr> <tr> <td>Phenols</td> <td>µg/L</td> <td>Monthly</td> <td>Representative</td> </tr> <tr> <td>Total organic carbon</td> <td>µg/L</td> <td>Monthly</td> <td>Representative</td> </tr> <tr> <td>Total petroleum hydrocarbons</td> <td>µg/L</td> <td>Monthly</td> <td>Representative</td> </tr> <tr> <td>Electrical conductivity</td> <td>µS/cm</td> <td>Monthly</td> <td>Representative</td> </tr> <tr> <td>Water level in storage</td> <td>Mm</td> <td>Monthly</td> <td>Direct measurement</td> </tr> </tbody> </table>				Pollutant	Units of Measure	Frequency	Sampling Method	Total suspended solids	Mg/L	Monthly	Representative	Biochemical oxygen demand	Mg/L	Monthly	Representative	Oil & Grease	Mg/L	Monthly	Representative	Total polycyclic aromatic hydrocarbons	µg/L	Monthly	Representative	Phenols	µg/L	Monthly	Representative	Total organic carbon	µg/L	Monthly	Representative	Total petroleum hydrocarbons	µg/L	Monthly	Representative	Electrical conductivity	µS/cm	Monthly	Representative	Water level in storage	Mm	Monthly	Direct measurement	<p>The Auditor sighted monitoring results for Point 8 in the AEPR for the 2012/2013 and 2013/2014 years and noted compliance with the requirements of this condition.</p>	Compliance
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No.	Consent Condition	Evaluation	Finding
70.	The Applicant must install a measurement device in the Evaporation Pond at the Gas Treatment Plant Site for recording the depth of effluent in the storage for the life of the Evaporation Pond.	Condition closed in a previous audit.	Not Triggered
Monitoring Program for Water Based Assessable Pollutants			
71.	The Applicant must at least one month prior to the completion of construction of the Gas Treatment Plant, submit to the DECCW's Manager Sydney Industry PO Box 668 Parramatta NSW 2128, a written report containing a program for monitoring assessable pollutants contained within the following waste streams:	Condition closed in a previous audit.	Not Triggered
	(a) oily water wastes proposed to be transported to the waste management facilities at Unanderra or Camellia or any other facility which can legally receive such wastes; and	Condition closed in a previous audit.	Not Triggered
	(b) sewage waste proposed to be transported to the Bargo Ponds or any other facility which can legally receive such wastes. Note: Monitoring of non controlled aqueous wastes is required by Condition 69.	Condition closed in a previous audit.	Not Triggered
Testing Methods – Concentration Limits			
72.	Subject to any express provisions to the contrary in this licence, the Applicant shall undertake monitoring for the concentration of a pollution discharged to waters or applied to a utilisation area or taken off-site in accordance with the Approved Methods Publication unless another method has been approved by the DECCW in writing before any tests are conducted.	The Auditor sighted the Annual Returns for the periods ending 21 December 2012 and 21 December 2013 and noted compliance with this condition. Samples are analysed by ALS Laboratories using methods quoted in the analytical reports.	Compliance
Gas Gathering System – Stream Crossings			
73.	Note: The Rivers and Foreshore Improvement Act 1948 applies to the proposed development and therefore any excavation, removal of material from the bank, shore or bed of any stream, estuary or lake, or land within 40 metres from the top of the bank will require a Part 3A	AGL reported that no under-boring works were undertaken during the audit period.	Not Triggered



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No.	Consent Condition	Evaluation	Finding
	<p>permit.</p> <p>The Applicant shall ensure that stream crossings B and F, as shown on the plan Camden Gas Project Stage 2 – RFI Act 3A Permit Areas by Sydney Gas (Figure 2, Appendix B) are under-bored. The gas pipe is to be at least 2 metres below the bed of the watercourses. The bed and banks of the watercourses are not to be disturbed.</p>		
74.	<p>The Applicant is permitted to trench stream crossings A, C, D, E, J, J, L, M, N, O, X, Y, Z, as shown on plan Camden Gas Project Stage 2 – RFI Act 3A Permit Areas by Sydney Gas (Figure 2, Appendix B). The Applicant shall prepare and implement a representative trenched crossing design. The design shall be prepared and implemented by a person(s) with relevant knowledge, qualifications and experience, in consultation with the Director-General. The Applicant shall submit the plan for approval by the Department prior to the issue of the Part 3A Permit. The final crossing design is to be presented in plan view and cross section. The cross section is to be at right angles to the direction of flow, is to extend for a minimum distance of 10 metres from the top of both banks and is to include the location of all structures associated with the proposed crossing.</p>	Condition not activated during the audit period.	Not Triggered
75.	<p>The Applicant shall ensure that stream crossing I is shown on plan Camden Gas Project Stage 2 – RFI Act 3A Permit Areas by Sydney Gas (Figure 2, Appendix B) is strapped to the Menangle Bridge.</p>	Condition not activated during the audit period.	Not Triggered
76.	<p>The Applicant shall ensure that stream crossing H as shown on plan Camden Gas Project Stage 2 – RFI Act 3A Permit Areas by Sydney Gas (Figure 2, Appendix B), is either strapped to the existing road crossing, strapped to an upgraded road crossing, under-bored or consist of a pipe bridge. Should a pipe bridge be proposed, the Applicant shall prepare and implement a design of the crossing which shall be prepared and implemented by a person(s) with relevant knowledge, qualifications and experience, in consultation with the NOW. The Applicant shall submit the plan for approval by the Director-General prior to the issue of the Part 3A Permit. The final crossing design is to be presented in plan view and cross section. The cross section is to be at right angles to the</p>	Condition not activated during the audit period.	Not Triggered



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No.	Consent Condition	Evaluation	Finding
	<p>direction of flow, is to extend for a minimum distance of 20 metres from the top of both banks and is to include the location of all structures associated with the proposed crossing.</p> <p>Note. A Part 3A Permit may be required for a road crossing upgrade.</p>		
77.	The Applicant shall advise the Director-General of the proposed stream crossing methods located on EMAI, which are to be assessed and approved by the NOW prior to the issue of the Part 3A Permit.	Condition not activated during the audit period.	Not Triggered
78.	The Applicant shall ensure that works within 20 m of watercourses are to be undertaken during dry weather conditions.	Condition not activated during the audit period.	Not Triggered
79.	The Applicant shall ensure that the disturbance to the bed and banks of all watercourses are kept at an absolute minimum during the construction procedure and reinstatement of the site.	Condition not activated during the audit period.	Not Triggered
Management of Site Water and Sediment Runoff			
80.	The Applicant shall implement all practicable measures to minimise soil erosion and the discharge of sediments and water pollutants from the site.	<p>The Auditor sighted the Soil and Water Management Sub-Plan (April 2014) and noted the inclusion of appropriate controls to minimise soil erosion and discharge of sediments and water pollutants from the premises.</p> <p>Within the RPPG, a diversion drain has been placed around the perimeter to minimise the volume of water flowing onto the site. Surface water generated on the site is captured in the drain leading to the sediment dam.</p>	Compliance
81.	The Applicant shall ensure that the amount of dirty water and sediment from the site entering protected waters, or that is exposed to the flow of protected waters, or that is likely to detrimentally affect water quality, riparian vegetation or habitat or the environment is minimised in a manner acceptable to the Director-General.	<p>The Soil and Water Management Sub-Plan (April 2014) includes appropriate controls to minimise the loss of dirty water and impacts on the surrounding environment. Key controls include:</p> <ul style="list-style-type: none"> ■ Installation of diversion drains; 	Compliance



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No.	Consent Condition	Evaluation	Finding
		<ul style="list-style-type: none"> ■ Use of silt fences and hay bale filters. <p>The Sub-Plan also includes detailed principles for the design and construction of watercourse crossings and specific controls for the establishment of construction pads, gathering lines and access tracks.</p> <p>The Sub-Plan is implemented through the role-specific induction program.</p>	
82.	The Applicant shall implement all relevant site drainage and sediment and erosion control works and measures and any other pollution controls as required by these conditions, prior to the commencement of any other works at the site.	<p>The Soil and Water Management Sub-Plan (April 2014) includes appropriate controls to minimise the loss of dirty water and impacts on the surrounding environment. Key controls include:</p> <ul style="list-style-type: none"> ■ Installation of diversion drains; ■ Use of silt fences and hay bale filters. <p>The Sub-Plan also includes detailed principles for the design and construction of watercourse crossings and specific controls for the establishment of construction pads, gathering lines and access tracks.</p> <p>The Sub-Plan is implemented through the role-specific induction program.</p> <p>AGL undertakes frequent site inspections to verify that pollution controls are established prior to the commencement of works. An updated Soil and Water Management Sub-Plan Checklist was developed and commenced use in May 2014. Prior to this date the checklists were more focused on activities based on the former EMP format.</p>	Compliance
83.	The Applicant shall document in detail the decommissioning of all sediment and erosion controls and any other water diversion structures to the satisfaction of the Director-General. The Applicant shall ensure that the decommissioning meets the requirements of the most recent	AGL has developed the "Sediment Control Removal Form". However, no sediment and erosion control structures were decommissioned during the audit period. Version 0 of the SWMP was prepared in 2004.	Not Triggered



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No.	Consent Condition	Evaluation	Finding
	version of the NSW Department of Housing's publication <i>Managing Urban Stormwater: Soils and Construction</i> (3 rd Edition 1998).	Compliance with this requirement is assumed to have been achieved in 2004. The Plan was subject to a minor update in 2014.	
	Soil and Water Management Plan		
84.	The Applicant shall prepare and implement a Soil and Water Management Plan (SWMP) for the development. A person, with professional qualifications, knowledge and experience to industry standards, must prepare the SWMP. The Applicant shall seek the Director-General's prior approval of the person to prepare the Plan. The SWMP shall be prepared to the satisfaction of the Director-General prior to the issue of the Part 3A permit . This plan shall include, but not necessarily be limited to:	The Soil and Water Management Sub-Plan complies with the relevant requirements of this condition.	Compliance
	(a) all works on protected land and in protected waters, and staging and maintenance requirements; (b) the measures to be implemented to minimise the potential for soil erosion and the discharge of sediment and other pollutants to lands and/or waters during drilling and construction activities;		Compliance
	(c) the measures to be implemented to mitigate the impacts of stormwater run-off from and within the site following the completion of drilling and construction activities;		Compliance
	d) demonstrate that erosion and sedimentation control measures will conform with, or exceed, the relevant requirements and guidelines contained in the Department of Housing's publication <i>Managing Urban Stormwater: Soils and Construction</i> (3 rd Edition 1998) or its latest version;		Compliance
	(e) consistency with the stormwater management plan for the catchment, should one exist, or with the <i>DECCW's Managing Urban Stormwater: Council Handbook</i> should a stormwater management plan for the catchment not exist;		Compliance
	(f) any DECCW licence requirements;		Compliance



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	(g) measures to rehabilitate erosion-affected areas and areas the subject of excavation, including the planting of local native tree, shrub and/or cover crop species;		Compliance
	(h) measures to maintain the soil quality, soil integrity and soil structure of land on the EMAI during the construction and operation of the proposal;		Compliance
	(h) measures to maintain the soil quality, soil integrity and soil structure of land on the EMAI during the construction and operation of the proposal;		Compliance
	(i) implement a program of regular testing of waste water quality for compounds, nutrients and metals, as outlined in the EIS;		Compliance
	(j) provide details of an appropriate soil sampling and monitoring program to ensure that areas used for waste water application do not lead to an unacceptable build-up of salts within the soil profile;	AGL reported that wastewater is not applied to land and hence a sampling program is not required to be included in the Soil and Water Management Sub-Plan.	Not Triggered
	(k) management procedures for all surface and groundwater collection and storage structures on the site, including a maintenance program for associated infrastructure (e.g. pipes, pumps, dam walls, etc) and a program for desilting of those structures, where relevant;	The Soil and Water Management Sub-Plan complies with the relevant requirements of this condition.	Compliance
	(l) details of the well maintenance procedures to ensure the integrity of the well isolation components to prevent the cross contamination of groundwater aquifers; and		Compliance
	(m) ensuring that saline groundwater which would exceed the ANZECC guidelines for the protection of aquatic ecosystems and irrigation application purposes is contained in lined holding evaporation ponds and dilutes with fresh water prior to any application of the water to the land surface.		Compliance



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No.	Consent Condition	Evaluation	Finding
	Soil and Water Management Plan – Rosalind Park Access Road		
84A.	The Applicant shall prepare and implement a Soil and Water Management Plan for the relocated Rosalind Park access road, to the satisfaction of the Director-General. This plan must be submitted to the Director General for approval prior to the commencement of construction, and:	Condition not activated during the audit period.	Not Triggered
	(a) be consistent with the requirements in Management Urban Stormwater: Soils and Construction, Volume 1 4 th Edition, 2004 (Landcom).		Not Triggered
	(b) identify activities that could cause soil erosion and generate sediment;		Not Triggered
	(c) describe measures to minimize soil erosion and the potential for the transport of sediment to downstream waters;		Not Triggered
	(d) describe the location, function, and capacity of erosion and sediment control structures; and		Not Triggered
	(e) describe what measures would be implemented to maintain (and if necessary, decommission) the structures over time.		Not Triggered
	Piping and Filling of Watercourse		
84B.	The Applicant shall obtain a Controlled Activity Approval under the <i>Water Management Act 2000</i> from NOW prior to work commencing on the piping and partial filling of the watercourse near GL05. The Applicant shall fully rehabilitate the watercourse after completion of the construction of GL17 to the satisfaction of NOW and the Director-General.	Condition not activated during the audit period.	Not Triggered



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No.	Consent Condition	Evaluation	Finding
	Evaporation Pond Liner Integrity Evaluation Program		
85.	The Applicant must submit at least 1 month prior to completion of construction of the Treatment Plant, to the <i>DECCW's Manager Sydney Industry PO Box 668 Parramatta NSW 2124</i> , a written report containing a program for future evaluation of the integrity testing of the liner in the evaporation pond. The report must contain details of an initial evaluation of the liner prior to use and then on an on-going program for review of the integrity of the liner.	Condition closed by a previous audit.	Not Triggered
86.	Within one month of the report above being provided to the licensee, the licensee must submit, to the DECCW's Manager Sydney Industry PO Box 668 Parramatta NSW 2124, a copy of each written report containing the results of an evaluation of the integrity testing of the liner in the evaporation pond as specified in the report submitted to the DECCW as required by Condition 85.	Condition closed by a previous audit.	Not Triggered
	INDIGENOUS HERITAGE		
	Protection of Indigenous Heritage		
87.	Prior to the commencement of site preparation works for the gas wells, gas gathering system and the Gas Treatment Plant Site, the Applicant shall clearly indicate the locations of known aboriginal relics on the site, and ensure that all employees and contractors are aware of these locations, to prevent the known relics being impacted upon during site preparation and construction.	Condition not activated during the audit period.	Not Triggered
88.	The Applicant shall provide a report to the Indigenous Heritage Monitoring undertaken for the Stage II project to DECCW and the Director-General within two months of the Heritage Monitoring being completed. Note: Under Section 86 of the National Parks and Wildlife Act 1974, it is an offence to disturb or excavate any land with the purpose of discovering an Aboriginal object without first obtaining a Section 87 permit.	Condition not activated during the audit period.	Not Triggered



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No.	Consent Condition	Evaluation	Finding
	Aboriginal Heritage – EM38		
88A.	The Applicant shall ensure that development of EM38 and upgrade of the gas gathering lines are undertaken in accordance with the recommendations in the reports titled Aboriginal Cultural Heritage Survey and Assessment Report – Camden Gas Joint Venture Project – Proposed Gas Well Location and Gas Gathering System Modifications, Camden, NSW dated February 2007, and Aboriginal Heritage Assessment – Sugarloaf Twin Gathering Line, Rosalind Park dated 8 September 2006.	Condition not activated during the audit period.	Not Triggered
	Aboriginal Heritage – EM39 and GL17		
88B.	The Applicant shall ensure that development of EM39 and GL17 and upgrade of the gas gathering lines are undertaken in accordance with the recommendations outlined in the cultural heritage assessment carried out by Biosis Research Pty Ltd in Appendix B of the Statement of Environmental Effects titled <i>Camden Gas Project Joint Venture – EM39 and GL17 Modification Project</i> .	Condition not activated during the audit period.	Not Triggered
	NON-INDIGENOUS HERITAGE		
	Protection of the Heritage Landscape of EMAI		
89.	The Applicant shall implement all mitigatory measures listed in Sections 7.1, 7.2 and 7.3 of the report titled Statement of Heritage Impact for Land within the Elizabeth Macarthur Agricultural Institute NSW Agriculture, Menangle by Geoffrey Britton dated September 2003.	Condition not activated during the audit period.	Not Triggered
90.	The Applicant shall ensure roadside plantings for sites EM 16, EM 18, EM 19 and EM 20 are strengthened using the species outline provided in the report titled Statement of Heritage Impact for Land within the Elizabeth Macarthur Agricultural Institute NSW Agriculture, Menangle by Geoffrey Britton dated September 2003. Note: a relic is defined under the Heritage Act as any deposit, object or	Condition not activated during the audit period.	Not Triggered



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No.	Consent Condition	Evaluation	Finding
	material evidence: <ul style="list-style-type: none"> ■ which relates to the settlement of the area that comprises NSW, not being Aboriginal settlement; and ■ which is more than 50 years old. 		
90A.	The Applicant shall ensure that, if any historical archaeological relics within the meaning of the <i>Heritage Act 1977</i> are disturbed, the Heritage Council of NSW shall be notified in accordance with section 146 of the <i>Heritage Act 1977</i> .	Condition not activated during the audit period.	Not Triggered
SAFETY AND RISK MANAGEMENT			
Risk Assessment			
Pre-Construction Studies			
91.	The Applicant shall prepare and submit for the approval of the Director-General at least one month prior to the commencement of construction of the development (except for construction of those preliminary works that are outside the scope of the hazard studies), or within such further period as the Director-General may agree, the studies set out under subsections (a) to (c) (the pre-construction studies). Construction, other than of preliminary works that do not adversely affect facility safety, shall not commence until approval has been given by the Director-General and, with respect to the fire safety study, approval has also been given by the Commissioner of the NSW Fire Brigades.	Condition closed in a previous audit.	Not Triggered
	(a) Fire Safety Study A fire safety study for the gas treatment plant of the proposed development. This study shall cover relevant aspects of the Department's Hazardous Industry Planning Advisory Paper No. 2, Fire Safety Study Guidelines. The study shall also be submitted for approval, to the NSW Fire Brigade.		Not Triggered



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No.	Consent Condition	Evaluation	Finding
	<p>(b) Hazard and Operability Study</p> <p>Updated Hazard and Operability (HAZOP) Studies for the development, chaired by an independent qualified person approved by the Director-General prior to the commencement of the study. The studies shall cover any significant changes to the gas treatment plant or gas wells, since the HAZOPs carried out by Kvaerner E & C (Australia) Pty Limited (report dated 15 November 2002) and Worley Pty Ltd (report dated 13 March 2003). The updated HAZOPs shall be carried out in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 8, HAZOP Guidelines. The reports shall also cover the implementation status of all recommendations arising out of the original studies.</p>		Not Triggered
	<p>(c) Final Hazard Analysis</p> <p>A final hazard analysis of the development, focusing on design changes since preparation of the preliminary hazard analysis, which significantly affect the risk results. The analysis should be prepared in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 6, Guidelines for Hazard Analysis.</p>		Not Triggered
	<p>Pre-commissioning Studies</p>		
92.	<p>The Applicant shall develop and submit for the approval of the Director-General, at least one month prior to the commencement of the commissioning of the development, or within such further period as the Director-General may agree, the plans and systems set out under subsections (a) and (b) (the pre-commissioning studies). Commissioning shall not commence until approval has been given by the Director-General. The Applicant shall implement the plans and systems set out under subsections (a) and (b) (the pre-commissioning studies).</p>	<p>The Auditor sighted the Emergency Response Plan (November 2013) and the Health and Safety Management Plan, Camden Project NSW (3 August 2011) and noted compliance with this condition. The updated Emergency Response Plan was provided to DoPE on 20/10/13.</p> <p>The Plans note earlier revisions which were approved by the then Department of Infrastructure Planning and Natural Resources.</p>	Compliance
	<p>(a) Emergency Plan</p> <p>A comprehensive emergency plan and detailed emergency procedures for the development, including the gas wells and gas treatment plant. This plan shall include detailed procedures for the safety of all people</p>	<p>This condition was recorded within a Sydney Gas Projects Commitments Register as completed and</p>	Compliance



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No.	Consent Condition	Evaluation	Finding
	outside of the development who may be at risk from the development. The plan shall be in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 1, Industry Emergency Planning Guidelines.	approved by the Director-General on 6 September 2004. Emergency evacuation drills are undertaken at least annual and record in AGL's scheduling database (MEX) as sighted by the Auditor.	
	(b) Safety Management System A document setting out a comprehensive safety management system, covering all operations on the gas wells, gathering system and gas treatment plant. The document shall clearly specify all safety related procedures, responsibilities and policies, along with details of mechanisms for ensuring adherence to procedures. Records shall be kept on-site and shall be available for inspection by the Director-General upon request. The Safety Management System shall be developed in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 9, Safety Management.		Compliance
	Compliance Report		
93.	The Applicant shall submit to the Director-General one month prior to the commissioning of the plant, or within such period approved by the Director-General, a compliance report detailing compliance with Conditions 91 and 92, including:	Condition closed in a previous audit.	Not Triggered
	(a) dates of study submission, approval, commencement of construction and commissioning;		Not Triggered
	(b) actions taken or proposed, to implement recommendations made in the studies; and		Not Triggered
	(c) responses to any requirement imposed by the Director-General.		Not Triggered
	Incident Report		
94.	The Applicant is required within 24 hours of any incident or potential incident with actual or potential significant off-site impacts on people or the biophysical environment, to supply a report to the Department outlining the basic facts. A further detailed report shall be prepared and	The Auditor sighted the Emergency Response Plan (November 2013) and the Health and Safety Management Plan, Camden Project NSW (November 2013) and noted compliance with the requirements of	Compliance



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	<p>submitted following investigations of the causes and identification of necessary additional preventive measures. That report must be submitted to the Director- General no later than 14 days after the incident or potential incident.</p> <p>The Applicant shall maintain a register of accidents, incidents and potential incidents. The register shall be made available for inspection at any time by the independent hazard auditor and the Director-General.</p>	<p>this condition.</p> <p>AGL reported with reference to AGL's incident reporting databases (formerly ConnectFirst, currently MyHSE) that there were no environmental incidents associated with this Development Consent during the audit period, and therefore no incidents reported to the Director-General.</p>	
	<p>Hazard Audit</p>		
95.	<p>Twelve months after the commencement of operations of the proposed development or within such further period as the Director-General may agree, the Applicant shall carry out a comprehensive hazard audit of the proposed development and within one month of the audit submit a report to the Director-General. The audit shall be carried out at the Applicant's expense by a duly qualified independent person or team approved by the Director-General prior to commencement of the audit. Further audits shall be carried out every three years or as determined by the Director-General and a report of each audit shall within a month of the audit be submitted to the Director-General. Hazard audits shall be carried out in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 5, Hazard Audit Guidelines.</p> <p>The audit shall include a review of the safety management system and a review of all entries made in the incident register since the previous audit.</p> <p>Note: The Applicant must comply with the requirements of the most recent version of the 'Schedule of Onshore Exploration and production Safety Requirements' published by the DII in August 1992 where equipment and/or pipeline are on a Production Lease.</p>	<p>AGL received a letter of approval for the Audit team from DoPE dated 4/7/2012.</p> <p>The report titled 2012 Hazard Audit, AGL Rosalind Park Gas Plant, Medhurst Road, Gilead, prepared by AECOM, dated 24/10/2013 was forwarded to the DoPE on 4/11/2013.</p>	Compliance
	<p>Crime Risk Performance</p>		
96.	<p>The Applicant is required to implement measures to minimise the risk of crime from the proposed development. The Applicant shall implement the following measures prior to the operation of the proposed</p>	<p>Condition noted.</p>	



