

Binder: Coal Seam Gas

Mining and Industry Projects
Department of Planning and Infrastructure
GPO Box 39
SYDNEY NSW 2001

ATTN: Clay Preshaw

December 2012

Dear Clay,

RE: STATE SIGNIFICANT DEVELOPMENT – STAGE 3 NORTHERN EXPANSION OF THE CAMDEN GAS PROJECT

Camden Council thanks you for the opportunity to comment on the proposed modifications to the Stage 3 Northern Expansion of the Camden Gas Project.

It is noted that this state significant development is located within the Camden Local Government Area (LGA), noting a total of six (6) gas well surface locations and associated gas gathering infrastructure.

In response to the Submissions Report and Council's original submission to the Part 3A Application, it is acknowledged that the applicant (AGL) has consulted with the landowners regarding the final locations of the gas wells. Furthermore, Council has reviewed the amended proposal in depth and wish to provide the following comments in relation to the proposed Northern Expansion of the Camden Gas Project:

General

1. The proposed gas wells, gathering lines, spine gathering lines and access tracks are generally located on land within private ownership. Some of these wells are identified in areas prescribed by the Department of Planning and Infrastructure as future growth areas. Covenants, restrictions as to user and easements should be placed on titles of land for the future identification in the planning or sale process of the land.

2. To reiterate Council's previous concerns regarding noise mitigation during the well construction phase, appropriate measures should be in place to maintain noise levels below 55dB (open space) and 45dB (building internal) to the nearest sensitive land uses, using the EPA Industrial Noise Policy as a guide. It is appreciated that the construction operations will be limited to designated hours, however, the drilling of the wells will continue outside of the specified hours. This is of particular concern given that acoustic shields to attenuate drilling noise will only be 'considered' by AGL rather than a commitment given to mitigate this impact. It is recommended that the Acoustic Report is reviewed to comply with such standards and the conditions of development consent (should a favourable determination be made) reflective of such requirements.
3. The Federal Government's Independent Expert Scientific Committee on Coal Seam Gas and Large Coal Mining Development needs to be consulted to ensure that the proposal does not conflict with any aspect of the bioregional assessment of the Southern Sydney region that was proposed to be prepared by the interim expert committee.
4. That the approval of the proposal be subject to AGL implementing a fugitive emissions monitoring system based on the results of AGL's investigation into best management practices and monitoring techniques for fugitive emissions as required by their Pollution Reduction Program. The monitoring program needs to be founded on a rigorous baseline study of existing methane concentrations in the area of the northern expansion.
5. The EPA needs to review the Environmental & Health Risk Assessment that AGL has undertaken in relation to the chemical used in fracture stimulation to ensure that the results are acceptable and that it complies with the Fracture Stimulation Activities Code of Practice recently released by the NSW Government. The risk assessment needs to assess both the potential human health and environmental risks of the chemicals used in fracture stimulation as they are intended to be use, i.e. in the proposed mixtures and under the same physico-chemical conditions that will be encountered in the coal seam.

Gas Well CU22

6. The gas gathering line (and its envelope) servicing the subject gas well severs an identified portion of local significant vegetation community. It is appreciated that AGL will undertake '*reasonable and feasible measures*' to reduce the impact on the native fauna and flora, however, it is recommended that this line is relocated approximately 75m to the north (or straddle the vegetation community) to eliminate any interference or disruption to this portion of significant vegetation.

Gas Well CU02

7. Council opposes the proposed location of the gas well as it is located adjacent to land zoned R1 General Residential. Whilst dwellings are yet to be constructed in this new release area, the proposed well could be located approximately 30m from the nearest dwelling separated only by a collector road. Using the DIPNR Locational Guidelines (May 2004) as guidance for separation distances between a well and sensitive land uses, it is appreciated that this separation distance complies. However, additional consideration should be given to maintaining 200m to the nearest sensitive land use (existing or future) as claimed by AGL in previous media statements.

Council is currently assessing a development application for the residential subdivision of land to the east of proposed well CU02. Given the pace of development in the area, it is possible that construction of houses on the land will commence within 12 months. If this is the case, the timing of well construction is critical to preventing exposing future residents to adverse noise impacts that are likely to occur during well construction. The developer should be consulted in this regard.

Depending on the final location within the well proposed envelope, operational noise may need to be assessed, and suitable attenuation measures implemented is required.

Gas Well CU06

8. The well is located in the vicinity of an identified portion of regionally significant vegetation community. The establishment of the surrounding lands to cater for the drilling of the wells would appear to encroach into these environmentally significant lands. It is appreciated that AGL will undertake '*reasonable and feasible measures*' to reduce the impact on the native fauna and flora, however, it is recommended that any works within the community are limited, if not eliminated in this area of environmentally significant land.

Gas Well CU10

9. The well is also located in the vicinity of an identified portion of regionally significant vegetation community. Please Refer to Comment No. 8.

If you have any questions, please do not hesitate to contact either myself on 4654 7802 or Council's Senior Project Officer, Matt Loader on 4654 7798.

Yours Sincerely,

Chris Lalor
Acting Team Leader Strategic Planning