

Our ref: OUT26/1788

Kiera Plumridge
Planning Group
NSW Department of Planning, Housing and Infrastructure

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6 March 2026

Subject: Mount Pleasant Operations Mod 8 (DA92/97) – Modification Report

Dear Kiera Plumridge,

I refer to your request for advice sent on 16 February 2026 to the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) Water Group about the above matter.

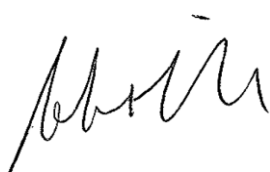
NSW DCCEEW Water Group has reviewed the Modification Report and makes recommendations to:

- Obtain a summary of the status of make good provisions for impacted groundwater bores.
- Update the Water Management Plan.

Please see Attachment A for more detail.

Should you have any further queries in relation to this submission please do not hesitate to contact the DCCEEW Water Assessments team at water.assessments@dcceew.nsw.gov.au.

Yours sincerely



Rob Brownbill,
Manager, Water Assessments, Planning & Knowledge Division
NSW Department of Climate Change, Energy, the Environment and Water

Attachment A

Detailed advice to DPHI Planning & Assessment regarding the Mt Pleasant Operations Modification 8 – Modification Report

1.0 Groundwater impact management

1.1 Recommendation – pre-determination

Department of Planning, Housing and Infrastructure (DPHI) requests the proponent to provide a summary of the make good status for all private bores predicted to exceed the >2m drawdown threshold (directly from the modification and cumulatively). The summary should include:

- Identification of affected bores with >2m drawdown including:
 - Bores CAS1_G and JLON1 – modification attributable drawdown
 - Four additional bores subject to cumulative >2m drawdown.
- Operational status of each bore (active, low-yield, dry, decommissioned) and information where relevant on:
 - Whether inactivity is mining related
 - Evidence from historical monitoring where available.
- Assessment of each bore for eligibility for make-good provisions under the NSW Aquifer Interference Policy (AIP) and project commitments.
- Make good measures undertaken or proposed.
- Monitoring and verification process.

Explanation

The Groundwater Impact Assessment (Appendix C) (GIA) identifies two private bores—CAS1_G and JLON1, affected by >2 m groundwater level drawdown attributable specifically to the Modification. Both are noted as inactive or low-yield, but the assessment does not establish whether their inactivity is due to historical or ongoing mining-related drawdown impacts, or for other reasons.

A clear understanding of the cause of groundwater level decline is necessary to determine make good obligations under the AIP. Without this clarification, it cannot be confirmed whether existing or future make-good obligations apply.

Groundwater levels in a further four private bores are predicted to exceed the AIP's >2 m minimal impact threshold under cumulative mining conditions (Mount Pleasant Operations (MPO) and neighbouring mines). However, the GIA does not state whether:

- make-good provisions have been enacted for these bores previously, or
- The proponent is committed to make-good actions where the modification contributes incrementally to already-substantial cumulative drawdown.

This is notable because several of the affected bores (e.g., CAS2_G, CAS3_G, CAS4_G) have already experienced significant historical drawdown—approximately 15 m in some cases—due to neighbouring mining operations, such as Dartbrook.

Where cumulative impacts exceed thresholds, obligations may still arise if the modified MPO contributes any material component of the impact.

The NSW Aquifer Interference Policy requires mining proponents to:

- identify all bores predicted to experience >2 m drawdown
- confirm whether the proponent's operations contributes to that drawdown
- undertake make-good measures where impacts are attributable in whole or in part.

Since the GIA confirms that Modification 8 creates incremental drawdown at some bores, even if the bores are inactive or already impacted, the proponent must demonstrate that all necessary obligations have been met or are planned.

A concise public summary reduces uncertainty and improves community confidence in the project's groundwater management.

2.0 Water Management Plan

2.1 Recommendation – post approval

DPHI requests the proponent to update the Water Management Plan to reflect the modification activities.

Explanation

The modification proposes an increase in ROM coal extraction rate from 10.5 Mtpa to 12.5 Mtpa with associated increase in coal handling processing water use, dust suppression and vehicle washdown usage rates. The Water Management Plan should be updated to incorporate the relevant changes and where necessary appropriate management and mitigation measures.

End Attachment A
