

narellan action group

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NAG REVISED DRAFT - 8 FEBRUARY 2013

AGL - CSG CREATES GASLANDS IN CAMDEN-LADESH

"without prejudice and in the public interest"

Submission from -	Narellan Action Group Greg Frawley Secretary, c/- 61 Turner Road, Currans Hill, NSW, 2567
Project Application No. -	09_0048
Project Title -	AGL Camden Gas Project, Northern Expansion
AGL Documents -	Environmental Assessment, October 2010 Submissions Report, October 2012
Applicant - Proponent	AGL Gas Production(Camden) Pty Ltd

Introduction

Narellan Action Group totally objects to AGL's Northern Expansion of the Camden Coal Seam Gas Project. This submission was seriously handicapped by Camden Council's failure to communicate with residents and AGL's very poor community consultation process which should be extended by 3 months to enable residents timely access to AGL - CSG Consultants Documents and respond.

There are key areas which we are still researching as some of our members are on annual holidays. These include -

- The Real Chemistry of Coal Seam Fracturing,
The Real Chemistry in Fugitive Gas Plumes,
The Real Chemistry of Toxic Emissions, (CHEMICAL DATA SHEETS)
The Real Risks of Migrating Plumes and Thermal Inversion,
The Real Impacts on Flora and Fauna

Potential Subsurface Movements,
Damage to Hydrology,
Contamination of Dams, Creeks, Groundwater and Springs,
Critical Incidents requiring Hospitalisation and Evacuation,
Noise and Vibration in Relation to Learning and Sleep Deprivation,
Implications of Remote Monitoring and Delayed Maintenance,
Emergency Services and Health Resources.
Critical Faults in the *Land Holders Rights, Access arrangements and Compensation Under the Petroleum(Onshore) Act 1991*

- AGL's Liability for Increases in Asthma and Respiratory Diseases (HARDYS)
- AGL's Responsibility to Create a Future Fund managed by an Independent Arbitrator(HARDYS) + AGL Commercial and Residential Land Compensation Fund for Developers when the land STOPS SELLING
- Transportation of Dangerous Goods - Dangerous Goods Act

You do realise that not one of the AGL - CSG Consultants' Reports has been subjected to any credible scientific scrutiny. None! Responses from government departments and Camden Council have been weak and accepting of the project with only a few minor objections. The community viewpoint will be very different. Our community is much more robust and you can expect the fight of your life if this project is accepted and endorsed in any way. Old out of date maps not showing residential street patterns helps reinforce the misrepresentation that the 'project area' is basically uninhabited.

Have AGL-CSG Consultants used 'Bing' maps? Why didn't they use Google Professional Maps or NASA maps which are updated every 3 months? Well, we think we know why!

With a billion dollar budget surely AGL-CSG Consultants could have afforded some decent maps - but they wanted vague out of date maps which suit their misrepresentation and deception - a well known and well used "old proponent strategy" !

Naturally there is no complete AGL-CSG 'footprint' map just a bunch of little chopped up maps to divert attention away from the big picture.

Misleading AGL-CSG Project Description

Cunningly the project description of the "AGL Camden Gas Project, Northern Expansion" is a misnomer with the actual impact area being the "CAMDEN - CAMPBELLTOWN - LIVERPOOL TRIANGLE".

Keeping "Camden" in the title as a single location helps dilute community concerns. When in fact the AGL-CSG Expansion directly effects over 30 suburbs either side of the Central Hill Line separating the Camden-Narellan-Leppington Zone from Menangle-Campbelltown-Ingleburn Zone.

SEE - THE BIG MAP OF AGL-CSG 2,500 METRE RADIAL FOOTPRINT
CALCULATE NUMBER OF HOUSES TO BE UNDERMINED

Using the 2500metre radius for each of the proposed 66 wells it is very clear that

AGL will drill, mine and 'frack' along two parallel lines under 30 well established and developing residential suburbs across Wollondilly, Camden and Campbelltown Local Government Areas.

CAMDEN-NARELLAN-LEPPINGTON SUBURBS to be undermined include -
Camden Park, Spring Farm, Elderslie, Narellan, Narellan Vale, Mount Annan, Currans Hill, Spring Hill, Manooka Valley, Smeaton Grange Industrial, Central Hills Industrial, Harrington Grove, Gregory Hills, Oran Park, Catherine Field, Gledswood Hills and Leppington

MENANGLE-CAMPBELLTOWN-INGLEBURN SUBURBS to be undermined include -
Menangle, Menangle Park, Glen Alpine, Rosemeadow, Campbelltown, Claymore, Woodbine, Eagle Vale, Blair Athol, Blairmont, Eschol Park, Kearns, Raby, Varroville, St Andrews, Ingleburn, Denham Court and Minto.

The existing active Menangle Park wells are environmental disasters while other existing wells closer to urban development have been plugged or downgraded so as not to attract attention. AGL refuses to provide the community with an audit of operations or answer any questions about its existing operations.

Misleading and Deceptive AGL - CSG "Project Area"

The first step in preparing a valid and credible environmental assessment is to accurately define the "project impact area" and then proceed to research all existing land use, proposed land use, infrastructure networks and environmental studies across all impact areas.

In this AGL- CSG Northern Expansion case there are really three project areas -

1. the **surface** project area,
2. the **sub-surface** project area,
- and, 3. the **atmospheric** project area

But AGL - CSG Con\$ultants really only focus on 1., with theoretical references to 2., while 3., the most critical atmospheric project area is virtually ignored.

1. AGL - CSG Con\$ultants refer to the 'surface project area' in a limited way and their subsequent supporting studies are constrained by these limits and therefore avoid recognition of the broader impacts of the expanded gas mining stretching a total of 165 kilometres below many planned, developing and well established residential suburbs, schools, businesses, commercial and industrial estates.

The actual surface area is in fact the full extent of all drilling lines stretching 2,500 metres (2.5 kilometres) in radius from each of the 11 mining locations, each with 6 wells making a total of 66 separate wells. A total footprint area of 200 square kilometres encompassing over 30 established suburbs.

Let us call this area the "actual drilling footprint". Get a map, accurately mark out the eleven proposed drilling locations and then with a compass draw eleven circles of 2500 metres to scale. Then estimate the area of the total undermining footprint. Which is, according to our estimate, an area 25 kilometres by 8 kilometres which

creates a total undermining footprint of 160 square kilometres undermining over 30 designated and established suburbs.

AGL-CSG limit their 'surface project area' to a 200 metre diameter buffer (not 200 metre radius) from each of the 11 proposed mining locations. So the total 'surface project area' according to AGL-CSG is 11 locations multiplied by the area of a circle with a 100 metre radius (200 metre circumference) making a total AGL-CSG 'surface project area' of 0.03 square kilometres. Very convenient don't you think?

2. Although there are numerous maps and diagrams there is no precise mapping of the massive footprint of affected sub-surface project areas. AGL - CSG Con\$ultants focus on the land where the gas wells will be located. Mapping the distances of drilling 2500metres away from well heads is not shown.

3. Air Quality in the atmospheric project area is the major environmental and health issue in the Camden/Narellan/Campbelltown Airshed which is a major receptor for Sydney's accumulated air pollution. This fact is virtually ignored by AGL - CSG Con\$ultants who minimise emissions to the point of not impacting on current air quality.

The Con\$ultants do not refer to major site-specific studies - historic and credible studies instrumental in stopping Camden Council and the State Government approving previous proponents of offensive, toxic and emissive industries in this area.

With an actual surface project area of 160 square kilometres it would be quite logical for a reasonable person to think that the 'atmospheric project area' or 'airshed' would be much larger as air movement is not restricted by a measurement on paper. If our reasonable person is very conservative and pro-mining it would be difficult for him/her to argue that the real atmospheric surface area would be less than double the actual surface project area of 160 square kilometres. Agreeing on a total atmospheric project area of 320 square kilometres would be reasonable - neither conservative or excessive.

Persuasive language aimed at disarming and dissolving real and serious implications involves calm and quiet omissions, focus on trivial matters and distractions, dissolving danger and risk into soft speak, and absorbing reaction with sweet jargon jam.

Such is the nature of environmental impact statements, environmental assessments and responses to submissions. Proponents don't react to criticism they ignore it.

AGL - CSG Con\$ultants failed to do this and therefore the Camden Gas Project was seriously flawed from the beginning. Setting up a false premise, a false scaffold, meant that the range of essential research relevant to the "project impact area" was not undertaken.

In the Executive Summary, Volume 1, 2010, AGL - CSG Con\$ultants at ES1-2 describe the project area inaccurately and continue this throughout the EA.

If the "project area" is not accurately defined then the information gathered will be compromised and misrepresented to the community during the consultation process. Over 2 years of misinformation and misrepresentation have fooled the local media and the local community. Unfortunately Camden Council's initial response was also very poor. Residents rely on Council to get it right and protect the community. But they failed again.

Charges of incompetency, negligence, unprofessionalism and deception will target AGL Con\$ultants who have misled trusting communities.

In CAMDEN GAS PROJECT NORTHERN EXPANSION ENVIRONMENTAL ASSESSMENT, VOLUME 1, October 2010, under 14.0 Air Quality at 14.1 Existing Environment 14.1.1 the "project area" is deceptively and falsely described...

"The Northern Expansion Project Area is ... largely undeveloped rural area with pockets of rural residential, recreational and future development lands in a pre dominantly cleared landscape. As such, it is anticipated that air quality would be generally good with few potential sources. Other external and surrounding uses such as the Smeaton Grange Industrial Park, however, would also have the ... potential to affect air quality within the Surface Project Area. Other factors directly affecting air quality in the area include:

- Local and regional sources of air pollution;
- Seasonal wind patterns;
- Temperature inversions; and
- Local Topography"

A potential visitor to the area reading this would not picture clusters of housing estates, schools, town centres or people; but instead, a large rural space with a few factories. Camden Council does not respond to correct the perception of place created by AGL - CSG Con\$ultants - a major failing on Council's part.

No mention of the many housing estates, commercial, business and recreational zones caught in the AGL - CSG emissions and risk zone. And no acknowledgement of the synergetic relationship between the last four dot points which combine to form the unique air shed of the Camden-Narellan Basin. Some of these points are handled independently, but not in depth, while the key points in combination are ignored completely.

This limited and inaccurate "project area" definition underpins the platform, scaffolding, purpose and scope of the EA which proceeds as though there are no real communities in close proximity to the proposed AGL - CSG wells.

Here are the major faults in this description of the initial "project area" statement -

1. This definition is not accurate or complete as it fails to acknowledge and include the close proximity of fully developed housing estates and communities at Currans Hill, Spring Hill, Mount Annan and the new residential estates of Gregory Hills, Sekisui House's The Hermitage and the new Catherine Urban release of 8000 home sites. It also fails to acknowledge Gregory Hills (Central Hills) Business, Commercial and Industrial zones as well as the Gregory Hills Development Corporations

development of a bulky goods zone which will feature a restaurant strip along the recreational riparian zone of South Creek.

