



Industry & Investment

OUT10/17918
9 November 2010

Mr Howard Reed
Manager, Mining
Department of Planning
GPO Box 39
SYDNEY NSW 2001

Attention Kate MacDonald

Dear Mr Reed

Stratford Coal Mine s.75M Modification Application 4 DA 23-98/99

I refer to your letter dated 11 August 2010 requesting submissions on the Environmental Assessment for the above project.

Industry & Investment NSW (I&I NSW) technical officers have reviewed the *Stratford Coal Mine July 2010 Modification Environmental Assessment* and provide the following comments which are directed at specific areas of I&I NSW responsibility:

MINERAL RESOURCES

I&I NSW Mineral Resources require the following issues to be addressed by the Proponent in presenting a Rehabilitation and Environmental Management Plan (REMP) to the satisfaction of the Director General I&I NSW.

- a) **Domain Specific Objectives:** Identify the functional domains of the project and describe the rehabilitation objectives for each domain.
- b) **Completion Criteria:** Propose strategic completion criteria for each domain having regard to the various phases of rehabilitation (ie. Decommissioning, Landform Establishment, Growth Medium Development, Ecosystem Establishment, Ecosystem Development) and outline the proponent's commitment to progressive rehabilitation. [Note: Detailed completion criteria for each phase of rehabilitation will be developed through the REMP process].

I&I NSW Mineral Resources recommend that the following conditions be incorporated into the planning approval, if granted:

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Rehabilitation Plan

The Proponent must prepare and implement a Rehabilitation and Environmental Management Plan (REMP) to the satisfaction of the Director General I&I NSW. The REMP must:

- a. be prepared in accordance with I&I NSW guidelines and in consultation with relevant agencies and stakeholders;
- b. be submitted and approved by the Director General I&I NSW prior to the commencement of construction;
- c. address all aspects of rehabilitation and mine closure, including final landuse assessment, rehabilitation objectives, domain objectives, completion criteria and rehabilitation monitoring.

As previously discussed with Department of Planning, any planning approval should not include separate plans such as the current; Final Void Plan, Landscape and Revegetation Management Plan, Erosion and Sediment Control Plan and Rehabilitation Management Plans, but rather be replaced by a single plan called Rehabilitation and Environmental Management Plan (REMP). The REMP should address all rehabilitation aspects, including landscape, final void management and mine closure. There should be no further requirement to develop management plans if this section is addressed adequately. I&I NSW requests that all references to such plans in the SEE and previous Development Consents, be replaced by the REMP under the Mining Act.

I&I NSW Mineral Resources does not object to the approval of the modified Project provided the above recommendations are taken into account and implemented.

AGRICULTURE

I&I NSW Agriculture considers that the proposed modifications to Stratford Coal Mine will not directly impact on additional agricultural resource lands, or result in substantial changes to rehabilitation proposals. The current use of some rehabilitation areas within the mining lease for grazing is also acknowledged.

The proposed additional coal processing volumes will increase water demand, However, the modified mining project and progressive filling of Stratford pit will also reduce the total available water storage capacity. Consequently the revised site water balances identifies surplus water volumes on average.

To help manage this surplus, the proponent proposes to irrigate 35 ha of rehabilitated pastures on Stratford Waste Emplacement. Appropriately managed irrigation which avoids excessive soil moisture levels (as proposed) and results in uniform application rates across a site can improve the density of vegetative ground cover (pastures) and the quantity of feed available for grazing. Appropriately managed grazing of irrigated pasture

areas can also increase pasture growth rates and hence water usage. Additional site monitoring and management is, however, needed to ensure that cattle access is controlled to prevent the compaction of wet or saturated soils and consequently soil degradation and reduced water infiltration rates.

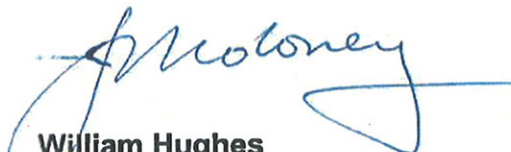
Of particular importance for the sustainability of the irrigation proposal is the quality of water to be used. The EA does not document the expected quality of water that would be used for irrigation; hence a critical consent condition will be to ensure the appropriate testing and monitoring of the quality of water that would be used for irrigation.

Additional matters that should be documented within an Irrigation Management Plan attached to the Site Water Management Plan (SWMP) and subsequently reported on are included below. &I NSW Agriculture recommends that the SWMP (or another relevant operational plan) is required to document;

- the type of irrigation equipment to be used, targeted application rates and critical parameters / triggers;
- targets for; soil moisture, irrigation uniformity, water quality how these will be monitored and who is responsible for this;
- monitoring and reporting programs for soils and possibly plant material within the irrigation area if salinity, acidity or other water quality risks are confirmed. This should not be restricted to a visual assessment unless a very low risk of adverse water quality is confirmed;
- additional monitoring and management responses to ensure the retention of healthy productive irrigated pastures suitable for grazing. This should include monitoring of pasture species and health, grazing management regimes and fertiliser applications. The latter can contribute to salinity if poorly managed, but may also be critical to maximise plant growth and water use; and
- possible contingency / corrective measures to ensure sustainable irrigation.

Should you have any enquires regarding this matter please contact Julie Moloney, Principal Adviser, Development Coordination on (02) 4931 6549.

Yours sincerely



William Hughes
Director
Industry Development

for