



ASSESSMENT REPORT

Camden Gas Project: Rosalind Park Access Road and Gas Gathering Line Section 96(AA) Modification

1 BACKGROUND

The Camden Gas Project (CGP) is a major coal seam methane project involving the extraction of gas from the Illawarra Coal Measures, collection and treatment of the extracted gas, and transfer of the treated gas by pipeline to the Sydney market. AGL Gas Production (Camden) Pty Limited (AGL) is the operator of the CGP, through a joint venture (Camden Gas Project Joint Venture – CGPJV) with Sydney Gas (Camden) Operations Pty Limited (Sydney Gas).

The CGP is located to the south of Camden and Campbelltown in the Camden, Campbelltown and Wollondilly local government areas (see Figure 1).

On 16 June 2004, the Land and Environment Court approved Stage 2 of the CGP, which initially comprised 43 wells, a gas treatment plant and gas gathering systems (DA 282-6-2003-i). Stage 2 has subsequently been expanded with additional gas wells and gas gathering systems and currently has approval for 104 wells.

2 PROPOSED MODIFICATION AND PROJECT NEED

On 23 December 2008, AGL submitted an application and associated Statement of Environmental Effects to the Department under Section 96(AA) of the *Environmental Planning and Assessment Act 1979* (EP&A Act) to modify development consent DA 282-6-2003-i.

The proposed modification involves (see Figure 2):

- the construction of a small access road, along the southern edge of the existing Rosalind Park Gas Plant (RPGP) to improve access to the existing Rosalind Park 09 (RP09) gas well; and
- the “twinning” of a small section of the existing gas gathering line between the existing RP08 gas well and the RPGP.

Access Road

AGL proposes to construct a shale access road along the southern edge of the RPGP (see Figure 3). The access road would be approximately 250m in length and approximately 3m wide. There is an existing informal track to gas well RP09, however the construction of the shale access road would formalise the existing track and improve access for maintenance vehicles. The access road would only be used on a ‘need-to’ basis by a single maintenance vehicle periodically. Vegetation clearing is not required for the construction and operation of the access road.