2. Furthermore, this statement makes an unresearched subjective assumption that "air quality would be fairly good" in the project area. How "unscientific", off-handed and offensive is this statement when we all know, including the NSW Department of Planning, that air quality across South Western and Western Sydney Airshed is poor and not improving. And AGL Con\$ultants want to add nuero-toxins to our breathing space and risk releasing a toxic haze which would be unmitigated unmanagable and irremediable in terms of health impacts.

Given the credible site-specific air quality studies available AGL Con\$ultants have been deliberately negligent in not considering the health concerns raised by existing pollution and the damaging toxin load AGL gas wells would add to health risks, particularly asthma and pulmonary disease.

Historic 'Site-Specific' Air Quality Studies Ignored

AGL Con\$ultants, whether through incompetence, ignorance or deliberate ... mischief, cannot be excused in any way from omitting references to the crucial and credible air quality studies that have been used to stop proposed inappropriate toxic and emissive industries from being established within the "project area".

These include emissive industries challenged by community groups:

1993-4 Elite Chemicals 24 Hour Sodium Hypochlorite Factory, Hartley Road,
Smeaton Grange
SEE - NARELLAN ACTION GROUP SUBMISSION

2006-7 Capral Aluminium Extrusion Factory, Anderson Road, Smeaton Grange
SEE - COMMUNITY SUBMISSIONS AND ONLY ABORTED NSW
COMMISSION OF INQUIRY ON RECORD

1997- 2007, Badgery's Creek 24 Hour International Airport
SEE - COMMUNITY and ACADEMIC SUBMISSIONS
Although the proponents are still trying this project will never get wings
because of the overwhelming weight of air, water, and noise studies and
urbanisation which leaves the site without an exclusion zone

1994 - Present, A number of smaller Emissive industries at Smeaton Grange
including a concrete crushing plant
SEE - CAMDEN COUNCIL

The dominant arguments in rejecting all the above proposals were based on real threats to air quality, disturbing noise and water contamination.

Here are some of the key air studies omitted from the AGL-CSG Environmental Assessment. All these studies are site-specific, historically significant and relevant today. Plus there have been many more recent studies confirming their results.

The major historic and site specific air quality studies are -

Simon M. Berkowicz,

"Local Topographic and Climatic Controls of Air Pollution Risk Near Narellan, NSW, 1982.

University of New South Wales (Restricted)

PTR 363.739272/1

Funded by the NSW Department of Planning 1981

This first site-specific study was funded by NSW Department of Planning. Berkowicz established strategic weather stations around the Narellan Basin including St Gregory's Marist College and conducted measurements and experiments on the controlling influences of thermal inversion or "katabatic winds". The public were never meant to see this study as the results are really concerning. It was the professional responsibility of NSW Department of Planning, the Environment Minister, AGL's Con\$ultants and Camden Council to disclose the merit of this study.

Clearly, it was in AGL's Con\$ultants interests to ignore this study.

R. Hyde and G.M. Johnson,

"Evaluation of Air Quality Issues for the Development of the Macarthur South and South Creek Valley Regions Of Sydney", 1990. CSIRO and Macquarie University(School of Earth Sciences)

R.Hyde and M. Young

and "Analysis of Surface Winds and the Vertical Structure of Wind Temperature at Smeaton Grange Industrial Park", 1990. Macquarie University(School of Earth Sciences)

South Western Sydney Area Health Service, "Strategic Plan for Health Promotion 1990 (Unpublished)

Metropolitan Air Quality Study - Air Emissions Inventory (MAQS), EPA NSW 1995

In any reasonable court of law these studies alone will stop the proposed AGL-CSG expansion.

SEE - RECENT CREDIBLE SITE-SPECIFIC AIR QUALITY STUDIES

The AGL - CSG con\$utant, *peaholmes'* (not a very pleasant name) air quality assessment dated August 2010 is a limited study not assessing the real characteristics of the Camden/Narellan Airshed. Using "approved methods" to measure existing consultants from a site 10 kilometres south of the "project area" found that the in assessing "*cumulative impacts*" at 6.5, page 12, that the "*overall emissions identified ... are not considered significant and subsequently are, unlikely to result in any discernible increase in emissions in the region*".

"unlikely " is a very scientific observation, don't you think? Very quantitative! Very precise! Very accurate!

Naturally, at 7, page 13, the "*Conclusion*" states that "*emissions from the CPG would not significantly alter and would not be likely to result in any detectable change at*

sensitive receptors. It is therefore concluded that the Project would have no discernible impact on air quality".

With the "sensitive receptor" being 10 kilometres away to the south in a very different air shed that may be "*likely*"!

Expecting long term local residents of Greater Camden/Narellan to think that air quality data collected at an unspecified point 10 kilometres away holds a direct, credible and scientific relationship to our sensitive airshed is an absolute insult to the collective intelligence of South West Sydneysiders.

At 8, page 14, not one site-specific air study, historic or current, is listed in the Reference List for this *paeholmes* study. No NSW government departments, across a variety of jurisdictions, mention 'air quality' as an issue. We used to have an environmental protection agency fully conversant with air quality issues in South Western Sydney. What happened to this department?

In not presenting 'air quality' as a major issue government departments have neglected, deliberately or through incompetence, their charter of protecting our living environment. In this case the AGL - CSG expansion may become a human rights issue beyond the scope of consenting authorities.

AGL-CSG Con\$ultants have failed to address the 'background levels' as a critical base standard absolutely critical for measuring increases in toxicology across the total air shed to be impacted by their operation.

AGL-CSG must provide details of all the measuring equipment, the limits of this measuring equipment and audit of locations where the measurements were taken.

Did AGL-CSG use equipment capable of measuring particulate matter in the ppm, ppb and/or ppt range?

Did AGI-CSG Con\$ultants measure the full range of organic and inorganic compounds in earth, air and water?

SEE - Dr David Cohen, ANSTO and Professor Paul Begg, Macquarie University

Impacts on Asthma and Respiratory Diseases

Already Camden-Campbelltown is recognised as the Asthma capital of the Greater Sydney Metropolitan Area.

AGL-CSG will release accidentally, carelessly, deliberately and unknowingly large toxic gaseous emissions to air which become untraceable, uncontrollable "fugitive emissions" - difficult to detect, impossible to control and disperse with safety. The risk of ignition is extremely high if fugitive gaseous emission enter our pre-schools, primary schools, high schools, workplaces, gymnasiums, car parks, shopping centres and parks.

While asthma attracts the most publicity emphysema, allergic alveolitis and cancer can be triggered by repeated exposure to accumulative pollution and pollution events. AGL-CSG with its toxic fugitive emissions to air will dramatically escalate the

frequency of allergic reactions and long term chronic respiratory diseases.

Air pollution monitoring only measures the chemical exposure at the moment of sampling. We are very much aware of the of the mining and industrial practices of releasing toxic emission at night to avoid detection and periodic monitoring. Nocturnal emissions can only be picked up by hourly concentric monitoring at varying distances from the site.

But fugitive toxic plumes of methane and associated gas emissions may pool dangerously in suburbs day or night and only be detected by ignition and explosion.

The thermal inversion phenomenon across the Camden-Campbelltown-Liverpool Basins will cause toxic gas emissions to stay below the cooling upper atmosphere and create greater risks of exposure and ignition.

Exposure to daytime and nocturnal emissions begins with dry mouth, sore throats, eye irritation, skin irritation, headaches, excessive mucus discharge and difficulty breathing - all symptoms of damaging exposure.

Our air shed is already sensitive and we cannot afford to allow AGL-CSG to emit risky, uncontrolled and potentially explosive fugitive plumes of toxic gases to pool at any time, day or night.

While NSW Health provides statistics for asthma we need to double all statistics held by -

- all Doctors, Medical Centres and Specialists
 - South Western Sydney Area Health Service
- The Macarthur Division of General Practitioners
NSW Department of Education
Independent Schools
Pre-schools and Kindergartens
Child Minding facilities
Hospitals - Public and Private

It is only then that we will have a clear picture of the deterioration of the air quality in South Western Sydney over the last decade and the potential for AGL-CSG to slowly kill us all.

Need to check the evidence of families without asthma or respiratory diseases moving into South Western Sydney and contracting asthma.

What credible local studies have been undertaken into the **"threshold limit value"** which is the concentration of chemical exposure a worker can tolerate over an 8 hour period.

SEE - *"Chemical Safety At Work"*, Erica Parker/Cathy Chaumont ISBN 0646 334484

What health surveillance measures for regular medical screening has AGL-CSG in place for toddlers, students, residents and workers of all ages in the 30 plus housing estates siting on top of the 'fracking' chemistry?

Of course we need full disclosure of the AGL-CSG chemistry before effective

toxicology screening can be developed.

If AGL Con\$ultants did their research they would discover that because of topographical nature of the area air pollution settles and accumulates in thermal inversion layers increasing the incidence of asthma and respiratory diseases.

We do not need any developments that have essentially unproven, untested, high risk and dangerous "remotely controlled" toxic technology undermining our houses, schools, workplaces, and recreational spaces.

Have you considered impacts on your new commercial zone in Gregory Hills where the new 24 hour gym will be smothered in toxic emissions? It doesn't make sense to have fitness addicts pumping iron and choking in pollution.

What about Masters and Macdonalds - its hard to work, shop, eat and suck on toxic emissions and asthma puffers at the same time.

What about the new schools - St Justin's and St Benedict's, Oran Park Anglican School and the Anglican Retirement Village?

What about St Gregory's Marist College? Would you allow AGL - CSG to threaten their world as well?

No one has a social licence to inflict punitive economic and health costs on our community - and steal the lifestyle of families in the South West.

"If we can't breathe here, we can't live here !"

Then two years later at 5.8.4 Submissions Report - Main Report - Appendix C, October 2012 the first paragraph of the "project area" statement is repeated verbatim with the same false impression. With over 2 years to reassess this document none of the AGL Con\$ultants picked up on the gross inaccuracy and omission described above.

Air Quality is relegated way down the list of impacts in a miscellaneous grouping titled "Other Impacts" and at 5.8.4 attracts only half an A4 page of consideration. "Temperature inversion", a two word phrase in the original EA is now dropped out completely.

AGL Con\$ultants are foolish to think that nothing new has developed in the project zone - all the new houses at Gregory Hills, all the new commercial areas such as Masters and Macdonalds and the 24 hour gym -

"The Amended Project is in largely undeveloped rural land with pockets of rural residential, recreational and future development lands in a predominantly cleared landscape. As such, it is anticipated that the air quality would be generally good with few potential pollution sources such as Smeaton Grange Industrial Park and traffic along major arterial roads and B-double routes such as the Camden Valley Way and Narellan Road."

Again after a two year lapse AGL Con\$ultants have failed to pick up on major air

quality studies.

This misrepresentation of the "project area" has something to do with the major state air pollution government agency, the Department of Environment and Heritage at 2.2.1 MAIN REPORT and APPENDIX A-F 2012 (page19) failing to refer to major historic air pollution studies. Air pollution was not raised as a key issue by the public body which is the custodian of sensitive and restricted air pollution studies that ethically and morally should be aimed to protect the residents of South West Sydney - in particular the Camden/Narellan Basin and adjacent sensitive areas of Campbelltown and Liverpool.