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No.	Consent Condition	Evaluation	Finding
	development.		
	Gas Treatment Plant		
	<p>The Applicant is required to:</p> <ul style="list-style-type: none"> (a) ensure the Plant is closed to community access; (b) fully enclose the Plant with a 3-metre metal framed chain mesh fence with a 3-strand barbed wire head; (c) ensure the Plant is gated and manned 24 hours per day; (d) keep vehicular and pedestrian gates closed at all times (when not in immediate use); (e) use self-closing and self-locking pedestrian gates; (f) use gate locking mechanisms that facilitate emergency egress; and (g) ensure plant staff are adequately trained in undertaking security functions. 	The Auditor inspected the RPGP and noted that it complies with this condition.	Compliance
	Gas Wellhead Sites		
	<p>The Applicant is required to:</p> <ul style="list-style-type: none"> (a) install fixed (permanent) perimeter fencing and gates around each well head. The fencing and gates should be 3 metres high (all inclusive) metal framed and topped with a 3-strand barbed wire head; and 	The Auditor inspected a sample of wellhead locations and noted that the security fencing and gates are 2.4 metres high (not three metres as required by this condition). Nonetheless there is no indication that the lower height of 2.4 metres has caused any security issues and the Auditor deems compliance with the requirements of this condition.	Compliance
	<ul style="list-style-type: none"> (b) keep gates securely hinged and permanently locked, unless otherwise agreed by NSW Police. 	Gates were observed by the Auditor to be securely hinged and permanently locked.	Compliance



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No.	Consent Condition	Evaluation	Finding
	Dangerous Goods		
97.	The Applicant shall ensure that the storage, handling, and transport of:	The auditor sighted the Dangerous Goods and Hazardous Materials Sub-Plan (April 2014) and noted the inclusion of procedures for the assessment and management of risk. AGL reported that no explosives are stored at the site and that methyl mercaptan is transported via a licenced contractor (Chemcouriers or Mainfreight) organised by the supplier (ICE Pty Ltd).	Not Triggered
	(a) Dangerous goods is done in accordance with the relevant Australian Standards, particularly AS1940 and AS1596, and the Dangerous Goods Code; and		Not Triggered
	(b) Explosives are carried out in accordance with the requirements of DII.		Not Triggered
	WASTE		
	Operating Conditions		
	Note: These conditions only apply to the storage, treatment, processing, reprocessing or disposal of waste at the premises if it requires an environment protection licence under the Protection of the Environment Operations Act 1997. Incorporates a DECCW General Term of Approval	The AGL Environmental Footprint spreadsheet for the financial years 2012/2013 and 2013/2014 provide detailed records of waste streams generated, recycled/reused and disposed, including concrete and steel, water, hazardous waste, non-hazardous waste, and ozone-depleting substances.	Compliance
98.	The Applicant must not cause, permit or allow any waste generated outside the premises to be received at the premises for storage, treatment, processing, reprocessing or disposal or any waste generated at the premises to be disposed of at the premises, except as expressly permitted by a licence under the Protection of the Environment Operations Act 1997.	AGL reported that no wastes are received, or disposed, at the premises. It is noted that a waste audit was not within the scope of this independent audit.	Compliance
99.	Except as provided by any other condition of this consent, only the hazardous and/or industrial and/or Group A waste listed below may be generated and/or stored at the premises: <ul style="list-style-type: none"> ■ Waste oil/water, hydrocarbons/water mixtures or emulsions. 	The AGL Environmental Footprint spreadsheet for the financial years 2012/2013 and 2013/2014 provide detailed records of waste streams generated, recycled/reused and disposed, including concrete and steel, water, hazardous waste, non-hazardous waste, and ozone-depleting substances. The wastes generated and/or stored at the premises are	Compliance



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No.	Consent Condition	Evaluation	Finding
		<p>consistent with this condition.</p> <p>AGL reported that no waste generated off-site and accepted at the site.</p> <p>It is noted that a waste audit was not within the scope of this independent audit.</p>	
100.	Deleted	Condition deleted.	
101.	Deleted	Condition deleted.	
102.	Deleted	Condition deleted.	
103.	The Applicant must ensure that any hazardous, industrial or Group A waste at the premises is assessed and classified in accordance with the DECCW's Environmental Guidelines: Assessment Classification and Management of Liquid and Non-Liquid Wastes in force as at 1 July 2003.	<p>The AGL Environmental Footprint spreadsheet for the financial years 2012/2013 and 2013/2014 provide detailed records of waste streams generated, recycled/reused and disposed, including concrete and steel, water, hazardous waste, non-hazardous waste, and ozone-depleting substances.</p> <p>AGL advised that the waste service provider undertakes any required waste classification.</p> <p>The Auditor sighted copies of Safety Data Sheets (SDS) used to advise waste contractors of waste characteristics and correspondence describing the characteristics of other waste materials (e.g. oily water).</p> <p>It is noted that the premises does not generate significant quantities of waste material of unknown composition and requiring classification.</p> <p>It is noted that a waste audit was not within the scope of this independent audit.</p>	Compliance



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No.	Consent Condition	Evaluation	Finding
104	The Applicant must ensure that waste identified for recycling is stored separately from other waste.	<p>AGL reported that a number of waste streams are separated for recycling, including cardboard, batteries, oil filters, scrap metal and paper. The Auditor verified this status via review of AGL's Environmental Footprint Spreadsheet for the financial years 2012/2013 and 2013/2014 and waste transport documentation.</p> <p>The Spreadsheets provide detailed records of waste streams generated, recycled/reused and disposed, including concrete and steel, water, hazardous waste, non-hazardous waste, and ozone depleting substances. AGL's Environmental Footprint is subject to independent audit.</p> <p>The Auditor observed the segregation of waste identified for recycling, including waste oil, oil filters, steel, paper, cardboard, plastics, timber and produced water.</p>	Compliance
105	Any movement of hazardous, industrial or Group A waste from the premises must be conducted in accordance with the DECC's waste tracking requirements. A copy of these tracking requirements is included in Schedule 8.	<p>The Auditor sighted a sample of waste tracking documentation and noted individual records to be complete. Waste tracking documentation was found to align with AGL's Environmental Footprint Spreadsheet for the financial years 2012/2013 and 2013/ 2014. These Spreadsheets provide detailed records of hazardous, industrial and Group A waste and are audited by AGL.</p> <p>The individual waste records were not considered by the Auditor to be comprehensively filed to enable rapid verification of tracking of all waste movements from the Camden Gas Project. It was also recommended that the Transport Certificate Numbers be included in the Environmental Footprint Spreadsheet. AGL undertook improvements during the audit to address this matter.</p> <p>It is noted that a waste audit was not undertaken as part of this independent audit.</p>	Compliance



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No.	Consent Condition	Evaluation	Finding
106	<p>Waste Management Plan</p> <p>The Applicant shall prepare and implement a Waste Management Plan for the whole site. This plan shall include, but not necessarily be limited to:</p>	The Waste Management Sub-Plan (April 2014) complies with this condition.	Compliance
	a) Measures to minimise the production and impact of waste produced at the site during drilling and operation.		Compliance
	b) Implementation of waste reduction, reuse and recycling principles.		Compliance
	c) Details of the reuse and recycling of waste water produced/collected on the site, including collection and handling procedures.		Compliance
	d) Details of appropriate disposal methods in the event that reuse and recycling are not available or are not practicable.		Compliance
	e) Programs for involving and encouraging employees and contractors to minimise domestic waste production on the site and reuse/recycle where appropriate. Key concepts of the plan and management measures should be submitted and approved by the Director-General prior to substantial construction. The plan shall be fully completed and approved by the Director-General prior to commissioning.		Compliance
107	Condition was not activated during the audit period.	Condition was not activated during the audit period.	Not Triggered
108	Condition was not activated during the audit period.	Condition was not activated during the audit period.	Not Triggered
109	The Applicant shall ensure that all heavy vehicles only travel along access roads designated for such vehicles.	<p>The Transport Management Sub-Plan (August 2008) addresses the requirement of this condition.</p> <p>AGL reported that vehicle operators are notified of specified access routes during the induction process.</p>	Compliance
110	The Applicant shall ensure that during and immediately following heavy rainfall events, vehicle movements to gas well sites and / or gas gathering systems will cease.	The Soil and Water Management Sub-Plan (April 2014) addresses the requirement of this condition.	Compliance



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No.	Consent Condition	Evaluation	Finding
111	On completion of drilling and fracking activities, the Applicant shall rehabilitate soils affected by compaction. This rehabilitation shall be conducted in consultation with a representative from EMAI.	Condition was not activated during the audit period.	Not Triggered
112	<p>Works within the Wollondilly Shire Council Road Reserve</p> <p>The Applicant shall prepare a Road Reserve Environment Management Plan (EMP) in consultation with Wollondilly Shire Council and Campbelltown City Council. The Road Reserve EMP shall be submitted to the Director-General for approval one month prior to the construction of the gas gathering line within the Road Reserve or within such period as approved the Director-General. The Road Reserve EMP shall include:</p>	Condition closed in a previous audit.	Not Triggered
112(a)	Proposed construction methods.	Condition closed in a previous audit.	Not Triggered
112(b)	Soil erosion and sediment control measures for works undertaken during construction and following completion of the works.		Not Triggered
112(c)	Traffic control plans.		Not Triggered
112(d)	Techniques for construction of the gas gathering line across Menangle Bridge.		Not Triggered
113	The Applicant shall liaise with Wollondilly Shire Council regarding the proposed crossing of the gas gathering line across Menangle Bridge and undertake the proposed works to the satisfaction of Wollondilly Shire Council.	Condition closed in a previous audit.	Not Triggered
114	<p>M5 Underbore – Menangle Park</p> <p>The Applicant shall conduct the underboring of the M5 road to the satisfaction of the RTA. The Applicant shall ensure that the M5 underbore:</p>	Condition closed in a previous audit.	Not Triggered
114(a)	Has a minimum depth of 1.2 metres at the lowest point of the road formation.		Not Triggered



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No.	Consent Condition	Evaluation	Finding
114(b)	Excavation for the thrust pits are outside the Freeway Reserve.		Not Triggered
114(c)	Requires no access from within the Freeway for construction or maintenance purposes; unless otherwise agreed by the RTA.		Not Triggered
115	<p>BUSHFIRE</p> <p>Bushfire Hazard Measures</p> <p>The Applicant shall implement the following bushfire hazard measures at the site:</p>	Condition closed in a previous audit.	Not Triggered
115(a)	Provision of a two-lane access road to the Treatment Plant area from Menangle Road.	Condition closed in a previous audit.	Not Triggered
115(b)	Provision of a 20 metre asset protection zone managed as an inner protection area, around the perimeter of the Gas Treatment Plant and gas well sites.	This obligation is inconsistent with the landscaping obligations, i.e. the requirement to have trees on the southern boundary of the RGP site and is not physically possible at some well sites due to land tenure or flora protection considerations.	Not Triggered
115(c)	Provision of a dedicated water supply tank of 20,000 Litres for the sole use of fire-fighting.	Condition closed in a previous audit.	Not Triggered
115(d)	<p>Provision of the location of gas wells, access roads to the gas well sites and access roads to the Gas Treatment Plant Site to the NSW Rural Fire Service.</p> <p>Note: The terms Asset Protection Zone and Inner Protection Area as specified in this Condition are defined within the Planning for Bushfire Protection 2001 Guidelines published jointly by the NSW Rural Fire Service and the Department.</p>	Condition closed in a previous audit.	Not Triggered
116	<p>Measures for the Living Quarters Building</p> <p>The Applicant shall consult with the NSW Rural Fire Service and lodge an application to the NSW Rural Fire Service for any approval or</p>	Condition closed in a previous audit.	Not Triggered



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No.	Consent Condition	Evaluation	Finding
	authorisation required in respect to the structure identified as Living Quarters.		
117	The Applicant shall comply with the requirements of any such further approval or authorisation granted by the NSW Rural Fire Service in respect of the structure Living Quarters.	Condition closed in a previous audit.	Not Triggered
118	The Applicant shall construct and maintain the building Living Quarters and the surrounding area in accordance with the requirements of the Planning for Bushfire Protection 2001 Guidelines published jointly by the NSW Rural Fire Service and the Department.	Condition closed in a previous audit.	Not Triggered
119	<p>Bushfire Management Plan</p> <p>The Applicant shall prepare and implement a Bushfire Management Plan for the whole site. This plan shall be prepared prior to the commissioning of the development and be prepared to the satisfaction of the Rural Fire Service having regard to any standard local government bushfire related requirements. The plan shall be submitted to the Director-General prior to commissioning and include, but not necessarily be limited to:</p>	The Emergency Response Plan (November 2013) addresses this condition. Correspondence records confirmed that AGL provided an updated draft of the Plan to the Rural Fire Service. The Service inspected the RGP site on 27/08/2013 following receipt of the Sub-Plan.	Compliance
119(a)	Adequate fire protection works, fire fighting equipment and hazard reduction measures with particular attention to boundaries of adjoining landholdings.	The Emergency Response Plan (November 2013) addresses the requirements of this condition.	Compliance
119(b)	An annual report on fire management activities to the Campbelltown Fire Management Committee.	An annual report on fire management activities is not submitted specifically to the Campbelltown Fire Management Committee. It is noted that AGL is liaising with the Bush Fire Brigades as part of fire preparedness activities. Details on AGL's bushfire management measures and annual performance are included within the AEPR, which is publicly available including to the Campbelltown Fire Management Committee. It is recommended that the Campbelltown Fire Management Committee be notified annually of the information in the	Compliance – Improvement Recommended



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No.	Consent Condition	Evaluation	Finding
		AEPR regarding bushfire management to better comply with this obligation.	
119(c)	The incorporation of relevant bushfire hazard measures and policies of the three Councils.	<p>The Emergency Response Plan (November 2013) references the Macarthur Bush Fire Risk Management Plan which forms the bushfire hazard measures and policies of the three Councils, which form the Macarthur Region of Councils.</p> <p>AGL has reviewed and incorporated the bushfire hazard measures and policies of the three Councils as documented in the Macarthur Bushfire Risk Management Plan. It is recommended that the Emergency Response Plan state that it incorporates the relevant bushfire hazard measures and policies of the three Councils. (Opportunity for Improvement)</p>	Compliance – Improvement Recommended
120	<p>REHABILITATION</p> <p>Site Rehabilitation Performance</p> <p>The Applicant shall ensure the prompt and effective rehabilitation of all disturbed areas of the site following the completion of construction, operations and associated activities and/or the decommissioning of plant, to minimise the generation of wind erosion dust.</p>	<p>The Rehabilitation and Landscape Management Sub-Plan (April 2014) addresses the requirements of this condition.</p> <p>AGL reported that no rehabilitation works were required or undertaken under this Development Consent during the audit period.</p>	Not Triggered
121	The Applicant shall carry out rehabilitation of the site in accordance with the requirements of the DOPE.	Condition was not activated during the audit period.	Not Triggered
122	The Applicant shall ensure that all areas of earthworks associated with the construction of the gas gathering system are rehabilitated to the pre-existing site conditions on completion of construction.	<p>The Rehabilitation and Landscape Management Sub-Plan (April 2014) addresses the requirements of this condition.</p> <p>AGL reported that no earthworks were undertaken under this Development Consent during the audit period.</p>	Not Triggered



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No.	Consent Condition	Evaluation	Finding
123	<p>Rehabilitation of Gas Gathering System \ Stream Crossings</p> <p>The Applicant shall ensure that for all trenched crossings, the natural bed and bank profiles are restored to their original conditions, with smooth and even surfaces following the installation of the gas pipe.</p>	<p>The Rehabilitation and Landscape Management Sub-Plan (April 2014) addresses the requirements of this condition.</p> <p>AGL reported that no trenched crossings were undertaken under this Development Consent during the audit period.</p>	Not Triggered
124	<p>The Applicant shall stabilise and rehabilitate as soon as possible all disturbed soil surfaces with sterile exotic cover crops and local native grasses. The Applicant is not permitted to use Kikuyu and other invasive grass species.</p>	<p>AGL advised that no areas were disturbed under this Development Consent during the audit period.</p>	Not Triggered
125	<p>The Applicant shall maintain and monitor all rehabilitated riparian zones for a period of at least two years after final planting. Maintenance must include sediment and erosion control, watering, weed control, replacement of plant losses, disease and insect control, mulching and any other requirements for achieving successful vegetation establishment. Note: The Director-General may require the Applicant to prepare and implement a Vegetation Management Plan and remedial works if disturbance is deemed excessive.</p>	<p>The Rehabilitation and Landscape Management Sub-Plan (April 2014) addresses the requirements of this condition.</p> <p>AGL reported that no rehabilitation maintenance works were required or undertaken under this Development Consent during the audit period.</p>	Not Triggered
126	<p>CONFIRMATION OF PROJECT COMPONENTS</p> <p>Gas Flare Design Report</p> <p>The Applicant shall submit a written report at least one month prior to the commissioning of the flare, to the DECC's Manager Sydney Industry PO Box 668 Parramatta NSW 2124, containing the following information:</p>	<p>Condition closed in a previous audit.</p>	Not Triggered
126(a)	<p>Describe best practice flare design and, in particular, identify flare design and operational conditions that minimise emissions of air pollutants (including VOCs and nitrogen oxides), maximise destruction of hydrocarbons and maximise dispersion of air pollutants.</p>		Not Triggered



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No.	Consent Condition	Evaluation	Finding
126(b)	Benchmark the design of the proposed Stage II flare against best practice as identified in subclause (a).		Not Triggered
126(c)	Assess the ability of the proposed Stage II flare to meet a destruction efficiency of 98% for VOCs plus methane.		Not Triggered
126(d)	Identify any changes in the design of the proposed Stage II flare required to meet the best practice requirements identified in a) and the destruction efficiency and nitrogen oxides emission rate specified in subclause (c) and any difficulties in making these changes.		Not Triggered
126(e)	Using the results of subclauses (a) to (d), identify the optimum temperature and residence time to achieve maximum destruction efficiency for the proposed flare design. Note: This condition confirms the gas flare structure and specifications.		Not Triggered
Gas Gathering System			
127	The Applicant shall comply with the following in the construction of the gas gathering system pipeline:	The EMP addresses the requirements of this condition. AGL reported that no gas gathering system construction was undertaken under this Development Consent during the audit period.	Not Triggered
127(a)	Signs stating the presence of a buried gas pipeline shall be erected periodically along the length of the trench once the pipeline has been laid.		Not Triggered
127(b)	Trenches are to be restored and reseeded with local grass seeds on completion of the work.		Not Triggered
127(c)	Local council traffic guidelines in respect of work carried out on road verges and underneath roads shall be implemented.		Not Triggered
127(d)	The Applicant shall construct the gas gathering system so as not to impeach lateral water flows.		Not Triggered



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No.	Consent Condition	Evaluation	Finding
127(e)	The Applicant shall ensure that no crown or camber remains along the gas gathering systems, following construction.		Not Triggered
127(f)	The pipeline shall be designed, constructed and operated in accordance with the Australian Standard for the installation and maintenance of Plastic Pipe Systems for Gas AS 3723-1989.		Not Triggered
127(g)	The Department shall be notified on the completion of any trenching works.	AGL reported that no trenching works were carried out under this Development Consent during the audit period.	Not Triggered
128	<p>Menangle Park Urban Release</p> <p>Should the future Local Environmental Plan and/or Master Plan for the Menangle Park urban release area identify the need to relocate any gas gathering lines the subject of this consent to ensure an efficient and environmentally sustainable urban outcome, that infrastructure shall be relocated by, and at the cost of the applicant to the satisfaction of the Director-General following consultation with Campbelltown City Council.</p>	Condition noted.	Not Triggered
	<p>SCHEDULE 5</p> <p>ENVIRONMENTAL MANAGEMENT, MONITORING, AUDITING AND REPORTING</p>		
1	<p>CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN</p> <p>The Applicant shall prepare and implement a Construction Environmental Management Plan (CEMP) to provide environmental management, practices and procedures to be followed during the drilling and construction phases of the proposed development. A framework plan outlining key practices, procedures and environmental management practices should be approved by the Director-General prior to the commencement of substantial construction. Sub-plans detailing implementation measures shall be submitted for approval at various stages of construction as agreed by the Director-General.</p>	Condition not activated during the audit period.	Not Triggered



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No.	Consent Condition	Evaluation	Finding
2	<p>OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN</p> <p>The Applicant shall prepare and implement an Operational Environmental Management Plan (OEMP) to provide environmental management practices and procedures to be followed during the operation of the development. The OEMP shall be forwarded to the Director-General for approval one month prior to commissioning. The OEMP shall include, but not necessarily be limited to:</p>	<p>The EMP (March 2014) addresses the requirements of this condition. The 2014 revision of the EMP was approved by DoPE on 24/03/2014.</p>	Compliance
2(a)	Identification of all statutory and other obligations that the Applicant is required to fulfil in relation to operation of the development, including all consents, licences, approvals and consultations.		Compliance
2(b)	A description of the roles and responsibilities for all key personnel involved in the drilling and operation of the development.		Compliance
2(c)	The overall environmental policies and principles to be applied to the operation of the development.		Compliance
2(d)	Standards and performance measures to be applied to the development, and a means by which environmental performance can be periodically reviewed and improved.		<p>The previous audit reported that performance against targets in the EMP was not being measured and recommended that performance targets be measured to drive continual improvement in performance. The EMP (March 2014) states that performance against objectives and targets will be reported in the AEPR. This was undertaken in the most recent AEPR, however, the linkages between the set objectives/targets and performance could be clearer.</p>
2(e)	Management policies to ensure that environmental performance goals are met and to comply with conditions of this consent.	The EMP (March 2014) addresses the requirements of this condition.	Compliance
3	The Applicant shall supply a copy of the CEMP and OEMP to the DECC, DOPE, Camden Council, Campbelltown City Council and Wollondilly Shire Council within fourteen days of the Director-General's approval. The Applicant shall ensure that a copy of the CEMP and	The OEMP comprises the EMP and the Sub-Plans. The EMP was updated on 14 March 2014 and provisionally approved by the Director General of DoPE on 24 March 2014. The updated Sub-Plans were forwarded to DoPE on 28 May 2014 and are currently being reviewed.	Compliance



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No.	Consent Condition	Evaluation	Finding
	OEMP is publicly available.	Upon final approval by the Department, the Sub-Plans will be forwarded to the Councils. The EMP is publicly available via AGL's website.	
4	The Applicant shall review and update the OEMP annually, or as directed by the Director-General. Note: Submission of a copy of the approved Plan to other Government agencies does not mean that their approval is required. The Plan is for the information of the agency.	The EMP was not reviewed and updated annually as required by this condition. It was issued as an approved document in July 2012 and March 2014. The Sub-Plans were updated at frequencies varying from two to six years. Each of the documents has been updated in the last year or is in the process of being updated (Air Quality and Traffic Management Sub-Plans).	Non-Compliance Level 2
5	ANNUAL ENVIRONMENTAL PERFORMANCE REPORTING Within twelve months of the date of this consent, and annually thereafter during the life of the development, the Applicant shall submit an Annual Environmental Performance Report to the Director-General. This report shall include, but not be limited to:	The AEPRs for the years 2012/2013 and 2013/2014 address the requirements of this condition. The Report for 2013/2014 was available in draft form at the time of this audit.	Compliance
5(a)	The standards, performance measures and statutory requirements the development is required to comply with.		Compliance
5(b)	An assessment of the environmental performance of the development to determine whether it is complying with these standards, performance measures, and statutory requirements.		Compliance
5(c)	Reporting against the implementation of the Project Commitments Register.		Compliance
5(d)	Copy of the Complaints Register for the preceding twelve month period and indicating what actions were (or are being) taken to address these complaints.		Compliance
5(e)	Indication of what actions were taken to address any issue and/or recommendation raised by the Community Consultative Committee.		Compliance



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No.	Consent Condition	Evaluation	Finding
5(f)	Provision of the detailed results of all the monitoring required by this consent.		Compliance
5(g)	Review of the results of this monitoring against: <ul style="list-style-type: none"> ■ impact assessment criteria; ■ monitoring results from previous years; and ■ predictions in the EIS 		Compliance
5(h)	Identify any non-compliance during the year.		Compliance
5(i)	Identify any significant trends in the data.		Compliance
5(j)	If any non-compliance is detected, describe what actions and measures would be carried out to ensure compliance, clearly indicating who would carry out these actions and measures, when they would be carried out, and how the effectiveness of these measures would be monitored over time.		Compliance
6	The Director-General may require the Applicant to address certain matters identified in the Annual Environmental Performance Report. Any action required to be undertaken shall be completed within such period as the Director-General may agree.	There were no matters identified by the Director-General during the audit period.	Not Triggered
7	The Applicant shall also submit a copy of the Annual Environmental Performance Report to the DECC, DOPE, Camden Council, Campbelltown City Council and Wollondilly Shire Council. The Applicant shall make a copy of the Report publicly available.	The Auditor sighted correspondence confirming that the 2012/2013 AEPR was sent to all relevant agencies in October 2013. The 2013/2014 Report was finalised in December 2014 and a copy placed on AGL's website.	Compliance
	<p>INDEPENDENT ENVIRONMENTAL AUDIT – CONSTRUCTION AT EMAI</p> <p>The Applicant shall commission and pay the full costs of an Independent Environmental Audit of the construction of the gas gathering system, construction of the access roads and drilling and</p>	Condition closed in a previous audit.	Not Triggered



