

5th February, 2013

Stop CSG Sydney  
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Mining and Industry Projects  
Department of Planning  
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Sent by email to [plan\\_comment@planning.nsw.gov.au](mailto:plan_comment@planning.nsw.gov.au)

Dear Sir/Madam

**RE: Opposition to Camden Gas Project Stage 3, Project Application 09\_0048**

This is a submission from Stop CSG Sydney, a community group that formed in 2010. We are concerned about the harmful environmental and social impacts of coal seam gas mining. We believe there is no place for unconventional gas mining across residential Sydney or on prime agricultural land, water catchments, state forests, areas of conservation value and areas of significant biodiversity.

We strongly object to AGL's project application 09\_0048 to expand its coal seam gas mining operations across Campbelltown and Camden. There is substantial new scientific evidence about the risk of coal seam gas mining to water, health and land since AGL started its original coal seam gas mining Camden mining project in 2001.

We object to the Camden expansion for a number of reasons, not least for the lack of community consultation involved in the process, and the right to say no. We believe AGL and the NSW Government are not acting responsibly, nor for the benefit of the people; that there are severe health and environmental risks associated with this project; and that the land upon which the project is proposed should remain protected as it is a place of Aboriginal and colonial historical significance. This land should not be used for coal seam gas extraction.

More specifically, we believe the fair processes of democracy are being bypassed. This project has been referred to the Planning Assessment Commission (PAC) for a merit review, with public

hearings. The consequence of this means that the residents of the local government areas in question (Camden, Wollondilly and Campbelltown) no longer have the ability to take a case, should they wish to challenge the PAC's decision, to the Land and Environment Court. Instead, the PAC, a body made up of un-elected members, appointed by the minister, can decide the fate of these people, their properties and their much-loved surroundings. The labelling of this process by AGL and the NSW Government as being "more transparent" is a falsification, because in reality this unelected body, not the people, will ultimately decide what can occur on this land. Thus, we object to the Northern Expansion of the Camden Gas Project as the people for whom it most concerns cannot have their case represented in a fair and unbiased court.

### **Proximity to rural-residential areas**

We further object to this project as the proposed sites for drilling are too close to residential and rural-residential areas. The decision to construct wells so close to residential areas is unprecedented and is a bold move considering not even Queensland has allowed mining to occur within 2km of major urban areas (Scenic Hills Association, 2011). We do not believe it is socially responsible to allow drilling anywhere in a residential area. Currently, a proposed well, Gas Well CU02, is adjacent to the land zoned R1 General Residential. Dwellings are not yet constructed on this land, however were they to be constructed, the proposed well would only be 30m from the nearest dwelling, separated only by a collector road (Camden Council, 2012). It is likely that construction of houses will start to occur in the next 12 months in the areas surrounding the proposed well. The noise pollution, as well as the visual pollution of seeing wells and their associated infrastructure caused from CSG well construction would potentially anger and frustrate residents buying into or living in these areas. Potential buyers and current residents must have the full information provided to them about this project, including potential threats to their health and wellbeing, as well as threats to their property values if CSG mining were to go ahead in proximity to their houses. Whilst AGL has provided drop in information sessions for the public regarding the type of mining and equipment they will be using, they have not addressed the issues of health or property pricing. Already, in Northern NSW, it has been suggested that property prices will drop as a consequence of CSG mining (CSG to 'cut property values' says independent advisor, 2012) and it would not be out of the question that this could occur here too. Residents need to be able to make informed choices, and it is the responsibility of AGL to provide this, and it is the responsibility of the NSW government to enforce this.

### **Health and social impacts**

We further object to this proposal because if the plans do go ahead, the safety, health, and social and emotional wellbeing of the residents living in proximity to the drill sites, and across Greater Western Sydney, with its 2 million people, will be compromised. The NSW Government should not be treating these millions of people as guinea pigs. Fugitive methane from the gas fields in Tara (unaccounted for in carbon pricing and in environmental impact) has been found to be at three times the levels than nearby areas and possibly higher than any levels of methane recorded of any gas field in the world (Maher & Santos, 2012). Reports from people living near Tara's gas fields have included persistent rashes, nausea, headaches, and nose bleeds. Doctors for the Environment Australia has said that these symptoms are similar to those being reported from people living near gasfields overseas, and as such they can not be ignored (Cubby, 2012, Nov 17). In this light, Stop CSG Sydney believes it is reckless and irresponsible to expand gasfields within a wind's breath of 2 million people; and it is the tax payer and the public health system that will pick up the cost after AGL has fracked its last well and is gone.