However the Department of Environment and Heritage, while directly avoiding air quality issues, does raise important questions on the "project description" at page 6 of the Detailed Responses to Submissions which appear to be largely ignores. Ironically, according to the tabulated responses at 3.0 Air Quality rates as the 5 major concern behind LAND USE, GROUNDWATER, EA PROCESS and SURFACE WATER. Surely this must have been a clue that the major public department responsible for monitoring air quality had lost the plot.

And at FIGURE 3, AECOM AMENDED PROJECT LAYOUT, and FIGURE 7, AECOM LAND USE CONTEXT map MAIN REPORT and APPENDIX A-F 2012 the street patterns of Gregory Hills Residential Estate and the Hermitage are missing - the AECOM Consultants have had 2 years to get this map up to date. There is no excuse for this omission. In fact all the maps have not been updated with the new street patterns of new suburbs. This continues the false impression that the AGL-CSG wells are in broad greenfield zones. Nothing is further from the truth.

A reasonable person could only assume that these omissions were a deliberate strategy from the very beginning thus negating the entire validity of the AE of October 2010 and Submission Report of October 2012.

Camden Council "in whom we trust" did not raise air quality issues. It has a sad history of neglect in this area. However Campbelltown Council raises serious concerns about air quality and gas emissions which are dismissed by AGL Consultants without considering the omnipresent air quality issues documented in major studies.

At 24.3 (VOL 1 2010) STATEMENT OF COMMITMENTS, AGL Consultants claims that it -

"... shall implement all practicable measures to minimise dust and other emissions generated by the construction and operation of the project to the satisfaction of the Director-General"

Residents out here won't give a proverbial 'frac' about the Director-General. We just want to know how you will manage to contain and mitigate a massive fugitive toxic gas plume floating around our houses, schools, factories and shopping centres without someone lighting a cigarette and killing untold numbers of people?

At page 27 and 27, the Discalced Carmelites raise the issue of "Long term issues associated with air pollution..." which AGL - CSG Consultants handle with usual

ignorance - not referring to long term air quality issues.

At page 63, clear concerns of Mary Lou Potts P/L are dismissed in a similar vein. At pages 65, 68 and 69, concerns on emissions and door raised by SJB Planning are dismissed.

The (no page number) BIOSIS Topographical Map, NSW Land Authority copyright 2011, does not shows the complete well assessment area and impact area at Gregory Hills. Again this is an old map not showing the new street pattern adjacent to CU02.

Nevertheless, every proposed CSG well is strategically located to compound the katabatic wind phenomenon and built on the accumulative air pollution load imported to the Camden-Narellan Basin by existing wind patterns.

In conclusion on air quality, AGL Con\$ultants do not include relevant, available, credible and objective research that pulls together the uniquely synergetic relationship between the four dot points at 14.1.1 -

- *"Local and regional sources of air pollution;
Seasonal wind patterns;
Temperature inversions; and
Local Topography"*

All concerns about existing poor air quality raised in submissions are disdainfully dismissed by the AGL Con\$ultants as the points raised, if answered with some honesty, have the potential to derail the whole gas expansion project.

Location of Proposed AGL - CSG Wells in Proximity to Houses, Schools and Communities

According to Camden Council papers of 11 December 2012 eleven surface locations each with 6 CSG well heads or bores fed by pipes will spreading a 2 kilometre diameter circle under houses, schools, creeks and community facilities.

(This indicates that Camden Council Staff did not check their facts)

But according to AGL Environmental Assessment Volume 1, 2010, in Table 4.3, Summary of Drilling Technology - four different forms of drilling are summarised with the Surface to Seam (SIS) or Horizontal Drilling for gas reserves more than 2,500 metres away. This in fact changes the affected area completely - multiplying it by two and a half. NAG - REDRAW RADIUS AS 2500 METRES FROM WELLS.

PAC PLEASE NOTE - A full audit of schools within the AGL-CSG footprint must be undertaken. This submission focuses on the Camden-Narellan end of the footprint.

There are so many unknowns about the directions, distances, depths and angles the drilling will take.

However, using the lower distance in Camden Council's papers of a 1 kilometre radius it is possible to check maps with a ruler and find that the following established and developing suburbs are affected:

CSG Wells near established and developing housing estates:

- the new housing estate of Gregory Hills
- the established housing estate and suburbs of Currans Hill and Spring Hill
parts of Mount Annan Botanical Gardens
parts of the established Mount Annan residential estate
the new Manooka Valley residential Village
north eastern corner of Harrington Park
approx. half of the Catherine Fields residential estate
part of Blair Athol residential estate
Blairmont residential estate and suburb
approx. half of Claymore housing estate and suburb
over half of Eagle Vale housing estate and suburb
Escol Park residential estate and suburb
Kearns residential estate and suburb
part of Raby residential estate and suburb
the residential suburb of Denham Court

CSG Wells near Schools:

- St Gregory's Marist College
- Mount Annan Christian School
Currans Hill Primary
Magdalen Catholic high School
the new St Justin's Catholic Primary School, Catherine Fields
the new St Benedict's Catholic High School, Catherine Fields
Blairmont Primary
Claymore Primary
Eagle Vale High School

THESE LISTS ARE NOT COMPLETE

Did AGL - CSG Consultants bring the northern expansion project to the attention of the Minister of the NSW Department of Education and Communities(DEC) ? There is no reference to consulting with DEC in the Executive Summary page ES1 - ES11.

As part of the Community Consultation Process pre-schools, primary and high schools should have been informed and given the opportunities to become informed in order to consider potential impacts on learning environment environments.

The Geology

A major concern is the proposed locations of the AGL - CSG footprint for undermining areas in close proximity to industrial estates and infrastructure, for example -

- Central Hills Business Park
- approx. half of Smeaton Grange Industrial Estate
under the Sydney Water Channel
major arterial roads and link roads
- Mount Annan Botanical Gardens
- Narellan Town Centre
Mount Annan Shopping Centre

Mount Annan Botanical Gardens with identifiable faults and land slip areas will be

undermined in a manner that would never be conceived for the Royal Botanic Gardens in Sydney.

Hydraulic 'fracking' is a volatile chemical extraction process which attacks the coal seam and shale and sandstone layers above it. According to a senior mining engineer 'fracking' is aimed at extracting methane gas from the sandstone layer as well as the coal seam. "Fracking " will irreparably damage the sandstone layer. No one will be down there observing all this. No one will have any idea of the real impacts, potential synergetic corrosion and the real long term damage to the sandstone layer.

As I stand in my garden above my 'you beaut' Sir Walter lawn perhaps aware of the layers of top soil and clay, I am less conscious of the deeper shale seams and the massive sandstone layer sitting above the coal seams. Damage these and Sir Walter will get angry.

Residents here are aware of shrinkage and movement of the clay layer as it causes most of the settlement problems for structures on piers and concrete slabs.

But don't worry. While the shale below the clay is fractured it retains stability under compression and generally acts as a water table for billabongs, creeks, dams and rivers.

Examine Narellan Creek, if you can find an original section, and you will find the shale base a few metres below. Exposed shale is brittle and erodes relatively quickly especially with animal, pedestrian or vehicular traffic.

So the two significant layers above the sandstone have stability issues yet they are the immediate platform for our built environment

It is the sandstone layer that forms the 'rock' or stable base for all structures above. Clay is essentially unstable in its natural form - expanding and contracting with water and dryness respectively. Over time this repetitive expansion-contraction cycle will actually pull a house apart, dislodge plumbing, move piers up and down, crack concrete slabs and effectively push and pull quietly, slowly and destructively until demolition is complete. If unchecked it will take around 20-40 years to demolish a house - about the same time as it takes to pay off the mortgage.

Of course without the great stability of the sandstone layer the process would be accelerated. So the significance of preserving the sandstone layer, the immovable critical sub-structure holding our built environment, schools, housing estates, factories, shopping centres and infrastructure together is critical.

Don't let no one mess with our sandstone. AGL-CSG propose to mess with it big time. AGI-CSG have already started destabilising the sandstone layer by drilling hundreds of exploratory holes through it to a depth of 700metres.

AGL-CSG will be directly responsible for maintenance and replacement costs for all dislocation of infrastructure such as roads, water pipes, underground electricity, sewerage lines, storm water pipes, roads, footpaths, roads and related infrastructure.

But mining companies in Australia are notorious for avoiding liability.

AGL-CSG will not take our land and communal infrastructure - they will slowly wreck it! AGL-CSG have already started to gang rape our valued environment with over 200 exploratory wells - and the exploration is not just for methane!

There is absolutely no way that O'Farrell Government politicians or any member of the PAC would allow AGL-CSG to pepper their suburbs with exploratory drilling penetrating the sandstone layer and threading the stability of their multi-million dollar homes. But its OK to let AGL-CSG runs amok out here in over 30 South Western Sydney suburbs? We'll see!

There is clear and irrefutable evidence that CSG causes earthquakes!
PAC Members ought to do their homework, do their research well before the hearing.
When the earth moves we will all be moving in with you.

The Hydrology

The natural environment of the Nepean River System is already excessively polluted. The Nepean River at Menangle has been affected by toxic algae blooms for years now.

AGL-CSG have wells on the edge of the Nepean River at Menangle and recent site flooding, on 29-30 January 2013, highlighted gas bubbling up although the flooded area. AGL's response on Channel 9 6pm News 30.01.2013, through a spokeswoman, claimed that it is air bubbling up, not gas, and that this was a 'natural thing'. The area was quickly fenced off.

Underground water aquifers will be exposed to AGL-CSG toxins and AGL will not have the motivation or capacity report it, to prevent it or the means to remediate it. Drilling pipe lines are connected with rubber joints prone to rolling and dislodging causing undetected corrosive emissions to earth, air and water.

A fully detailed audit of every AGL-CSG drilling exploration location in the Macarthur Region is essential to get an overview of the potential damage done to the Nepean River System. Test or exploratory drilling has been going on for years. There are literally hundreds of drilling locations. At least 30 plus drilling sites at the historic Camden Park Estate, Macarthur Agricultural Institute, on the banks of the Nepean River.

A thorough independent audit must include a comprehensive log of precise locations, diameters of bores, depths and angles of drilling lines, full 'fracking' chemistry, and all operational variations. The public is entitled to know about the AGL-CSG history of exploratory mining throughout the area over the past 12 years. Independent studies need to assess the impacts of all AGL-CSG drilling on existing hydrology in South West Sydney before the full range of potential risks can be assessed for the Northern Expansion.

Anecdotal evidence suggests that the damage has been widespread and that certain stakeholders, earning considerable income from hosting AGL-CSG wells, are diluting

arguments regarding the real impacts. But do they know the real impacts of AGL-CSG hydraulic 'fracking' chemistry?

Without regard for Indigenous Heritage some AGL-CSG drilling has occurred dangerously close to significant Aboriginal "scar trees" - but this has not been made public.

Without any regard for European Heritage AGL-CSG have pock marked the original Camden Park Estate with over 30 exploratory wells along the Menangle River and over at Mt Taurus.

