

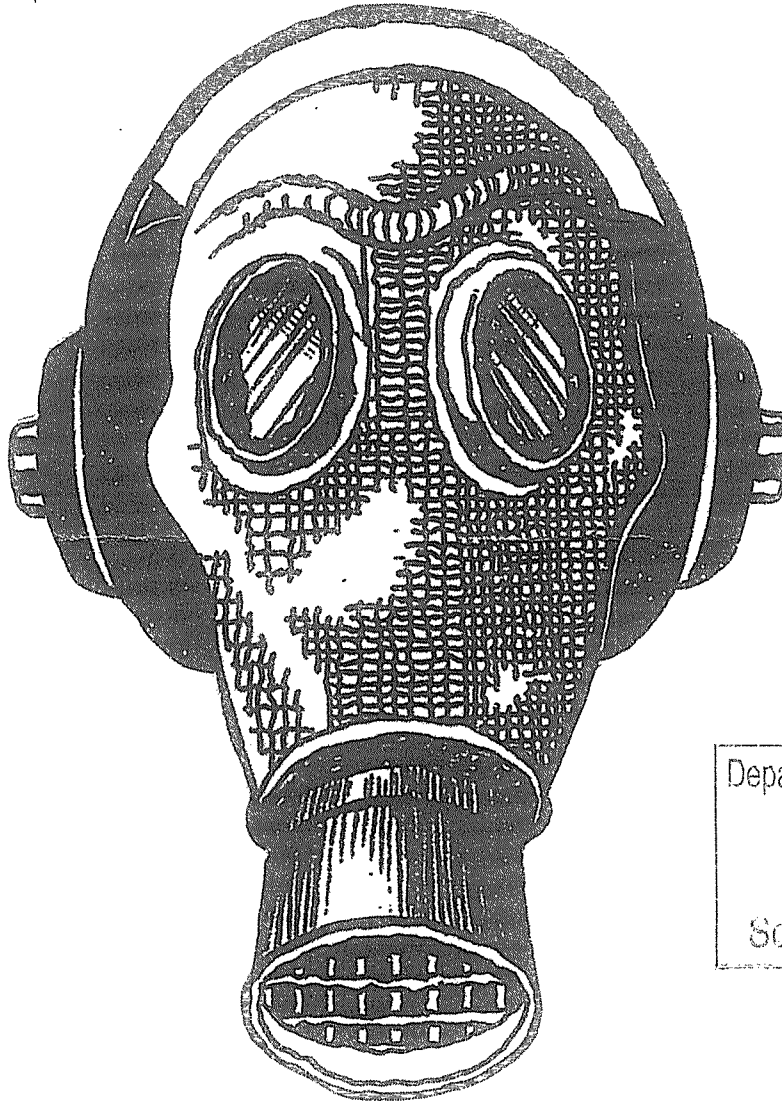
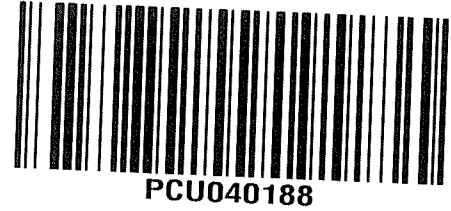
# narellan action group

established 1994

draft submission

december 2012

*to Dept of Planning  
Re: 09-0048*



Department of Planning  
Received  
19 DEC 2012  
Scanning Room

*"without prejudice and in the public interest"*

REAL PEOPLE IN REAL COMMUNITIES  
WANTING TO "BREATHE EASY"

V

AGL - CSG CAMDEN GAS PROJECT NORTHERN EXPANSION

*"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

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.

### 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.

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

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

But AGL - CSG Consultants really only focus on 1., with theoretical references to 2., while 3., the most critical area is virtually ignored.

1. AGL - CSG Consultants 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.

2. Although there are numerous maps and diagrams there is no precise mapping of the affected sub-surface project areas. AGL - CSG Consultants 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 Consultants who minimise emissions to the point of not impacting on current air quality. The Consultants 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.

