



Ms Catlin Elliott  
Senior Planner  
Mining & Industry Projects  
Department of Planning and Infrastructure  
GPO Box 39  
SYDNEY NSW 2001

Dear Ms Elliott

**Mangoola Coal Project Modification 6 (06\_0014 MOD 6)  
Environmental Assessment Review**

I refer to your email of 28 May 2013 regarding the modification application from Xstrata Mangoola Pty Ltd to increase run-of mine (ROM) coal extraction from 10.5 million tonnes per annum (Mtpa) to 13.5Mtpa.

NSW Trade & Investment, Division of Resources & Energy (DRE) has reviewed the *Mangoola Coal Modification 6 Environmental Assessment* (EA) dated May 2013 and provides the following comments which are directed at specific areas of DRE responsibility for this proposal.

**MINING TITLE**

As coal is a prescribed mineral under the *Mining Act 1992*, the proponent is required to hold appropriate mining titles from DRE in order to mine this mineral. DRE understands the proposed mining activities are within Mining Lease 1626 held by the Proponent.

Under the *Mining Act 1992*, mining and rehabilitation are regulated by conditions included in the mining lease, including requirements for the submission of a Mining Operations Plan (MOP) prior to the commencement of operations, and subsequent Annual Environmental Management Reports (AEMR).

**REHABILITATION AND MINE CLOSURE**

The EA has not fundamentally addressed the impact to rehabilitation as a result of increased coal extraction and changes to the landform, or stockpiling of ROM coal. DRE considers that the following issues should be addressed prior to the granting of any planning approval:

- assess the impact of the final landform on surface water management to reduce the potential for soil erosion and reliance on infrastructure such as drop structures.
- assess the impact to rehabilitation as a result of changes to the rehabilitation schedule.

- revise the final landform to make the final landform more consistent with the surrounding landscape.
- assess the potential for spontaneous combustion related to stockpiling of ROM coal and identify management actions to minimise the risk and how this would be monitored.

The EA does not provide an adequate description of the project's functional domains including tailings dams, waste emplacements, final voids, infrastructure areas. DRE notes that the EA does not describe whether the specific performance objectives and standards of each domain have changed as a result of the changes to the final landform.

## **REQUIREMENTS PRIOR TO GRANTING OF APPROVAL**

DRE require the following issues to be addressed by the Proponent prior to the granting of any planning approval.

- **Domain Specific Objectives:** Identify the functional domains of the project and describe the rehabilitation objectives for each domain in light of final landform changes.
- **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.

DRE considers that it is important for emplacement design to be sympathetic with the surrounding topography. DRE accepts the conceptual landform design outlined in the EA, however the Proponent should be aware that as part of the MOP, DRE will require further detail regarding emplacement design, with specific reference to vertical relief and drainage.

## **RECOMMENDED CONDITIONS OF APPROVAL**

DRE recommends that the following conditions be incorporated into the planning approval, if granted:

### **Rehabilitation Plan**

The Proponent must prepare and implement a Rehabilitation Plan to the satisfaction of the Director General of Department of Trade & Investment, Regional Infrastructure & Services. The Rehabilitation Plan must:

- be prepared in accordance with DRE guidelines and in consultation with relevant agencies and stakeholders;
- be submitted to and approved by the Director General of Department of Trade & Investment, Regional Infrastructure & Services prior to the commencement of activities;

- address all aspects of rehabilitation and mine closure, including post mining land use assessment, rehabilitation objectives, completion criteria and rehabilitation monitoring;
- include a final landform design that is sympathetic with the surrounding topography of the area and considers natural drainage design and relief patterns and principles;
- include a Life of Mine Tailings Strategy that:
  - I. must be prepared by a team of suitably qualified and experienced persons.
  - II. addresses all aspects of life of mine tailings incorporating design, operation, water balance and decommissioning including rehabilitation and closure.

The Proponent should liaise with DRE in developing the above documents for their proposed operation. DRE is available to meet with the Proponent to assist it to address the above recommendations.

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

Yours sincerely



**Adrian Delany**  
**Acting Director, Industry Coordination**

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