



Wednesday 25th September, 2013

Mr David Kitto
Director
Mining Industry Projects
Department of Planning and Infrastructure
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Dear David,

Increased production at Springvale Colliery to 4.5 mtpa (DA11/92 MOD 4)

The Colong Foundation believes that this proposal for increased coal production has come forward too soon. The modification application should be part of the foreshadowed proposal to extend this mine's planning approval beyond 2014.

As a way forward, the Colong Foundation proposes that if any consent is issued for this section 75W modification application it should lapse with the expiry of all existing development consents on September 28, 2014. In this way this modification proposal for the next stage of the Springvale mine can be reviewed then and not be locked into a long-term development consent.

The Environmental Assessment states that 'Springvale Mine's challenge is to maximise returns through the mineral wealth within existing lease areas, whilst ensuring a minimal environmental impact' (pg iii). There is usually an inverse relationship between maximising returns and environmental impact, so as Centennial Coal's proposal goes against this trend, its assertions need to be closely examined.

This is where this modification application runs into difficulty because it asserts that there will be no increased environmental impacts, in fact the application asserted that impacts shall be minimal.

The environmental assessment does not consider in detail the impacts arising from coal production on the natural surface features of Newnes Plateau in the Gardens of Stone reserve proposal due to mine surface subsidence. It asserts that the impacts will be acceptable, yet Centennial Coal does not define these acceptable impacts or consider surface subsidence in any detail.

The Colong Foundation notes that from proposed longwall 216 the void width will be around 261 metres, which is around the width of the first ten longwall panels when the mine started. The Foundation also notes that from longwall 216, the gate road pillars are to be increased to between 105.2 and 125.2 metres. These changes to mine geometry and the shortening of longwall panels may reduce surface impacts.

The Subsidence Management Planning (SMP) process, operating from about the 10th longwall to 15th longwall has led to increased and unacceptable environmental impacts. Centennial Coal has distorted the adaptive management and risk management framework of the SMP process to produce outcomes that damaged the natural environment. The SMP process was supposed to allow for greater environmental protection, not to increase environmental damage.

Centennial Coal does not acknowledge or discuss in the environmental assessment the process taken by regulatory authorities to bring the abovementioned changes in mine geometry about. The Colong Foundation is unaware whether the regulatory authorities believe these changes in mine plan are sufficient to prevent the surface damage, or not. It would be helpful if the regulatory agencies, and not the mining company, were to specify what is meant by 'minimal environmental impact'.

The landform is described in the environmental assessment as: 'The surface lands adjacent to and above Springvale Mine underground workings... on the Newnes State Forest, which comprises narrow gorges with high ridgelines, steep sided slopes and sandstone cliffs above incised valleys, hilly areas with relatively flat crests and spurs'...(pg 8). These features and critically, nationally endangered upland swamps, streams, cliffs and pagodas are impacted by the longwall mine design. The regulatory agencies should specify in precise detail how these features shall be subjected to minimal environmental impact.

There is insufficient information in the environmental assessment to determine whether delicate surface features will be protected by the proposed changes, or not.

Centennial Coal has assumed that it is acceptable to reduce in an unspecified manner, environmental impacts and increase coal production without a detailed discussion on mine geometry, mine subsidence, and what exactly is minimal environmental impact.

The Colong Foundation disagrees. There is no information presented in this environmental assessment to give any confidence that the proposed changes in mine geometry will deliver protection to nationally endangered upland swamps or to pagodas, cliffs and streams.

No development consent should be issued until information is provided to explain the changes to longwall mine geometry, how these changes were brought about and what the benefits are of these changes.

Water Make and Water Pollution

Centennial states that the proposed increase in production will increase the rate of water make to the mine. Centennial also believes that this increase should be offset by changes to the longwall panel layout that tends to reduce water make to the mine.

It is unclear to this reader whether the water make will increase or not, but it is accepted that it will not exceed the approval limit of 30ML/day, provided that limit is for Springvale Colliery only. The effluent discharge limit is in fact believed to be for both Springvale and Angus Place Mines through the Springvale Water Transfer Scheme. If this is the case, then limits may be exceeded by the combined water make from both mines.

The amount of water make will no doubt be re-examined with the new development application when the existing consent lapses in September 2014.

The question of water make and its quality is a serious matter of concern. Centennial Coal has not provided any data to prove their assertion that the mine water make does not contain new surface waters.

The Colong Foundation believes that mine water make to be in part connate water from the Lithgow and Katoomba coal seams that is of very poor quality. Such mine effluent should not be released or used by a power plant without heavy treatment. It is also believed that the mine water make is part new surface water. It is not accepted that it is all ancient water trapped since the coal seams and overlying strata were laid down. Part of the mine effluent is now surface water that is drawn downwards due to cracking, mobilised joints and other structural features.

Assertions by mining consultants that streams on Newnes Plateau are ephemeral is questioned. Mining industry assertions that the surface cracking associated with mine subsidence is not connected to this wet mine is also questioned.

Centennial Coal and its consultants continue to argue otherwise but there are few facts to support their assertions which operate against common sense. No other mines are as wet as Springvale, Angus Place and Clarence Collieries. Something odd is happening regarding the Newnes Plateau aquifers and water make at these mines. Bland assertions that there is no problem are tedious and untrue.

Thank you for the opportunity to comment.

Yours sincerely,



Keith Muir
Director
The Colong Foundation for Wilderness Ltd