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.

*"without prejudice and in the public interest"*

AGL - CSG Consultants 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 Consultants 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 Consultants 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 Consultants - 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.

*"without prejudice and in the public interest"*

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.

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:

- 1994      Elite Chemicals 24 Hour Sodium Hypochlorite Factory, Hartley Road, Smeaton Grange  
SEE - NARELLAN ACTION GROUP SUBMISSION
- 2007      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.

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, AGL's Consultants and Camden Council to disclose the merit of this study. Clearly, it was in AGL's Consultants 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

"Analysis of Surface Winds and the Vertical Structure of Wind and 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 (MAQS)

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

*"without prejudice and in the public interest"*

If AGL Consultants 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 Consultants 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 Consultants 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 Consultants 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 aired 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"*

*"without prejudice and in the public interest"*



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 raid 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 show 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.

*"without prejudice and in the public interest"*

In conclusion on air quality, AGL Consultants 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 Consultants as the points raised, if answered with some honesty, have the potential to derail the whole gas expansion project.

**Location of 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.

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.

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 Macooka 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

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.

CSG Wells near Industrial

- Central Hills Business Park
- approx. half of Smeaton Grange Industrial Estate

A list of major arterial roads and link roads should be added along with the Sydney Water Channel which is affected by a number of wells.

The AGL - CSG consultant, *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 *peaholmes* 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.

### The Chemistry

All the associated neuro-toxins that come with mining coal seam methane must be included in the chemical equation.

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 Consultants please provide this crucial information?

### 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 explosions.

It is the petroleum toxins that accompany coal seam gas that cause greater toxicity and stench - not odour.

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?

### 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

### 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 Consultants provide.

*"without prejudice and in the public interest"*

It is imprudent and unethical for any consenting authority to rely solely on the proponent's consultant 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 Consultants claims that it -

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

How will AGL Consultants 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 Consultants realise that the perception of noise at night time is 6 time 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.

NAG - SEE PROFESSOR (DR) JOHN GOLDBERG, Sydney University

Camden Council 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)

### Health Issues

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

### 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.

I phoned again on 12 December 2012 - same result.

### 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?

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.

**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.

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 Politics**

The Carr, Obied, Iemma, Tropodi, Costa, Keneally, Macdonald, Rees Labor government gave out the CSG mining licences over their decade of power. There have serious questions being asked by the ICAC.

with the answers incriminating past Labor politicians. Did Labor knowing sell the suburban souls, valued lifestyle and sensitive environment of the residents of South West Sydney to a toxic, offensive and emissive CSG industry. I suppose it is the political poison that allows Labor to turn on the lower socio-economic residents of the South West.

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.

#### **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.

*"without prejudice and in the public interest"*

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 100,000 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 mismanaged by idiots.

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, 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 that they had not read AGL documents.

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?

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

### State Politics

The three state members of parliament representing the project area are against the AGL - CSG northern expansion.

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.

However, the Premier'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, that is if the Premier recognises 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 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 - CSC 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.

## 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 essential 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 dam 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?

*"without prejudice and in the public interest"*

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 their homes for coal seam gas and 'frac' your lifestyle" ?*

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 truly independent specialists have been engaged to assess AGL - CSG documents. The process is flawed.

*"without prejudice and in the public interest"*

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: and, 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. oh, silly me, I forgot that the Premier recently changed the rules to protect you, but not us.

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, Manuka Village 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 you expecting new homemakers in Gregory Hills to do your bidding by protesting against CSG wells? That would be a bit rich, but not surprising.

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 barbeques destroying the 'dream' and 'amenity' promoted in glossy publicity programs.

Remember NAG's very effective "BREATHE EASY" campaign of 1994?  
It may have to revived

*"without prejudice and in the public interest"*

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



Greg Frawley, Founding Secretary, Narellan Action Group

END OF DRAFT ONE SUBMISSION

DECEMBER 2012