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No.	Consent Condition	Evaluation	Finding
	fracking of gas wells on the EMAI. The objective of the audit is to monitor the performance and effect of construction activities on the EMAI.		
8	<p>The Independent Environmental Audit shall: (a) be conducted by a suitably qualified, experienced, and independent person(s) whose appointment has been approved by the Director-General; and (b) be consistent with ISO 19011:2002 - Guidelines for Quality and/ or Environmental Management Systems Auditing, or updated versions of these guidelines/manuals.</p> <p>The Audit shall:</p> <p>(a) assess the environmental performance of the construction of the development on EMAI, and its effects on the surrounding environment;</p> <p>(b) assess whether the development is complying with the relevant standards, performance measures, and statutory requirements;</p> <p>(c) consider the Applicant's proposed Construction Environmental Management Plan for the EMAI Site; and</p> <p>(d) recommend measures or actions to improve the environmental performance of the construction of the development on EMAI, and/or its environmental management and monitoring systems (if required).</p>	Condition closed in a previous audit.	Not Triggered
9	Within one month of completion of the audit, the Applicant must submit a copy of the audit report to the Director-General, the NSW Heritage Office and NSW Agriculture. The Director-General may require the Applicant to address certain matters identified in the report and any comments received from the NSW Heritage Office and NSW Agriculture. Any action required to be undertaken shall be completed within such period as the Director-General may agree.	Condition closed in a previous audit.	Not Triggered



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No.	Consent Condition	Evaluation	Finding
10	<p>INDEPENDENT ENVIRONMENTAL AUDIT\OPERATION</p> <p>Within two years of the date of this consent and every two years thereafter, unless the Director-General directs otherwise, the Applicant shall commission and pay the full costs of an Independent Environmental Audit. The Independent Environmental Audit shall:</p>	The scope of this 2012 – 2014 Independent Environmental Audit addresses this condition.	Compliance
	a) Be conducted by a suitably qualified, experienced, and independent person(s) whose appointment has been approved by the Director-General.		Compliance
	b) consistent with ISO 19011:2002 - Guidelines for Quality and/ or Environmental Management Systems Auditing, or updated versions of these guidelines/manuals.		Compliance
	c) Assess the environmental performance of the development, and its effects on the surrounding environment.		Compliance
	d) Assess whether the development is complying with the relevant standards, performance measures, and statutory requirements.		Compliance
	e) Review the adequacy of the Applicant's Environmental Management Plan.		Compliance
	f) Recommend measures or actions to improve the environmental performance of the development, and/or its environmental management and monitoring systems.		Compliance
11	Within two months of commissioning the audit, the Applicant must submit a copy of the audit report to the Director-General, DECC and the DOPE.	DoPE approved an extension to this condition to provide consistency with other similar Development Consent conditions, and now require submission of the audit report within three months of completion	Not Triggered



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No.	Consent Condition	Evaluation	Finding																										
12	<p>ASSESSABLE POLLUTANTS – LOAD LIMITS</p> <p>The Applicant shall pay the load based licensing fees once a licence under the Protection of the Environment Operations Act 1997 has been issued. The licence will identify the assessable pollutants for each fee-based activity classification. These assessable pollutants will be required to be monitored and pollutant loads calculated in accordance with the DECC’s Load Calculation Protocol. The assessable pollutants and load limits applicable to this activity are given in the table below.</p> <table border="1" style="width: 100%; border-collapse: collapse; margin: 10px 0;"> <thead> <tr> <th style="text-align: center;">Assessable Pollutant</th> <th style="text-align: center;">Load Limit (kg)</th> </tr> </thead> <tbody> <tr><td>Benzene (air)</td><td style="text-align: center;">47</td></tr> <tr><td>Benzo (a) pyrene (air)</td><td style="text-align: center;">0.27</td></tr> <tr><td>Fine particles (air)</td><td style="text-align: center;">460</td></tr> <tr><td>Hydrogen sulphide (air)</td><td style="text-align: center;">1.6</td></tr> <tr><td>Nitrogen oxides (air)</td><td style="text-align: center;">103000</td></tr> <tr><td>Sulphur oxides (air)</td><td style="text-align: center;">3000</td></tr> <tr><td>Volatile organic compounds (air)</td><td style="text-align: center;">33000</td></tr> <tr><td>Total suspended solids (water)</td><td style="text-align: center;">360</td></tr> <tr><td>Biochemical oxygen demand (water)</td><td style="text-align: center;">370</td></tr> <tr><td>Oil and grease (water)</td><td style="text-align: center;">96</td></tr> <tr><td>Total PAHs (water)</td><td style="text-align: center;">0.14</td></tr> <tr><td>Total phenolics (water)</td><td style="text-align: center;">0.1</td></tr> </tbody> </table> <p>Note: An assessable pollutant is a pollutant which affects the licence fee payable for the licence. The above load limits in the table may be revised after submission of annual returns for the first three years of operation of the plant. Note: Clause 17(1) and (2) of the Protection of the Environment Operations (General) Regulation 1998 requires that monitoring of actual loads of assessable pollutants listed in Condition 12 (above) must be carried out in accordance with the testing method set out in the relevant load calculation protocol for the fee-based activity classification.</p>	Assessable Pollutant	Load Limit (kg)	Benzene (air)	47	Benzo (a) pyrene (air)	0.27	Fine particles (air)	460	Hydrogen sulphide (air)	1.6	Nitrogen oxides (air)	103000	Sulphur oxides (air)	3000	Volatile organic compounds (air)	33000	Total suspended solids (water)	360	Biochemical oxygen demand (water)	370	Oil and grease (water)	96	Total PAHs (water)	0.14	Total phenolics (water)	0.1	<p>AGL’s spreadsheet ‘LBL Summary RPPG’, for the years 2011/202 and 2012/2013 (the relevant periods for the audit period as reporting is undertaken post-December of each year) detail the load calculations based on quarterly or annual monitoring results. It was noted that AGL achieved compliance during the audit period with each specified air limit. The spreadsheet was reviewed by Pacific Environment Limited (correspondence dated 13 February 2013) to ensure compliance with licence reporting requirements.</p> <p>For the 2012/2013 year no payment was required as the load fee was less than the administrative fee for the licence. For the 2011/2012 year a fee of \$6,119.16 was paid for load based fees.</p> <p>The list of applicable assessable pollutants has been reduced in the licence. The following pollutants have been removed from the load limit requirement:</p> <ul style="list-style-type: none"> ■ Total suspended solids (water) ■ Biochemical oxygen demand (water) ■ Oil and grease (water) ■ Total PAHs (water) ■ Total phenolics (water) 	Compliance
Assessable Pollutant	Load Limit (kg)																												
Benzene (air)	47																												
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No.	Consent Condition	Evaluation	Finding
13	<p>MONITORING AND RECORDING CONDITIONS</p> <p>The results of any monitoring required to be conducted by the DECC's General Terms of Approval, or a licence under the Protection of the Environment Operations Act 1997, in relation to the development or in order to comply with the load calculation protocol must be recorded and retained as set out in the conditions below (Condition 14 and 15).</p>	<p>AGL's spreadsheet 'LBL Summary RPGP', for the years 2011/202 and 2012/2013 (the relevant periods for the audit period as reporting is undertaken post-December of each year) detail the load calculations based on quarterly or annual monitoring results.</p>	Compliance
14	<p>The Applicant shall keep all records required to be kept by the licence:</p> <ul style="list-style-type: none"> ■ in a legible form, or in a form that can readily be reduced to a legible form; ■ kept for at least 4 years after the monitoring or event to which they relate took place; and ■ produced in a legible form to any authorised officer of the DECC who asks to see them. 	<p>Monitoring records prepared during the audit period were sighted by the Auditor and found to comply with this condition.</p>	Compliance
15	<p>The Applicant shall keep the following records in respect of any samples required to be collected:</p> <ul style="list-style-type: none"> ■ the date(s) on which the sample was taken; ■ the time(s) at which the sample was collected; ■ the point at which the sample was taken; and ■ the name of the person who collected the sample. 	<p>Monitoring records prepared during the audit period were sighted by the Auditor and found to comply with this condition.</p>	Compliance
16	<p>REPORTING CONDITIONS</p> <p>The Applicant shall provide an Annual Return to the DECC in relation to the development as required by any licence under the Protection of the Environment Operations Act 1997 in relation to the development. In the Annual Return the Applicant must report on the annual monitoring</p>	<p>The Auditor sighted the December 2012 and December 2013 Annual Returns and noted compliance with this condition.</p>	Compliance



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No.	Consent Condition	Evaluation	Finding
	<p>undertaken (where the activity results in pollutant discharges), provide a summary of complaints relating to the development, report on compliance with licence conditions and provide a calculation of licence fees (administrative fees and, where relevant, load based fees) that are payable. If load based fees apply to the activity the Applicant will be required to submit load-based fee calculation worksheets with the return.</p>		
17	<p>COMMUNITY CONSULTATIVE COMMITTEE</p> <p>The Applicant shall ensure the continuation of the existing Sydney Gas Operations Camden Project Community Consultative Committee to oversee the environmental performance of the development. The Committee shall continue to be chaired by an independent chairperson approved by the Director-General in consultation with the Applicant, Camden Council, Campbelltown City Council and Wollondilly Shire Council. The Committee shall:</p>	<p>The Auditor sighted relevant documentation including meeting minutes and verified compliance with this condition.</p>	<p>Compliance</p>
17(a)	<p>Have four community representatives residing in the PEL 2 area.</p>		<p>Compliance</p>
(b)	<p>Have one representative from each of the following Councils: Camden Council, Campbelltown City Council and Wollondilly Shire Council.</p>		<p>Compliance</p>
(c)	<p>Meet at least quarterly.</p>		<p>Compliance</p>
(d)	<p>Take minutes of the meeting.</p>		<p>Compliance</p>
(e)	<p>Make comments and recommendations about the implementation of the development and environmental management plans, monitor compliance with conditions of this consent and other matters relevant to the operation of the Stage 2 development during the term of the consent.</p> <p>Representatives from relevant government agencies or other individuals may be invited to attend meetings as required by the Chairperson.</p>		<p>Compliance</p>



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No.	Consent Condition	Evaluation	Finding
18	The Applicant shall:	The Auditor reviewed relevant documentation including meeting minutes and presentations and verified compliance with this condition. The Committee minutes are publicly available on the Camden Gas Project website and AGL reported that they are emailed to committee members and DoPE.	Compliance
(a)	Ensure that two of its representatives attend the Committee's meetings.		Compliance
(b)	Provide the Committee with regular information on the environmental performance and management of the development.		Compliance
(c)	Ensure that the Committee has reasonable access to the necessary plans to carry out its functions.		Compliance
(d)	Consider the recommendations and comments of the Committee and provide a response to the Committee and Director-General.		Compliance
(e)	Provide access for site inspections by the Committee.		Compliance
(f)	Make the minutes available for public inspection at Camden Council, Campbelltown City Council and Wollondilly Shire Council within fourteen days of the Committee meeting, or as agreed to by the Committee.		Compliance
(g)	Forward a copy of the minutes of each Committee meeting, and any responses to the Committee's recommendations to the Director-General and the D11 within a month of each Committee meeting.		Compliance
19	<p>COMPLAINTS REGISTER</p> <p>The Applicant shall record details of all complaints received in an up-to-date Complaints Register. The Register shall record, but not necessarily be limited to:</p>		During the audit period, in 2013, the Camden Gas Project transitioned from one complaints register (Complaints Register) to another register (Consultation Manager, a communications database). The complaints registers addressed the requirements of this condition. No complaints were received within the scope of this Development Consent during the audit period.
a)	the date and time, where relevant of the complaint;	Compliance	
b)	the means by which the complaint was made;	Compliance	



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	c) any personal details of the complainant that were provided, or if no details were provided, a note to that effect;		Compliance
	d) the nature of the complaints;		Compliance
	e) any action(s) taken by the Applicant in relation to the complainant, including any follow-up contact with the complainant; and		Compliance
	f) if no action was taken by the Applicant in relation to the complaint, the reason(s) why no action was taken.		Compliance
	The Complaints Register shall be made available for inspection by the DECCW or the Director-General upon request. The Applicant shall also make summaries of the register, without details of the complainants, available for public inspection.		Compliance
20	<p>COMMUNITY AWARENESS PROTOCOL</p> <p>The Applicant shall prepare a Community Awareness Protocol to advise nearby residents and appropriate authorities if a leak of mercaptan odourant occurs from the Gas Treatment Plant and/or associated facilities. The Protocol shall detail the circumstances when it will be implemented and describe the procedure and timeframe in which residents and authorities will be notified. The residents and authorities to be notified will be identified in the Protocol. The Applicant shall submit the Community Awareness Protocol to the Director-General for approval one month prior to commissioning of the Gas Treatment Plant.</p>	<p>The Pollution Incident Response Management Plan (July 2014) and the Emergency Response Plan (November 2013) address this condition. However the commitment is to notification on the “same day” as a leak. The Auditor considers this inadequate and considers that the commitment should include “as soon as practicable” to minimise the time in which nearby residents are notified. (Opportunity for Improvement).</p> <p>AGL reported that there were no leaks of methyl mercaptan associated with this Development Consent during the audit period.</p> <p>The document history detailed in the Sydney Gas Emergency Response Plan records approval by the then Department of Infrastructure, Planning and Natural Resources on 9 August 2004, prior to commissioning of the RPPG.</p>	Compliance – Improvement Recommended



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No.	Consent Condition	Evaluation	Finding
	<p>SCHEDULE 6</p> <p>MANDATORY CONDITIONS FOR ALL EPA LICENCES</p> <p>Note: References to “DECCW” in the Consent Conditions have been referenced as “EPA” in this Audit Report. The following Mandatory Conditions do not have any numbering.</p>		
	<p>OPERATING CONDITIONS</p>		
	<p>Activities must be carried out in a competent manner</p>		
	Licensed activities must be carried out in a competent manner. This includes: activity; and	The licensed activities appear to be being carried out in a competent manner in compliance with this condition. AGL’s incident register indicates that no significant incidents occurred and no complaints were received during the audit period.	Compliance
	(a) the processing, handling, movement and storage of materials and substances used to carry out the		Compliance
	(b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.		Compliance
	<p>Maintenance of plant and equipment</p>		
	All plant and equipment installed at the premises or used in connection with the licensed activity:	The plant and equipment installed or used in connection with licensed activities appear to be being maintained and operated in compliance with this condition. AGL’s incident register indicates that no significant incidents occurred and no complaints were received during the audit period.	Compliance – Improvement Recommended
	(a) must be maintained in a proper and efficient condition; and		
	(b) must be operated in a proper and efficient manner.		Compliance



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No.	Consent Condition	Evaluation	Finding
		regulatory action in relation to two PINs and an official caution, each relating to a “failure to maintain plant and equipment”.	
	MONITORING AND RECORDING CONDITIONS		
	Recording of pollution complaints		
	The licensee must keep a legible record of all complaints made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this licence applies.	During the audit period, in 2013, the Camden Gas Project transitioned from one complaints register (Complaints Register) to another register (Consultation Manager, a communications database). The complaints registers addressed the requirements of this condition. No complaints were received within the scope of this Development Consent during the audit period.	Compliance
	The record must include details of the following:		Compliance
	(a) the date and time of the complaint;		Compliance
	(b) the method by which the complaint was made;		Compliance
	(c) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect;		Compliance
	(d) the nature of the complaint;		Compliance
	(e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and		Compliance
	(f) if no action was taken by the licensee, the reasons why no action was taken.		Compliance
	The record of a complaint must be kept for at least 4 years after the complaint was made.		Compliance
	The record must be produced to any authorised officer of the EPA who asks to see them.		Compliance
	Telephone complaints line		
	The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted at the premises or by the vehicle or mobile plant, unless otherwise specified in the licence.	AGL maintains a telephone complaints line, the details of which are contained on AGL’s website as well as at well sites, access roads and gas gathering lines. The Auditor telephoned the complaints line during the Audit	Compliance



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No.	Consent Condition	Evaluation	Finding
	The licensee must notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint.	and was satisfied with the complaints handling process.	Compliance
	This condition does not apply until 3 months after this condition takes effect.		Compliance
	REPORTING CONDITIONS		
	Annual Return documents		
	What documents must an Annual Return contain? The licensee must complete and supply to the EPA an Annual Return in the approved form comprising:	The Annual Returns for the audit period (2012/2013 and 2011/2012) addressed the requirements of this condition.	Compliance
	(a) a Statement of Compliance; and		Compliance
	(b) a Monitoring and Complaints Summary.		Compliance
	A copy of the form in which the Annual Return must be supplied to the EPA accompanies this licence. Before the end of each reporting period, the EPA will provide to the licensee a copy of the form that must be completed and returned to the EPA.		Compliance
	Period covered by Annual Return		
	An Annual Return must be prepared in respect of each reporting, except as provided below. Note: The term reporting period is defined in the dictionary at the end of this licence. Do not complete the Annual Return until after the end of the reporting period.	The Annual Returns for the audit period (2012/2013 and 2011/2012) addressed the requirements of this condition.	Compliance
	Where this licence is transferred from the licensee to a new licensee, (a) the transferring licensee must prepare an annual return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted; and (b) the new licensee must prepare an annual return for the period commencing on the date the application for the transfer of the licence is granted and ending on the last day of the reporting	No licence transfers occurred during the audit period.	Not Triggered



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No.	Consent Condition	Evaluation	Finding
	<p>period.</p> <p>Note: An application to transfer a licence must be made in the approved form for this purpose.</p>		
	<p>Where this licence is surrendered by the licensee or revoked by the EPA or Minister, the licensee must prepare an annual return in respect of the period commencing on the first day of the reporting period and ending on</p> <p>(a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or</p> <p>(b) in relation to the revocation of the licence – the date from which notice revoking the licence operates.</p>	<p>No licences were surrendered or revoked by the EPA or the Minister during the audit period.</p>	<p>Not Triggered</p>
	<p>Deadline for Annual Return</p>		
	<p>The Annual Return for the reporting period must be supplied to the EPA by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date').</p>	<p>The 2011/2012 Annual Return was submitted after the 60 day period. It was due on 20 February 2013 and was submitted on 24 February, four days late. This was noted as a non-compliance in the Annual Return.</p> <p>The 2012/2013 Annual Return was submitted on 18 February 2014 within the 60 day period.</p>	<p>Non-Compliance Level 2</p>
	<p>Notification where actual load cannot be calculated</p>		
	<p>Where the licensee is unable to complete a part of the Annual Return by the due date because the licensee was unable to calculate the actual load of a pollutant due to circumstances beyond the licensee's control, the licensee must notify the EPA in writing as soon as practicable, and in any event not later than the due date.</p>	<p>AGL was not unable to calculate the actual load of a pollutant due to circumstances beyond its control during the audit period.</p>	<p>Not Triggered</p>
	<p>The notification must specify:</p>		<p>Not Triggered</p>
	<p>(a) the assessable pollutants for which the actual load could not be calculated; and</p>		<p>Not Triggered</p>
	<p>(b) the relevant circumstances that were beyond the control of the licensee.</p>		<p>Not Triggered</p>



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No.	Consent Condition	Evaluation	Finding
	Licensee must retain copy of Annual Return		
	The licensee must retain a copy of the annual return supplied to the EPA for a period of at least 4 years after the annual return was due to be supplied to the EPA.	Copies of the Annual Return for the last four years have been retained by AGL.	Compliance
	Certifying of Statement of Compliance and Signing of Monitoring and Complaints Summary		
	Within the Annual Return, the Statement of Compliance must be certified and the Monitoring and Complaints Summary must be signed by:	The requirements of this condition were satisfied for the 2012/2013 and 2011/2012 Annual Returns.	Compliance
	(a) the licence holder; or		Compliance
	(b) by a person approved in writing by the EPA to sign on behalf of the licence holder.		Compliance
	Notification of environmental harm		
	Note: The licensee or its employees must notify the EPA of incidents causing or threatening material harm to the environment as soon as practicable after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act	AGL advised that no incidents of environmental harm occurred during the audit period.	Not Triggered
	Notifications must be made by telephoning the EPA's Pollution Line service on 131 555.		Not Triggered
	The licensee must provide written details of the notification to the EPA within 7 days of the date on which the incident occurred.		Not Triggered
	Written report		
	Where an authorised officer of the EPA suspects on reasonable grounds that:	AGL advised that there have not been any events during the audit period, within the scope of this audit, where the EPA has advised it that it suspects that an "event has caused, is causing or is likely to cause material harm to the environment" and thereby requesting provision of a written report into the event. Hence, the Auditor considers that this condition was not triggered during the	Not Triggered
	(a) where this licence applies to premises, an event has occurred at the premises; or		Not Triggered
	b) where this licence applies to vehicles or mobile plant, an event has occurred in connection with the carrying out of the activities authorised by this licence, and the event has caused, is causing or is likely to cause material harm		Not Triggered



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No.	Consent Condition	Evaluation	Finding
	to the environment (whether the harm occurs on or off premises to which the licence applies), the authorised officer may request a written report of the event.	audit period.	
	The licensee must make all reasonable inquiries in relation to the event and supply the report to the EPA within such time as may be specified in the request.	Nonetheless, during the audit period there were a number of instances when the EPA made written or verbal requests for written reports, to which AGL responded in writing.	Not Triggered
	The request may require a report which includes any or all of the following information:	On 13 August 2012, the EPA issued a written request to AGL regarding non-compliances with monitoring obligations at the RPGTP and directing AGL to provide a written report to the EPA under the terms of Condition R3 of the EPL. AGL subsequently provided a written report regarding the matter to the EPA on 4 September 2012. AGL responded to other verbal requests for written reports to be issued in relation to monitoring exceedances (letters dated 5 August 2013), 10 September 2013, 25 September 2013). On 29 January 2013, AGL responded to an email from the EPA dated 9 January 2013 requesting further information in relation to monitoring exceedances. On 13 June 2013, AGL also responded to a letter dated 6 June 2013 from the EPA in relation to a breach of the obligation to publish all monitoring data on its website within 14 days of obtaining that data.	Not Triggered
	(a) the cause, time and duration of the event;		Not Triggered
	(b) the type, volume and concentration of every pollutant discharged as a result of the event;		Not Triggered
	(c) the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event; and		Not Triggered
	(d) the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort;		Not Triggered
	(e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants;		Not Triggered
	(f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and		Not Triggered
	(g) any other relevant matters.	Not Triggered	
	The EPA may make a written request for further details in relation to any of the above matters if it is not satisfied with the report provided by the licensee. The licensee must provide such further details to the EPA within the time specified in the request.	The correspondence regarding these matters did not indicate that an “event has caused, is causing or is likely to cause material harm to the environment” and is, therefore, not considered to be subject to this condition to produce a written report. However, the correspondence is noted here to demonstrate that AGL has responded to requests from the EPA for written reports.	Not Triggered



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No.	Consent Condition	Evaluation	Finding
	GENERAL CONDITIONS		
	Copy of licence kept at the premises or on the vehicle or mobile plant		
	A copy of this licence must be kept at the premises or on the vehicle or mobile plant to which the licence applies.	A copy of the licence is available in electronic form at the RPGP site and was available to the EPA during an unannounced EPL Compliance Audit in July 2013.	Compliance
	The licence must be produced to any authorised officer of the EPA who asks to see it.		Compliance
	The licence must be available for inspection by any employee or agent of the licensee working at the premises or operating the vehicle or mobile plant.		Compliance
	SCHEDULE 7 GENERAL CONDITIONS FOR PART 3A PERMITS DEPARTMENT OF WATER AND ENERGY		
1	Irrespective of the granting of this consent or approval by any other Authority, work is not to commence in, or within a horizontal distance of 40m from the top of the bank of the watercourse/foreshore, without the prior issue of a Part 3A permit by the NOW.	Condition was not activated during the audit period.	Not Triggered
2	Prior to the issue of the Part 3A permit the applicant must provide the NOW with the following: <ul style="list-style-type: none"> ■ A copy of the development consent including all conditions of approval; ■ Plans and/or other documentation (3 copies) that satisfy the NOW's General Terms of Approval and recommendations which are included in the consent conditions; and ■ The appropriate permit fee paid to the NOW. 	Condition was not activated during the audit period.	Not Triggered
3	Work is to be carried out in accordance with drawings and any management plans required by these conditions and approved by the	Condition was not activated during the audit period.	Not Triggered