Research from Garfield County, Colorado, USA, where gas fields are located close to residential areas, found methylene chloride and polycyclic aromatic hydrocarbons were amongst the chemicals detected in air samples taken near gas well development. Although these chemical were detected in concentrations that the EPA accepts, the authors cautioned that the EPA benchmark safety levels were based on occupational exposure, i.e. short term exposure to a large amount of the chemical, but not on consistent exposure to small amounts of chemicals, such as for a resident living close to a coal seam gas mining field who could be exposed every day (Colburn, 2012). They argued this could be particularly dangerous for a pregnant woman, child or an elderly person. A literature search of the chemicals released into the air during the development of the well pad in this study showed that 35 of the chemicals detected were found to affect the brain/nervous system, 33 the liver/metabolism, and 30 the endocrine system, which includes reproductive and developmental effects. Other air quality studies from the same gas fields, found that both non cancer hazard indices as well as higher cancer risks were greater for residents living closer to wells, with the greatest hazard indices relating to short term, high emissions during well completion (McKenzie et al, 2012).

Stop CSG Sydney believes the NSW government has a responsibility to take the precautionary response to coal seam gas mining in this densely populated area until it is proved that there are no risks. It is of great concern that the report by Dr Maher and Dr Santos has been publicly dismissed, and that the evidence from the Colorado studies are not informing planning locally. Both these papers argue that a precautionary approach be taken, with continuous air quality monitoring and

pre/post studies. **An independent health assessment should be carried out before this project goes any further.** It is also unacceptable that the local health district was not informed in time about this project (South West Sydney Local Health District correspondence to DePI, 2012). The NSW government's own ministry of health has called for a comprehensive assessment to establish the full range of potential health risks. This should be listened to. It is worrying to see that the different arms of the one government did not communicate prior to this project going on exhibition.

The social and emotional impact of CSG mining has also not been addressed in this project. Two submissions to the Upper House inquiry into CSG in 2012 warned that the industry could result in "widespread emotional distress, social disruption and political turmoil", that high stress levels as a result of CGS could tip farmers "over the edge", with "catastrophic results", and that "if governments perpetuate the deliberate destruction of property, lifestyle and prospects for country Australians many will become depressed, some will suicide, but some will respond with anger, revenge and violence" (Somerville and Duffy, 2012). It is inconceivable that a government, which cannot claim lack of foresight on this issue, has not called for AGL to address these potential issues.

#### **Hydraulic fracturing and impacts on water supply**

Stop CSG Sydney objects to the use of hydraulic fracturing ('fracking') particularly near water catchments and residential areas, and calls that the NSW government act to protect Sydney's water supply.

The above-stated risks to health and safety will increase when hydraulic fracturing ('fracking') is used. In Kingaroy, Queensland, where fracking was used, ground water and bores used for stock were contaminated with toluene and benzene near the Cougar Energy project, resulting in Queensland's Department of Environment and Resource Management ordering Cougar to stop its underground coal gasification trial (Shearman, 2010). Reports from overseas have called for a complete ban of fracking near drinking water protections areas (Ewen et al, 2012), yet despite this AGL has proposed that the main gas line will run alongside the Upper Canal, which is not only heritage- listed but also contains a backup for Sydney's water supply. In Australia, baseline studies (i.e. prior to well development) of the water quality in aquifers have not been conducted; thus, if potable water were contaminated in the process we would have no way to prove this.

#### **Impacts to cultural heritage**

We further object to this project as the land in which the drilling will occur lies near a significant Aboriginal historical site, which should be respected and preserved. The Yandel'ora "land of peace between peoples", was a meeting area centred on Mount Annan but including the upper reaches of Bunbury Curran Creek, and the land to the west of Appin Road down to the banks of the Nepean River, where at least once in a generation hundreds of thousands of Aboriginal people from south eastern Australia gathered, leaving their weapons outside the area, to settle disputes in a peaceable manner, to clarify law and arrange marriages here (Royal Botanic Gardens Domain and Trust, nd). Out of respect for the Dharawal people, this sacred space should not be physically altered for the worse.