SEE - GOVERNOR LACHLAN MACQUARIE'S DIARIES,
relating to Mt Taurus
Friday 16 November 1810

Where in the AGL-CSG documents do Consultants refer to the hydrological history of the development of Smeaton Grange Industrial Estate at Narellan?
Smeaton Grange, formerly a wetland system, is a particularly sensitive area where the fast velocity concrete Narellan Channel, substituting for the original meandering billabong system, sends high volumes of contaminated storm water and ground water directly into the Harrington Park Lake system? Occasional flooding occurs where the Narellan Creek Channel passes under the Camden Valley Way. Flooding at this point means that Harrington Park Lake system experiences local flooding and deposits of rubbish. Minor and major flooding events happen so quickly that there is no way human responses can control them. After any rain event the pollution is evident throughout this catchment leading to the Nepean River at Cobbitty.

In wet weather any toxic liquid releases by AGL-CSG will move rapidly into the Narellan Creek Catchment or South Creek Catchment contaminating wetland flora and fauna well before any effective form of remedial containment can be put in place.

Across the 'real project area' exaggerated and clearly visible cracking of the upper clay layer right down to the shale water table is normal in dry seasons.

The removal of over 150 dams in Smeaton Grange, Turner Road Precinct, Central Hills, Manooka Valley, Currans Hills, Mount Annan, Harrington Park, Oran Park and Gregory Hills has had considerable impact on the local hydrology.

The normal absorption of rain water in the wetland area by open paddocks, billabongs and dams has been displaced with rapid run-off from roofs, roads, drive ways, massive concrete slabs and fast velocity storm water channels. Therefore the hydrology has undergone significant transformation.

It is very doubtful that Camden Council has conducted any major hydrology studies over the past 40 years.

Does any NSW Statutory Authority keep regular and reliable records of toxicity levels in the Narellan Creek Channel and Harrington Park Lake catchment flowing to the

Nepean River?

At what locations does regular and reliable water quality testing occur? And what specific methods and range of chemical testing is applied?

"Harrington Park is an environmentally friendly community, with particular attention being paid to retaining and preserving natural bush land, wetland and open space. In addition, the lake is not only pleasing to look at but helps maintain the purity of the nearby Nepean River."

HARRINGTON PARK LAKESIDE ESTATE Brochure

The Chemistry

The fact that AGL-CSG is hiding toxic chemicals used in 'fracking' behind the veil of "commercial confidentiality clauses" illustrates its contempt for the environment and communities expected to bear the full impact of cumulative emissions to earth, water and air.

AGL-CSG (2012 Main Report, p 37) compares their 'fracking' chemicals to those on a laundry shelf and food additives in ice cream. Plus chemicals can be chosen that are non-toxic and environmentally safe! Well let us look at this more closely.

Potassium Carbonate, Enzyme, Hydrochloric Acid, Bactericide or Sodium Hypochlorite are all toxic chemicals that in industry require chemical data sheets for safe handling, risk management and emergency services responses.

This list is not complete as AGL-CSG will use whatever chemicals necessary to achieve highly productive release of methane gas under high pressure.

The section on "Fracking Fluids" is deceptive as it trivialises the real dangers of chemicals used in large quantities hydraulically forced in a volatile chemical reaction to release methane gas under pressure.

AGL-CSG turn toxic 'fracking' chemistry into a fairy tale or a nursery rhyme in an attempt to put reasonable fears to sleep.

In "Detailed Responses to Submissions", The NSW Office of Environment and Heritage refer to a broader group of toxic petroleum 'fracking' chemicals containing benzene, toluene, ethylene, xylene, biocides, corrosion inhibitors, pre-frac acid washing and 'fracking' fluid breakdown chemicals. All are highly toxic.

AGL-CSG, under self-monitoring and self-regulation, make the absolutely ridiculous claims that 100% of 'fracking' fluids will be recovered.

That is an absolutely absurd claim and displays the absolute contempt AGL-CSG Consultants have toward the residents of South Western Sydney.

AGL-CSG Consultants lack credibility in dismissing major concerns by a statutory government body charged with caring for our environment.

There is no way our community could accept the unknown 'fracking' chemical cocktails that AGL-CSG will serve our environment. For AGL-CSG it's a case of which neuro-toxins we will shove under our houses to extract methane gas.

We know that on AGL-CSG sites all the protection suits are disposed of after "one

use only".

Where is the full description of the chemical process of fracturing and the range of chemical reactions that will occur?

The complete chemistry of drilling, mining and fracturing is not included in the AE. Could AGL - CSG Con\$ultants please provide this crucial information?

SAND + WATER + BIOCIDES + NEURO-TOXINS + HYDROCHLORIC ACID + COAL + SANDSTONE + AQUIFERS + WATER TABLES + GEOLOGICAL FAULTS + EARTH + OXYGEN + EMISSION TO AIR + EMISSIONS TO WATER + PARTICULATE MATTER TO AIR AND WATER ... this is a formula that ought to be fully disclosed, deconstructed, analysed and quantified in relation to our safety by credible experts who cannot be got at by AGL-CSG. Clearly the Con\$ultants working for AGL-CSG have their price but lack any credibility.

After a disastrous failure AGL-CSG Con\$ultants will scatter and regroup under different banners to ply their trade and prey on more unsuspecting communities. They come up within a new name, add up their combined years of "expertise and experience", rent a swish office with Harbour views and fly with a poetic mission statement.

Has AGL-CSG informed Lady Mary Fairfax about the risks and frequency of toxic discharges to ground water, surface water, storm water which will flow from the CU wells into catchments leading to Narellan Creek Channel and to Harrington Park Lakes?

Where are the AGL-CSG **Chemical Data Sheets** for all the toxic and hazardous materials to be used in the drilling, mining, 'fracking' operations and the toxic gaseous, liquid and particulate emissions to earth, air and water?

Is AGL-CSG exempt from providing this basic chemical safety information?

It is a mandatory element of Environmental Assessments (formerly EIS) to include comprehensive lists of toxic chemicals and the formulas to be used which produce a synergetic range of chemical compounds?

This enables consenting authorities to assess the range of safety issues and potential critical incidents in relation to adjacent land use zones.

HAZMAT requires Medical Safety Data Sheets MSDS, to Australian Standards, in order to develop a methodology to respond to the range of potential critical incidents AGL-CSG may encounter on their operational sites as well responses to undetected leaks of fugitive gaseous emissions migrating into pre-schools, schools, workplaces, shopping centres, parks and roadways.

There is a problem here as AGL-CSG imports most of its chemicals from overseas where the quality of production is generally inferior. Although the hydrochloric acid may be locally produced.

SEE - PHOTOS OF UNMARKED STAINLESS STEEL TANKER AT 'LOGAN BRAE'

Appears to be an ex-milk tanker? Interesting. And the dawn and dusk arrivals of two tankers each day - what is in these tankers?

Schools need to develop a separate **critical incident policy** for AGL-CSG emissions. For example the traditional response to a fire on site schools evacuate the student cohort to an open space usually the oval. In the case of an AGL-CSG fugitive gas emission a comprehensive lockdown might be necessary to avoid respiratory contact with asphyxiants causing interference with respiration, causing choking, allergic reaction and potential death.

What warning systems will AGL-CSG put in place to alert communities to toxic emissions to air and water?

Should AGL-CSG get the political red carpet then there are food manufacturers in Smeaton Grange who will need to relocate as any emission compromises their standards of production. The same issue faced them with the proposed Capral Extrusion Plant in 2003.

Coles Myer also had serious concerns then as the massive air conditioning units servicing the 60,000 square meter warehouse would not be able to filter out toxic emissions to air, in particular gaseous emissions and fine particulate matter. PAC need to go back and check all this.

Bunnings Narellan, Masters Home Improvements Gregory Hills, Narellan Town Centre, Mount Annan Market Place, Harrington Park Shopping Centre all fit within the concerns expressed by Coles Myer. Plus all the similar businesses from Campbelltown to Glenfield including Centre Link, Police Stations etc.

An independent audit of all service and manufacturing industries in Smeaton Grange Industrial Estate, Graham Hill Road Industrial Estate and the new Central Hills Industrial Estate (Turner Road Precinct) is essential to establish the OH&S issues related to

Fugitive Gaseous Emissions - undetectable and uncontrollable

The Oaks farmer with methane gas bubbling up to the surface of his dam overnight where it forms a half metre high layer held in a stable position by thermal inversion awaiting dispersal by ignition and explosion or ventilating winds.

Fugitive gaseous and particulate emissions pooling up to one metre above the ground level and accessing air conditioners, open doors in homes, workplaces, community centres, businesses, factories, shops and schools.

The Odour

While methane gas in its pure state is colourless and odourless how do you check for its presence? You cannot use a live flame to check for gas leaks as this causes ignition and volatile explosions.

It is the petroleum toxins that accompany coal seam gas that cause greater toxicity and stench - not odour. They may be the only useful indicator of toxic plumes around

US.

Will AGL and Camden Council supply and feed a canary for every household in the entire "project area" so that when the canaries choke we will know to put on our gas masks, ring 000 and HAZMAT, close the school or cancel the barbecue?

After exposure to acrid, pungent, irritating, toxic and offensive odours our ability to smell becomes de-sensitised but the corrosive and asphyxiating attack continues on our respiratory and pulmonary functions.

SEE - MP03 - FURNACE PHOTOS AND BUSH FIRE SPARKED BY PASSING TRAIN! AND CHECK OUT THE ODOUR

Risk to the Community

"No significant residual impact" is the new equivalent to "Not a credible event"
see p 63 sjb sub appendix c

In response to a submission by Karbic with reference to "methane leaks resulting from the process of hydraulic fracturing will contaminate air" AGL consultants responded with ...

"... the predominant source of hazard for the Northern Expansion Project are potential CSM leaks, though these would only have the potential to cause injury or damage if there was ignition, which would result in fire or explosion."

CAMDEN GAS PROJECT NORTHERN EXPANSION, SUBMISSIONS REPORT,
OCTOBER 2012, page 72

Throughout the AE and submission responses the risks are dismissed and relegated to the sideline when in fact they should be answered with some honesty referring to critical incidents here and overseas.

A major concern is the concentration of venting CSM emission and transient invisible plumes in relation to thermal inversion layers with the potential for the plume to move into school, residential, commercial and traffic areas causing asphyxiation and or igniting to form a fire ball. The EA does not address this issue.

(AECOM Mitigation Measures 24.9)

NAG - GET EXAMPLES TO PRESENT TO PAC

There is strong anecdotal evidence that AGL-CSG is not reporting toxic emissions to air and water at Menangle and The Oaks. Essentially self-regulatory AGL-CSG can delay its obligatory responses to critical incidents and probably in some cases totally ignore them. AGL-CSG are being labelled as "corporate cowboys" for their negligence in handling emissions.

Monitoring of established wells is done from Sydney bringing delayed reaction times into play. The nearest HAZMAT unit at Bankstown is at least 25 kilometres away taking 40 minutes travel time and longer in peak hour.