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No.	Consent Condition	Evaluation	Finding
	NOW that will accompany the 3A permit.		
4	Any Part 3A permit issued is to be renewed on an annual basis until all works and all rehabilitation, including maintenance provisions, have been satisfactorily completed in accordance with the permit conditions. Any application for renewal will be lodged at least 1 month prior to the permit expiry date.	Condition was not activated during the audit period.	Not Triggered
5	Work shall not cause unnecessary damage to, or increase erosion of, the stream bed or banks. The permit holder shall carry out any instructions given by the NOW with a view to preventing degradation of the stream bed or banks.	Condition was not activated during the audit period.	Not Triggered
6	Any vegetation or other material removed from the area of works shall be disposed of so that the material cannot be swept back into the stream during a flood.	Condition was not activated during the audit period.	Not Triggered
7	All works proposed must be designed, constructed and operated so they do not cause erosion or sedimentation and to minimise adverse impacts on aquatic and riparian environments	The Soil and Water Management Sub-Plan (April 2014) includes appropriate controls for watercourse crossings. AGL reported that no works were undertaken within 40 metres of watercourses/foreshores during the audit period.	Not Triggered
8	No plastic netting is to be used, for any purpose, in the stream or within the riparian zone unless such netting is of a rapidly biodegradable variety.	The Soil and Water Management Sub-Plan (April 2014) includes appropriate controls for watercourse crossings. AGL reported that no works were undertaken within 40 metres of watercourses/foreshores during the audit period.	Not Triggered
9	Erosion and sediment control measures are required to be implemented prior to any works commencing, and must be maintained for as long as necessary after the completion of works, to prevent sediment and dirty water entering the river system. These measures are to be in accordance with Council's requirements and follow best management practices as outlined in the NSW Department of Housing's Managing Urban Stormwater: Soils and Construction (1998) manual (the Blue	The Soil and Water Management Sub-Plan (April 2014) includes appropriate controls for watercourse crossings. AGL reported that no works were undertaken within 40 metres of watercourses/foreshores during the audit period.	Not Triggered



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No.	Consent Condition	Evaluation	Finding
	Book).		
10	The excavation of soil/spoil and its removal is the responsibility of the permit holder and the owner or occupier of the land.	Condition noted.	Not Triggered
11	The approval of NSW Fisheries is required for all proposed designs of in-stream works prior to the issue of the Part 3A permit.	Condition was not activated during the audit period.	Not Triggered
12	These conditions are issued with the proviso that operations shall be carried-out on freehold land. Should operations be on Crown Land, these conditions are null and void and the occupier of Crown Land should contact the Department of Lands to obtain landowner's consent.	Condition was not activated during the audit period.	Not Triggered
13	Work is to be carried out in accordance with any conditions imposed by other government agencies, provided such conditions do not conflict with these conditions or the conditions on the Part 3A permit.	Condition noted.	Not Triggered
14	The permit holder and the owner or occupier of the land are responsible for any works undertaken by any other person or company on this site.	Condition noted.	Not Triggered
15	The rehabilitation of the area in accordance with the Part 3A permit conditions is the responsibility of the permit holder and the owner or occupier of the land.	Condition noted.	Not Triggered
16	Any Part 3A permit granted is not transferable to any other person or company without the written approval of the NOW and does not authorise works at any other site.	Condition noted.	Not Triggered
17	Any Part 3A permit granted does not give the holder the right to occupy any land without the owner(s) consent nor does it relieve the holder of any obligation which may exist to also obtain permission from local government and other authorities who may have some form of control over the site and/or the activities proposed.	Condition noted.	Not Triggered
18	Work as executed survey plans of a professional standard shall be provided to the NOW upon request.	Condition was not activated during the audit period.	Not Triggered



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No.	Consent Condition	Evaluation	Finding
19	If, in the opinion of a the NOW officer, any activity is being carried out in such a manner that it may unnecessarily degrade the riparian zone, stream, lake or foreshore environment, all work shall cease immediately upon oral or written direction of such officer.	Condition was not activated during the audit period.	Not Triggered
20	If the permit conditions have been breached, the permit holder shall restore the site in accordance with the permit conditions and/or as directed by the NOW. If any breach of the permit conditions requires a special site inspection by the NOW, then the permit holder shall pay a fee prescribed by the NOW for this inspection and all subsequent breach inspections.	Condition was not activated during the audit period.	Not Triggered
21	If works are to cease prior to completion the NOW must be notified in writing one month in advance of the cessation of the operation.	Condition was not activated during the audit period.	Not Triggered
SCHEDULE 8 DECC WASTE TRACKING REQUIREMENTS			
O5	Monitoring of waste movements within NSW		
O5.1	Conditions O5.2 to O5.16 apply to the movement of the types of hazardous and/or industrial and/or Group A waste as listed in L5.3, within NSW.	Condition noted.	Not Triggered
Prerequisites for waste movements			
O5.2	If the waste is transported from the premises, the licensee must ensure that the waste is transported:	The Auditor sighted a sample of waste tracking documentation and noted individual records to be complete. Waste tracking documentation was found to align with AGL's Environmental Footprint Spreadsheet for the financial years 2012/2013 and 2013/ 2014. These Spreadsheets provide detailed records of hazardous, industrial and Group A waste and are audited by AGL.	Compliance
O5.2(a)	To a place which has been licensed by the DECC to issue consignment authorisation numbers.		Compliance
O5.2(a)	To a place that can otherwise lawfully accept that class of waste.		Compliance
O5.3	If the waste is transported from the premises, the licensee must;		Compliance



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No.	Consent Condition	Evaluation	Finding
O5.3(a)	Obtain a consignment authorisation number from the consignee.	The individual waste records were not considered by the Auditor to be comprehensively filed to enable rapid verification of tracking of all waste movements from the Camden Gas Project. It was also recommended that the Transport Certificate Numbers be included in the Environmental Footprint Spreadsheet. AGL undertook improvements during the audit to address this matter.	Compliance
O5.3(b)	Complete an approved waste data form in relation to the consigned waste in accordance with the instructions on the form and to the extent required, and give a copy of the form to the person transporting the waste.		Compliance
O5.3(c)	Ensure that the waste data form: (i) is completed accurately, and (ii) is retained for a period of not less than 4 years from the time the form was completed, and (iii) is made available for inspection by an authorised officer on request		Compliance
O5.3(d)	Ensure, if the waste is of such an amount as to require the person transporting it to be licensed, that the person transporting the waste is licensed.		Compliance
	Application for a consignment authorisation number		
O5.4	To obtain a consignment authorisation number as required by 05.3 (a), the licensee must apply in writing to the consignee. An application must include the following information:	AGL reported that applications for consignment authorisation numbers are prepared by the waste contractors. The Auditor sighted evidence of consignment authorisation numbers on waste tracking documentation in accordance with the requirements of this condition for wastes removed from the Camden Gas Project. AGL advised that the waste service provider undertakes any required waste classification. The Auditor sighted copies of SDS used to advise waste contractors of waste characteristics and correspondence describing the characteristics of other waste materials (e.g. oily water).	Compliance
O5.4(a)	A statement identifying the classification of the waste in accordance with the requirements of condition 04.1.		Compliance
O5.4(b)	Copies of all information used to classify the waste.		Compliance
O5.4(c)	An estimate of the amount of waste to which the application applies.		Compliance
O5.4(d)	Whether the consignment will consist a single load or multiple loads.		Compliance
O5.4(e)	An estimate of the total period required for transportation of the consignment.		Compliance



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No.	Consent Condition	Evaluation	Finding
O5.4(f)	<p>The date of dispatch of at least the first load in the consignment.</p> <p>Note: The licensee may nominate the dates of dispatch of as many loads as is feasible. This should be discussed with the consignee and will depend on the predictability of the rate of generation of the waste and the likelihood of the need for amendments to the dates nominated. If the waste is predictable, a schedule may be able to be submitted for the entire consignment, however if it is unpredictable, the date of only one future load may be able to be determined at a time (see also O5.9 about amending notified dates). Note: The requirement for a written application for a consignment authorisation number does not preclude preliminary contact to obtain quotes and/or advice. Such preliminary contact does not require the formal provision of the above information that need only be supplied in the formal application.</p>	<p>It is noted that the premises does not generate significant quantities of waste material of unknown composition and requiring classification.</p> <p>It is noted that a waste audit was not undertaken as part of this independent audit.</p>	Compliance
O5.5	<p>Once an application for a consignment authorisation number, as set out in O5.4 has been submitted, the licensee must not submit an application for the same consignment to another consignee until notification is received concerning the outcome of the application.</p>	Condition noted.	Not Triggered
	<p>Notification of dates of dispatch of the second and subsequent loads in a consignment</p>		
O5.6	<p>The licensee must provide the consignee with written notification of the date of dispatch of each load of waste.</p>	<p>Waste tracking forms, including consignment authorisation numbers, were sighted by Auditor for disposal of waste chemicals from the Camden Gas Project.</p> <p>The waste contractors contracted by AGL have established processes to track consigned waste in accordance with NSW regulatory requirements.</p> <p>It is noted that a waste audit was not undertaken as part of this independent audit.</p>	Compliance



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No.	Consent Condition	Evaluation	Finding
O5.7	<p>The notification referred to in 05.6 must be received by consignee no later than the date of arrival of the preceding load at the destination.</p>	<p>Waste tracking forms, including consignment authorisation numbers, were sighted by Auditor for disposal of waste chemicals from the Camden Gas Project.</p> <p>The waste contractors contracted by AGL have established processes to track consigned waste in accordance with NSW regulatory requirements.</p> <p>It is noted that a waste audit was not undertaken as part of this independent audit.</p>	Compliance
Notification of a final load in a consignment			
O5.8	<p>Unless the movement of an entire consignment of waste occurs in a single load, by the time the final load in a consignment is accepted at the destination, the licensee must have informed the consignee in writing, that no further loads are to be dispatched under that consignment authorisation number.</p> <p>Note: The notifications referred to in conditions 05.6 and 05.8 may be attached to the waste data form of the preceding load.</p>	<p>Waste tracking forms, including consignment authorisation numbers, were sighted by Auditor for disposal of waste chemicals from the Camden Gas Project.</p> <p>The waste contractors contracted by AGL have established processes to track consigned waste in accordance with NSW regulatory requirements.</p> <p>It is noted that a waste audit was not undertaken as part of this independent audit.</p>	Compliance
Amendments to the nominated date(s) of dispatch			
O5.9	<p>If the date of dispatch for a load of waste is changed, the licensee must give written notification of this to the consignee and nominate a revised date of dispatch.</p>	<p>Waste tracking forms, including consignment authorisation numbers, were sighted by Auditor for disposal of waste chemicals from the Camden Gas Project.</p> <p>The waste contractors contracted by AGL have</p>	Compliance



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No.	Consent Condition	Evaluation	Finding
		<p>established processes to track consigned waste in accordance with NSW regulatory requirements.</p> <p>It is noted that a waste audit was not undertaken as part of this independent audit.</p>	
O5.10	<p>A notification referred to in 05.9 must occur on or before the date of delivery as previously nominated.</p> <p>Note: More than one amendment to dates of dispatch may occur.</p>	<p>Waste tracking forms, including consignment authorisation numbers, were sighted by Auditor for disposal of waste chemicals from the Camden Gas Project.</p> <p>The waste contractors contracted by AGL have established processes to track consigned waste in accordance with NSW regulatory requirements.</p> <p>It is noted that a waste audit was not undertaken as part of this independent audit.</p>	Compliance
	Cancellation of consignment authorisations		
O5.11	<p>If the licensee determines that the delivery of a consignment of waste is to be discontinued for any reason, the consignee must be notified in writing before the nominated date of dispatch of the next expected load.</p>	<p>Waste tracking forms, including consignment authorisation numbers, were sighted by Auditor for disposal of waste chemicals from the Camden Gas Project.</p> <p>The waste contractors contracted by AGL have established processes to track consigned waste in accordance with NSW regulatory requirements.</p> <p>It is noted that a waste audit was not undertaken as part of this independent audit.</p>	Compliance
	Notification of delayed delivery by transporter		
O5.12	<p>If the licensee receives written notification from a transporter who removed waste from the premises specifying a revised date of delivery to the destination which is more than 7 days after the date of dispatch, the licensee must note and record that date.</p>	<p>Condition was not activated during the audit period.</p>	Not Triggered



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No.	Consent Condition	Evaluation	Finding
	Record keeping		
O5.13	<p>The licensee must record and retain all information related to each consignment of waste.</p> <p>Note: This includes waste data forms and copies of other documents such as notifications of revised delivery dates, regular and other reports, etc.</p>	<p>The Auditor sighted a sample of waste tracking documentation and noted individual records to be complete. Waste tracking documentation was found to align with AGL's Environmental Footprint Spreadsheet for the financial years 2012/2013 and 2013/ 2014. These Spreadsheets provide detailed records of hazardous, industrial and Group A waste and are audited by AGL.</p> <p>The individual waste records were not considered by the Auditor to be comprehensively filed to enable rapid verification of tracking of all waste movements from the Camden Gas Project. It was also recommended that the Transport Certificate Numbers be included in the Environmental Footprint Spreadsheet. AGL undertook improvements during the audit to address this matter.</p> <p>Waste tracking forms, including consignment authorisation numbers, were sighted by Auditor for disposal of waste chemicals from the Camden Gas Project.</p> <p>The waste contractors contracted by AGL have established processes to track consigned waste in accordance with NSW regulatory requirements.</p> <p>It is noted that a waste audit was not undertaken as part of this independent audit.</p>	Compliance
O5.14	The records referred to in 05.13 must be kept so that:	<p>The Auditor sighted a sample of waste tracking documentation and noted individual records to be complete. Waste tracking documentation was found to align with AGL's Environmental Footprint Spreadsheet for the financial years 2012/2013 and 2013/ 2014. These Spreadsheets provide detailed records of</p>	Compliance
O5.14 (a)	All records relating to individual consignment authorisation numbers are kept physically together.		Compliance
O5.14 (b)	Consignments transported by each transporter can be readily identified		Compliance



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No.	Consent Condition	Evaluation	Finding
	and accessed.	hazardous, industrial and Group A waste and are audited by AGL.	
O5.14 (c)	Consignments sent to each destination can readily be identified and accessed. Note: The licensee must keep all information for at least 4 years.	<p>The individual waste records were not considered by the Auditor to be comprehensively filed to enable rapid verification of tracking of all waste movements from the Camden Gas Project. It was also recommended that the Transport Certificate Numbers be included in the Environmental Footprint Spreadsheet. AGL undertook improvements during the audit to address this matter.</p> <p>Waste tracking forms, including consignment authorisation numbers, were sighted by Auditor for disposal of waste chemicals from the Camden Gas Project.</p> <p>The waste contractors contracted by AGL have established processes to track consigned waste in accordance with NSW regulatory requirements.</p> <p>It is noted that a waste audit was not undertaken as part of this independent audit.</p>	Compliance
	Exception reporting		
O5.15	The licensee must notify the DECC, in writing, within 48 hours of becoming aware of any suspected breaches of the Act, the Protection of the Environment Operations (Waste) Regulation 1996 or this licence.	Condition was not activated during the audit period.	Not Triggered
O5.16	The licensee must notify the DECC in writing within 48 hours of becoming aware of any of the following:	Condition was not activated during the audit period.	Not Triggered
O5.16 (a)	The refusal by a person to whom the licensee has applied for a consignment authorisation number in accordance with 05.4 to issue such a number.		Not Triggered
O5.16 (b)	The refusal of a transporter to transport waste after arriving at the		Not Triggered



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No.	Consent Condition	Evaluation	Finding
	licensee's premises for the purposes of transporting that waste.		
O5.16 (c)	A transporter who transports, or attempts to transport, waste without a waste data form completed to the extent required.		Not Triggered
O5.16 (d)	The refusal of a consignee to accept waste from the licensee.		Not Triggered
O5.16 (e)	The failure of the licensee to receive written confirmation of receipt of waste from a consignee within 21 days of dispatch, or where a transporter has provided written notification of a revised date of delivery as set out in O5.12 within 21 days of that date.		Not Triggered
O5.16 (f)	The notification by a transporter of a revised date of delivery which is more than 90 days after the date of dispatch of the waste. Note: The DECC should be notified of exception reports by sending a facsimile to: Manager, Hazardous Waste Regulation, NSW Environment Protection Authority.		Not Triggered
O6	Monitoring of interstate movements of controlled wastes		
O6.1	Conditions O6.2 to O6.11 apply to the movement of the types of hazardous and/or industrial and/or Group A waste as listed in L5.3, into and out of NSW. Note: The requirements of the NEPM apply to the interstate movement of any of the wastes listed in Appendix 1 of this licence.	AGL reported that there was no interstate movement of controlled wastes from the Camden Gas Project during the audit period.	Not Triggered
	Classification of controlled waste		
O6.2	The licensee must accurately identify the waste, in accordance with O4.1, and determine if the waste is a controlled waste within the meaning of the NEPM. Note: The waste producer must check with the agency in the State or Territory of destination to determine whether waste is classified as a controlled waste under the NEPM. Unless advised otherwise by the	AGL reported that there was no interstate movement of controlled wastes from the Camden Gas Project during the audit period.	Not Triggered



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No.	Consent Condition	Evaluation	Finding
	agency of the State or Territory of destination, any waste included in Appendix 1 of this licence is a controlled waste for the purposes of the NEPM.		
	Application for a consignment authorisation		
O6.3	<p>If the waste is transported from the premises to another participating State or Territory, the licensee must comply with all conditions attached to the consignment authorisation issued by an agency or a facility delegated by an agency in the destination State or Territory.</p> <p>Note: The waste producer is required by the Protection of the Environment Operations (Waste) Regulation 1996 to obtain, prior to the waste being dispatched, a consignment authorisation from an agency, or a facility delegated by an agency, in the destination State or territory to allow the movement of controlled waste.</p>	AGL reported that there was no interstate movement of controlled wastes from the Camden Gas Project during the audit period.	Not Triggered
	Waste movements		
O6.4	If the waste is transported from the premises to another participating State or Territory, the licensee must ensure that the waste is transported to a place that can lawfully be used as a waste facility for that waste.	AGL reported that there was no interstate movement of controlled wastes from the Camden Gas Project during the audit period.	Not Triggered
O6.5	The licensee must ensure that the waste transporter is licensed as required by the agency of each participating State or Territory through which the waste is transported.	AGL reported that there was no interstate movement of controlled wastes from the Camden Gas Project during the audit period.	Not Triggered
O6.6	The licensee must:	AGL reported that there was no interstate movement of controlled wastes from the Camden Gas Project during the audit period.	Not Triggered
O6.6(a)	Retain a copy of the waste transport certificate for the waste for a period of not less than 4 years from the time the form was completed.	AGL reported that there was no interstate movement of controlled wastes from the Camden Gas Project during the audit period.	Not Triggered



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No.	Consent Condition	Evaluation	Finding
06.6(b)	<p>Make the copy of the waste transport certificate available for inspection by an authorised officer on request.</p> <p>Note: The waste producer is required by the Protection of the Environment Operations (Waste) Regulation 1996 to complete a waste transport certificate for the waste. This should be done in accordance with the instructions printed on the certificate and the required copy of the waste transport certificate should be forwarded to the agency in the State of destination.</p>	AGL reported that there was no interstate movement of controlled wastes from the Camden Gas Project during the audit period.	Not Triggered
	Notification of delayed delivery by transporter		
06.7	<p>If the licensee receives written notification from the transporter who removed waste from the licensee's premises specifying a revised date of delivery to the destination which is more than 7 days after the date of dispatch, the licensee must note and record that date.</p>	AGL reported that there was no interstate movement of controlled wastes from the Camden Gas Project during the audit period.	Not Triggered
	Record keeping		
06.8	<p>The licensee must record and retain all information related to each consignment of waste.</p> <p>Note: This includes the waste transport certificates and copies of other documents such as consignment authorisations issued by an agency in the destination State or Territory, notifications of revised delivery dates by transporters, regular and other reports, etc.</p>	AGL reported that there was no interstate movement of controlled wastes from the Camden Gas Project during the audit period.	Not Triggered
06.9	The records referred to in 06.8 must be kept so that:	AGL reported that there was no interstate movement of controlled wastes from the Camden Gas Project during the audit period.	Not Triggered
06.9(a)	All records relating to each consignment authorisation are kept physically together.	AGL reported that there was no interstate movement of controlled wastes from the Camden Gas Project during the audit period.	Not Triggered
06.9(b)	Consignments transported by each transporter can be readily identified and accessed.	AGL reported that there was no interstate movement of controlled wastes from the Camden Gas Project during the audit period.	Not Triggered
06.9(c)	Consignments sent to each destination can readily be identified and	AGL reported that there was no interstate movement of controlled wastes from the Camden Gas Project during the audit period.	Not Triggered



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No.	Consent Condition	Evaluation	Finding
	<p>accessed.</p> <p>Note: The licensee must keep all information for at least 4 years.</p>		
	Exception Reporting		
O6.10	The licensee must notify the DECC in writing within 48 hours of becoming aware of a suspected breach of the Act, the Protection of the Environment Operations (Waste) Regulation 1996 or this licence.	AGL reported that there was no interstate movement of controlled wastes from the Camden Gas Project during the audit period.	Not Triggered
O6.11	The licensee must notify the DECC in writing within 48 hours of becoming aware of any of the following:	AGL reported that there was no interstate movement of controlled wastes from the Camden Gas Project during the audit period.	Not Triggered
O6.11 (a)	The refusal by an agency, or facility delegated by an agency, in participating State or Territory to whom the licensee has applied for a consignment authorisation in accordance with 06.3, to issue such an authorisation.		Not Triggered
O6.11 (b)	The refusal of a transporter to transport waste after arriving at the licensee's premises for the purposes of transporting that waste to another participating State or Territory to the extent required.		Not Triggered
O6.11 (c)	A transporter who transports, or attempts to transport, waste to another participating State or Territory without a waste transport certificate completed to the extent required.		Not Triggered
O6.11 (d)	The refusal of a destination in another participating State or Territory to accept from the licensee waste for which a consignment authorisation has been issued.		Not Triggered
O6.11 (e)	The failure of the licensee to receive written confirmation of receipt of waste from a destination in another participating State or Territory within 28 days of dispatch. Note: The DECC should be notified of		Not Triggered



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No.	Consent Condition	Evaluation	Finding
	exception reports by sending a facsimile to: Manager, Hazardous Waste Regulation, NSW Environment Protection Authority.		
R4	Regular reporting of transportation of certain wastes within NSW		
R4.1	Conditions R4.2 to R4.5 apply to the transport of hazardous and/or industrial and/or Group A waste within NSW.	Condition noted.	
	Regular reporting		
R4.2	The licensee must supply to the DECC, for each transporter that transported waste from the licensee's premises, the information as set out in Appendix 2, table 1.	Appendix 2, table 1 is not attached to the Development Consent and therefore the obligation is not clear. It is noted that this condition is 'cut and paste' from the previous environment protection licence for the Camden Gas Project and that these conditions are not present in the current environment protection licence.	Not Triggered
R4.3	The licensee must supply to the DECC, for each destination within NSW which received waste from the licensee, the information as set out in Appendix 2, table 2.	Appendix 2, table 1 is not attached to the Development Consent and therefore the obligation is not clear. It is noted that this condition is 'cut and paste' from the previous environment protection licence for the Camden Gas Project and that these conditions are not present in the current environment protection licence.	Not Triggered
	Reporting periods		
R4.4	Reports to the DECC in accordance with R4.2 and R4.3 shall be supplied on or before:	Appendix 2, table 1 is not attached to the Development Consent and therefore the obligation is not clear. It is noted that this condition is 'cut and paste' from the previous environment protection licence for the Camden Gas Project and that these conditions are not present in the current environment protection licence.	Not Triggered
R4.4(a)	30 April for the reporting of information relating to wastes transported from the premises between 1 January and 31 March of that year.		Not Triggered
R4.4(b)	31 July for the reporting of information relating to wastes transported from the premises between 1 April and 30 June of		Not Triggered