This land is also a place of colonial historical significance, and provides for recreational use such as the equestrian centre and the Botanic Garden. This land is also occupied in some parts by religious groups who provide retreats and would not be able to maintain business were well construction to take place. This land also provides opportunity for urban agriculture, and hence food security. The risk of contamination of the soil or water in this land must be taken into consideration. As the Scenic Hills Association have stated "cultural, educational and recreational land uses are an essential part of a civilised society and need to be considered in any strategic land use planning" (Scenic Hills Association, 2012). Thus, we object to this project as we believe that the land has been and should continue to be used for purposes far greater than gas mining- these are of far more "state significance".

### **Environmental impacts and threats to biodiversity**

All mining has an impact on the natural environment and some parts of the proposed project are in zoned Environmentally Protected areas, home to 19th Century Cumberland Plain Woodland, now listed as 'critically endangered'. These areas of state significance should be protected from extractive industries. Having seen the physical destruction CSG operations have caused in the Pilliga forest (such as the contamination of water and soil with heavy metals like arsenic and lead (Cubby, 2012, Feb 10), the proposed project near these woodlands should not proceed. The threat of unexpected well blow outs, resulting in venting of polluted foam into the air close to a drinking water canal (in Camden, May 17<sup>th</sup> 2011), as well as the potential for fugitive methane emissions, such as that which occurred in the Condamine river close to coal seam gas operations in Tara, Queensland, are additional reasons as to why this project should not go ahead.

Additionally, coal seam gas development and production requires altering the landscape to accommodate infrastructure such as roads, water management activities, processing facilities,

compressor stations, pipeline to power stations and export terminals. This will have a severe visual impact on the beautiful area, but could also potentially upset the biodiversity of this area.

### **History of poor environmental management**

We also object to the project, as AGL so far has proved to be negligent in regards to its conduct on this land, and we do not see them as responsible enough to carry out this work. AGL was found to have breached their environmental protection licence (EPL No.12003) and its planning consent for Camden Gas project Stage 2 when in August 2012 AGL admitted that it had not been conducting continuous air monitoring at the Rosalind Gas Treatment Plant at Menangle since 2009 (Gorrey, 2012, Aug 21). In August 2012, AGL started drilling at a new well at Tabcorps Menangle Park near the Nepean River with no community consultation despite objections from the Campbelltown City Council (Cubby, 2012, Aug 23). Additionally, on the 17<sup>th</sup> May, 2011, AGL was caught on camera venting well contents to the air following a maintenance procedure that went wrong. The incident occurred on the Sugarloaf property in Menangle with wind carrying in the direction of the nearby Upper Canal (carrying Sydney's back-up water supply) and homes at Glen Alpine. AGL was issued with a formal warning from the Office of Environment and Heritage for this incident, which declared that the degasser unit had not been operated in a "proper and efficient manner" as per the licence conditions (Office Environment and Heritage correspondence to AGL, 2011).

### **Scale of the project**

We are also concerned that this proposal does not truly indicate the total extent of the proposed gas fields. It is well known that a CSG well has a limited life span. Once each well runs dry the only ongoing solution is to expand the gas field at its edge. For the Camden project to be viable in the long term, there will need to be a number of these expansions. How many expansions over time will AGL apply for to keep this gas field alive? How many suburbs are you prepared to put at risk? Sydney residents deserve to know where the line will be drawn.

The industry argue 'NSW needs the gas' but why then is so much (80% and more) destined for overseas markets? Far more jobs would be created if the NSW government committed itself to a renewable energy economy.

The proposed project presents a major threat to the health and safety of residents of the areas concerned, and potentially, to the residents of Sydney, if we take into consideration the threat to drinking water. The benefits of mining do not stack up in light of the health and environmental impacts it may have. To this end we demand a Royal Commission into the health and environmental impacts of CSG mining before any more exploration and production licences are approved and we

call for a halt on current CSG mining projects until the outcomes of the Royal Commission have been determined.

Yours sincerely,

Sarah Gaskin, on behalf of Stop CSG Sydney

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