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### **Tahmoor Coking Coal Operations – Modification 4 (DA67/98) – Submission Report**

Dear Paul

I refer to the Department's email dated 29 June 2018 inviting the Resources Regulator to provide a response to the Tahmoor Coking Coal Operations – Modification 4 (DA67/98) – Submissions Report.

The Resource Regulator's consolidated response to the report is outlined below.

#### Mine Subsidence Issues – *Mining Act 1992*

The response to submissions adequately addresses the issues raised in the Environmental Operations review of the MOD4 application (INT17/253765/DOI). Specifically, Section 6.1.2 of the report:

- acknowledges an oversight in stating that Longwalls 31 to 37 were approved in the Subsidence Management Plan and confirms that only Longwall 31 has secondary extraction approved under the SMP at present; and
- confirms an SMP approval will be sought for Longwall 32 secondary extraction.

The Resources Regulator will consult with the Department of Planning as part of the assessment of this application when it is received by the Department.

#### Mine Subsidence Issues – *Work Health and Safety (Mines and Petroleum Sites) Act 2013*

In the submission to the Environmental Assessment, Tahmoor Underground Modification 4, DA 67/98 in December 2017 (OUT17/49826), the Resources Regulator outlined that further information was required to understand the likely extent of the subsidence and the impact it may have on surface structures.

On review of the response to submission, it is apparent that the mine operator has undertaken investigations into matters raised in the Resources Regulator submission in relation to the potential influence of the major geological structure referred to as the Nepean Fault complex to cause abnormal subsidence. The investigations have included field mapping of the fault to gain improved understanding of the fault structure and reviews of available information on the potential for fault interaction with longwall extraction leading to abnormal subsidence. These are important aspects of understanding the hazards.

The abovementioned investigations have focussed on the potential for abnormal subsidence due to Longwall 32 affecting the Picton High School.

It also should be noted that the mine operator has not completed the investigations into the following matters raised in the Resources Regulator submission (OUT17/49826):

- an investigation into the feasibility of undertaking high frequency subsidence monitoring within the Tahmoor High School; and
- the undertaking of sensitivity analysis by competent structural engineers based on relevant subsidence scenarios.

Notwithstanding the above, due to the proximity of longwall extraction to a major geological complexity it is our view that there is inherent uncertainty in the potential for development of abnormal subsidence. This uncertainty together with the sensitivity of the site (i.e. presence of Picton High School) should be noted.

These matters are related to the mine operator's understanding of the hazards and the effectiveness of risk controls. As such these are operational matters that will be regulated under the *Work Health and Safety (Mines and Petroleum Sites) Act 2013* by the Resources Regulator.

Should you have any questions in regard to this advice, please do not hesitate to contact Matthew Newton (Director Compliance Operations) on 4063 6444.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Anthony Keon', with a stylized flourish at the end.

Anthony Keon  
Chief Compliance Officer  
NSW Resources Regulator

19 July 2018