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No.	Consent Condition	Evaluation	Finding
	that year.		
R4.4(c)	31 October for the reporting of information relating to wastes transported from the premises between 1 July and 30 September of that year.		Not Triggered
R4.4(d)	31 January for the reporting of information relating to wastes transported from the premises between 1 October and 31 December of the previous year. Note: The DECC should be notified of exception reports by sending a facsimile to: Manager, Hazardous Waste Regulation NSW Department of Environment and Climate Change.		Not Triggered
	Nil reports		
R4.5	If waste has not been transported from the premises in any reporting period as set out in R4.4 the DECC must be advised in writing by the licensee, by the dates referred to in R4.4 in lieu of reporting as required in R4.2 and R4.3.	Condition was not activated during the audit period.	Not Triggered
R5	Regular reporting of interstate movements of controlled wastes		
R5.1	Conditions R5.2 to R5.5 apply to the movement of hazardous and/or industrial and/or Group A waste as listed in L5.3, into and out of NSW. Note: The requirements of the NEP apply to the interstate movement of any of the wastes listed in Appendix 1 of this licence.	AGL reported that no controlled wastes from the Camden Gas Project were transported interstate during the project period.	Not Triggered
	Regular reporting		
R5.2	The licensee must supply to the DECC, for each transporter that transported waste from the premises to a destination in another participating State or Territory, the information as set out in Appendix	AGL reported that no controlled wastes from the Camden Gas Project were transported interstate during the project period.	Not Triggered



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No.	Consent Condition	Evaluation	Finding
	2, table 3.		
	Reporting periods		
R5.3	Reports to the DECC in accordance with R5.2 shall be supplied on or before:	AGL reported that no controlled wastes from the Camden Gas Project were transported interstate during the project period.	Not Triggered
R5.3(a)	30 April for the reporting of information relating to wastes transported from the premises between 1 January and 31 March of that year.		Compliance
R5.3(b)	31 July for the reporting of information relating to wastes transported from premises between 1 April and 30 June of that year.		Compliance
R5.3(c)	31 October for the reporting of information relating to wastes transported from the premises between 1 July and 30 September of that year.		Compliance
R5.3(d)	31 January for the reporting of information relating to wastes transported from the premises between 1 October and 31 December of the previous year.		Compliance
	Nil reports		
R5.4	If waste has not been transported from the premises in any reporting period as set out in R5.3, the DECC must be advised in writing by the licensee, by the dates referred to in R5.3 in lieu of reporting as defined in R5.2.	AGL reported that no controlled wastes from the Camden Gas Project were transported interstate during the project period.	Not Triggered
	Interstate transport of controlled wastes		
R5.5	The licensee must comply with the requirements of the NEPM.	AGL reported that no controlled wastes from the Camden Gas Project were transported interstate during the project period.	Not Triggered



Table 5: DA 183-8-2004-I (Mt Taurus and Menangle Park)

No.	Consent Condition	Evaluation	Finding
	SCHEDULE 2		
	Obligation to Minimise Harm to the Environment		
1.	The Applicant shall implement all practicable measures to prevent or minimise any harm to the environment that may result from the construction or operation of the development.	<p>An EMS has been established to manage environmental risks and drive improvements in performance. The EMS consists of an EMP, related sub-plans and a Compliance Register.</p> <p>Various management tools have been implemented to monitor and measure implementation of the EMS.</p> <p>The ECR was sighted and found to be effective for monitoring compliance against project approval obligations. During the audit period the ECR transitioned from Mipela to Regulatory Compliance Register to CMO-Compliance. CMO was commissioned only on 30 June 2014. However, supporting documents were not included for all conditions to verify compliance status. It is recommended that each Consent Condition in the Compliance Register be checked to ensure that relevant supporting documentation is referenced (Opportunity for Improvement).</p> <p>It is also noted that the consent conditions contained in CMO-Compliance are not consistently a 'word for word' representation of the relevant condition, which presents a risk of misinterpretation and inability to fully comply with the condition. It is recommended that each condition in CMO-Compliance be checked to ensure it is a 'word for word' representation of the consent conditions (Opportunity for Improvement).</p> <p>There were no reported environmental incidents or non-compliances during the audit period.</p>	Compliance – Improvement Recommended



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No.	Consent Condition	Evaluation	Finding
	Terms of Approval		
2.	The Applicant shall carry out the development generally in accordance with the:	AGL reported that the development is being undertaken in accordance with the EMS, which incorporates the requirements of Consent Conditions and the supporting documentation. The Sub-Plans have been going through a process of review and upgrade during 2013/2014 and have been submitted to DoPE, with the exception of the Sub-Plans for air quality and traffic which are still undergoing the revision process.	Compliance
	(a) DA submitted to the Department on 28 July 2004;		Compliance
	(b) Statement of Environmental Effects - Harness Racing Drilling Program Sydney Gas Company dated 24 June 2003;		Compliance
	(c) Review of Environmental Effects - Mt Taurus Drilling Program Sydney Gas Company dated March 2004;		Compliance
	(d) Modification Application MOD 27-3-2007 and Camden Gas Project Joint Venture Gas Well and Gathering Line Modification Project Statement of Environmental Effects, dated March 2007; and		Compliance
	(e) Modification Application MOD 13-10-2011, Camden Gas Project: MP25 Environmental Assessment dated October 2011, Response to Submissions dated 17 February 2012 and associated Statement of Commitments dated April 2012 (see Appendix 1); and		Compliance
	(f) Conditions of this consent. If there is any inconsistency between the above documents, the latter document shall prevail over the former to the extent of the inconsistency. However, the conditions of this consent shall prevail over all other documents to the extent of any inconsistency.	Refer to relevant conditions for an assessment of compliance.	
3.	The Applicant shall comply with any reasonable requirement/s of the Director-General arising from the Department's assessment of:	Condition is noted.	Not Triggered
	(a) Any reports, plans or correspondence that are submitted in accordance with this consent; and		Not Triggered
	(b) The implementation of any actions or measures contained in these reports, plans or correspondence.		Not Triggered
4.	This approval is for a period of twenty one (21) years from the granting of the production lease.	Condition was not activated during the audit period.	Not Triggered



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No.	Consent Condition	Evaluation	Finding
5.	Nothing in this consent permits the drilling and operation of any additional wells (beyond the approved 17 wells for gas production) or gas gathering lines.	The Auditor reviewed the list of gas wells drilled and operated by AGL against the Development Consent and Modifications and noted that the only additional well beyond those approved by the Development Consent comprised MP25 which was approved by a Modification dated 9/7/2012.	Compliance
6.	The Applicant shall provide Campbelltown City Council and Wollondilly Shire Council with the Geographical Positioning System (GPS) co-ordinates and digital survey data for gas well sites and gas gathering systems within their respective Local Government Area, in a format suitable to each of these Councils, within two months of the completion of the gas wells and gas gathering system.	Condition closed in a previous audit in relation to all wells other than MP25. The Auditor sighted records of the survey data sent to Campbelltown Council on 16/6/2013, approximately nine months after the MP25 well was completed (on 25/9/2012), but not within the two months required by this condition.	Non-Compliance Level 2
7.	The Applicant shall provide Campbelltown City Council and Wollondilly Shire Council with the wellhead configurations of each gas well within two months of the gas well being completed or two months from the date of this consent, whichever is the later.	Condition closed in a previous audit in relation to all wells other than MP25. The Auditor sighted records of the wellhead configuration sent to Campbelltown Council on 16/6/2013, approximately nine months after the MP25 well was completed (on 25/9/2012), but not within the two months required by this condition.	Non-Compliance Level 2
8.	The Applicant shall provide written notification to the Director-General that it has fulfilled the requirements of Conditions 6 and 7, within two weeks of the information being provided to the Councils.	Records provided by AGL confirmed that the Director-General was provided written notification on the same day as was provided to the councils as required by this condition.	Compliance
	Environmental Management		
9.	Except as may be expressly provided for by a licence under the Protection of the Environment Operations Act 1997 in relation to the development, the Applicant shall comply with section 120 of the Protection of the Environment Operations Act 1997, in carrying out this development. Note: Section 120 of the Protection of the Environment Operations Act 1997 applies to the disposal of wastewater.	The Auditor sighted the EMP for the Camden Gas Project, including the Soil and Water Management Sub-Plan (April 2014) and the Waste Management Sub-Plan (April 2014). The Sub-Plans detail a number of controls to prevent the pollution of water.	Compliance
10.	The Applicant is required to ensure that the Dam at gas well site MT1 is appropriately lined so that waters stored in the dam do not potentially	Condition closed in a previous audit.	Not Triggered



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No.	Consent Condition	Evaluation	Finding
	contaminate the surrounding and underlying soils.		
11.	The Applicant is not permitted to spray or discharge water from the earth Dam at gas well site MT 1, onto any land or water surface unless it has prior written approval from the Director-General.	Condition closed in a previous audit.	Not Triggered
12.	The Applicant is required to store and manage the use and disposal of water in accordance with the current version of the Office of Environment and Heritage's <i>Environmental Guidelines: Assessment, Classification and Management of Liquid and Non-Liquid Wastes</i> .	<p>The Auditor sighted the EMP for the Camden Gas Project, including the Soil and Water Management Sub-Plan (April 2014) and the Waste Management Sub-Plan (April 2014). The Sub-Plans detail a number of controls to prevent the pollution of water.</p> <p>AGL reported that produced water from the wells is removed by EPA licensed liquid waste contractors and transported to an EPA licensed treatment plant, where it is treated and blended with other liquid waste and cleaned for industrial beneficial re-use.</p>	Compliance
13.	The Applicant shall undertake the development in a way that minimises the noise generated by the development.	The Auditor sighted the Noise Management Sub-Plan (November 2013) and noted the inclusion of controls to minimise noise impacts. AGL reported that no drilling works were undertaken during the audit period.	Compliance
	Construction Hours		
13A.	<p>The Applicant shall ensure that all construction work (except for the drilling (including well casing and grouting) of surface to in-seam wells), shall only be conducted between 7.00am and 6.00pm Monday to Friday and between 8.00am and 1.00pm Saturdays, unless inaudible at any residential receiver.</p> <p><i>Note: Inaudible means that the construction activity cannot be heard by the human ear at the nearest affected residential receiver.</i></p>	<p>The Auditor sighted the Noise Management Sub-Plan (November 2013) and noted the inclusion of controls to minimise noise impacts. AGL reported that twinning (i.e. installation of a duplicate line) of a gas gathering line was undertaken during the audit period for well MP25. AGL reported that the works were undertaken within the hours nominated by this condition.</p>	Compliance



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No.	Consent Condition	Evaluation	Finding										
	Construction Noise Criteria for Surface to in-seam Wells												
13B.	<p>Noise from the drilling and construction of MP30 shall not exceed the sound pressure level (noise) limits in the table below:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center;">Receiver Location</th> <th style="text-align: center;">Weekday (7.00am-6.00pm) Saturday (7.00am-1.00pm)</th> <th style="text-align: center;">Saturday (1.00pm-6.00pm) Sunday (7.00am-6.00pm)</th> <th style="text-align: center;">Evening (6.00pm-10.00pm)</th> <th style="text-align: center;">Night (10.00pm-7.00am)</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">Nearest Receiver</td> <td style="text-align: center;">57</td> <td style="text-align: center;">42</td> <td style="text-align: center;">42</td> <td style="text-align: center;">40</td> </tr> </tbody> </table>	Receiver Location	Weekday (7.00am-6.00pm) Saturday (7.00am-1.00pm)	Saturday (1.00pm-6.00pm) Sunday (7.00am-6.00pm)	Evening (6.00pm-10.00pm)	Night (10.00pm-7.00am)	Nearest Receiver	57	42	42	40	Condition was not activated during the audit period.	Not Triggered
Receiver Location	Weekday (7.00am-6.00pm) Saturday (7.00am-1.00pm)	Saturday (1.00pm-6.00pm) Sunday (7.00am-6.00pm)	Evening (6.00pm-10.00pm)	Night (10.00pm-7.00am)									
Nearest Receiver	57	42	42	40									
13C.	<p>Noise from the drilling and construction of MP25 shall not exceed the sound pressure level (noise) limits in the table below:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center;">Receiver Location</th> <th style="text-align: center;">Weekday (7.00am-6.00pm) Saturday (7.00am-1.00pm)</th> <th style="text-align: center;">Saturday (1.00pm-6.00pm) Sunday (7.00am-6.00pm)</th> <th style="text-align: center;">Evening (6.00pm-10.00pm)</th> <th style="text-align: center;">Night (10.00pm-7.00am)</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">Nearest Receiver</td> <td style="text-align: center;">47</td> <td style="text-align: center;">42</td> <td style="text-align: center;">42</td> <td style="text-align: center;">40</td> </tr> </tbody> </table>	Receiver Location	Weekday (7.00am-6.00pm) Saturday (7.00am-1.00pm)	Saturday (1.00pm-6.00pm) Sunday (7.00am-6.00pm)	Evening (6.00pm-10.00pm)	Night (10.00pm-7.00am)	Nearest Receiver	47	42	42	40	A noise monitoring report by Wilkinson Murray, dated 22/8/12 for monitoring during drilling on 16/8/2012 indicated compliance with noise criteria at the nearest residence for day, evening and night-time.	Compliance
Receiver Location	Weekday (7.00am-6.00pm) Saturday (7.00am-1.00pm)	Saturday (1.00pm-6.00pm) Sunday (7.00am-6.00pm)	Evening (6.00pm-10.00pm)	Night (10.00pm-7.00am)									
Nearest Receiver	47	42	42	40									
14.	The Applicant is required to prepare and implement a Water Management Plan for the sites and the Dam at MT 1 for the life of the development. The Water Management Plan will include (and not be limited to) sediment and erosion control measures to be implemented prior to the construction of the earth Dam at gas well site MT1. The Applicant shall submit the Water Management Plan for the Director-General's approval within one month of the date of this consent.	Condition closed in a previous audit.	Not Triggered										
15.	The Applicant is required to prepare and implement a Flood Management Plan for the sites for the life of the development. The Flood Management Plan will include (and not be limited to) measures to minimise and mitigate flooding impacts. The Applicant shall submit the Flood Management Plan for the Director-General's approval within one month of the date of this consent.	Condition closed in a previous audit.	Not Triggered										
16.	The Applicant is required to prepare and implement a Soil and Water Management Plan for the sites for the life of the development. The	Condition closed in a previous audit.	Not Triggered										



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No.	Consent Condition	Evaluation	Finding
	Applicant shall submit the Soil and Water Management Plan for the Director-General's approval within one month of the date of this consent.		
	Soil and Water Management Plan at MP25		
16A.	Prior to the commencement of construction of the gas well at MP25, the management plans submitted under conditions 15 and 16 must:	The Soil and Water Management Plan was updated in July 2012 by EMGA Mitchell McLennan to address these requirements.	Compliance
	a) be updated by a suitably qualified expert;	The updated Soil and Water Management Plan was approved by the Director-General on 11/7/2012.	Compliance
	b) be re-submitted to the Director-General for approval prior to the commencement of construction activities at the MP25 gas well site;		Compliance
	c) include measures to minimise impacts on surface water and groundwater quality at the MP25 gas well site, including but not limited to: <ul style="list-style-type: none"> i. using above-ground baffle tanks to contain all drilling fluids during drilling operations; ii. disposing of all drilling fluids and groundwater collected in the baffle tanks at an authorised wastewater treatment facility; iii. ensuring that adequate spill control equipment and materials will be available at drill sites; iv. a contingency plan to address any groundwater brought to the surface that exceeds the capacity of onsite detention structure, and would avoid discharges from the site (otherwise than in accordance with an environment protection licence); and v. ensuring that no hydraulic fracturing occurs and that no fracking fluids containing Benzene, Toluene, Ethylbenzene and Xylene (BTEX0 chemicals) are used. 		Compliance



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No.	Consent Condition	Evaluation	Finding
	Bore Construction at MP25		
16B	The Applicant must ensure that the gas well at MP25:	AGL reported that the gas well at MP25 complied with this condition.	Compliance
	(a) is designed in consultation with, and in accordance with the specifications required by, the Division of Resources and Energy (DRE), under the Department of Trade, Investment, Regional Infrastructure and Services (DTIRIS);		Compliance
	(b) is cased with steel across the uppermost beneficial-use aquifer layer;		Compliance
	(c) has all casing fully cemented from casing shoe to surface, leaving no open annuluses; and		Compliance
	(d) has a blow-out prevention device on the wellhead secured to the steel casing.		Compliance
	In order to protect the integrity of any underground aquifers, prevent gas escape and maintain groundwater quality.	Noted.	
	Gas Gathering Line – MP16 to MP30		
16C.	For the gas gathering line between MP30 and MP15, the Applicant shall, to the satisfaction of the Director-General ensure that:	Construction works were not underway at the time of the audit. AGL reported that these conditions were complied with during the construction works.	Compliance
	(a) pipelines are designed, constructed and operated in accordance with the Australian Standard for Installation and Maintenance of Plastic Pipe Systems for Gas AS3723-1989 (or its latest version);		
	(b) the route of the gas gathering and water transport systems and access roads follow previously or currently disturbed areas wherever practicable;		
	(c) trenches are not left open overnight, unless adequately covered;		
	(d) open trenching works within 20 metres of watercourses are only		



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No.	Consent Condition	Evaluation	Finding
	undertaken during dry weather conditions;		
	(e) construction activities do not impede lateral water flows;		
	(f) no crown or camber remains along any gas gathering system line, following rehabilitation;		
	(g) signs are erected at intervals along all gas gathering system lines indicating the presence of a buried gas pipeline; and		
	(h) impacts to riparian vegetation and engendered ecological communities are minimised.		
	Heritage		
16D.	The Applicant shall ensure that, if any historical archaeological relics within the meaning of the Heritage Act 1977 are disturbed, the Heritage Council of NSW shall be notified in accordance with section 146 of the Heritage Act 1977.	Condition was not activated during the audit period.	Not Triggered
	Threatened Species		
16E.	The Applicant shall ensure that, during the drilling and construction of MP30 and upgrading of the gas gathering lines, impacts on threatened species are minimised by implementing actions including, but not limited, to the following:	Condition was not activated during the audit period.	Not Triggered
	(a) The recommendations outlined in Sections 6 and 7 of the Ecosearch Environmental Consultants Pty Ltd report titled Flora and Fauna Assessment, AGL –Gas Well and Gathering Line Project Modifications ; and		Not Triggered
	(b) Marking the boundaries of endangered ecological communities (EECs) and locations of other known threatened species and, where possible, avoiding construction activities within these areas.		Not Triggered



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No.	Consent Condition	Evaluation	Finding
17.	The Applicant is required to prepare and implement a Weed Management Plan for the sites for the life of the development. The Applicant shall submit the Weed Management Plan for the Director-General's approval within one month of the date of this consent.	The Auditor sighted the Rehabilitation & Landscape Management Sub-Plan (April 2014) and noted compliance with the requirements of this condition.	Compliance
17A.	<p>Prior to the commencement of construction of the gas well at MP25, the management plan under condition 17 must:</p> <ul style="list-style-type: none"> (a) be updated by a suitably qualified expert to include gas well MP25; and (b) be re-submitted to the Director-General for approval. 	The Auditor sighted the Rehabilitation & Landscape Management Sub-Plan (April 2014) and noted compliance with the requirements of this condition.	Compliance
	<p>Redrilling and Refracking Management Plan</p> <p><i>Note: For the purposes of this consent the redrilling and/or additional fracking of a well does not constitute wellhead maintenance.</i></p>	Condition noted.	
18.	The Applicant shall obtain the prior approval of the Director-General for the redrilling and/or additional fracking of a gas well.	AGL reported that no redrilling or fracking works were undertaken during the audit period.	Not Triggered
19.	<p>The Applicant shall prepare a Redrilling and Refracking Management Plan in consultation with the Department of Primary Industries for the redrilling and/or refracking of an existing well. The Plan shall be submitted to the Director-General no later than one month prior to the commencement of the work or within such period as agreed by the Director-General.</p> <p>The Plan shall include, but not necessarily be limited to:</p>	AGL reported that no redrilling or fracking works were undertaken during the audit period.	Not Triggered
	(a) a description of all the activities to be undertaken on the well site during the redrilling and/or refracking work;		Not Triggered
	(b) details of how the environmental performance of the work will be monitored and what actions will be taken to address identified adverse environmental impacts;		Not Triggered
	(c) reference to the relevant parts of the Environmental Management Plan required under condition 21 of this consent;		Not Triggered



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No.	Consent Condition	Evaluation	Finding
	(d) compliance with all the relevant environmental performance requirements of this consent; and		Not Triggered
	(e) arrangements for complaints handling procedures during the redrilling/refracking work.		Not Triggered
20.	The Applicant shall give written notification of the proposed redrilling/refracking work to potentially affected residences and other noise sensitive receivers at least fourteen days prior to work commencing.	AGL reported that no redrilling or fracing works were undertaken during the audit period.	Not Triggered
	Operational Environmental Management Plan (OEMP)		
21.	The Applicant shall prepare and implement an Operational Environmental Management Plan (OEMP) to provide environmental management practices and procedures to be followed during the operation of the development. The OEMP shall be forwarded to the Director- General for approval within one month of the date of this consent. The OEMP shall include, but not necessarily be limited to:	<p>The Auditor sighted the EMP (March 2014) and noted the content conforms to the requirements of this condition.</p> <p>Correspondence was sighted from DoPE to AGL confirming approval of the EMP. AGL advised that the current revisions of the Soil and Water Management Sub- Plan (April 2014) and the Rehabilitation & Landscape Management Sub-Plan (April 2014) are being reviewed by DoPE.</p>	Compliance
	(a) identification of all statutory and other obligations that the Applicant is required to fulfil in relation to operation of the development, including all consents, licences, approvals and consultations;		Compliance
	(b) a description of the roles and responsibilities for all key personnel involved in the operation of the development;		Compliance
	(c) the overall environmental policies and principles to be applied to the operation of the development;		Compliance
	(d) standards and performance measures to be applied to the development, and a means by which environmental performance can be periodically reviewed and improved; and		Compliance
	(e) management policies to ensure that environmental performance goals are met and to comply with conditions of this consent.		Compliance



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No.	Consent Condition	Evaluation	Finding
21A.	<p>Prior to the commencement of construction of the gas well at MP25, the OEMP submitted under condition 22 must:</p> <p>(a) be updated by a suitably qualified expert to include gas well MP25; and</p> <p>(b) be re-submitted to the Director-General for approval.</p>	The EMP was updated in July 2012 and includes reference to gas well MP25.	Compliance
22.	The Applicant shall supply a copy of the OEMP to Campbelltown City Council and Wollondilly Shire Council within fourteen days of the Director-General's approval. The Applicant shall ensure that a copy of the OEMP is publicly available.	Condition closed in a previous audit.	Not Triggered
23.	The Applicant shall review and update the OEMP annually, or as directed by the Director-General	The EMP was not reviewed and updated annually as required by this condition. It was issued as an approved document in July 2012 and March 2014. The Sub-Plans were updated at frequencies varying from two to six years. Each of the documents has been updated in the last year or is in the process of being updated (Air Quality and Traffic Management Sub-Plans).	Non-Compliance Level 2
Annual Environmental Performance Reporting			
24.	The Applicant shall include the operation of MT1 - MT10 inclusive, MP13 – MP17 inclusive, and MP30, and the associated gas gathering system and the conditions of this consent, in the Annual Environmental Performance Report required under Schedule 5 Condition 5 of development consent DA-282-6-2003-i, dated 16 June 2004.	The Auditor sighted the Annual Environmental Performance Reports for the 2012/2013 and 2013/2014 (draft) years and noted compliance with this condition.	Compliance
Independent Environmental Audit			
25.	The Applicant shall include the operation of MT1 - MT10 inclusive, MP13 – MP17 inclusive, and MP30, and the associated gas gathering system, and the conditions of this consent, in the Independent Environmental Audit required under Schedule 5 Condition 8 of development consent DA-282-6-2003-i, dated 16 June 2004.	The scope of this independent audit satisfies this condition.	Compliance



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Table 6: DA 9-1-2005 (Glenlee Wells)