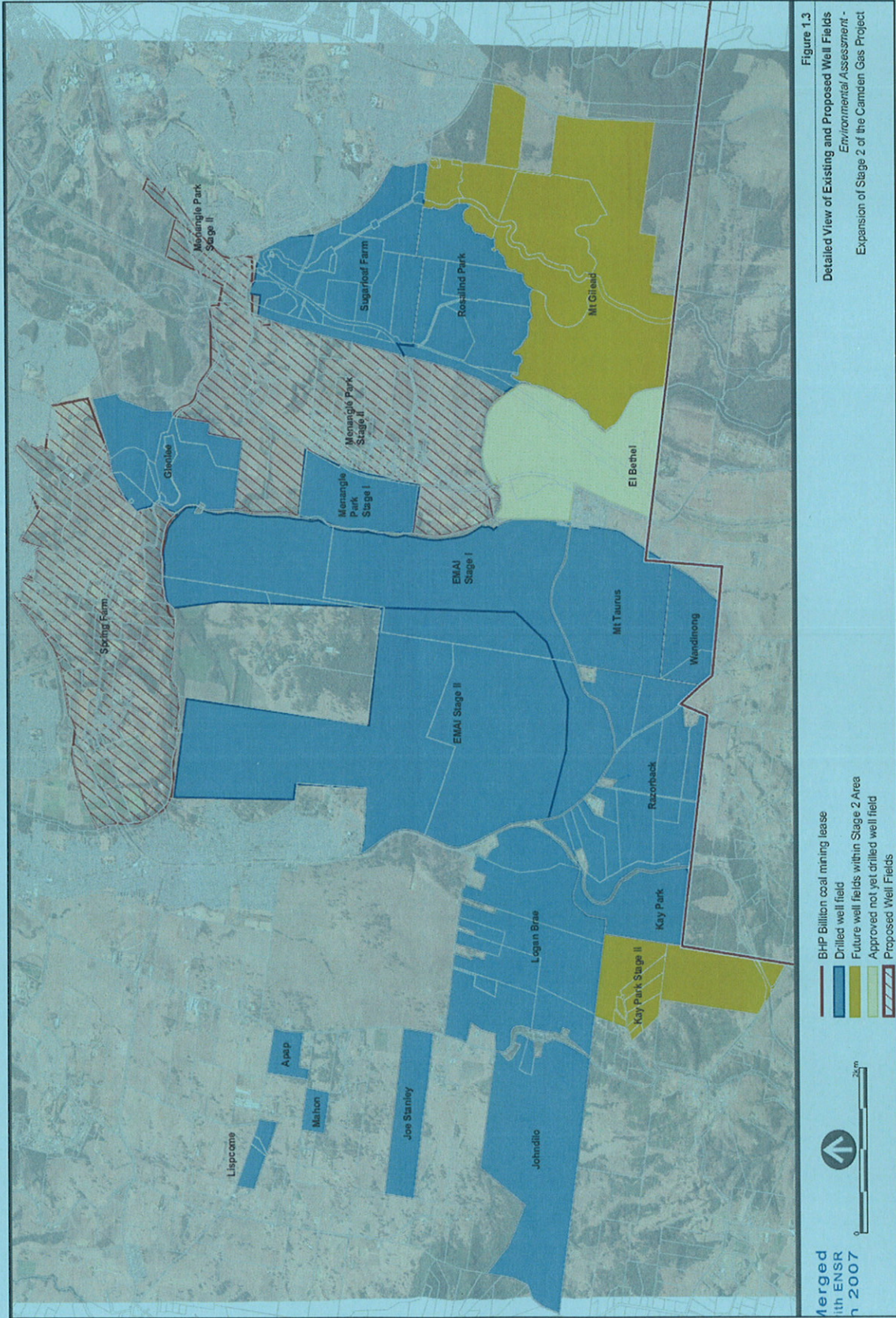


Figure 1: Location of the Camden Gas Project



Figure 2: Location of proposed access road and gas gathering line



Figure 3: *Location of proposed access road along the southern edge of the RGP*

Gas Gathering Line

AGL proposes to “twin” a section of the existing gas gathering line between gas well RP08 and the RGP, located within the Rosalind Park Property. The existing gas gathering line currently services a number of gas wells and this upgrade is required to ensure there is sufficient capacity to transport coal seam methane gas from these gas wells to the RGP.

The upgrading of the gas gathering line would be approximately 800m long and at a minimum depth of 750mm (up to 1200mm). The proposed upgrade would generally follow the existing disturbed gas gathering line route, at an offset distance of approximately 1.5 metres, deviating in two places (see Figure 2). One of the deviations from the existing route is proposed to avoid development across an existing drainage line. This deviation would be within a dam wall, in an area previously disturbed by agricultural activities (see Figure 4).

Trenching and filling along the dam wall would occur for approximately one to two days whilst the gas gathering line is constructed and installed. The material excavated from the trench during this time would be used in the backfilling, compaction and rehabilitation of the dam wall.

The gas gathering system would be designed, constructed and operated in accordance with the requirements of 'Australian Standard AS 3723-1989 Installation and maintenance of Plastic Pipe Systems for Gas'. Pipeline isolation valves would be installed in strategic locations so sections of the gathering lines can be isolated in the event of an emergency. Sign posts would also be installed to mark and identify pipeline locations, stating:

Warning
AGL Gas Developments
Tel (02)9963 1318 (24 hr emergency phone number)
Low Pressure Gas Main



Figure 4: Dam wall showing location of proposed diversion for the gas gathering line route

Construction

Construction hours would be 7:00am to 6:00pm, Monday to Friday and 8:00am to 1:00pm Saturday with no work on Sunday or Public Holidays. Construction of the access road would be completed within 1 week, and the gas gathering line would be completed within approximately 6 weeks.

3 STATUTORY CONTEXT

Under section 96AA(1) of the EP&A Act, a consent authority may modify a development consent granted by the Court if:

- (a) *it is satisfied that the development to which the consent relates is substantially the same development as the development for which consent was originally granted;*
- (b) *it has notified the application in accordance with:*
 - (i) *the regulations, if the regulations so require, ...*
- (c) *it has notified ... each person who made a submission ... on the development application of the proposed modification by ... written notice ...*
- (d) *it has considered any submissions made concerning the proposed modification ...*

In regards to these 3 requirements:

- the Department is satisfied that the proposal would be substantially the same development, considering that access roads to gas wells and gas gathering lines were approved in the original consent;
- the Department has legal advice which says there is no need to notify previous submitters if the proposal is of minimal environmental impact. In this instance, the Department is satisfied that the proposal is of minimal environmental impact (see Section 4 of this report), and consequently that it is not necessary to notify previous submitters. Nevertheless the Department consulted with several public authorities on the proposal; and

- the Department has considered all the relevant issues raised by the submissions received from the Department of Environment and Climate Change (DECC), Department of Primary Industries (DPI), and Department of Water and Energy (DWE) on the proposal (see below). The public authorities did not object to the proposal, however DWE requested a condition be included whereby reconstruction and rehabilitation of a watercourse be carried out in accordance with the *Australian Stream Rehabilitation Manual* (LWRRDC, 2000). A copy of the submissions is attached as Appendix B (Tagged B).