Presently the contamination trail is not being monitored as toxic liquid emissions are

transported out of the area north, up the Putty Road to Wollomi.

CHECK

SEE PHOTOS OF MP03 - THE GREEN UNMARKED TRAILERS

Politicians are quick to show sympathy towards victims of natural disasters but it would be unlikely that any politicians would want to turn up at a disastrous incident involving toxic AGL-CSG emissions especially if they were responsible for giving the expansion the go ahead.

There is no monitoring of underground chemical reactions once the wells are plugged. This represents a major risk as fissures in the sub-structure can be oxygenated to regenerate unchecked corrosive reactions.

What warning systems will AGL-CSG and statutory authorities put in place to cover the 200 square kilometre urban footprint susceptible to fugitive toxic liquid, gaseous and particulate emissions to earth, air and water?

Will mobile gas dispersal fans be used to break fugitive gas plumes?

Noise

The noise assessment at 13.0 (Vol. 1, 2010) attempts to build a picture of existing ambient noise levels that make the addition of drilling and operation of gas wells virtually negligible. This is hard to believe.

Noise is a definite and tangible impact. Only one company, Heggies Pty Ltd, provides an assessment of potential noise and vibration upon which AGL - CSG relies. The proponent pays, the Con\$ultants provide.

To establish how wrong the noise studies are we should compare the decibel read outs to the Sharapova grunt which averages 79dBa.

It is imprudent and unethical for any consenting authority to rely solely on the proponent's con\$ultant for reliable, credible, dependable and accurate information.

It is necessary for an independent and expert analysis of the Heggies assessment.

At 24.3 (VOL 1 2010) STATEMENT OF COMMITMENTS AGL Con\$ultants claims that it -

"... implement all practicable measures to undertake the development in a way minimises the noise generated".

How will AGL Con\$ultants minimise the 24 hour drilling vibration and resonant noises transmitted through the earth from below out houses? Is there a special noise-busters team that does that?

Do the AGL Con\$ultants realise that the perception of noise at night time is 6 times greater than in daylight hours? This issue is not addressed clearly in the EA or in response to submissions. There will be a lot of cranky tired students at schools. A lot more accidents at work and on the road.

St Gregory's Marist College probably signed an agreement with AGL not to complain about or criticise the project. But that won't stop the parents from kicking up a fuss when their boys aren't sleeping.

What studies have AGL Consultants undertaken into noise generated in drilling and noise transmission via air and earth?

Reflected noise may also be an issue to consider.

FURTHER RESEARCH REQUIRED

SEE - **Dr John Goldberg**, Former Honorary Associate Professor, Acoustics Group, Faculty of Architecture, Sydney University

Key Issues requiring independent investigation are -

- VIBRATION INVESTIGATION
- REFLECTED NOISE
- RE-RADIATION NOISE
- ACOUSTIC RADIATION

Recommended company VIPAC - Acoustic Scientists and Engineers with the capacity to measure AGL-CSG operations.

Camden Council's minimal submission mentions noise mitigation strategies during the construction phase but neglects noise related to 24 hour operation drilling operation in establishing wells followed by the wells life of 15 years x 24hours x 7days a week when machinery will waver between efficiency and approaching breakdown. Noise is a constant - it will be there all the time.

How can the proponent stop the vibration of 24 hour drilling below houses? Is there a special trick to that?

Moving ahead to 25.0 RESIDUAL RISK this modelling looks really fictitious in relation to noise. Noise and vibration cause "startle effect" syndrome, a type of nervous agitated response which affects personal health and welfare. Add tiredness to this and you have serious health issues.

How would the vibration thresholds of 2.4mm/s to 3mm/s impact on noise levels above and below ground at different times of the day and night?
(AECOM Mitigation Measures 24.9)

SEE - NOISE IMPACTS ON ANIMALS AND PETS

Health Issues in Relation to Noise

Noise is a major physical and Psychological stressor highly underrated and undervalued in industry because of compensation issues. Physical impacts of repeated or continuous noises include increases in blood pressure, heart rate, cholesterol, hormone levels and muscle tension.

Psychological impacts of noise includes emotional instability, annoyance, decreases in productivity, breaks in concentration and workplace accidents.

A more involved range of psychological and mental effects includes nervous

disorders.

Noise induced deafness occurs with repeated exposure to noises above 80 decibels. Loss of balance and tinnitus often parallel increasing deafness which is generally diagnosed in retrospect, well after the damage has been done.

AGL-CSG Consultants failed to undertake studies into the relationship between repetitive noise, sustained noise, nocturnal perception of noise levels and impulse noise exposure.

In the event of a critical - fire or explosion what warning systems will be put in place to shut down or evacuate schools, residential estates and shopping centres?

Will schools and residents be provided with canaries and gas masks?

What evacuation plans will be provided to residents and which safety facilities will be utilised?

The NSW Ambulance service is already under stress as is the NSW Fire Brigade. Who will pay for ambulance services as the prohibitive costs have already had a serious impact on residents calling 000. (A CURRENT AFFAIR, Channel 9, 6.30pm, 11 December 2012)

Will ambulance services and hospital resources be adequate to handle a major critical incident as it is recognised that first hour of treatment is critical in exposure to toxic emissions?

NAG - INSERT NSW HEALTH'S CURRENT STATISTICS ON ASTHMA AND RESPIRATORY CONDITIONS TRIGGERED BY POLLUTANTS

Predictable Risks to the Architectural Integrity of Built Environments and Infrastructure

Water pipes, sewerage mains, pits and pipes, storm water drains, catchment channels, underground electricity, light poles and so on all have the potential to be damaged by the destabilising nature of AGL-CSG

WHAT STATUTORY STATE GOVERNMENT BODY AUDITS, MONITORS AND ASSESSES POTENTIAL THREATS TO EXISTING INFRASTRUCTURE WHEN AN INTRODUCED SECOND LAYER LAND USE IS PROPOSED ?

Re-radiation of noise, acoustic radiation and industrial resonance have not been examined AGL-CSG Consultants. Concrete structures are susceptible to cracking if subjected to repeated and continuous industrial resonance.

SEE - STEEL MILL BRISBANE - ROD BARMILL

Houses

The complete project area is not described by AGL-CSG Consultants. So let's look at it. Essentially Liverpool-Camden-Campbelltown TRIANGLE sits on clay which

expands in the wet and contracts in the dry. Houses are predominantly constructed on foundations using piers or concrete slabs, the latter dominating since the 1980s. When extended wet or dry periods occur foundations are stressed to cracking point and everything moves. This is difficult enough to deal with. We need detailed statistics on damaged foundations within the TRIANGLE first before we assess the potential impact of AGL-CSG damage to the clay, shale and sandstone layers under us and destructive implications for the built environment. Some houses in Gregory Hills are being built on concrete slabs mounted on a series of deep vertical concrete columns to prevent movement in clay.

Industrial and Commercial

Smeaton Grange Industrial Estate is a recycled wetland where billabongs have been filled and levelled above a shale water table approximately 2 metres to 3 metres below. The shale water table still actively drains into fast velocity concrete channels dissecting Smeaton Grange Industrial Estate where massive concrete slabs and pre-cast concrete slab built factories sit on clay. Any damage to the water table and the sandstone seam underneath holding it all together could seriously compromise the structure of concrete driveways, parking areas, factory floors and associated infrastructure.

There are several springs in the Smeaton Grange -Turner Road Industrial Precincts which are not mentioned in the EA. There are also wet spots or sink holes. Central Hills is similarly built on clay cut and fill with a stabilising concrete wall perimeter to the south boundary. But it is still on clay.

A comprehensive audit of every structure is required before AGL-CSG can submit their proposal.

Where are the AGL Consultants' arguments and studies that support the theft of house and land values from families committed to half million dollar mortgages to secure their stolen dreams?

This "*do nothing*" conclusion is only seen from AGL's point of view. It does not take in the interests of the local community.

The "*do nothing*" option lets us "breathe easy" and enjoy our living environment.

Compromised Community Consultation

AGL's "Community Consultation", EA October 2010, Volume 1, 6.3

In reviewing this chapter the only element left out of the community consultation process was the community. Landowners and politicians are not the extent of the community. The largest dominant element that makes up the community is the residential population given only a small window of opportunity to access one copy of the EA and now the Response to Submissions.

At page 42, Frisic and Bernatovic claim that "no communication, written or verbal, was received from the gas company or its consultants".

At page 42, Galluzzo and Piscuneri claim that "no communication, written or verbal, was received from the gas company or its consultants".

At page 42, Henrys make a similar claim.

Where is the audit of costs in publicity, advertising, mail-outs, focus groups, information sent to local resident action groups, printing and distribution of documents (EA and Responses to Submissions), the dates and locations of "information sessions" and the special bus trips organised for business and special interest groups?

This is a crucial question because the general public were excluded from the consultation process. AGL Consultants will argue that the documents are available on the internet. But not every affected resident has the internet and not every resident can navigate AGL's poorly indexed study.

Where is the evidence of consultation with business and manufacturing companies in Smeaton Grange? Why do I ask this? Very simple, there are food manufacturing companies that require certain levels of air quality to produce within health and hygiene parameters. This was highlighted in 2003 with the rejected Capral state significant project.

Real momentum is gathering against the AGL-CSG northern expansion at Currans Hill, Spring Hill, Mount Annan, Manooka Valley, The Hermitage, Gregory Hills and Turner Road precinct.

Have buyers of residential lots at Gregory Hill and Oran Park withdrawn due to the CSG expansion? Yes they have.

Communicating with AGL via Ms Jenny O'Brien Community Relations Manager

Copies of emails sent requesting information, 'fracking' chemistry, audit of existing gas well operations etc. are summarised below and a copy of all relevant correspondence can be tabled at the PAC Hearing.

Are land sales representatives 'disclosing' to buyers the future threat to air quality and environmental impacts of CSG wells - as well as showing purchasers accurate maps with the proposed locations of future wells?

The Hermitage housing estate owned by Sekisui House is also threatened by the GSC wells. I am sure Sekisui will be deeply concerned as Hermitage homes directly overlook a proposed gas well in the South Creek riparian zone.

NAG has avoided getting involved in the AGL - CSG issue up until now. But the proposed locations of CSG wells - CU02, CU06, CU10, CU14, CU22, CU26, CU29 and CU31- has created real concern locally although very few people attended the SGL information sessions.

It's the proponent's age old trick of having limited information sessions in the busy approach to Christmas ensuring minimal opportunities to respond as families work flat out up until the holidays. But now I am tuning in.

Perhaps an on-site rally at Gregory Hills and other affected suburbs along the destructive line of wells will be necessary to built up an overpowering community reaction to the proponent AGL and its faceless backers.

Local Government Politics - Camden Council

Camden Council, presently a Liberal dominated council, has failed again to represent its ratepayers and concerned residents and people who work in the Camden LGA.

Camden Council's two submissions of 2010 and 2012 carelessly avoid the key environmental concerns of residents. Camden Council's negligence threatens the amenity of thousands of residents who have settled in the area near the proposed emissive gas wells. Camden Council's failure to inform residents and ratepayers of the potential risks of AGL - CSG wells adjacent to schools, homes and businesses amounts to criminal negligence.

