



Mr Chris Lauritzen
MACH Energy Pty Ltd
GPO Box 94
Brisbane QLD 4001

Chris
Dear Mr Lauritzen,

**Mount Pleasant Coal Project (DA 92/97 MOD 3)
Request for Additional Information**

I am writing to seek additional information to inform the Department's continued assessment of the third modification application for the Mount Pleasant Coal Project (DA 92/97 MOD 3).

Noise

The Environmental Assessment (EA) identifies that the delineation of noise assessment groups (NAGs) has been amended relative to the existing approved project. The Department does not consider that sufficient justification has been provided for the proposed changes in NAGs, which would increase the existing noise criteria applicable to a substantial number of properties. Further, the Department is not yet convinced that all of the proposed extensions to existing NAG boundaries are reflective of background levels in these locations.

I also note that the proposed NAG boundaries appear to cover a broad range of predicted noise levels, for example NAG 8 includes predicted impacts ranging between 45 dB in the west to less than 35 dB in the east. Given this range of predicted impacts, the Department is unlikely to recommend the application of uniform noise criteria for all residents within these areas, especially in areas such as east Muswellbrook where the project is predicted to meet lower noise limits. I would therefore request that further consideration is given to the refinement and differentiation of receivers within NAGs (especially NAGs 6, 7 and 8).

Further, the Department is concerned that the reliance on previous studies and justification provided in relation to changes proposed in the EA do not address the contemporary noise assessment requirements requested in the Department's letter of 2 June 2016.

Water

It would appear from the layout of the water management system that dams MWD and ED3 would be located on the site's boundary with Bengalla Mine. The RTS identifies that, while no spills were simulated for the Fines Emplacement Area and MWD, any rainfall in excess of the design criteria for the Mine Water Dam would flow to the Dry Creek Diversion Project. Having considered the current setting of the surface water environment, the Department notes that, if there is sufficient excess water to spill from the MWD, this rainfall event coupled with the additional MWD water could also exceed the capacity of structures in place for the Dry Creek Diversion and pose a risk of spilling into areas of land owned by the adjacent Bengalla Mine.

In the unlikely event that the dams overtop and flow to the south, this could result in potential pollution and safety risks, as well as operational disruptions to Bengalla Mine. An alternative option that has been applied at other mine sites throughout the Hunter Valley would involve

spillway designs for MWD and ED3 that direct water towards the east and flood the Mount Pleasant open cut pit instead of travelling offsite to the south. The Department understands that MACH Energy is continuing to negotiate with Bengalla over potential surface water interactions and management systems and requests that you provide an update on the appropriate management and/or retention of water onsite in the unlikely event that these dams fill beyond capacity.

It is unclear how the water discharges from the various water storage facilities, such as dams and fines emplacement areas, will be treated before discharge to the receiving environment. For example, it is proposed that the Fines Emplacement Area and ED2 discharge to Sandy Creek, SD4 to the Hunter River and SD1 and SD3 to Rosebrook Creek (Figure 6 in Appendix E of the EA). These water storage facilities could contain a range of pollutants such as coal fines, oil and grease and suspended particulates. While a preliminary response to these matters has been provided in the RTS, the EPA and the Department have residual concerns with the management of these potential impacts. Please provide more detail regarding the treatment and licensing of various discharges to meet suitable water quality standards for receiving waters.

Rail

Please provide an update on the progress of negotiations with Bengalla regarding the relocation of the rail loop and proposed timeframes for this to occur.

Please note that the Department may wish to seek clarification on additional matters as it continues to progress with its assessment of the modification.

If you wish to discuss this matter further, please contact Tertius Greyling at the details listed above.

Yours sincerely



Howard Reed 22-12-17
Director Resource Assessments