On 4 March 2009, the Minister delegated her powers and functions as a consent authority to modify consents under section 96AA of the EP&A Act to the Director-General, Department of Planning. Consequently, the Director-General may determine the proposal under delegated authority.

4 ASSESSMENT

The Department's assessment of the key issues is summarised in Table 1 below:

Table 1: Assessment of key issues

Access Road and Gas Gathering Line		
Issue	Prediction	Recommended Measures
Hazards	- The study area has previously been identified as being flood prone. - The access road would be of all weather construction, which would minimise any potential damaged that may occur as a result of a flood event. - The excavated area for the gas gathering line would be revegetated, which would minimise any risk of exposure and damage to the gas gathering line as a result of a flood event. - Measures would be implemented to prevent/minimise soil erosion during and following construction of the access road in accordance with the AGL Environmental Management System and Soil Water Management Sub Plan. - These measures include: - all areas not subject to construction works shall be retained free from disturbance, and - topsoil stockpiles shall be located outside hazard areas such as drainage depressions. - The proposed access road and gas gathering line would have a minimal impact on soil erosion.	No additional control measures required.
Waste	- All topsoil from the construction of the access road would be stripped and placed in windrows beside the road for later use during final rehabilitation. - Soil excavated for the upgrading of the gas gathering line would be used for rehabilitation purposes to backfill the trench. - There would be no soil waste generated from the construction of the access road or the upgrading of the gas gathering line.	No additional control measures required.
Water	- The proposed modifications are unlikely to impact on groundwater resources and are not considered to impact on water flow as the gas gathering line would be constructed within the dam wall to the west of an existing drainage line and the access road is generally not in close proximity to any watercourse. - There are no requirements to apply for a controlled action approval under the <i>Water Management Act 2000</i> from DWE. - DWE requires any proposed reconstruction and rehabilitation of watercourses be carried out in accordance with the <i>Australian Stream Rehabilitation Manual</i> (LWRRDC, 2000), however this requirement is not relevant	No additional control measures required.

	to this modification.	
Visual amenity	- The proposed access road would be located at the rear of the gas plant and shielded by vegetation to the south and west. - The proposed gas gathering line would be underground within rural pasture lands. - The proposed modifications would not be visible from publicly accessible areas.	No additional control measures required.
Noise	- The proposed access road and gas gathering line would be carried out in accordance with the existing AGL Environment Health and Safety Management Plan. - Noise emissions generated from the construction of the access road and upgrading of the gas gathering line would be well within recommended noise levels at the nearest residential receptors.	No additional control measures required.
Air Quality	- Water carts would be used to prevent dust generation. - The proposed modifications would have minimal impact on air quality.	No additional control measures required
Aboriginal Heritage	The proposed modifications are not likely to have any significant impact on aboriginal heritage within the study area.	No additional control measures required.
Flora & Fauna	The proposal is unlikely to have a significant impact on ecologically significant flora or fauna communities.	No additional control measures required.
Transport & Traffic	The proposed modifications would not cause a significant increase in traffic movements, during construction or operation.	No additional control measures required.

5 CONCLUSION

The Department has assessed the application in accordance with the relevant requirements of the EP&A Act.

This assessment has found that the proposed modifications would be of minimal environmental impact, and could be appropriately managed to ensure an acceptable level of environmental performance.

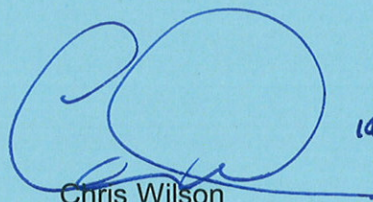
The overall benefits to the State from increased gas production outweigh any minor potential impacts, for which mitigation measures have been developed.

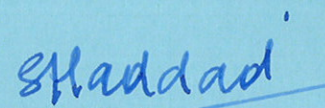
On this basis, the Department is satisfied that the proposed modifications are justified, and should be approved.

6 RECOMMENDATION

It is RECOMMENDED that the Executive Director:

- consider the findings and recommendations of this report;
- approve the application under section 96(AA) of the EP&A Act; and
- sign the attached notice of modification (Tagged A).


 12.7.09
 Chris Wilson
 Executive Director
 Major Project Assessment


 Sam Haddad
 Director-General
 16/3/2009.