Camden Council's failure to read the 5 Volumes of AGL-CSG documents, analyse, deconstruct and digest the immense environmental, social and economic impacts over a 2 year period is the very reason why the broader Camden Community has been robbed of information critical. Residents do feel let down by Camden Council.

Analysis of Camden Council's October 2010 Submission.

Camden Council's language in this submission is weak and "accepting" of the AGL - CSG expansion. In a brief 2 page document Council raises only a few issues related to the location of one or two CSG wells, consulting with landowners, and noise during the construction phase.

No mention of air quality and related health issues which are the most serious concerns of local residents. No mention of the vast housing estates, school, commercial and industrial stakeholders.

Analysis of Camden Council's October 2012 Submission.

Just as weak and accepting this slightly longer document of 3 pages raises 1 point in the opening paragraphs followed by 9 points. Opening with an acknowledgement that *"the applicant(AGL) has consulted with the landowners regarding the final locations of gas wells"* - but not residents affected.

It is not just the surface area of land that the CSG wells will impact upon. With approximately 165 kilometres of sub-surface gas piping, going in different directions under houses, pre-schools, schools, shops, factories and community amenities the list of actual stakeholders, in addition to the landowners of the well head locations, has not been taken into account for consultation purposes.

Camden Council made the same mistake in inviting Capral to establish a toxic and emissive industry in Smeaton Grange Industrial Estate - community outrage defeated the proposal, as it will defeat the AGL northern expansion. Because Camden Council cannot be relied upon to follow its mission statement of good governance the community will have to carry them with rallies and campaigns.

Camden Council raises noise during construction with a mitigating tone. And finally fugitive emissions in relation to air quality get a mention taking up 6 lines.

Then risk assessment in relation to chemicals used in fracture stimulation fills 8 lines without important references to support points.

This is followed by opposition to the location of CU02 being close to the residential estate of Gregory Hills. But no statements of concern regarding all the other residential suburbs of Manooka Valley, Currans Hill, Spring Hill, Mount Annan, Harrington Park and the Industrial and business zones in Smeaton Grange and Central Hills. Camden Council should be sacked.

Concluding with locations of gas wells CU06 and CU10 as being in the vicinity of zones with "native fauna and flora" and significant vegetation respectively.

With such poor quality submissions from Camden Council, AGL - CSG Consultants must be laughing. Is there a hidden agenda the community cannot see.

Camden Council has failed its community again, trivialising and omitting the key issues and the lifestyle investment of over 400,000 resident stakeholders, ratepayers, schools, employees, employers, business and manufacturing investors.

Camden Council did not consult with the community. Whereas Campbelltown Council did robustly raise issues in depth reflecting real concerns felt by its communities.

In assessing the feeble submissions from Camden Council, consenting authorities will see little resistance to the AGL - CSG expansion. Council officers have no expertise at all, as evidenced in the current "Flood Study" fiasco.

Camden Council has no chance of objectively analysing and dissecting the mistake ridden AGL - CSG documents. Council pretends it has expertise in all areas but essentially it is not capable of engaging in any form of serious academic analysis.

On 11 December 2012, Camden Council in front of a packed and indignant gallery tried to impress with a pathetic discussion of the AGL - CSG proposal. When the gallery is full, certain councillors like to appear concerned and attempt to talk about key topics. When the gallery is empty discussion disappears. Councillors asked questions of Executive Staff indicating very clearly that they had not read AGL documents. Having noted all their comments it was absolutely clear that not one of them had read the 5 Volumes of AGL-CSG documents.

SEE - NOTES ON THE MAYOR'S AND COUNCILLORS COMMENTS

Executive Staff, including Mr Chris Lalor, Team Leader Strategic Planning, and signatory to Council's latest submission could not answer the most basic questions. Does the Mayor and her Councillors expect the community to pick up the pieces, and fight another toxic industry?

At a later meeting with the Mayor and Acting General Manager this fact was reinforced. This amounts to negligence and points to some sort of collusion between AGL-CSG managers and senior council staff directly evidenced by one Councillor (not to be named at this point - pending the contents of that person's submission).

Camden Council do not have any audits on the number of test holes drilled by AGL - and there are literally hundreds - with at least over 30 in the Elizabeth Macarthur

Agricultural Institute, which although in the Wollondilly LGA, is the most significant European Heritage site in the area. Drilling here has been done adjacent to significant Aboriginal Heritage "Scar" Trees".

We have to ask the question - **How did AGL-CSG get open, unlimited and un-monitored access to the historic Camden Part Estate** without some resistance from Camden Councillors and Council Environmental and Heritage staff?

Not one NORTH WARD COUNCILLOR has approached our group to discuss the AGL Expansion proposal. It has been 2 years, since October 2012, when AGL published its Environmental Assessment. Any reasonable ratepayer would think that that was sufficient time for Councillors and staff to prepare, publish and disseminate important information about the AGL-CSG proposal. Plenty of time for Councillors to do their own research and canvas community opinion.

Just this week - 25 January 2013 we received Camden Council's community newsletter "**let's connect**" for the first quarter of 2013 - in this 16 page glossy spread there is absolutely nothing about the proposed AGL-CSG Expansion - a clear indicator that Council was not even thinking of providing residents with relevant information on the most serious toxic threat ever to enter Camden LGA.

By 31 January 2013 just one week before the 8 Feb deadline the Mayor of Camden still has not managed to put up a banner on the Narellan Road or the Camden Valley Way.

But a local action group managed to place a banner and a series of smaller posters on the footbridge.

The opportunity to print a reminder of the submission deadline on the Camden Council Instalment Rates Invoice mailed out over the last 6 months was lost as it was never on Council's mind. Instead there is an ad for 'illegal dumping' - a bit ironic don't you think?

Nothing in the local press from the Mayor or any of the Councillors a week out from the deadline. No sign of any Councillors door knocking anywhere - no wonder communities are totally dissatisfied with the poor performance of Camden Council.

Robust community resistance to the CSG expansion is considerable and growing daily with no thanks to Camden Council.

New South Wales State Politics - State Members in the "AGL-CSG Project Area

Our local state members in the O'Farrell Government - Chris Patterson(Camden), Bryan Doyle(Campbelltown) and Jai Rowell(Wollondilly) - have come out in the Camden Advertiser, Wednesday 5 December 2012, and Sunday Telegraph, Sunday 9 December 2012 in unified opposition to the AGL-CSG Expansion.

Andrew McDonald, shadow Health Minister at Glenfield has recently raised health issues.

Let us look at the politics here. Firstly all four are against AGL-CSG Expansion. That's great for our community. But Liberals Patterson and Rowell were "outed" very

late - just 13 days before the original 18 December 2012. Rowell may have jumped up and down in parliament but he has done very little to lift the profile of the AGL-CSG issue locally.

How many Patterson/Rowell photo opportunities in the local press connect to the AGL-CSG issue since October 2010, when both politicians first knew about it?

How many Patterson/Rowell tax payer funded political newsletters have addressed the AGL-CSG issue since October 2010, when both politicians first knew about it?

We all welcome this belated outing only achieved because community groups applied pressure. Coming out in unified opposition to AGL-CSG with less than 2 weeks to the original submissions deadline of 18 December 2012 points to lethargy, incompetence and negligence in not reading the AGL documents.

If they had been genuinely against AGL-CSG they would have been raising concerns to inform the wider public soon after AGLs Environmental Assessment to mine under communities was published and exhibited in October 2010 - they have had 2 years to use their unlimited resources to inform their electorates. Better late than never most will say. But if our community loses to AGL-CSG then a large portion of the blame will rest with politicians who failed to inform their communities.

Brian Doyle has been consistently vocal in opposition stating that *"mining and residential communities don't mix!"* Labor's Dr Andrew Macdonald has recently realised the health impacts raising public concern.

NAG is absolutely convinced that the last minute opposition of Patterson and Rowell is more about 'political speak' - voicing concern and urging the electorate to make submissions, given that they have withheld critical information for so long. Throwing the onus back onto residents - this is absolute negligence.

The test will be whether each of these politicians, whether genuinely concerned or faking it, write detailed personal submissions with specific and comprehensive arguments reflecting community outrage and that they have actually read AGL-CSG documents.

New South Wales State Politics - The State of Corruption, Contempt and Criminality

Kate McClymont SMH - *"we are talking about massive corruption"* with reference to the current ICAC inquiry - and the residents of South Western Sydney are being herded and prodded by politicians and vested interests to step up and swallow the big life-shortening daily dose of AGL-CSG neuro-toxins. Perhaps in 10 years we will have another belated ICAC inquiry into how AGL-CSG got their foot into metropolitan Sydney. For AGL-CSG to get this far with minimal resistance requires support from statutory bodies interwoven with lobbyists and developers.

The Carr, Obied, Iemma, Tropodi, Costa, Sartor, Keneally, Macdonald, Rees Labor government gave out the AGL-CSG mining licences over their decade of power. Presently serious questions are being asked at the ICAC exposing broad and deep corruption in granting of mining licences and it would not surprise anyone if ALG-

CSG was involved in unethical political networking to achieve it's aims.

What involvement did the "Terrigals" have in the granting of mining licences to AGL-CSG to undermine vast areas of established communities with a toxic, untested, hazardous, offensive and emissive practices?

These politicians are absolute scum, toxic grubs and parasites bleeding taxpayers and stealing our lifestyle in South Western Sydney.

Did NSW Labor knowingly sell the souls of South Western Sydney residents into toxic slavery, condemning the 'salt of the earth', the devout suburban heartland, the valued 'westie' lifestyle, and the not so sought after environment - betraying the lower socio-economic stuff of statistics - FOR WHAT?

The Hon Barry O'Farrell was elected to govern NSW on the promise that no CSG mining would occur in areas feeding water catchments and areas of prime agricultural activity. Did I miss the statement under his breath that he would exploit the residential estates of South Western Sydney - the retarded battlers who can't see a thing out there in the accumulated air pollution of Greater Sydney.

The vast majority of AGL-CSG wells follow creeks, rivers and catchments - all along the Nepean River and its tributary creeks. Does Premier O'Farrell know this?

Premier O'Farrell's media release of Tuesday 11 September 2012,
GOVERNMENT UNVEILS NEW PROTECTIONS FOR AGRICULTURAL LAND points to AGL - CSG Camden Gas Project going back to the drawing board. But does Premier O'Farrell recognise existing land use categories of schools, housing, commerce, manufacturing and industry as being valid and lawful and as important as water catchments and agriculture?

For the first time in the State's history, the NSW Government is protecting prime agricultural land and water resources while providing greater certainty for landholders and the resources industry.

The Strategic Regional Land Use Policy released today includes 27 new measures designed to provide greater protections for farmers and to better balance competing land uses.

Does this mean existing valid land uses of education, residential, commercial, industrial and recreational zones where extensive investment in infrastructure has occurred over many years cannot be compromised by another land use which threatens the health and wealth of students, residents and workers?

Minister for Planning Brad Hazzard said the package of initiatives provides comprehensive protection for valuable agricultural land and water resources, while allowing for the responsible development of the State's resources.

