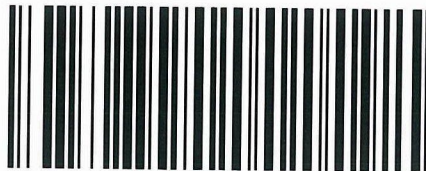




Department of
Primary Industries



PCU012121

OUT12/29538

20 NOV 2012

Mr Matthew Riley
Mining and Industry Projects
NSW Department of Planning and Infrastructure
GPO Box 39
SYDNEY NSW 2001



Dear Mr Riley

**Springvale Colliery Modification 3 - Bore 8 (DA 11/92 - MOD 3)
Response to exhibition of Environmental Assessment**

I refer to your email of 9 October 2012 requesting advice from the Department of Primary Industries (DPI) in respect to the above matter.

Comment by Forests NSW

Forests NSW advises:

- the proposal utilises a path of least disturbance and is fundamentally acceptable
- Forests NSW is engaged in the process of issuing an Occupation Permit to Centennial Coal for the site itself and associated supporting infrastructure
- any approval of the application should, however, require implementation of measures in the Statement of Commitments regarding threatened species and heritage
- in addition, any approval of the application should include a requirement that the proposed development is secured from the public at all times (which is a requirement in the Operational Plan for the Forest).

For further information please contact Jack Cotterill, Acting Stewardship Forester (Bathurst office) on 6330 1025 or at: jack.cotterill@sf.nsw.gov.au.

Comment by NSW Office of Water

The NSW Office of Water notes the proposed modification:

- is necessary to maintain access to coal for the approved longwall operations in Longwalls 415-419 which are yet to be extracted, following existing operations in Longwalls 401-414 which have been extracted since 1995, and
- requires a replacement bore licence to account for the take of water from the Richmond groundwater source in accordance with the rules of the *Water Sharing Plan for the Greater Metropolitan Region Groundwater Sources 2011*.

Detailed comment and recommended conditions for any proposed approval are provided in Attachment A.

For further information please contact Fergus Hancock, Planning and Assessment Coordinator (Newcastle office) on 4904 2532 or at: Fergus.Hancock@water.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Phil Anquetil', with a stylized, cursive script.

Phil Anquetil
Executive Director Business Services

Attachment A

Springvale Dewatering Bore 8 (DA 11/92 MOD 3) Response to exhibition of Environmental Assessment

Comment by NSW Office of Water

1. Licensing arrangements

The application is a modification to an existing licensed extraction from the Richmond Groundwater Source, governed under the *Water Sharing Plan for the Greater Metropolitan Region Groundwater Sources 2011* (WSPGMRGWS). The extraction of groundwater by means of the proposed bore requires access shares in the above groundwater source.

A comment made in Appendix G, to the effect that the take of groundwater from the consented development is unlikely to be subject to water sharing arrangements under the WSPGMRGWS is not explained in the Environmental Assessment (EA). All take of water by means of mining excavations requires regulation under the appropriate legislation, which includes subordinate legislation. It is the Office of Water's position that the take of groundwater by means of either an underground mining excavation and/or a dewatering bore to surface is subject to the access sharing arrangements and any limitations imposed under the WSPGMRGWS.

The volumetric limitations imposed under the WSPGMRGWS should be considered in terms of the actual take of groundwater by means of the underground mining operation against Centennial Springvale Coal's licences, which are in force to account for 9 848 ML of porous rock groundwater.

The Office of Water will assess Centennial Springvale's requirement for any future accounting for the take of groundwater in accordance with the rules of the WSPGMRGWS and the provisions of the *Water Management Act 2000*.

The installation of the dewatering bore will require a component of Springvale Coal's current entitlement volume to that bore. This is to ensure that the volumetric limit to Springvale Coal's existing licences is not exceeded, and to ensure double accounting (taking licensed groundwater multiple times from different bores) is avoided.

2. Water management

The transfer of groundwater from the proposed dewatering bore to Springvale Coal's coal handling facility prior to discharge or on-supply to other water users, including Delta Electricity, should be incorporated into the licences held by Springvale Coal. Centennial Springvale Coal should develop a water management transfer component of its Site Water Management Plan, to incorporate the installation of the transfer pipeline and any necessary upgrade to water management facilities or storages to address the incremental increase in groundwater take from the Springvale underground mine workings.

3. Recommended conditions of approval

If the proposed project is approved, the Office of Water recommends the following conditions:

Minimise Groundwater Impacts

- The Proponent shall carry out the project in a way that prevents and/or minimises the potential surface and groundwater impacts of the project.

Baseflow Offsets

- The Proponent shall offset the loss of any baseflows to watercourses caused by the project. Offsets should be provided by the retirement of adequate water entitlements to account for the loss attributable to the project.

Water Management Plan

- The Proponent shall develop and implement a Water Management Plan for the overall Springvale Coal Mine operations, which includes the additional Dewatering Bore No.8. This Plan must be developed in consultation with the Office of Water and include:
 - accounting for groundwater ingress against the rules of the *Water Sharing Plan for the Greater Metropolitan Region Groundwater Sources 2011*,
 - identification and quantification of the sources of groundwater ingress to the mining operation, including any inter-change from closed, flooded mine workings (State Mine or Kerosene Vale) up-dip of the mine workings,
 - the installation, operation and reporting on changes in groundwater levels and pressures above and below the Mt York Claystone and the water bearing zones of the Banks Wall sandstone strata,
 - extension of groundwater monitoring to all upland swamps within the envelope of groundwater drawdown surrounding the Springvale mining operation,
 - conduct of on-going monitoring and provide reports on measurable changes to groundwater quality within the Banks Wall sandstone and aquifers above the Banks Wall sandstone, and
 - contingency arrangements to any detected changes to groundwater conditions in the monitoring programme above, including:
 - development of threshold triggers to changes in groundwater levels, pressures and quality, in accordance with ANZECC ecosystem protection requirements,
 - development of verification procedures to the groundwater predictions made for the Springvale development consent and Bore 8 EA,
 - formation of reporting procedures to the Office of Water with respect to the monitoring and verification requirements identified above,
 - development of potential mitigation response measures to such measured changes, and
 - development of operational and post-operational management measures in the event that impacts exceed trigger levels, and/or extend beyond the approval period in force.

End Attachment A
