



Our reference: EF13/5437 DOC13/91181

Mr David Kitto
Director, Mining and Industry Projects
Development Assessment Systems and Approvals
Department of Planning and Infrastructure
GPO Box 39
SYDNEY NSW 2001

Attention: Jessie Giblett

Dear Mr Kitto

State Significant Development - Dewhurst Gas Exploration Pilot Expansion (SSD 6038) – Review of Publicly Exhibited Environmental Impact Statement

I refer to the Environmental Impact Statement provided for the proposed Dewhurst Gas Exploration Pilot Expansion (SSD 6038) received by the Environment Protection Authority (EPA) on 6 November 2013.

On 1 July 2013 the *Protection of Environment Operations (Scheduled Activities) Regulation 2013* ('the Amendment Regulation') commenced. The Amendment Regulation lists coal seam gas exploration, assessment and production activities as Scheduled Activities under Schedule 1 of the *Protection of Environment Operations Act 1997* (the POEO Act).

On the basis of the information submitted to date, the proposal is a scheduled activity under the POEO Act. The proponent has submitted to the EPA an application for an Environment Protection Licence (EPL) for coal seam gas activities that are occurring within the vicinity of this proposal. The proponent will need to submit a variation application to the EPA to add this proposal to the EPL if approved.

The EPA has reviewed the information provided. Attachment A provides comments on the proposal. In summary the key issues raised by the EPA relate to the following:

- Groundwater quality monitoring.
- Noise Impacts
- Fugitive emissions and a leak detection and repair program.

Should you have any other enquiries regarding this matter or the EPA can be of further assistance, please contact Jessica Creed by telephoning (02) 6773 7000.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Carmen Dwyer'.

9-12-13

CARMEN DWYER
Special Projects Manager – Coal Seam Gas
Environment Protection Authority

Attachment A - EPA Comments for the Proposed Dewhurst Gas Exploration Program

The EPA has reviewed the Dewhurst Gas Exploration Pilot Expansion Environmental Impacts Statement and provides the following comments:

Erosion and Sediment Controls:

Erosion and sediment controls should be implemented consistent with the guidelines, principles and recommended minimum design standards contained in *Managing Urban Stormwater: Soils and Construction – Volume 1* (the Blue Book).

The unsealed road network associated with the proposal should be managed and maintained consistent with the guidelines, principles and recommended minimum design standards contained in:

Managing Urban Stormwater: Soils and Construction – Volume 2C Unsealed Roads and Erosion and sediment control on unsealed roads – A field guide for erosion and sediment control maintenance practices. NSW Office of Environment and Heritage.

Leak Detection and Repair Program:

The EPA notes that a monitoring program is to be implemented to monitor fugitive emissions from the well development and operation as well as the gas gathering pipeline network and associated equipment. The EPA recommends that a Leak Detection and Repair program be incorporated into this program that is conducted in accordance with *US EPA Method 21 – Determination of Volatile Organic Compound Leaks (40 CFR Part 60, Appendix A, Method 21)*.

Noise Impacts

The EPA notes that there are predicted noise impacts both during the construction and operation phase of the proposal. The proponent will need to ensure that appropriate mitigation measures are in place to reduce construction and operational noise at nearby sensitive receptors.

If approved the EPA recommends that DoPI incorporates noise limits into the conditions as follows:

Construction Noise Limits:

Receptor	Standard Construction Hours 7am – 6pm Monday to Friday; 8am to 1pm Saturdays	Outside of Standard Construction Hours
Any sensitive receptor	40db(A) LAeq(15 minute)	35db(A) LAeq(15 minute)