Is comprehensive protection only reserved for selected land use zones?

Does this mean that the comprehensive protection provided to water resources and agriculture is not being provided for educational, residential, commercial, industrial and recreational land use zones?

"The previous Labor government failed to protect our valuable agricultural land or deliver certainty for the resources industry. Since last year's election, we have been working hard to strike the right balance to protect agricultural land, water and the environment, and believe this policy achieves that balance," Mr Hazzard said.

Does this mean that corrupt practices endorsed by the previous Labor Government under Carr-Obied-Tripodi-Macdonald-Iemma-Rees-Keneally-Sartor involving hidden commercial contracts, insider trading and secret commissions will not happen in the future? Is it too late to save us from corrupt deals and toxic development?

The Policy, which has been the subject of extensive community and stakeholder engagement, extends well beyond the NSW Liberals & Nationals' pre-election commitments.

Does this mean that AGL - CSG Consultants will actively participate in extensive community and stakeholder engagement? Up until this point the largest stakeholder, the local population of 200,000, has been excluded from the community consultation process. Only 2 copies of AGL - CSG documents on display in Camden and Campbelltown Council foyers. It is a bloody disgrace.

On 12 December 2012 Premier O'Farrell said on 2CH Sydney Radio morning news that he has real concerns about AGL - CSG well in Camden Northern Expansion and that he has no money to pay out the contractual agreements to stop AGL mining licences granted by the previous Labor government. This is no excuse to inflict punitive toxic and offensive third world air pollution on residents of South Western Sydney.

"The state has no money to pay out contracts" said Premier Barry O'Farrell.

This false premise used as an excuse by Premier O'Farrell to dump AGL-CSG on our community has been openly debunked by Professor Flint on 2GB Radio. How feeble this premier is, wanting to honour a suspect and corrupt licensing mining deal set up by the previous Labor Government, at the expense of our amenity when in fact the real reason is money.

Squeezing the project through as a 'state significant project' is very deceptive as the actual job density at AGL-CSG mining locations is very low. Once the wells are operational they remain un-manned with computer monitoring based in Sydney.

With the average price of a house in Sydney reaching \$660,000 the week before the submission deadline it is very clear that new home buyers out here have been misled and deceived by developers and estate agents for over 2 years - since October 2010 at least when the AGL-CSG Environmental Assessment was first published. Claims by Dartwest management are false as they made a submission early on indicating that they knew of the AGL-CSG Northern Expansion.

Every person who purchased land and house after October 2010 is reasonably positioned to take legal action, perhaps a collective 'class action' against agents, project home builders, developers, the State Member for Camden(former Mayor), the Mayor and Councillors of Camden Council and the State Government for their combined failure to openly disclose important information that could and possibly will seriously impact on the amenity, the possible and likely drop in value of properties, the risks of emissions to the environment fro AGL-CSG mining and 'fracking' under new homes.

Is replacing the \$7000 first home buyers grant with the \$15,000 NEW BUILT HOME GRANT a financial trap for trusting settlers to go west and choke in South Western

Sydney's polluted atmosphere? Is the Premier generously subsidising death in the "Great Australian Dream"?

Will Lady Mary Fairfax's alleged 'secret agreement' with the State Government not to mine under Harrington Park be breached by AGL-CSG with its 2500 metre drilling footprint reaching under Harrington Grove?

If Harrington Park is exempt from AGL-CSG mining and the other 30 suburbs are mined there will be a serious social dislocation, an imposed class agenda that could divide our community.

Is white-anting the vast population and infrastructure of South Western Sydney with AGL's TOXIC Coal Seam Gas the profitable solution to balance the state's coffers?

Is increasing the domestic price of natural gas while lowering the export price to China, for example, a means of making South West Sydney carry the guilt for opposing the expansion of AGL's Coal Seam Gas project?

As residents are we expected to subsidise cheap exported gas to China by paying more for our domestic gas, while choking on neuro-toxic emissions by untested, unsafe, hazardous, and offensive AGL-CSG mining practices?

What is the volumetric comparison between domestic coal seam gas consumption and export gas consumption? And what volume of emissions will each resident swallow each year - maybe there will be a tax on that too!

Is 80% of AGL's Coal Seam Gas, heavily domestically subsidised, being sold cheaply and exported to China for energy to make instantly disposable, poor quality and often toxic and dangerous products of one and two dollar shop standards?

It is interesting to note that AGL-CSG are using cheap and inferior Chinese steel pipes - YANTAI BAOSTEEL (at AGL-CSG Logan Brae, Cawdor) in all their drilling, and very cheap unstandardised imported chemicals. The risks of using poor quality steel pipes in coal seam gas mining and 'fracking' increases the risk of critical breakdowns and and critical incidents.

An independent audit of all AGL-CSG imported materials must be undertaken, in relation to Australian Standards, to predict the potential for operational breakdowns resulting in underground explosions and lethal toxic emissions to earth, air and water.

SEE - LOGAN BRAE PHOTOS

Is South Western Sydney the economic scapegoat for the incompetence, corruption and poor house keeping of Labor and Liberal politicians?

On 12 December 2012 Premier O'Farrell said on 2CH Sydney Radio morning news that he has real concerns about AGL - CSG well in Camden Northern Expansion and that he has no money to pay out the contractual agreements to stop AGL mining licences granted by the previous Labor government. This is no excuse to inflict

punitive toxic and offensive third world air pollution on residents of South Western Sydney.

"The state has no money to pay out contracts" said Premier Barry O'Farrell.

Professor Flint explained on 2GB that the state government is not legally obligated to pay out contracts if the AGL-CSG Environmental Assessment is rejected for valid reasons.

Premier O'Farrell and his Mining and Planning Ministers are trying to fool our community with false arguments. Even if the O'Farrell Government had to pay out contracts that is no reason to subject the residents of South Western Sydney to live in a pollution loaded atmosphere bound to take 20 years of our lives.

Federal Government

Apparently the Federal Government **Mining Tax** has produced nothing with the Gillard Government hiding behind taxpayer confidentiality to avoid disclosing the actual amount the tax has raised

The NSW Government estimates that the Federal **Carbon Tax** and Green Energy schemes add about \$316 a year to a typical 7MWh household bill. Why should the people of South Western Sydney pay a carbon tax to subsidise green energy initiatives while being choked by AGL-CSG toxic emissions. This does not make sense. Perhaps the carbon tax for residents of South Western Sydney is a "piss off and die tax", a funeral tax, an extra death duty as AGL-CSG bullies the O'Farrell Government into feudal extraction of life from vital communities.

At the last minute the Hon Tony Burke, Federal Environment Minister, has weighed into the CSG debate - maybe this will help win the battle. Or is it just another motherhood approach to win votes but do nothing? We'll see.

Perhaps this is Tony Burke's contrition for his cunning and trickery when he used his \$2 company Atticus P/L in an attempt to hijack the "anti-Badgerys" airport campaign - he was actually "pro-Badgerys" and got sprung.

Why hasn't The Hon Russell Matheson, Federal Member for Macarthur, expressed any public concern for the AGL-CSG proposed expansion. NAG dropped in a flyer and a phone number to contact us - but he didn't respond. Very disappointing. Let's not write him off totally as he may have lobbied Tony Burke into action. But that's highly unlikely.

For God's sake Russell speak up ... let your community know what you're thinking. Don't become a one trick pony like Patterson, cruising Argyle in blue denim and R.M Willies, chatting up chicks over coffee and waiting for the next photo opportunity - well trained by your predecessor Pat Farmer. You are taking the money - so represent your community on the big issues! Show us your stuff!

But we will graciously accept his help to stop AGL-CSG from degrading South Western Sydney. But he had better act quickly and decisively for a solid result.

Cost-Benefit Analysis - Economics versus Health

Where is the comprehensive and objective cost-benefit analysis "BALANCING" all the key elements of economic gain for the state, money for the government, claims of jobs versus toxic emissions to earth/air/water, compromising existing and established land use zones, cumulative impacts on health and well being of people trapped in homes they cannot sell, damage to the sandstone layer causing buildings to crack, and social malaise and morbidity caused by stealing lifestyles and contaminating environments? Do the sums and come up with an answer to justify AGL-CSG repeatedly pack raping over 30 communities for 30 years.

The PAC

Concerns about how appointments are made? About qualifications, expertise, experience, affiliations, political histories, scholarships, board memberships, family trusts, share portfolios and pecuniary interests which can influence the decision of a PAC member towards self-interest and not the community's interest.

PAC must ease community concerns by openly and comprehensively addressing these issues, declaring any impediment to 'procedural fairness' for residents of South Western Sydney.

After years of political abuse the people of South Western Sydney need a sense of 'procedural fairness' to challenge the suspect process of how AGL-CSG got into our space and under it without any 'trustworthy' political defence.

The whole process is certainly a matter for the ICAC.

We have serious concerns about the PAC compressing the hearing into a few days to muffle genuine community responses.

Many residents who made submission will not be able to get time off work to make their presentations and therefore the PAC ought to have night sessions to cater for them. The convenience and comfort of the PAC is irrelevant when our communities face the largest ever threat to our living, learning and working environments.

Narellan Action Group (NAG)

No doubt AGL-CSG Lawyers will attempt to deconstruct Narellan Action Group demanding through the PAC Chairperson access to our Articles of Association and Membership files. AGL-CSG may use similar threatening tactics commonly used by lawyers representing major stakeholders.

At the 2003 Capral Commission of Inquiry, Landcom lawyers were allowed by the Commissioner, a particularly weak man, to threatened me personally as spokesperson for NAG. The Commission of Inquiry was the only one in NSW ever to be aborted after the cumulative load of credible evidence from well prepared residents and expert witnesses, including Dr John Goldberg, became too much for sympathetic Statutory Authorities (EPA & PLANNING), Capral and Landcom lawyers to bear.

It is amazing that when one small individual speaks with some directness to protect a valued living and working environment the players for the big boys show their true colours.

Exactly the same scenario will be played out with AGL-CSG, who will leave out towns for good and never to return with their untested toxic proposal.

But it backfired as it always does simply because our structure was designed for survival.

Narellan Action Group is not incorporated, we have only one "social justice" clause that drives us:

To oppose the development of toxic, hazardous, emissive, offensive, contaminating and inappropriate developments being placed in proximity to existing residential suburbs, town centres, industrial workplaces, schools and recreational spaces.

Narellan Action Group is not connected in any way to any political party - not Liberal, not Labor, not the Greens, none of them. Collectively we are just normal people loving our homes and neighbourhoods and trying to protect our communities from absurd and offensive schemes that will degrade and devalue our world for our kids and grand kids, and future generations.

Narellan Action Group will challenge every back door promoter, every political lobbyist, every corporate entity and every player seeking to destroy our lifestyle in South Western Sydney.

Narellan Action Group is fiercely independent of all other action groups, lobby groups and business groups.

Presently, our sole aim is to keep AGL-CSG from undermining and contaminating our valued infrastructure, our metropolitan areas, our urban areas, our educational facilities, our hospitals, our industrial estates and recreational spaces in over 30 suburbs in South Western Sydney.