No.	Consent Condition	Evaluation	Finding
SCHEDULE 2			
Obligation to Minimise Harm to the Environment			
1.	The Applicant shall implement all practicable measures to prevent or minimise any harm to the environment that may result from the construction or operation of the development.	<p>An EMS has been established to manage environmental risks and drive improvements in performance. The EMS consists of an EMP, related sub-plans and a Compliance Register.</p> <p>Various management tools have been implemented to monitor and measure implementation of the EMS.</p> <p>The ECR was sighted and found to be effective for monitoring compliance against project approval obligations. During the audit period the ECR transitioned from Mipela to Regulatory Compliance Register to CMO-Compliance. CMO was commissioned only on 30 June 2014. However, supporting documents were not included for all conditions to verify compliance status. It is recommended that each Consent Condition in the Compliance Register be checked to ensure that relevant supporting documentation is referenced (Opportunity for Improvement).</p> <p>It is also noted that the consent conditions contained in CMO-Compliance are not consistently a 'word for word' representation of the relevant condition, which presents a risk of misinterpretation and inability to fully comply with the condition. It is recommended that each condition in CMO-Compliance be checked to ensure it is a 'word for word' representation of the consent conditions (Opportunity for Improvement).</p> <p>There were no reported environmental incidents or non-compliances during the audit period.</p>	Compliance Improvement Recommended



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No.	Consent Condition	Evaluation	Finding
	Terms of Approval		
2.	The Applicant shall carry out the development generally in accordance with the:	<p>AGL reported that the development is being undertaken in accordance with the EMS, which incorporates the requirements of Consent Conditions and the supporting documentation. The Sub-Plans have been going through a process of review and upgrade during 2013/2014 and have been submitted to DoPE, with the exception of the Sub-Plans for air quality and traffic which are still undergoing the revision process.</p> <p>AGL reported that there have not been any significant changes in operations or infrastructure at Glenlee during the audit period.</p>	Compliance
	(a) DA submitted to the Department on 4 January 2005;		Compliance
	(b) <i>Statement of Environmental Effects – Elizabeth Macarthur Agricultural Institute Horizontal Drilling Project Sydney Gas Company</i> dated July 2002;		Compliance
	(c) <i>Statement of Environmental Effects – Glenlee Drilling Project Drilling Operations Sydney Gas Company</i> dated September 2002		Compliance
	(d) Letter from Sydney Gas Operations Pty Ltd to the Department dated 13 May 2005, modifying the application to relocate well GL3;		Compliance
	(e) The modification application submitted to the Department on 11 April 2006 and the accompanying document <i>Camden Gas Project Joint Venture Proposed Multiple Gas Well Modifications</i> prepared by AGL Gas Production (Camden) Pty Ltd and Sydney Gas (Camden) Operations Pty Ltd, dated April 2006;		Compliance
	(f) Modification Application MOD 28-3-2007 and <i>Camden Gas Project Joint Venture Gas Well and Gathering Line Modification Project Statement of Environmental Effects</i> , dated March 2007;		Compliance
	(g) letter from AGL Energy Limited to the Department dated 28 th May 2010, modifying the application to revise condition 26 of schedule 2; and		Compliance
	(h) Conditions of this consent. If there is any inconsistency between the above documents, the latter document shall prevail over the former to the extent of the inconsistency. However, the conditions of this consent shall prevail over all other documents to the extent of any inconsistency.	Refer to relevant conditions for an assessment of compliance.	
3.	This approval is for a period of twenty one (21) years from the granting of the production lease.	Condition was not activated during the audit period.	Not Triggered
4.	The Applicant shall not commence the construction of well GL11 until the Director-General has approved the Drilling and Fracing Management Plan required under condition 37.	Condition closed in a previous audit	Not Triggered



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No.	Consent Condition	Evaluation	Finding
5.	The Applicant shall comply with any reasonable requirement/s of the Director-General arising from the Department's assessment of:	Condition is noted.	Not Triggered
	(a) Any reports, plans or correspondence that are submitted in accordance with this consent; and		Not Triggered
	(b) The implementation of any actions or measures contained in these reports, plans or correspondence.		Not Triggered
6	Nothing in this consent permits the drilling and operation of any additional wells (beyond the approved 8 wells for gas production).	The Auditor reviewed the list of gas wells against the Development Consent and confirmed that no additional wells were drilled or operated during the audit period.	Compliance
7.	The Applicant shall provide Camden Council and Wollondilly Shire Council with the Geographical Positioning System (GPS) co-ordinates and digital survey data for gas well sites and gas gathering systems within their respective Local Government Area, in a format suitable to each of these Councils, within two months of the completion of the gas wells and gas gathering system.	Condition closed in a previous audit.	Not Triggered
8.	The Applicant shall provide Camden Council and Wollondilly Shire Council with the wellhead configurations of each gas well within two months of the gas well being completed or two months from the date of this consent, whichever is the later.	Condition closed in a previous audit.	Not Triggered
9.	The Applicant shall provide written notification to the Director-General that it has fulfilled the requirements of Conditions 7 and 8, within two weeks of the information being provided to the Councils.	Condition closed in a previous audit.	Not Triggered
10.	The Applicant shall comply with the following in the construction of the gas gathering system pipeline:	Condition was not activated during the audit period. AGL reported that no gas gathering system pipelines were constructed during the audit period.	Not Triggered
	(a) signs stating the presence of a buried gas pipeline shall be erected periodically along the length of the trench once the pipeline has been laid;		Not Triggered
	(b) trenches are to be restored and reseeded with local grass seeds on completion of the work;		Not Triggered
	(c) local council traffic guidelines in respect of work carried out on road verges and underneath roads shall be implemented;		Not Triggered
	(d) the Applicant shall construct the gas gathering system so as not to impeach lateral water flows;		Not Triggered



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No.	Consent Condition	Evaluation	Finding
	(e) the Applicant shall ensure that no crown or camber remains along the gas gathering systems, following construction;		Not Triggered
	(f) the pipeline shall be designed, constructed and operated in accordance with the Australian		Not Triggered
	(g) Standard for the installation and maintenance of Plastic Pipe Systems for Gas AS 3723-1989 (or its latest version); and		Not Triggered
	(h) the Department shall be notified on the completion of any trenching works.		Not Triggered
11.	Should the Spring Farm Master Plan for the Spring Farm urban release area, and development of the Garden Gates subdivision in Mt Annan South, identify the need to relocate any gas gathering lines the subject of this consent to ensure an efficient and environmentally sustainable urban outcome, that infrastructure shall be relocated by, and at the cost of the Applicant to the satisfaction of the Director- General, following consultation with Camden Council and Landcom.	Condition was not activated during the audit period.	Not Triggered
	Hours of Operation		
12.	The Applicant may conduct construction activities on land owned by Waste Service NSW, during the following hours: Monday to Friday 7.00 am to 6.00 pm; Saturday and Sunday 7.00 am to 6.00 pm. (Excluding Public Holidays)	Condition was not activated during the audit period.	Not Triggered
13.	For development carried out on land not owned by Waste Service NSW, the Applicant is restricted to the following hours of construction: Monday to Friday 7.00 am to 6.00 pm; Saturday 8.00 am to 1.00 pm. (Excluding Public Holidays)	Condition was not activated during the audit period.	Not Triggered
	Environmental Management		Not Triggered
14	The Applicant shall obtain a Part 3A Permit prior to the commencement of construction of any crossing of a stream by the gas gathering line.	Condition was not activated during the audit period.	Not Triggered
	Note: The <i>Rivers and Foreshore Improvement Act 1948</i> applies to the proposed development and therefore any excavation, removal of material from the bank, shore or bed of any stream, estuary or lake, or land within 40 metres from the top of the bank will require a Part 3A Permit.		Not Triggered



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No.	Consent Condition	Evaluation	Finding
15.	Except as may be expressly provided for by a licence under the <i>Protection of the Environment Operations Act 1997</i> in relation to the development, the Applicant shall comply with section 120 of the <i>Protection of the Environment Operations Act 1997</i> , in carrying out this development. Note: Section 120 of the <i>Protection of the Environment Operations Act 1997</i> applies to the disposal of wastewater.	AGL reported that there had not been any water pollution incidents during the audit period. The Auditor sighted the EMP for the Camden Gas Project, including the Soil and Water Management Sub-Plan (April 2014) and the Waste Management Sub-Plan (April 2014). The Plans detail a number of controls to prevent the pollution of water.	Compliance
16	The Applicant shall implement all practicable measures to minimise soil erosion and the discharge of sediments and water pollutants from the site.	The Auditor sighted the EMP for the Camden Gas Project, including the Soil and Water Management Sub-Plan (April 2014) and the Waste Management Sub-Plan (April 2014). The Plans detail a number of controls to prevent the pollution of water. AGL's Standard Operating Procedure: Vacuum Truck Operations – describes the transfer of produced water from the farm tank at the well site into the truck and unloading to a holding tank at RPGP. A Well Check Sheet is used to record results of inspections of well tanks for leaks.	Compliance
17.	The Applicant shall implement all relevant site drainage and sediment and erosion control works and measures prior to the commencement of any other works at the site.	AGL reported that no construction works were undertaken during the audit period.	Not Triggered
18.	The Applicant shall ensure that the gas gathering system connecting well site EM 1H shall be constructed outside the breeding seasons of raptor species.	Condition was not activated during the audit period.	Not Triggered
19.	The Applicant shall undertake the development in a way that minimises the noise generated by the development.	The Auditor sighted the Noise Management Sub-Plan (November 2013) and noted the inclusion of appropriate controls to minimise noise. With respect to this Development Consent, no noise monitoring was warranted within the audit period and no noise complaints were received by AGL.	Compliance
20.	The Applicant is required to prepare and implement a Flood Management Plan for the well within the floodplain for the life of the development. The	The Auditor sighted the Emergency Response Plan (November 2013) and noted the inclusion of a flood	Compliance



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No.	Consent Condition	Evaluation	Finding
	Flood Management Plan will include (and not be limited to) measures to minimise and mitigate flooding impacts. The Applicant shall submit the Flood Management Plan for the Director-General's approval within one month of the date of this consent.	emergency procedure. The procedure includes a number of controls to minimise and mitigate flood impacts.	
21.	The Applicant shall ensure that the route of the gas gathering system follows previously or currently disturbed areas wherever possible.	Condition was not activated during the audit period. AGL reported that no gas gathering lines were constructed during the audit period.	Not Triggered
22.	The Applicant shall ensure that trenches constructed during the construction of gas gathering lines are not left open overnight unless otherwise agreed by the Director-General.	Condition was not activated during the audit period. AGL reported that no gas gathering lines were constructed during the audit period.	Not Triggered
	Threatened Species		
22A.	The Applicant shall ensure that during the upgrading of the gas gathering lines, impacts on threatened species are minimised by implementing actions including, but not limited, to the following:	Condition was not activated during the audit period. AGL reported that no gas gathering lines were upgraded during the audit period.	Not Triggered
	(a) The recommendations outlined in Sections 6 and 7 of the Ecosearch Environmental Consultants Pty Ltd report titled <i>Flora and Fauna Assessment, AGL –Gas Well and Gathering Line Project Modifications</i> ; and		Not Triggered
	(b) Marking the boundaries of endangered ecological communities (EECs) and locations of other known threatened species and, where possible, avoiding construction activities within these areas.		Not Triggered
23.	The Applicant shall not remove mature trees as part of this development unless otherwise agreed by the Director-General.	The Auditor sighted the Flora and Fauna Management Sub-Plan (April 2014) and noted the inclusion of this control measure. AGL reported that no mature trees were removed during the audit period.	Compliance
24.	The Applicant shall implement best practice flora and fauna management.	The Auditor sighted the Flora and Fauna Management Sub-Plan (April 2014) and noted the inclusion of various control measures.	Compliance



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No.	Consent Condition	Evaluation	Finding
		AGL uses a Hazard Identification Form to assess potential risks, including flora and fauna impacts, prior to undertaking site works.	
25.	The Applicant shall take all practicable measures to minimise potential flora and fauna impacts of the proposed development.	<p>The Auditor sighted the Flora and Fauna Management Sub-Plan (April 2014) and noted the inclusion of various control measures.</p> <p>AGL uses a Hazard Identification Form to assess potential risks, including flora and fauna impacts, prior to undertaking site works.</p>	Compliance
26.	The Applicant shall provide landscaping around the well heads using appropriate species in consultation with the land owner.	The Auditor sighted the Rehabilitation & Landscape Management Sub-Plan (April 2014) and noted the inclusion of this condition. AGL reported that no rehabilitation works were undertaken during the audit period.	Compliance
27.	The Applicant shall employ a suitably qualified ecologist with specific experience in identifying the Cumberland Plain Snail, during the construction period of the development. The ecologist shall monitor and examine areas for the presence of the threatened Cumberland Plain Snail, during the clearing for the development.	The Auditor sighted the Rehabilitation & Landscape Management Sub-Plan (April 2014) and noted the inclusion of this condition. AGL reported that no construction works were undertaken during the audit period.	Not Triggered
28.	The Applicant shall prepare a translocation strategy for the threatened Cumberland Plain Snail, which will be submitted for the Director-General's approval prior to construction. The translocation strategy shall be implemented should any individuals or populations of the Cumberland Plain Snail be identified.	Condition closed in a previous audit.	Not Triggered
29.	The Applicant is required to prepare and implement a Weed Management Plan for the sites for the life of the development. The Applicant shall submit the Weed Management Plan for the Director-General's approval within one month of the date of this consent.	The Auditor sighted the Rehabilitation & Landscape Management Sub-Plan (April 2014) and noted the inclusion of this condition. The updated Sub-Plan was submitted to the Director-General for approval in May 2014 and AGL is awaiting a response.	Compliance



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No.	Consent Condition	Evaluation	Finding
30.	Prior to the commencement of site preparation works for the gas gathering system, the Applicant shall clearly mark the locations of known Aboriginal relics on the site (using flags, fencing or other appropriate method) and ensure that all employees and contractors are aware of these locations, to prevent the known relics being impacted or disturbed during site preparation and construction.	Condition was not activated during the audit period.	Not Triggered
31.	The Applicant shall relocate the section of the gas gathering line east of the Aboriginal relic identified as Clutha 1, to ensure that this the relic is not harmed from installation of the gas gathering line. Details of the relocation of the line shall be submitted to the Director-General for approval.	Condition was not activated during the audit period.	Not Triggered
Safety and Risk			
32.	The Applicant shall develop and implement an Emergency Plan and Safety Management System for the development. The plan/system shall be submitted for the approval of the Director-General, at least one month prior to the commissioning of the development, or within such further period as the Director-General may agree. Commissioning shall not commence until the Director-General has approved the plan/system.	The Auditor sighted the Emergency Response Plan (November 2013) and the Health and Safety Management Plan, Camden Project NSW (3 August 2011) and noted compliance with this condition. The updated Emergency Response Plan was provided to DoPE on 20/10/13.	Compliance
	(a) <u>Emergency Plan</u> A comprehensive emergency plan and detailed emergency procedures for the development shall be prepared in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 1, Industry Emergency Planning Guidelines. The plan shall include detailed procedures for the safety of all people outside of the development who may be at risk from the development.	The Plans note earlier revisions which were approved by the then Department of Infrastructure Planning and Natural Resources. This condition was recorded within a Sydney Gas Projects Commitments Register as completed and approved by the Director-General on 6 September 2004.	Compliance
	(b) <u>Safety Management System</u> A document setting out a comprehensive safety management system, covering all operations on the gas wells and gathering system shall be developed in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 9, Safety Management. The document shall clearly specify all safety related procedures, responsibilities and policies, along with details of mechanisms for ensuring adherence to procedures. Records shall be kept on-site and shall be made available for inspection by the Director-General upon request. In particular records shall be maintained to demonstrate that management of change procedures were	Emergency evacuation drills are undertaken at least annual and record in AGL's scheduling database (MEX) as sighted by the Auditor.	Compliance



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No.	Consent Condition	Evaluation	Finding
	followed for the connection of the new gas lines to the existing network and for the integration of the new wells into the automatic control system.		
	Note: The Applicant may update the current approved version of the relevant study/plan/system prepared to comply with Schedule 4 Condition 92 of development consent DA-282-6-2003-i, dated 16 June 2004. The updated version shall incorporate and adequately address the relevant aspects of the additional wells and related plant.		Compliance
	Compliance Report		
33.	<p>Three months after commencement of operation of the development, the Applicant shall submit to the Director-General a compliance report detailing compliance with Condition 32, including:</p> <ul style="list-style-type: none"> (a) dates of study/plan/system completion/submission and commencement of construction and commissioning; (b) actions taken or proposed, to implement recommendations made in the studies/plans/systems; and (c) responses to any requirement imposed by the Director-General under Condition 35. <p>This report shall verify that:</p> <ul style="list-style-type: none"> (a) The Emergency Plan required under Condition 32(a) is effectively in place and that at least one emergency exercise has been conducted; and (b) The Safety Management System required under Condition 32(b) has been fully implemented and that records required by the system are being kept. <p>The report shall include a signed commitment by the Applicant's representative responsible for the operation of the development, that for each study/plan/system:</p> <ul style="list-style-type: none"> (a) The required study/plan/system has been undertaken or prepared to the relevant Hazardous Industry Planning Advisory Panel; (b) All recommendations of each study/plan/system have been implemented; and (c) All safety management system and their associated risk controls have been implemented and are being maintained. 	<p>The Compliance Report was completed and submitted to the Director-General on 7/6/14, titled <i>Rosalind Park Gas Plant, Compliance Audit, AECOM Australia Pty Ltd, 3/5/14</i> for AGL. The date of submission of the report represents a non-compliance as it was not submitted within three months of commencement of operation of the development.</p> <p>The Report complies with contents required by this condition.</p> <p>A separate letter was sent by AGL with the report to the Director-General to address the required signed commitment by the Applicant's representative.</p> <p>No further action is warranted.</p>	Non-Compliance Level 2



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No.	Consent Condition	Evaluation	Finding
Hazard Audit			
34.	<p>Twelve months after the commencement of operations of the proposed development or within such further period as the Director-General may agree, the Applicant shall carry out a comprehensive hazard audit of the development and within one month of the audit submit a report to the Director- General.</p> <p>The audit shall be carried out at the Applicant’s expense by a duly qualified independent person or team approved by the Director-General prior to commencement of the audit. Further audits shall be carried out every three years or as determined by the Director-General and a report of each audit shall, within one month of the audit, be submitted to the Director-General. Hazard audits shall be carried out in accordance with the Department’s Hazardous Industry Planning Advisory Paper No. 5, Hazard Audit Guidelines.</p> <p>Note: The Applicant may include the three yearly hazard audit of the development with the Hazard Audit required under Schedule 4 Condition 95 of development consent DA-282-6-2003-i, dated 16 June 2004.</p>	<p>AGL received a letter of approval for the Audit team from DoPE dated 4/7/2012.</p> <p>The report titled 2012 Hazard Audit, AGL Rosalind Park Gas Plant, Medhurst Road, Gilead, prepared by AECOM, dated 24/10/2013 was forward to DoPE on 4/11/2013.</p>	Compliance
35.	<p>The Applicant shall comply with all reasonable requirements of the Director-General in respect of the implementation of any measures arising from recommendations of the studies or reports referred to in Conditions 32 to 34 inclusive, within such time as the Director-General may agree.</p>	<p>Condition was not activated during the audit period.</p> <p>AGL did not receive a response from the Department of Planning on the 2012 Hazard Audit report.</p>	Not Triggered
Drilling and Fracing Management Plan			
	<p>Note: For the purposes of this consent the redrilling and/or additional fracing of a well does not constitute wellhead maintenance.</p>	<p>Condition was not activated during the audit period.</p> <p>AGL reported that drilling, redrilling or fracing works were undertaken during the audit period under this Development Consent.</p>	Not Triggered
36.	<p>The Applicant shall obtain the prior approval of the Director-General for the drilling, redrilling and/or additional fracing of a gas well.</p>	<p>Condition was not activated during the audit period.</p>	Not Triggered



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No.	Consent Condition	Evaluation	Finding
37.	The Applicant shall prepare a Drilling and Fracing Management Plan in consultation with the Department of Primary Industries for the drilling of a well, or redrilling and/or refracing of an existing well. The Plan shall be submitted to the Director-General no later than one month prior to the commencement of the work or within such period as agreed by the Director-General. The Plan shall include, but not necessarily be limited to:	Condition was not activated during the audit period.	Not Triggered
	(a) a description of all the activities to be undertaken on the well site during the drilling, redrilling and/or refracing work;	Condition was not activated during the audit period.	Not Triggered
	(b) details of how the environmental performance of the work will be monitored and what actions will be taken to address identified adverse environmental impacts;	Condition was not activated during the audit period.	Not Triggered
	(c) reference to the relevant parts of the Environmental Management Plan required under condition 41;	Condition was not activated during the audit period.	Not Triggered
	(d) compliance with all the relevant environmental performance requirements of this consent; and	Condition was not activated during the audit period.	Not Triggered
	(e) arrangements for complaints handling procedures during the drilling, redrilling and/or refracing work.	Condition was not activated during the audit period.	Not Triggered
38.	The Applicant shall give written notification of the proposed drilling, redrilling and/or refracing work to potentially affected residences and other noise sensitive receivers at least fourteen days prior to work commencing.	Condition was not activated during the audit period.	Not Triggered
	Construction Environmental Management Plan (CEMP)		
39.	The Applicant shall prepare and implement a Construction Environmental Management Plan (CEMP) to provide environmental management, practices and procedures to be followed during the construction phases of the proposed development. A framework plan outlining key practices, procedures and environmental management practices should be approved by the Director-General prior to the commencement of construction.	Condition was not activated during the audit period. No construction works were undertaken during the audit period.	Not Triggered
40.	The Applicant shall consult with the EMAI in the preparation of the CEMP. The CEMP shall identify measures to minimise the impact of construction of the gas gathering system and any related activities, within and adjacent to the Raptor Breeding zones on the EMAI site. Note: The Applicant may update the current approved version of the	Condition was not activated during the audit period. No construction works were undertaken during the audit period.	Not Triggered



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No.	Consent Condition	Evaluation	Finding
	CEMP prepared to comply with Schedule 5 Condition 1 of development consent DA-282-6-2003-i, dated 16 June 2004. The updated version shall incorporate and adequately address the relevant aspects of the additional wells and related plant.		
	Operational Environmental Management Plan (OEMP)		
41.	The Applicant shall prepare and implement an Operational Environmental Management Plan (OEMP) to provide environmental management practices and procedures to be followed during the operation of the development. The OEMP shall be forwarded to the Director-General for approval within one month of the date of this consent. The OEMP shall include, but not necessarily be limited to:	The Auditor sighted the EMP (March 2014), and approval by DoPE (24/03/2014) and noted that the content complies with this condition.	Compliance
	(a) identification of all statutory and other obligations that the Applicant is required to fulfil in relation to operation of the development, including all consents, licences, approvals and consultations;		Compliance
	(b) a description of the roles and responsibilities for all key personnel involved in the operation of the development;		Compliance
	(c) the overall environmental policies and principles to be applied to the operation of the development;		Compliance
	(d) standards and performance measures to be applied to the development, and a means by which environmental performance can be periodically reviewed and improved; and		Compliance
	(e) management policies to ensure that environmental performance goals are met and to comply with conditions of this consent.		Compliance
	Note: The Applicant may update the current approved version of the OEMP prepared to comply with Schedule 5 Condition 2 of development consent DA-282-6-2003-i, dated 16 June 2004. The updated version shall incorporate and adequately address the relevant aspects of the additional wells and related plant.		Compliance



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No.	Consent Condition	Evaluation	Finding
	Annual Environmental Performance Reporting		
42.	The Applicant shall include the operation of wells GL2 – 4 inclusive, GL 6, EMAI-1H and EMAI-1V and the associated gas gathering system and the conditions of this consent, in the Annual Environmental Performance Report required under Schedule 5 Condition 5 of development consent DA-282-6-2003-i, dated 16 June 2004.	The Auditor sighted the AEPR for the 2012/2013 and 2013/2014 (draft) years and noted compliance with this condition.	Compliance
	Independent Environmental Audit – Construction at EMAI		
43.	<p>The Applicant shall commission and pay the full costs of an Independent Environmental Audit of the construction of the gas gathering system, construction of the access roads and drilling and fracing of gas wells on the EMAI. The objective of the audit is to monitor the performance and effect of construction activities on the EMAI.</p> <p>The Independent Environmental Audit shall:</p> <p>(a) be conducted by a suitably qualified, experienced, and independent person(s) whose appointment has been approved by the Director-General; and</p> <p>(b) be consistent with ISO 19011:2002 - Guidelines for Quality and/ or Environmental Management Systems Auditing, or updated versions of these guidelines/manuals.</p>	Condition closed in a previous audit.	Not Triggered
	<p>The Audit shall:</p> <p>a) assess the environmental performance of the construction of the development on EMAI, and its effects on the surrounding environment;</p> <p>b) assess whether the development is complying with the relevant standards, performance measures, and statutory requirements;</p> <p>c) consider the Applicant's proposed Construction Environmental Management Plan for the EMAI Site; and</p> <p>d) recommend measures or actions to improve the environmental performance of the construction of the development on EMAI, and/or its environmental management and monitoring systems (if required).</p>		Not Triggered
	Within one month of completion of the audit, the Applicant must submit a copy of the audit report to the Director-General, the NSW Heritage Office and Department of Primary Industries-Agriculture. The Director-General may require the Applicant to address certain matters identified in the report		Not Triggered



