



Mr Jon Degotardi
Manager – Technical Services
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Dear Mr Degotardi

Metropolitan Coal Mine - Longwalls 305-307 Extraction Plan

I refer to:

- your letter dated 9 October 2019 enclosing the Extraction Plan for Longwalls 305-307 at the Metropolitan Coal Mine; and
- revisions to the Extraction Plan submitted on 30 January 2020, 15 February 2020 and 11 March 2020.

The Department's Planning and Assessment Group has undertaken a comprehensive assessment of the Extraction Plan in consultation with WaterNSW, the Dams Safety Committee, the Department's Division of Resources and Geoscience and Biodiversity Conservation Division and the Resources Regulator. The Department also sought advice from the Independent Expert Panel for Mining in the Catchment (Catchment Panel) and received a submission from the Woronora Reservoir Impact Strategy Panel (WRIS Panel).

The mining proposed under the Extraction Plan represents the first mining that would be undertaken beneath the Woronora Reservoir. Therefore, it is important that the Extraction Plan is sufficiently robust and contains an appropriate adaptive management regime to ensure that the subsidence impacts of this mining are effectively managed to ensure the strict water performance measures in the project approval for the Woronora Reservoir, the Eastern Tributary and the Waratah Rivulet continue to be met.

It is noted that Metropolitan Coal would implement a similar adaptive management approach to that used for the final stages of Longwall 303 and Longwall 304. This proposal is consistent with previous Extraction Plan approvals and is subject to detailed monitoring supporting adaptive management and the potential early cessation of the longwall if certain triggers are exceeded.

It is also noted that the Extraction Plan's Trigger Action Response Plan (TARP) proposed to be used for Longwall 305-307 (see the Plan's Table 29, as varied in your response of 11 March 2020) has been designed and refined to identify the onset of valley closure, rather than to meet a particular predicted or observed magnitude of closure that would result in an impact.

Further, the TARP has been designed (as it was for the TARP implemented for Longwalls 303 and 304) to include adaptive management and higher frequency monitoring at a greater distance from the finishing line, WaterNSW and based on recommendations of the Catchment Panel.

It is noted that the Eastern Tributary Technical Committee (ETTC) would continue to meet and review monitoring data. Reports outlining the key outcomes would then be submitted to the Department and WaterNSW within 24 hours. The Department considers that there is value also in the committee reviewing all monitoring data from Longwalls 303, 304 and 305 and that it continues to operate during Longwall 306 and Longwall 307.

WaterNSW has recommended that adaptive management continues to be applied to Longwall 307 and the Waratah Rivulet. This recommendation was endorsed by the Catchment Panel. The

Department considers that this recommendation has merit, and it has been reflected in the proposed conditions of approval for the Extraction Plan.

Given the important work undertaken by the WRIS Panel and the detailed assessment and recommendations in its Stage 1 and Stage 2 reports, it is also considered that the WRIS Panel should continue to be involved in the project to provide key advice as mining under the Woronora Reservoir is undertaken.

Based on this assessment, advice from agencies and the Catchment Panel, the Secretary grants approval for the extraction of Longwall 305-307 subject to the Extraction Plan and the following conditions:

- *That the Eastern Tributary Technical Committee completes a review of all monitoring data from Longwalls 303, 304 and 305 within 4 months of the completion of Longwall 305 and continues to operate during extraction of Longwall 306 and Longwall 307.*
- *That the Woronora Reservoir Impact Strategy Panel continues to:*
 - a. *review impacts on the Woronora Reservoir during extraction of Longwalls 305-307;*
 - b. *advise on appropriate amendments to the monitoring program; and*
 - c. *recommend any appropriate changes to the mine plan required to continue to achieve the development consent's performance measures relevant to the Woronora Reservoir.*
- *That the Extraction Plan's adaptive management regime for the Eastern Tributary is extended to cover the Waratah Rivulet, with appropriate updates made to the Trigger Action Response Plan (Table 29, version received on 11 March 2020) prior to the extraction of Longwall 307.*
- *That Metropolitan Coal provides a Woronora Reservoir monitoring status report to the Department and WaterNSW on a monthly basis (unless otherwise agreed by the Secretary), which includes:*
 - a. *an update on mine development;*
 - b. *findings of inspections of mine workings;*
 - c. *results of surveys of subsidence and valley closure;*
 - d. *an updated register of geological structures;*
 - e. *a detailed Mine Water Balance with particular consideration of potential losses from the Woronora Reservoir; and*
 - f. *results of groundwater monitoring and surface water monitoring, including assessment against relevant triggers in the Trigger Action Response Plan.*

This Extraction Plan approval continues to adopt the established precautionary approach and requires the implementation of an adaptive management regime, as was implemented for Longwalls 303 and 304.

Please update the Extraction Plan's Water Management Plan to reflect the most recent revisions made to Table 29 and place the correct version on your website at the earliest convenience.

A Record of Decision, which summarises the Department's consideration of the Extraction Plan and updated Trigger Action Response Plan is attached.

If you have any further questions, please call Steve O'Donoghue, on 0477 345 626.


Mike Young
Executive Director
Energy, Resources and Compliance
as nominee of the Secretary

16/3/20