There is no formal membership, there is no membership fee - but simply volunteers who come together to get a job done - individuals and businesses - giving freely of their precious time and services.

Narellan Action Group does not engage in fundraising activity.

Narellan Action Group does not receive any support from Camden Councillors, Camden Mayor, Camden Council Staff, or, The Hon Chris Patterson Member for Camden. They have been collectively absolutely useless. It will be very interesting to see if any of them bother to make personal submissions indicating that they have real AGL-CSG documents. They are great at posturing, photo opportunities and looking after their own commercial interests - and that's about it.

Narellan Action Group did ask for assistance in a number of areas including car stickers, roadside banners, roadside signs, photocopying etc. but we got nothing.

All Camden Council will contribute is a few banners to be positioned on the Narellan Road and Camden Valley Way.

The Camden Mayor and State Member after receiving direct pressure from Narellan Action Group will produce ratepayer and taxpayer funded flyers which will be delivered only a few days before the 8 February 2013 deadline. The question is will they have any substance to assist residents and businesses to write submissions or will they be weak and whimpey? We will see. It's 7 February and we haven't received the flyers - but we believe some areas have.

Morality, Ethics and Social Justice and the Role of Decision Makers

The AGL-CSG Expansion under 30 populated suburban areas has the potential to divide Australia like no other contentious issue before. It is already on the move up north where daily reports of CSG operations display negligence and contempt for human life and amenity.

AGL-CSG know exactly what the negative impacts will be on urban areas. As a self-regulating and self-monitoring entity the AGL-CSG management team are most likely to conceal toxic emission events, delay reporting and rationalise their way out of responsibility. As long as the drilling lines are feeding methane gas into the export contracts maintenance of wells will not be a pro-active practice but a reactive practice - such is the nature of financially driven companies.

Powerful, arrogant and cashed up with a billion dollars AGL-CSG management have selected what they perceive to be the weakest link - the residents of South West Sydney - to target for their experiment, to undermine homes, schools and workplaces. They have insulted us with a poorly prepared and researched Environmental Assessment thinking that we would just roll over.

We wouldn't want risky toxic AGL-CSG undermining Mosman, Kirribilli, Strathfield, Sutherland, Randwick, Bellevue Hill, Balgowlah, Hornsby or Pymble. Too many historic buildings and houses, wonderful churches where politicians, decision makers and board directors suit up and "pray" each Sunday for the health and well being of the "westie lab rats" being gassed way out there beyond Liverpool.

We wouldn't want dirty AGL-CSG undermining the Royal Botanic Gardens in Sydney, but we'll let them under Mount Annan Botanical Gardens which is not of any real significance, where faults and slip are evident.

We wouldn't want AGL-CSG undermining Sydney Boys' and Girls' High Schools, St Ignatius Riverview, Sydney Grammar or Barker College, but it's OK to undermine Mount Annan Christian College, St Gregory's Marist College, State Primary and High Schools.

Members of the PAC panel must empathise with toxic threat to residents out here. After you make your recommendations and report back to the Premier and Planning Minister you simply cannot wash your hands and walk away. Whatever you decide you will have to live with it. Should you approve the AGL-CSG Expansion you will have a miserable life ahead as Narellan Action Group keeps you up to date with all the operational negligence, toxic emissions and health impacts.

AGL's "Do Nothing" Option, EA October 2010, Volume 1, 3.3

At 3.3 a false premise, an illogical argument is presented in the "Do Nothing" Option -

'... the "do nothing" option would result in a lost opportunity to develop a convenient and competitive natural gas supply within the Sydney Basin, sterilising a major state significant resource in an already constrained NSW gas market, and there would be no flow of resulting economic and social benefits to the NSW community.'

Where is the *"cost-benefit analysis"* regarding the gas project and its negative impacts on the economic, social and environmental degradation of the amenity and lifestyle of adjacent housing estates at Spring Hill, Mount Annan, Currans Hill, Manooka Valley, Gregory Hills, The Hermitage and all the commercial and industrial zones?

Liability

The NSW Mine Subsidence Board (Picton Office) is not responsible for any damage to property caused by AGL - CSG operations.

Liability for CSG wells is handled by the NSW DEPARTMENT OF TRADE, INVESTMENT, REGIONAL INFRASTRUCTURE AND SERVICES (Newcastle).

I phoned them twice on 10 December 2012 and was put on to Mr Ricky Mentarin who I was told was handling all CSG inquiries. His extension rang to a message machine and I left a message for him to call me.

Conclusion

The original AGL-CSG *Environmental Assessment* (2010) and subsequent *Main Report* (2012) used a limited and deceptive description of the "project area" failing to acknowledge the extent of massive urban development into which mining is proposed. Ignoring present population statistics creates the impression that the entire area is essentially rural.

Of course the pecuniary interest files may not record politicians with shares in AGL but probably detached companies with undisclosed trusts and shelf companies that hold the shares. The financial network of relationships amongst Consultants requires investigation. There needs to be a full audit of the funding of the Environmental Assessment and Submissions Report.

The political push for the AGL - CSG expansion must be driven by political energy stimulated by incentives. Do we have to wait years for some observant journalist to discover the network of corrupt incentives? Clearly, the 3 local state members of parliament are against the expansion so the political drive is from outside our area. That is not unusual - decisions on our lifestyle being manipulated by colourful politicians and their associates who don't give a damn about the welfare of vast communities across South Western Sydney.

A serious failure by AGL - CSG Consultants to include significant air pollution studies that identify the Camden-Narellan air shed as highly sensitive and receptor to inordinate accumulative volumes of toxins produced across the Sydney Basin.

A State Commission of Inquiry is required to examine the scenario in which the previous Labor Government and the Minister for Mining allowed exploratory mining

licences to be granted over large residential and urban areas. Perhaps the ICAC need to be involved due to the destructive nature of ministerial decisions. Is there another fully based MacDonald-Obied mini series to be played out on television as we choke?

The AGL - CSG proposed Northern Expansion of the Camden Gas Project must be completely aborted to protect the thousands of families, schools and businesses in South West Sydney. There is no way our communities will tolerate AGL's destructive threat to our environment and amenity.

We are constantly reminded that AGL is all powerful and that the northern expansion cannot be stopped. Australian mining companies may be more powerful than all levels of government but they will never overpower communities determined to block toxic and emissive industries that threaten our living, learning, working and natural environment.

Members of the Planning and Assessment Commission must ask themselves this simple question - *"Would members of the PAC welcome AGL Coal Seam Gas into their streets to drill under your homes for coal seam gas and chemically 'fracc' your lifestyle" ?* No, PAC members would not accept it under any terms.

Let us say the answer is 'yes'! Then, what would you do to ensure that the proponent's information is accurate and beyond scrutiny. That makes sense. Would you believe the "negligible impact" language of the EA. No, you would have all the reports examined by credible independent experts to ensure that the process would not pose any threat to your world. Well, no fully independent specialists have been engaged to assess AGL - CSG documents. The process is flawed.

This is a *"foot in the door project"* for AGL - CSG to access the entire metropolitan area of Greater Sydney. Pick on the weakest link - a generally low socio-economic grouping of suburbs and some mortgage belt middle class McMansion suburbs so busy working to pay for their threatened lifestyle with no time to look at one copy of the AGL paperwork at Camden Council. It makes us an ideal target.

There are coal deposits under the entire Sydney Metropolitan Area so under the current laws AGL - CSC can apply for exploration and mining licences to bore under your homes.

The Hon Brad Hazzard, Minister for Trade and Investment, Regional Infrastructure and Services has one primary obligation - to protect the current infrastructure and land use zones of the project area and not allow commercial interests to contaminate our air, our water, our earth, our streets, our homes, our schools, our workplaces, our open spaces, and our recreational spaces.

In early 2013 as the anti-CSG movement gathers more cohesion, concentrated media coverage, credible expert reports, protestors may gather at the entrances to Gregory Hills, Oran Park, The Hermitage, Manooka Valley and Central Hills land sales will virtually stop. People's anger will be channelled into action as another inappropriate emissive development threatens our world.

Are developers and agents who deliberately continue to mislead home buyers in Gregory Hills, Oran Park, Harrington Grove and Spring Farm expecting to be bailed out by the communities they mislead? That would be a bit rich, but not surprising. With the exception of Sekisui House they continue to break the 1990 Real Estate Act by failing to 'disclose' to potential buyers the proposed AGL-CSG expansion. They expect their victims to save them.

Who would commit to a 30 year/\$500,00 mortgage for a dream home in the most polluted airshed in the state? Homes will lose value rapidly with the stench of heavily polluted air settling in thermal inversion layers over barbecues destroying the 'dream' and 'amenity' promoted in glossy publicity programs.

Remember NAG's very effective "BREATHE EASY" campaign of 1994? If AGL-CSG get the go-ahead it will be revived for the most intense fight to save our valued 'westie' world from degradation.

Narellan Action Group is saying "not in anyone's backyard" in any urban area. Generally, residents in South Western Sydney have lost faith in the 3 layered political system where the political players are so busy setting themselves up for post-political positions on company boards and excessive superannuation payouts that they have little connection to major issues impacting on their electorates.

Finale

By the time we have finished with AGL-CSG, their Con\$ultants, their urgers, their lobbyists, their political schemers, their faceless backers and those pretending, posturing and posing to oppose the expansion, but secretly pushing it, will all be exposed as thieves, grubs and scumbags trying to steal our homes, communities and infrastructure. We're coming! And it will be big. So get ready.

If you threaten our lives, our children, our future, our homes and our communities then we will come at you - every last one of you - that's not a threat - It's simply us defending our valued patch.

On the 6.30pm Channel 7 News, 07.02.2013, on the eve of the AGL-CSG submissions deadline Premier O'Farrell opened the new state of the art Huggies nappy factory in South Western Sydney. He commented that,

"Politicians are a like nappies. They're a bit full of it sometimes ... and they need regular changing"

You're right Premier - it's the only time you have been right - but don't try dumping your loaded toxic AGL-CSG nappy on South Western Sydney.

We'll dump you and your local pretenders quicker than a toxic nugget.

Remember that ...

Governments who take every power away from their citizens no longer have any power over them.

We will not accept the AGL-CSG proposed expansion on any terms.

We unconditionally totally reject the entire AGL-CSG expansion proposal.

Go and 'frac' your own neighbourhoods if you think it's such a great idea.
We are sure they would love it on the North Shore.

Yours Faithfully,

Greg Frawley,

7 February 2013

Founding Secretary,

Narellan Action Group (Established in 1994 to oppose inappropriate, hazardous, offensive, toxic and emissive industries being developed adjacent to our homes, our schools, our workplaces, recreational spaces and open spaces)

Footnote: The tone of this submission is deliberately direct and challenging, reflecting our anger and distrust towards politicians, councillors, developers and faceless backers wanting to undermine our valued communities with a toxic mining industry threatening the health and well-being of generations of families in South Western Sydney.

END OF THE BATTLE, START OF THE WAR!
AND IT WILL BE SOME WAR IF YOU LET AGL-CSG INTO OUR LIVES!