

Resource Assessments
Department of Planning, Industry and Environment
GPO Box 39
Sydney NSW 2001
Attn: Melanie Hollis

Dear Melanie Hollis

Mangoola Coal Continued Operations Project (MCCOP (SSD-8642)): Environmental Assessment – Response to Submissions

I refer to correspondence dated 19 December 2019 inviting the Resources Regulator to provide advice on the Mangoola Coal Continued Operations Project - Response to Submissions for Mangoola Coal Continued Operations Project MCCOP (SSD-8642).

Development Details

The Mangoola Coal Continued Operations Project is located approximately 10 kilometres north from Denman, NSW.

Mangoola Coal Operations Pty Ltd has submitted a Response to Submissions in support of the Mangoola Coal Continued Operations Project that proposes to extract additional coal reserves within an additional area to the north of the existing operation.

The Mangoola Coal Continued Operations Project proposes to:

- Mine in an additional area to the north of the existing operation, whilst continuing to mine in the current area. It is estimated that the project, if approved, will extend mining operations at Mangoola Coal Mine for another eight years.
- Development and use of mine related infrastructure associated with the proposed mining area.
- Seek an extension of one year to the currently approved life of the mine to 2030.
- Amendments to the approved final landform of the existing operation, specifically in relation to the final void.

The Resources Regulator has previously provided the following advice:

- Mangoola Coal Continued Operations Project: Adequacy of the Environmental Impact Statement (EIS) dated 16 August 2019 (EAMSG0003640).

Environment and Rehabilitation

The Mining Act Inspectorate within the Resources Regulator has responsibility for providing strategic advice for environmental issues pertaining to the proposed project in so far as they relate to or affect rehabilitation. The Resources Regulator advises you that the information provided in the Environmental Assessment – Response to Submissions received 19 December 2019 does not adequately address the issues raised in the submission from the Resources Regulator dated 16 August 2019 (EAMSG0003640). Additional information is

required to demonstrate that sustainable rehabilitation outcomes can be achieved as a result of the project. The required additional information is as follows:

- It is noted that the Applicant has provided a description of preliminary recommendations provided by the geotechnical assessment such as bench widths and minimum setbacks, however bench height and slope has not been provided.
- It is noted that the Applicant has committed to further investigation of alternatives to the use of safety berms along the top of each highwall, however no alternative or control measures to address ongoing maintenance into perpetuity has been presented.
- The level of detail provided in the Environmental Impact Statement and Response to Submissions is not consistent between each considered final landform. The independent review has considered economic, mine feasibility / engineering and broad environmental outcomes to further justify the preferred final landform (case 3). The financial implications and surface disturbance area of each option has broadly been described. The Resources Regulator does not consider sufficient information has been provided to discount differing case options. For example, case option 6 (partial backfilling of each void) has been cited as resulting in a larger surface area affected by the final void, however whether sustainable rehabilitation outcomes may have been increased / decreased such as increased land use opportunities and potentially enhanced landform/ geotechnical stability have not been articulated for each discounted option. As such, the Resources Regulator cannot comment on the appropriateness of the preferred final landform. The Resources Regulator would recommend that at minimum, further information is provided for landform case option 6 (partial backfilling of each void) and case option 4 (one final void in the north).

Mine Safety Mine Safety Operations within the Resources Regulator is responsible for ensuring that mine operators manage the risk to worker health and safety through compliance with the Work Health and Safety (Mines and Petroleum Sites) Act 2013 and the subordinate mining legislation, in particular, the effective management of risk associated with the principal hazards specified in the Work Health and Safety (Mines and Petroleum Sites) Regulation 2014. Mine Safety Operations has not identified any risk that would require comment in relation to this matter.

If you require additional information, please contact the Resources Regulator on 1300 814 609 (Option 2, then 5), or via email at nswresourcesregulator@service-now.com.

Yours sincerely,

Peter Ainsworth
Manager Environmental Operations
Mining Act Inspectorate
Resources Regulator
NSW Department of Planning, Industry & Environment

23 January 2020