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No.	Consent Condition	Evaluation	Finding
	and any comments received from the NSW Heritage Office and Department of Primary Industries-Agriculture. Any action required to be undertaken shall be completed within such period as the Director-General may agree.		
	Note: The Applicant may include the construction of the development on the EMAI in the audit prepared to comply with Schedule 5 Condition 8 of development consent DA-282-6-2003-i, dated 16 June 2004.		Not Triggered
	Independent Environmental Audit – Operation		
44.	The Applicant shall include the operation of wells GL2 – 4 inclusive, GL 6, EMAI-1H and EMAI-1V and the associated gas gathering system, and the conditions of this consent, in the Independent Environmental Audit required under Schedule 5 Condition 10 of development consent DA-282-6-2003- i, dated 16 June 2004.	The scope of this 2012-2014 IEA addresses this condition.	Compliance



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Table 7: DA 75-4-2005 (Sugarloaf Farm)

No.	Consent Condition	Evaluation	Finding
SCHEDULE 2			
Obligation to Minimise Harm to the Environment			
1.	The Applicant shall implement all practicable measures to prevent or minimise any harm to the environment that may result from the construction or operation of the development.	<p>An EMS has been established to manage environmental risks and drive improvements in performance. The EMS consists of an EMP, related sub-plans and a Compliance Register.</p> <p>Various management tools have been implemented to monitor and measure implementation of the EMS.</p> <p>The ECR was sighted and found to be effective for monitoring compliance against project approval obligations. During the audit period the ECR transitioned from Mipela to Regulatory Compliance Register to CMO-Compliance. CMO was commissioned only on 30 June 2014. However, supporting documents were not included for all conditions to verify compliance status. It is recommended that each Consent Condition in the Compliance Register be checked to ensure that relevant supporting documentation is referenced (Opportunity for Improvement).</p> <p>It is also noted that the consent conditions contained in CMO-Compliance are not consistently a 'word for word' representation of the relevant condition, which presents a risk of misinterpretation and inability to fully comply with the condition. It is recommended that each condition in CMO-Compliance be checked to ensure it is a 'word for word' representation of the consent conditions (Opportunity for Improvement).</p> <p>There were no reported environmental incidents or non-compliances during the audit period.</p>	Compliance - Improvement Recommended



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No.	Consent Condition	Evaluation	Finding
	Terms of Approval		
2.	The Applicant shall carry out the development generally in accordance with the:	<p>AGL reported that the development is being undertaken in accordance with the EMS, which incorporates the requirements of Consent Conditions and the supporting documentation. The Sub-Plans have been going through a process of review and upgrade during 2013/2014 and have been submitted to DoPE, with the exception of the Sub-Plans for air quality and traffic which are still undergoing the revision process.</p> <p>AGL reported that there were no significant changes in AGL's operations or infrastructure at Sugarloaf Farm during the period of this audit.</p>	Compliance
	(a) Development Application submitted to the Department on 18 April 2005;		Compliance
	(b) <i>Statement of Environmental Effects – Camden Gas Project, Sugarloaf Farm Drilling Program, PPL4</i> Sydney Gas (Camden) Operations Pty Ltd, dated March 2005;		Compliance
	(c) Letter from Sydney Gas (Camden) Operations Pty Ltd to the Department dated, 15 May 2005, amending the application to include the link between SL6 and RP3;		Compliance
	(d) Letter from Sydney Gas (Camden) Operations Pty Ltd to the Department, dated 20 May 2005, amending the application to relocate SL5;		Compliance
	(e) Letter from Sydney Gas (Camden) Operations Pty Ltd to the Department, dated 30 May 2005, providing a response to general public submissions;		Compliance
	(f) Letter from Sydney Gas (Camden) Operations Pty Ltd to the Department, dated 17 June 2005, about the access roads;		Compliance
	(g) Letter from Sydney Gas (Camden) Operations Pty Ltd to the Department of Environment and Conservation, dated 10 June 2005, about Aboriginal heritage issues;		Compliance
	(h) Letter from Sydney Gas (Camden) Operations Pty Ltd to the Department, dated 11 July 2005, showing the updated plan of Aboriginal and archaeological assessment areas;		Compliance
	(i) Modification Application MOD 29-3-2007 and Camden Gas Project Joint Venture Gas Well and Gathering Line Modification Project Statement of Environmental Effects , dated March 2007;		Compliance
	(j) Modification Application DA 75-4-2005 MOD 2 and letter dated 18 December 2009;		Compliance
	(k) EA titled Spring Farm and Menangle Park Gas Gathering System Modifications – Gas gathering line MP22 to SL02 prepared by AGL Gas Production (Camden) Pty Ltd, and dated 7 December 2010; and	Compliance	
	(l) conditions of this approval.	Refer to relevant conditions for an assessment of	



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No.	Consent Condition	Evaluation	Finding
	If there is any inconsistency between the above documents, the latter document shall prevail over the former to the extent of the inconsistency. However, the conditions of this consent shall prevail over all other documents to the extent of any inconsistency.	compliance.	
3.	The Applicant shall comply with any reasonable requirement/s of the Director-General arising from the Department's assessment of: (a) Any reports, plans or correspondence that are submitted in accordance with this consent; and (b) The implementation of any actions or measures contained in these reports, plans or correspondence.	Condition noted. No requirements were issued by the Director-General during the audit period.	Not Triggered
	Limits on Approval		
4.	This approval shall lapse within 21 years of the date of this consent or on the expiry date of Petroleum Production Lease No. 4, whichever is the shorter period.	Condition was not activated during the audit period.	Not Triggered
5.	Nothing in this consent permits the drilling and operation of any additional wells (beyond the approved 9 wells for gas production).	The Auditor reviewed the list of gas wells provided by AGL against the Development Consent and confirmed that no additional wells have been drilled or operated during the audit period. PPL 1, 2, 4, 5 & 6 Annual (Geoscientific) Report 2 September 2013 to 2 September 2014, dated 5/9/2014 noted two wells were in operation (SL02 and SL03) and one well had been suspended (SL09). Seven approved wells have not been drilled.	Compliance
6.	If after five years of the date of this consent any well that is the subject of this consent has not yet been drilled or completed, then the Applicant shall surrender the approval for that well.	Condition closed in a previous audit.	Not Triggered
7.	The access road near SL7 shall only be used in an emergency.	AGL reported that the access road to SL7 site was not constructed.	Not Triggered



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No.	Consent Condition	Evaluation	Finding
	Administration		
8.	<p>Construction shall not commence until the Applicant has obtained a Part 3A Permit under the <i>Rivers and Foreshores Improvement Act 1948</i>, a Licence from the OEH under the <i>Protection of the Environment Operations Act 1997</i>, and an approval under section 60 of the <i>Heritage Act 1977</i> from the NSW Heritage Council.</p> <p>Note: The <i>Rivers and Foreshore Improvement Act 1948</i> applies to the proposed development and therefore any excavation, removal of material from the bank, shore or bed of any stream, estuary or lake, or land within 40 metres from the top of the bank will require a Part 3A Permit.</p>	Condition was not activated during the audit period. AGL reported that no wells were constructed during the audit period.	Not Triggered
9.	An application must be made to the OEH under section 90 of the <i>National Parks and Wildlife Act 1974</i> for approval to destroy the known objects at Sugarloaf Farm Site 1 (Locale 5) and Sugarloaf Farm Site 5.	Condition was not activated during the audit period.	Not Triggered
10.	The Applicant must, in the opinion of the OEH be a fit and proper person to hold a Licence under the <i>Protection of the Environment Operations Act 1997</i> , having regard to the matters in section 83 of that Act.	<p>It was noted by the Auditor that during the audit period AGL received three PINs and entered into an Enforceable Undertaking. AGL undertook the measures required by the New South Wales EPA and there are no outstanding matters. The EPA has yet to sign-off on all the Enforceable Undertaking conditions as it is ongoing. The EPA has not indicated any intention to pursue matters through the legal courts.</p> <p>However, it is noted that the criteria contained in Section 83 are broad and a non-compliance with a statutory obligation does not automatically lead to a conclusion that a party is not a fit and proper person to hold a licence. On balance, the Auditor considers AGL to be a fit and proper person within the terms of this condition.</p>	Compliance
11.	The premises for the purposes of the Licence under the <i>Protection of the Environment Operations Act 1997</i> , includes the gas gathering system, access roads and gas wells and any associated effluent storages, temporary work areas and infrastructure associated with the gas gathering systems, access roads and gas wells.	Condition is noted.	Not Triggered



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No.	Consent Condition	Evaluation	Finding
12.	The premises also applies to the gas well heads consisting of the area bounded by the fenced enclosure during gas well operation. During well establishment, the premises have a nominal area of 100 metres X 70 metres and is surrounded by fencing. At various times during well head maintenance, the premises at the gas well head comprises an area of dimensions 25 metres X 25 metres.	AGL advised that no new well heads were constructed during the audit period. The Camden Gas Project's EPL has increased the workover nominal area to 50 metres x 40 metres. Only three wellheads are located at Sugarloaf Farm and all are within the required dimensions.	Compliance
13.	The Applicant must provide Council with the Geographical Positioning System (GPS) co-ordinates and digital survey data for the gas well sites and gas gathering system in a format suitable to the Council, within two months of the completion of the gas wells and gas gathering system.	Condition was closed in a previous audit.	Not Triggered
14.	The Applicant must provide Council with the Geographical Positioning System (GPS) co-ordinates and digital survey data for the gas well sites and gas gathering system in a format suitable to the Council, within two months of the completion of the gas wells and gas gathering system.	Condition was closed in a previous audit.	Not Triggered
15.	The Applicant shall provide written notification to the Director-General that it has fulfilled the requirements of Conditions 13 and 14, within two weeks of the information being provided to the Council.	Condition was closed in a previous audit.	Not Triggered
ENVIRONMENTAL PERFORMANCE CONDITIONS			
Activities Must be Carried out in a competent Manner			
16.	<p>The development must be carried out in a competent manner. This includes:</p> <ul style="list-style-type: none"> ■ The processing, handling, movement and storage of materials and substances used to carry out the activity; and ■ The treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity. 	The development appears to be being carried out in a competent manner in compliance with this condition. AGL's incident register indicates that no significant incidents occurred and no complaints were received during the audit period.	Compliance
Maintenance of Plant and Equipment			
17.	All plant and equipment installed at the premises or used in connection with the development must be maintained and operated in a proper and efficient condition.	The plant and equipment installed or used in connection with licensed activities appear to be being maintained and operated in compliance with this condition. AGL's incident register indicates that no significant incidents occurred	Compliance - Improvement Recommended



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No.	Consent Condition	Evaluation	Finding														
		<p>and no complaints were received during the audit period.</p> <p>However, a search of the Camden Gas Project's planning maintenance system indicated that 40% of currently pending planned maintenance tasks are overdue as of 24 October 2014. Details of the nature and environmental significance of these tasks were not viewed by the auditor. The Auditor recommends that AGL review the nature and significance of the outstanding tasks and implements corrective action where appropriate. The Auditor also notes the EPA's regulatory action in relation to two PINs and an official caution, each relating to a "failure to maintain plant and equipment".</p>															
	Noise Limits																
18.	<p>Noise from the operation of the development shall not exceed the sound pressure level (noise) limits presented in the Table below:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th rowspan="2" style="text-align: center;">Location</th> <th style="text-align: center;">Day</th> <th style="text-align: center;">Evening</th> <th colspan="2" style="text-align: center;">Night</th> </tr> <tr> <th style="text-align: center;">$L_{Aeq}(15 \text{ minute})$</th> <th style="text-align: center;">$L_{Aeq}(15 \text{ minute})$</th> <th style="text-align: center;">$L_{Aeq}(15 \text{ minute})$</th> <th style="text-align: center;">$L_{A1}(1 \text{ minute})$</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">Any residential premise</td> <td style="text-align: center;">35</td> <td style="text-align: center;">35</td> <td style="text-align: center;">35</td> <td style="text-align: center;">45</td> </tr> </tbody> </table>	Location	Day	Evening	Night		$L_{Aeq}(15 \text{ minute})$	$L_{Aeq}(15 \text{ minute})$	$L_{Aeq}(15 \text{ minute})$	$L_{A1}(1 \text{ minute})$	Any residential premise	35	35	35	45	<p>The Noise Management Sub-Plan (November 2013) includes this condition and appropriate controls to minimise noise. The AEPR for the 2012/2013 and 2013/2014 (draft) years confirms a status of compliance.</p> <p>With respect to this Development Consent AGL reported that no noise monitoring was warranted within the audit period and no noise complaints were received by AGL.</p>	Compliance
Location	Day		Evening	Night													
	$L_{Aeq}(15 \text{ minute})$	$L_{Aeq}(15 \text{ minute})$	$L_{Aeq}(15 \text{ minute})$	$L_{A1}(1 \text{ minute})$													
Any residential premise	35	35	35	45													
	<p>Notes</p> <ul style="list-style-type: none"> ■ The limits represent the sound pressure level (noise) contribution, at the nominated receiver locations in the table. ■ Day is defined as the period from 7.00am to 6.00pm Monday to Saturday and 8.00am to 6.00pm Sundays and Public Holidays. ■ Evening is defined as the period from 6.00pm to 10.00pm. ■ Night is defined as the period from 10.00pm to 7.00am Monday to Saturday and 10.00pm to 8.00am Sundays and Public Holidays. ■ Noise from the site is to be measured at the most affected point within the residential boundary, or at the most affected point within 30 metres of the dwelling where the dwelling is more than 30 metres from 	Refer to condition above.															



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No.	Consent Condition	Evaluation	Finding										
	<p>the boundary to determine compliance with the noise limits set out in the table.</p> <ul style="list-style-type: none"> ■ Noise from the premises is to be measured at 1 metre from the dwelling facade to determine compliance with the LA1 (1 minute) noise level in the table. ■ Where it can be demonstrated that direct measurement of noise from the premises is impractical, the OEH may accept alternative means of determining compliance (see Chapter 11 of the <i>NSW Industrial Noise Policy</i>). ■ The modification factors presented in section 4 of the <i>NSW Industrial Noise Policy</i> shall also be applied to the measured noise level where applicable. ■ The noise emission limits identified in the table apply under meteorological conditions of wind speed up to 3m/s at 10 metres above ground level, and temperature inversion conditions. 												
Construction Noise Criteria for SIS Wells													
18A.	<p>Noise from the drilling and construction of SL08 and SL09 shall not exceed the sound pressure level (noise) limits in the table below:</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th style="text-align: center;">Receiver Location</th> <th style="text-align: center;">Weekday (7.00am-6.00pm) Saturday (7.00am-1.00pm)</th> <th style="text-align: center;">Saturday (1.00pm-6.00pm) Sunday (7.00am-6.00pm)</th> <th style="text-align: center;">Evening (6.00pm-10.00pm)</th> <th style="text-align: center;">Night (10.00pm-7.00am)</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">Nearest Receiver</td> <td style="text-align: center;">54</td> <td style="text-align: center;">44</td> <td style="text-align: center;">47</td> <td style="text-align: center;">41</td> </tr> </tbody> </table>	Receiver Location	Weekday (7.00am-6.00pm) Saturday (7.00am-1.00pm)	Saturday (1.00pm-6.00pm) Sunday (7.00am-6.00pm)	Evening (6.00pm-10.00pm)	Night (10.00pm-7.00am)	Nearest Receiver	54	44	47	41	<p>Condition was not activated during the audit period.</p> <p>AGL reported that no drilling works were undertaken during the audit period. It is further noted that approval has lapsed for any well that has not been drilled and hence this condition will not be activated in the future.</p>	Not Triggered
Receiver Location	Weekday (7.00am-6.00pm) Saturday (7.00am-1.00pm)	Saturday (1.00pm-6.00pm) Sunday (7.00am-6.00pm)	Evening (6.00pm-10.00pm)	Night (10.00pm-7.00am)									
Nearest Receiver	54	44	47	41									
19.	<p>The Applicant shall prepare and implement a Construction Noise Management Protocol for construction of the development. The Protocol shall be submitted for the approval of the OEH and the Director-General at least one week prior to commencement of construction. The Protocol must include but is not limited to:</p> <p>(a) Compliance with the noise criteria in Condition 18A during all</p>	<p>Condition was closed out in a previous audit.</p>	Not Triggered										
			Not Triggered										



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No.	Consent Condition	Evaluation	Finding
	construction activities, when assessed at sensitive locations including residences and schools;		
	(b) Details of the proposed drill rig focussing on the noise emission characteristics for all phases of well establishment, including percussion drilling, setting and casing, and fracturing;		Not Triggered
	(c) Identification of sensitive receivers likely to be impacted by noise levels exceeding the noise goal in (a) above;		Not Triggered
	(d) Details of proposed best practice mitigation measures to seek achieve the noise goal in (a) above;		Not Triggered
	(e) The consideration of best practice mitigation required in (d) above must include but is not necessarily limited to optimum orientation of drill rigs and temporary barriers;		Not Triggered
	(f) Community consultation including advance notice of commencement of construction activities and site contact details;		Not Triggered
	(g) A system to receive, document, respond, action and monitor complaints; and		Not Triggered
	(h) Monitoring methods and program.		Not Triggered
20.	At least one month prior to operation of the development the Applicant shall prepare and submit for the Director-General's approval, a Well Gathering System and Trunk Line Maintenance Noise. Management Protocol to be used for the premises for the life of the consent. The Protocol shall include but is not limited to:	The Noise Management Sub-Plan was updated in November 2013 and forwarded to the Director-General on 14/5/2014. AGL has not received a response from the Director-General. The Noise Management Sub-Plan (November 2013) complies with this condition.	Compliance
	(a) A primary objective of attaining the noise limits in condition 18;		Compliance
	(b) Community consultation;		Compliance
	(c) Advance notice to affected members of the community for planned well maintenance activities;		Compliance
	(d) Complaints handling monitoring system;		Compliance



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No.	Consent Condition	Evaluation	Finding
	(e) Mitigation measures;		Compliance
	(f) The design/orientation of the proposed mitigation methods demonstrating best practice;		Compliance
	(g) Construction times;		Compliance
	(h) Contingency measures where noise complaints are received; and		Compliance
	(i) Monitoring methods and programs.		Compliance
	Hours of Operation		
21.	<p>The Applicant shall ensure that all construction work (except for the drilling (including well casing and grouting) of SIS wells), shall only be conducted between 7.00am and 6.00pm Monday to Friday and between 8.00am and 1.00pm Saturdays, unless inaudible at any residential receiver.</p> <p>Note: Inaudible means that the construction activity cannot be heard by the human ear at the nearest affected residential receiver.</p>	<p>The Noise Management Sub-Plan (November 2013) includes this condition.</p> <p>However, AGL reported that no construction works were undertaken under this Development Consent during the audit period.</p>	Not Triggered
22.	<p>Planned maintenance activities at any of the wells must only be conducted between:</p> <p>(a) 7.00 am to 6.00 pm on weekdays; and</p> <p>(b) 8.00am and 1.00pm on Saturdays (excluding Public Holidays)</p> <p>Note: This condition does not apply to the delivery of material outside the hours of operation under condition 21 if that delivery is required by police or other authorities for safety reasons; and /or the operation or personnel or equipment are endangered. In such circumstances, prior notification is to be provided to the OEH and affected residents as soon as possible, or within a reasonable period in the case of an emergency.</p>	<p>The Noise Management Sub-Plan (November 2013) includes this condition.</p> <p>AGL reported that planned maintenance activities are undertaken only during the hours specified in this condition.</p>	Compliance
	Air Quality		
23.	<p>The Applicant shall carry out the development in a manner that will minimise emissions of dust from the site.</p> <p>Note: The <i>Protection of the Environment Operations Act 1997</i> states that no offensive odour may be emitted from particular premises unless potentially offensive odours are identified in the Licence and the odours</p>	<p>The Air Quality Sub-Plan (August 2008) includes a number of dust mitigation measures.</p> <p>AGL reported that no dust complaints were received during the audit period.</p>	Compliance



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No.	Consent Condition	Evaluation	Finding
	are emitted in accordance with conditions specifically directed at minimising the odours are permitted. Where it is appropriate for a Licence to identify and control odours, conditions for the Licence should be developed in consultation with Air Policy.		
	Water		
24.	Except as may be expressly provided by a Licence, the Applicant shall comply with section 120 of the <i>Protection of the Environment Operations Act 1997</i> during the carrying out of the development. Note: Section 120 of the <i>Protection of the Environment Operations Act 1997</i> applies to the disposal of wastewater.	The Auditor sighted the EMP for the Camden Gas Project, including the Soil and Water Management Sub-Plan (April 2014) and the Waste Management Sub-Plan (April 2014). The Sub-Plans detail a number of controls to prevent the pollution of water. AGL's incident database and Annual Returns for its EPL indicate that there were no incidents of polluting waters during the audit period.	Compliance
	Stormwater/Sediment Control		
25.	At least one week prior to the commencement of construction, the Applicant shall submit for the approval of the Director-General, an Erosion and Sediment Control Plan. The Plan must be implemented and used for the duration of all construction activities associated with the development. The Plan must describe the measures that will be employed to minimise soil erosion and the discharge of sediment and other pollutants to land and/or waters during construction activities. The Plan should be prepared in accordance with the requirements for such plans outlined in Landcom's <i>Managing Urban Stormwater: Soils and Construction</i> .	Condition was closed out in a previous audit.	Not Triggered
	Waste		
26.	The Applicant must not cause, permit or allow any waste generated outside the site to be received at the site for storage, treatment, processing, reprocessing or disposal or any waste generated at the site to be disposed of at the site, except as expressly permitted by a licence under the <i>Protection of the Environment Operations Act 1997</i> . Note: this condition only applies to the storage, treatment, processing, reprocessing or disposal of waste at the site if it requires an environment protection licence under the <i>Protection of the Environment Operations Act 1997</i> .	The Auditor sighted the AGL Environmental Footprint spread sheet for the financial years 2012/13 and 2013/14. These spreadsheets provided a detailed record of waste streams generated, recycled/reused and disposed, including concrete and steel, water, hazardous waste, non-hazardous waste and ozone-depleting substances, and indicate compliance with this condition.	Compliance



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No.	Consent Condition	Evaluation	Finding
27.	The Applicant must ensure that any hazardous, industrial or Group A waste is assessed and classified in accordance with the DECCW's Environmental Guidelines: Assessment Classification and Management of Liquid and Non-Liquid Wastes.	<p>The AGL Environmental Footprint spreadsheet for the financial years 2012/2013 and 2013/2014 provide detailed records of waste streams generated, recycled/reused and disposed, including concrete and steel, water, hazardous waste, non-hazardous waste, and ozone-depleting substances.</p> <p>AGL advised that the waste service provider undertakes any required waste classification.</p> <p>The Auditor sighted copies of SDS used to advise waste contractors of waste characteristics and correspondence describing the characteristics of other waste materials (e.g. oily water).</p> <p>It is noted that the premises does not generate significant quantities of waste material of unknown composition and requiring classification.</p> <p>It is noted that a waste audit was not within the scope of this independent audit.</p>	Compliance
Safety and Risk Management			
28.	Prior to construction of the wellhead, the Applicant shall provide a Report to the Department from an independent and suitably qualified person approved by the Director-General, to confirm that the design and operation of the wellhead complies with the Department's <i>Locational Guidelines - Development in the Vicinity of Operating Coal Seam Methane Wells</i> (May 2004) for an Automatically Controlled Well (with Separator/Optional Pump). In particular, the Report shall confirm that all safety related systems required by the Guidelines have been included.	A draft report titled Assessment of Sugarloaf Well Design Against Locational Guidelines (Department of Planning) was prepared by Planager Pty Ltd, a risk specialist consultancy, on 24/10/2014. However, the report was not prepared prior to construction of the wellhead as required by this condition.	Non-Compliance Level 2
29.	The Applicant shall develop and implement an Emergency Plan and Safety Management System for the development. The plan/system shall be submitted for the approval of the Director-General, at least one month prior to the commissioning of the development, or within such further period as the Director-General may agree. Commissioning shall not commence until the Director-General has approved the plan/system.	The Auditor sighted the Emergency Response Plan (November 2013) and the Health and Safety Management Plan, Camden Project NSW (3 August 2011) and noted compliance with this condition. The updated Emergency Response Plan was provided to DoPE on 20/10/13.	Compliance



