

Clon Garriff
594 Glen Rd
Craven NSW 2422

15th July 2014

The Director General
NSW Department of Planning & Environment
GPO Box 39
Sydney NSW 2001

Dear Director General,

Re: State Environmental Planning Policy (Mining, Petroleum Production and Extractive Industries) Amendment 2014.

I write to lodge my **objection** to the above proposed amendments as currently on display.

Taken as a whole, the proposed changes contribute nothing to the improvement of the social, economic, or environmental wellbeing of the people of NSW, but instead are blatantly and shamelessly designed to serve the interests of the Coal Seam Gas industry, and in particular those of AGL.

On the specific matter of the proposed "clarification" of the "3km / 5 well" rule I note as follows:

- (1) The rule did not need clarification. It already states quite clearly that no new well should be drilled within 3 kms of an existing (active or suspended) well, unless a proper EIS has been submitted and approved;
- (2) Presumably, when the rule was first put in place, your Department had good reason to fear a negative outcome in such a situation, or else was at least observing the Precautionary Principle. What has changed ?
- (3) The proposed "clarification" is nothing of the sort. Rather, it is a complete nullification. You should have no difficulty in envisaging a contrived situation whereby one or even two wells could be drilled in close proximity to an existing well, while another three members of the "set" were located so as to carry the group centroid outside the 3 km radius. Even more bizarre scenarios involving multiple sets can readily be visualised.

- (4) To those Gloucester residents who are familiar with AGL's activities in the Valley, it is quite evident that this proposed change to the 3 km rule is nothing more than an artificially contrived device to get around AGL's current problems with its proposal to fracture stimulate four wells at Waukivory (actually at Forbesdale). The concept of a centroid has no relevance in this setting.

I therefore request that the proposed amendments be withdrawn in their entirety.

Yours faithfully,

[Signed]

(Dr) Gerald McCalden.