CAMDEN GAS PROJECT - INDEPENDENT ENVIRONMENTAL AUDIT 2012 - 2014

No.	Consent Condition	Evaluation	Finding
	<p>(a) Emergency Plan A comprehensive emergency plan and detailed emergency procedures for the development shall be prepared in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 1, Industry Emergency Planning Guidelines. The plan shall include detailed procedures for the safety of all people outside of the development who may be at risk from the development.</p>	<p>The Plans note earlier revisions which were approved by the then Department of Infrastructure Planning and Natural Resources.</p> <p>This condition was recorded within a Sydney Gas Projects Commitments Register as completed and approved by the Director-General on 6 September 2004.</p>	Compliance
	<p>(b) Safety Management System A document setting out a comprehensive safety management system, covering all operations on the gas wells and gathering system shall be developed in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 9, Safety Management. The document shall clearly specify all safety related procedures, responsibilities and policies, along with details of mechanisms for ensuring adherence to procedures. Records shall be kept on-site and shall be made available for inspection by the Director-General and the independent auditor upon request. In particular records shall be maintained to demonstrate that management of change procedures were followed for the connection of the new gas lines to the existing network and for the integration of the new wells into the automatic control system.</p>	<p>Emergency evacuation drills are undertaken at least annual and record in AGL's scheduling database (MEX) as sighted by the Auditor.</p>	Compliance
	<p>Note: The Applicant may update the current approved version of the relevant study/plan/system prepared to comply with Schedule 4 Condition 92 of development consent DA-282-6-2003-i, dated 16 June 2004. The updated version shall incorporate and adequately address the relevant aspects of the additional wells and related plant.</p>		Compliance
	Compliance Report		
30.	<p>Three months after commencement of operation of the development, the Applicant shall submit to the Director-General a compliance report detailing compliance with Condition 29, including:</p> <p>(a) Dates of study/plan/system completion/submission and commencement of construction and commissioning;</p> <p>(b) Actions taken or proposed, to implement recommendations made in the studies/plans/systems; and</p> <p>(c) Responses to any requirement imposed by the Director-General under Condition 32.</p>	<p>A non-conformance was reported against this condition in the 2008-2010 and 2010-2012 Independent Environmental Audits (24 August 2011 and 23 August 2013 respectively) due to failure to prepare and submit a compliance report within three months of commencement of operation of the development.</p> <p>The Compliance Report was completed and submitted to the Director-General on 7/6/14, titled Rosalind Park Gas Plant, Compliance Audit, AECOM Australia Pty Ltd, 3/5/14</p>	Non-Compliance Level 2



CAMDEN GAS PROJECT - INDEPENDENT ENVIRONMENTAL AUDIT 2012 - 2014

No.	Consent Condition	Evaluation	Finding
	<p>This report shall verify that: (a) The Emergency Plan required under Condition 29(a) is effectively in place and that at least one emergency exercise has been conducted; and (b) The Safety Management System required under Condition 29(b) has been fully implemented and that records required by the system are being kept.</p> <p>The report shall include a signed commitment by the Applicant's representative responsible for the operation of the development, that for each study/plan/system: (a) The required study/plan/system has been undertaken or prepared to the relevant Hazardous Industry Planning Advisory Paper; (b) All recommendations of each study/plan/system have been implemented; and (c) All safety management system and their associated risk controls have been implemented and are being maintained.</p>	<p>for AGL. The date of submission of the report represents a non-compliance as it was not submitted within three months of commencement of operation of the development.</p> <p>The Report complies with contents required by this condition.</p> <p>A separate letter was sent by AGL with the report to the Director-General to address the required signed commitment by the Applicant's representative.</p> <p>No further action is warranted.</p>	
	<p>Hazard Audit</p>		
31.	<p>Twelve months after the commencement of operations of the proposed development or within such further period as the Director-General may agree, the Applicant shall carry out a comprehensive hazard audit of the development and within one month of the audit submit a report to the Director- General.</p> <p>The audit shall be carried out at the Applicant's expense by a duly qualified independent person or team approved by the Director-General prior to commencement of the audit. Further audits shall be carried out every three years or as determined by the Director-General and a report of each audit shall, within one month of the audit, be submitted to the Director-General. Hazard audits shall be carried out in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 5, Hazard Audit Guidelines.</p> <p>Note: The Applicant may include the three yearly hazard audit of the development with the Hazard Audit required under Schedule 4 Condition 95 of development consent DA-282-6-2003-i, dated 16 June 2004. The due</p>	<p>AGL received a letter of approval for the Audit team from DoPE dated 4/7/2012.</p> <p>The report titled 2012 Hazard Audit, AGL Rosalind Park Gas Plant, Medhurst Road, Gilead, prepared by AECOM, dated 24/10/2013 was forward to DoPE on 4/11/2013.</p>	Compliance



CAMDEN GAS PROJECT - INDEPENDENT ENVIRONMENTAL AUDIT 2012 - 2014

No.	Consent Condition	Evaluation	Finding
	date for a combined audit shall be the earlier of the due dates for the separate audits.		
32.	The Applicant shall comply with all reasonable requirements of the Director-General in respect of the implementation of any measures arising from recommendations of the studies or reports referred to in Conditions 28 to 31 inclusive, within such time as the Director-General may agree.	Condition was not activated during the audit period. AGL did not receive a response from the Department of Planning on the 2012 Hazard Audit report.	Not Triggered
	<p>Redrilling and Fracing Management Plan</p> <p>Note: For the purposes of this consent the redrilling and/or additional fracing of a well does not constitute wellhead maintenance.</p>	Condition noted.	
33.	The Applicant shall obtain the prior approval of the Director-General for the redrilling and/or additional fracing of a gas well.	AGL reported that no redrilling or fracing was undertaken during the audit period.	Not Triggered
34.	The Applicant shall prepare a Redrilling and Fracing Management Plan in consultation with the Department of Primary Industries for the redrilling and/or refracing of an existing well. The Plan shall be submitted to the Director-General no later than one month prior to the commencement of the work or within such period as agreed by the Director-General. The Plan shall include, but not necessarily be limited to:	AGL reported that no redrilling or fracing was undertaken during the audit period.	Not Triggered
	(a) A description of all the activities to be undertaken on the well site during the redrilling and/or refracing work;		Not Triggered
	(b) Details of how the environmental performance of the work will be monitored and what actions will be taken to address identified adverse environmental impacts;		Not Triggered
	(c) Reference to the relevant parts of the Environmental Management Plan required under condition 52;		Not Triggered
	(d) Compliance with all the relevant environmental performance requirements of this consent; and		Not Triggered
	(e) Arrangements for complaints handling procedures during the redrilling and/or refracing work.		Not Triggered
35.	The Applicant shall give written notification of the proposed redrilling and/or refracing work to potentially affected residences and other noise sensitive receivers at least fourteen days prior to work commencing.	AGL reported that no redrilling or fracing was undertaken during the audit period.	Not Triggered



CAMDEN GAS PROJECT - INDEPENDENT ENVIRONMENTAL AUDIT 2012 - 2014

No.	Consent Condition	Evaluation	Finding
Gas Gathering System			
36.	The Applicant shall ensure that the route of the gas gathering system follows previously or currently disturbed areas wherever possible.	Condition closed in a previous audit.	Not Triggered
37.	The Applicant shall ensure that trenches constructed during the construction of gas gathering lines are not left open overnight unless otherwise agreed by the Director-General.	Condition not activated during the audit period. AGL reported that no gas gathering lines were constructed during the audit period.	Not Triggered
38.	The Applicant shall comply with the following in the construction of the gas gathering system pipeline:	Condition closed in a previous audit.	Not Triggered
	(a) Signs stating the presence of a buried gas pipeline shall be erected periodically along the length of the trench once the pipeline has been laid;		Not Triggered
	(b) Trenches are to be restored and reseeded with local grass seeds on completion of the work;		Not Triggered
	(c) Construct the gas gathering system so as not to impeach lateral water flows;		Not Triggered
	(d) Ensure that no crown or camber remains along the gas gathering systems, following construction;		Not Triggered
	(e) Design, construct and operate the pipeline in accordance with the Australian Standard for the installation and maintenance of Plastic Pipe Systems for Gas AS 3723-1989 (or its latest version); and		Not Triggered
	(f) Notify the Department on the completion of any trenching works.		Not Triggered
Flora and Fauna			
39.	The Applicant shall take all practicable measures to minimise potential flora and fauna impacts of the development.	The Flora and Fauna Management Sub-Plan (April 2014) includes appropriate controls to minimise impacts on flora and fauna.	Compliance
40.	The Applicant shall not remove mature trees as part of this development unless otherwise agreed by the Director-General of DoPE, or delegate.	The Flora and Fauna Management Sub-Plan (April 2014) includes appropriate controls to minimise impacts on flora and fauna. AGL reported that no mature trees were removed during the audit period.	Compliance



CAMDEN GAS PROJECT - INDEPENDENT ENVIRONMENTAL AUDIT 2012 - 2014

No.	Consent Condition	Evaluation	Finding
41.	The Applicant shall prepare a translocation strategy for the threatened Cumberland Plain Snail, which will be submitted for the Director-General's approval prior to construction. The translocation strategy shall be implemented should any individuals or populations of the Cumberland Plain Snail be identified.	Condition closed out in a previous audit.	Not Triggered
42.	The Applicant shall prepare and implement a Weed Management Plan for the site for the life of the development. The Applicant shall submit the Weed Management Plan for the Director-General's approval within one month of the date of this consent.	The Rehabilitation & Landscape Management Sub-Plan (April 2014) addresses this condition.	Compliance
Threatened Species			
42A.	The Applicant shall ensure that, during the drilling and construction of SL08 and SL09, impacts on threatened species are minimised by implementing actions including, but not limited, to the following:	The Flora and Fauna Management Sub-Plan (April 2014) includes appropriate controls to minimise impacts on flora and fauna.	Not Triggered
	(a) The recommendations outlined in Sections 6 and 7 of the Ecosearch Environmental Consultants Pty Ltd report titled <i>Flora and Fauna Assessment, AGL –Gas Well and Gathering Line Project Modifications</i> ; and	AGL advised that no upgrading works of gas gathering lines were undertaken during the audit period.	Not Triggered
	(b) Marking the boundaries of endangered ecological communities (EECs) and locations of other known threatened species and, where possible, avoiding construction activities within these areas.		Not Triggered
Bushfire Management			
43.	The Applicant shall: (a) Ensure that the development is suitably equipped to respond to any fires on the site; and (b) Assist the Rural Fire Service and emergency services as much as possible if there is a fire on the site.	The Emergency Response Plan (November 2013) addresses the requirements of this condition. All AGL vehicles used for the Camden Gas Project have a 9 kg fire extinguisher and all employees have a mobile phone. Employees are given basic fire extinguisher training. A fire safety trailer is located at the RPPG for use at well heads if required.	Compliance
44.	Prior to operation the Applicant shall prepare a Bushfire Management Plan for the development, to the satisfaction of the Director-General. The Applicant shall consult with Council and the Rural Fire Service in the preparation of the Plan. Note: The Applicant may update the current	This condition is addressed via the Camden Bush Fire Management Plan, contained with the Emergency Response Plan for AGL Camden Gas Project, Lot 35,	Non-Compliance Level 2



CAMDEN GAS PROJECT - INDEPENDENT ENVIRONMENTAL AUDIT 2012 - 2014

No.	Consent Condition	Evaluation	Finding
	approved version of the Bushfire Management Plan prepared to comply with Schedule 4 Condition 110 of development consent DA-282-6-2003-i, dated 16 June 2004. The updated version shall incorporate and adequately address the relevant aspects of the additional wells and related gas gathering system.	Medhurst Road, Menangle, NSW, November 2013. However, no consultation was undertaken with Council or the Rural Fire Service. AGL email records indicate liaison has occurred with the Sydney Metropolitan Fire Brigade.	
	Heritage		
45.	The Applicant must ensure that should any historical relics be uncovered, excavation or disturbance of the area is to stop immediately and the Heritage Council of NSW is notified within a reasonable time of the discovery or location of these relics. Archaeological assessment and approval, or endorsement, may be required prior to works continuing in the affected area(s) based on the nature of the discovery.	Condition was not activated during the audit period. This requirement is nonetheless communicated to employees and contractors through the role-specific induction program.	Not Triggered
46.	An Interpretation Study being prepared to the satisfaction of the Director, Heritage Office and executed by the Applicant within 6 months of the date of this approval.	Condition was not activated during the audit period.	Not Triggered
	Aboriginal Relics		
47.	The Applicant must ensure that should any Aboriginal objects be uncovered, excavation or disturbance of the area is to stop immediately and the OEH is to be informed in accordance with section 91 of the <i>National Parks and Wildlife Act 1974</i> .	Condition was not activated during the audit period. The Aboriginal Cultural Heritage Management Plan addresses this condition.	Not Triggered
48.	Prior to the commencement of construction, the Applicant shall clearly mark the locations of known Aboriginal relics on the site (using flags, fencing or other appropriate method) and ensure that all employees and contractors are aware of these locations, to prevent the known relics being impacted or disturbed during site preparation and construction.	Condition was not activated during the audit period.	Not Triggered
	Sydney Water Supply Canal		
49.	The Applicant shall carry out the construction and operation of the development in a manner that will not adversely affect the structural integrity of the Upper Canal and associated structures nor impact the quality of water in the Upper Canal. The Applicant shall be responsible for ensuring that all persons involved in the development are informed of these requirements.	The wells are located such as to result in no ongoing impact to the Sydney Water Supply Canal.	Compliance



CAMDEN GAS PROJECT - INDEPENDENT ENVIRONMENTAL AUDIT 2012 - 2014

No.	Consent Condition	Evaluation	Finding
50.	The Applicant shall comply with the requirements in Sydney Water's <i>Guidelines on Precautions to be taken when Building Over or Adjacent to Sydney Water's Assets</i> .	Condition was not activated during the audit period.	Not Triggered
ENVIRONMENTAL MANAGEMENT AND MONITORING			
Construction Environmental Management Plan (CEMP)			
51.	<p>The Applicant shall prepare and implement a Construction Environmental Management Plan (CEMP) to provide environmental management, practices and procedures to be followed during the construction phases of the proposed development. A framework plan outlining key practices, procedures and environmental management practices should be approved by the Director-General prior to the commencement of construction.</p> <p>Note: The Applicant may update the current approved version of the CEMP prepared to comply with Schedule 5 Condition 1 of development consent DA-282-6-2003-i, dated 16 June 2004. The updated version shall incorporate and adequately address the relevant aspects of the additional wells and related plant approved by the Director-General prior to the commencement of construction.</p>	Condition was not activated during the audit period.	Not Triggered
Operational Environmental Management Plan (OEMP)			
52.	The Applicant shall prepare and implement an Operational Environmental Management Plan (OEMP) to provide environmental management practices and procedures to be followed during the operation of the development. The OEMP shall be forwarded to the Director-General for approval within one month of the date of this consent. The OEMP shall include, but not necessarily be limited to:	The EMP (March 2014) addresses this condition.	Compliance
	(a) Identification of all statutory and other obligations that the Applicant is required to fulfil in relation to operation of the development, including all consents, licences, approvals and consultations;		Compliance
	(b) A description of the roles and responsibilities for all key personnel involved in the operation of the development;		Compliance
	(c) The overall environmental policies and principles to be applied to the operation of the development;		Compliance



CAMDEN GAS PROJECT - INDEPENDENT ENVIRONMENTAL AUDIT 2012 - 2014

No.	Consent Condition	Evaluation	Finding
	(d) Standards and performance measures to be applied to the development, and a means by which environmental performance can be periodically reviewed and improved; and		Compliance
	(e) Management policies to ensure that environmental performance goals are met and to comply with conditions of this consent.		Compliance
	Note: The Applicant may update the current approved version of the OEMP prepared to comply with Schedule 5 Condition 2 of development consent DA-282-6-2003-i, dated 16 June 2004. The updated version shall incorporate and adequately address the relevant aspects of the additional wells and related plant.		Compliance
	Annual Return		
53.	The Applicant shall provide an annual return to the OEH in relation to the development as required by any Licence under the <i>Protection of the Environment Operations Act 1997</i> in relation to the development. In the return the Applicant must report on the annual monitoring undertaken (where the activity results in pollutant discharges), provide a summary of complaints relating to the development, report on compliance with Licence conditions and provide a calculation of licence fees (administrative fees and where relevant, load based fees) that are payable.	The Annual Returns for the 2012/2013 and 2013/2014 years address this condition.	Compliance
	Annual Environmental Performance Reporting		
54.	Within twelve months of the date of this consent, and annually thereafter during the life of the development, the Applicant shall submit an Annual Environmental Performance Report to the Director- General. This report shall include, but not be limited to:	The AEPR for the 2011/2012 and 2012/2013 years (the time period relevant to this audit) address this condition.	Compliance
	(a) The standards, performance measures and statutory requirements the development is required to comply with;		Compliance
	(b) An assessment of the environmental performance of the development to determine whether it is complying with these standards, performance measures, and statutory requirements;		Compliance
	(c) Copy of the Complaints Register for the preceding twelve month period and indicating what actions were (or are being) taken to address these complaints;		Compliance



CAMDEN GAS PROJECT - INDEPENDENT ENVIRONMENTAL AUDIT 2012 - 2014

No.	Consent Condition	Evaluation	Finding
	(d) Indication of what actions were taken to address any issue and/or recommendation raised by the Camden Gas Project's Community Consultative Committee;		Compliance
	(e) Provision of the detailed results of all the monitoring required by this consent;		Compliance
	(f) Identify any non-compliance during the year;		Compliance
	(g) Identify any significant trends in the data; and		Compliance
	(h) If any non-compliance is detected, describe what actions and measures would be carried out to ensure compliance, clearly indicating who would carry out these actions and measures, when they would be carried out, and how the effectiveness of these measures would be monitored over time.		Compliance
	Note: The Applicant may include the operation of wells SL1 – 9 and the associated gas gathering system and the conditions of this consent, in the Annual Environmental Performance Report required under Schedule 5 Condition 5 of development consent DA-282-6-2003-i, dated 16 June 2004.		Compliance
55.	The Director-General may require the Applicant to address certain matters identified in the Annual Environmental Performance Report. Any action required to be undertaken shall be completed within such period as the Director-General may agree.	Condition was not activated during the audit period.	Not Triggered
56.	The Applicant shall also submit a copy of the Annual Environmental Performance Report to the OEH, Department of Primary Industries and Campbelltown City Council. The Applicant shall make a copy of the Report publicly available.	The auditor sighted evidence of submission of the AEPR for the 2012/2013 year to each of the entities (in their then form) required by this condition. It is noted that the 2012/2013 Report is available on AGL's website. The Report for the 2013/2014 year is still in preparation.	Compliance
	Independent Environmental Audit – Construction at Sugarloaf Farm		
57.	On completion of all construction works, the Applicant shall commission and pay the full costs of an Independent Environmental Audit of the drilling and fracing of gas wells and construction of the gas gathering system and access roads on the site. The objective of the audit is to monitor the performance and effect of construction activities on the site.	Condition closed in a previous audit.	Not Triggered



CAMDEN GAS PROJECT - INDEPENDENT ENVIRONMENTAL AUDIT 2012 - 2014

No.	Consent Condition	Evaluation	Finding
	<p>The Independent Environmental Audit shall:</p> <ul style="list-style-type: none"> (a) Be conducted by a suitably qualified, experienced, and independent person(s) whose appointment has been approved by the Director-General; and (b) Be consistent with ISO 19011:2002 - Guidelines for Quality and/ or Environmental Management Systems Auditing, or updated versions of these guidelines/manuals. <p>The Audit shall:</p> <ul style="list-style-type: none"> a) Assess the environmental performance of the construction of the development on the site, and its effects on the surrounding environment; b) Assess whether the development is complying with the relevant standards, performance measures, and statutory requirements; c) Consider the Applicant’s proposed Construction Environmental Management Plan; and d) Recommend measures or actions to improve the environmental performance of the construction of the development, and/or its environmental management and monitoring systems (if required). <p>Within one month of completion of the audit, the Applicant must submit a copy of the audit report to the Director-General and the NSW Heritage Office. The Director-General may require the Applicant to address certain matters identified in the report and any comments received from the NSW Heritage Office. Any action required to be undertaken shall be completed within such period as the Director- General may agree.</p>		
	<p>Independent Environmental Audit – Operation</p>		
58.	<p>Within two years of the date of this consent and every two years thereafter, unless the Director-General directs otherwise, the Applicant shall commission and pay the full costs of an Independent Environmental Audit. The Independent Environmental Audit shall:</p>	<p>The scope of this 2012-2014 IEA addresses this condition.</p>	<p>Compliance</p>
	<ul style="list-style-type: none"> (a) Be conducted by a suitably qualified, experienced, and independent person(s) whose appointment has been approved by the Director-General; 		<p>Compliance</p>



CAMDEN GAS PROJECT - INDEPENDENT ENVIRONMENTAL AUDIT 2012 - 2014

No.	Consent Condition	Evaluation	Finding
	(b) Be consistent with ISO 19011:2002 - Guidelines for Quality and/ or Environmental Management Systems Auditing, or updated versions of these guidelines/manuals;		Compliance
	(c) Assess the environmental performance of the development, and its effects on the surrounding environment;		Compliance
	(d) Assess whether the development is complying with the relevant standards, performance measures, and statutory requirements;		Compliance
	(e) Review the adequacy of the Applicant's Environmental Management Plan; and		Compliance
	(f) Recommend measures or actions to improve the environmental performance of the development, and/or its environmental management and monitoring systems.		Compliance
	Note: The Applicant may include the operation of wells SL1 – 9 and the associated gas gathering system and the conditions of this consent, in the Independent Environmental Audit required under Schedule 5 Condition 10 of development consent DA-282-6-2003-i, dated 16 June 2004.		Compliance
	Complaints Register		
59.	The Applicant shall keep a legible record of all complaints made to the applicant or any employee or agent of the Applicant in relation to pollution arising from any activity of the development. The Register must:	During the audit period, in 2013, the Camden Gas Project transitioned from one complaints register (Complaints Register) to another register (Consultation Manager, a communications database). The complaints registers addressed the requirements of this condition. No complaints were received within the scope of this Development Consent during the audit period.	Compliance
	(a) Record the date and time of the complaint;		Compliance
	(b) Record the method by which the complaint was made;		Compliance
	(c) Note any personal details of the complainant or, if no such details were provided, a note to that effect;		Compliance
	(d) The nature of the complaint;		Compliance
	(e) The action taken by the applicant in relation to the complaint, including any follow-up contact with the complainant; and		Compliance
	(f) State, if no action was taken by the Applicant, the reasons why no action was taken.		Compliance



CAMDEN GAS PROJECT - INDEPENDENT ENVIRONMENTAL AUDIT 2012 - 2014

No.	Consent Condition	Evaluation	Finding
	The record of a complaint must be kept for at least 4 years after the complaint was made, and must be produced to any authorised officer of the OEH or the Department who asks to see them.		Compliance
60.	The Applicant must: (a) Operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted on the site or by the vehicle or mobile plant, unless otherwise specified in the Licence; and (b) Notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint.	AGL maintains a telephone complaints line, the details of which are contained on AGL's website as well as at well sites, access roads and gas gathering lines. The Auditor telephoned the complaints line during the Audit and was satisfied with the complaints handling process.	Compliance
	Community Liaison		
61.	The Applicant shall ensure the continuation of the existing Sydney Gas Operations Camden Project Community Consultative Committee to oversee the environmental performance of the development.	The Auditor sighted the minutes of the Community Consultative Committee meetings confirming that the Committee was in existence.	Compliance



Report Signature Page

GOLDER ASSOCIATES PTY LTD

A handwritten signature in black ink, appearing to read 'T. Carmichael', with a long horizontal flourish extending to the right.

Tom Carmichael
Associate

TC/TR/tc

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Africa	+ 27 11 254 4800
Asia	+ 86 21 6258 5522
Australasia	+ 61 3 8862 3500
Europe	+ 44 1628 851851
North America	+ 1 800 275 3281
South America	+ 56 2 2616 2000

solutions@golder.com
www.golder.com

