5 July 2023

Department of Planning and Environment
Attention: Stephen O'Donoghue, Director Resource Assessments
4 Parramatta Square
12 Darcy Street
Parramatta NSW 2150

Via email: stephen.odonoghue@planning.nsw.gov.au

Dear Mr O'Donoghue,

RE: VICKERY EXTENSION PROJECT – MODIFICATION (MOD 1)

This Scoping Letter provides an overview of the proposed modification to Development Consent State Significant Development (SSD) 7480 for the Vickery Extension Project. The Vickery Extension Project involves the development of the Vickery Coal Mine within Coal Lease 316, Mining Lease (ML) 1718 and ML 1838 and associated infrastructure including a rail spur, coal handling and preparation plant (CHPP) and groundwater borefield.

Whitehaven Coal Limited (Whitehaven) is proposing to modify Development Consent (SSD 7480) to allow for:

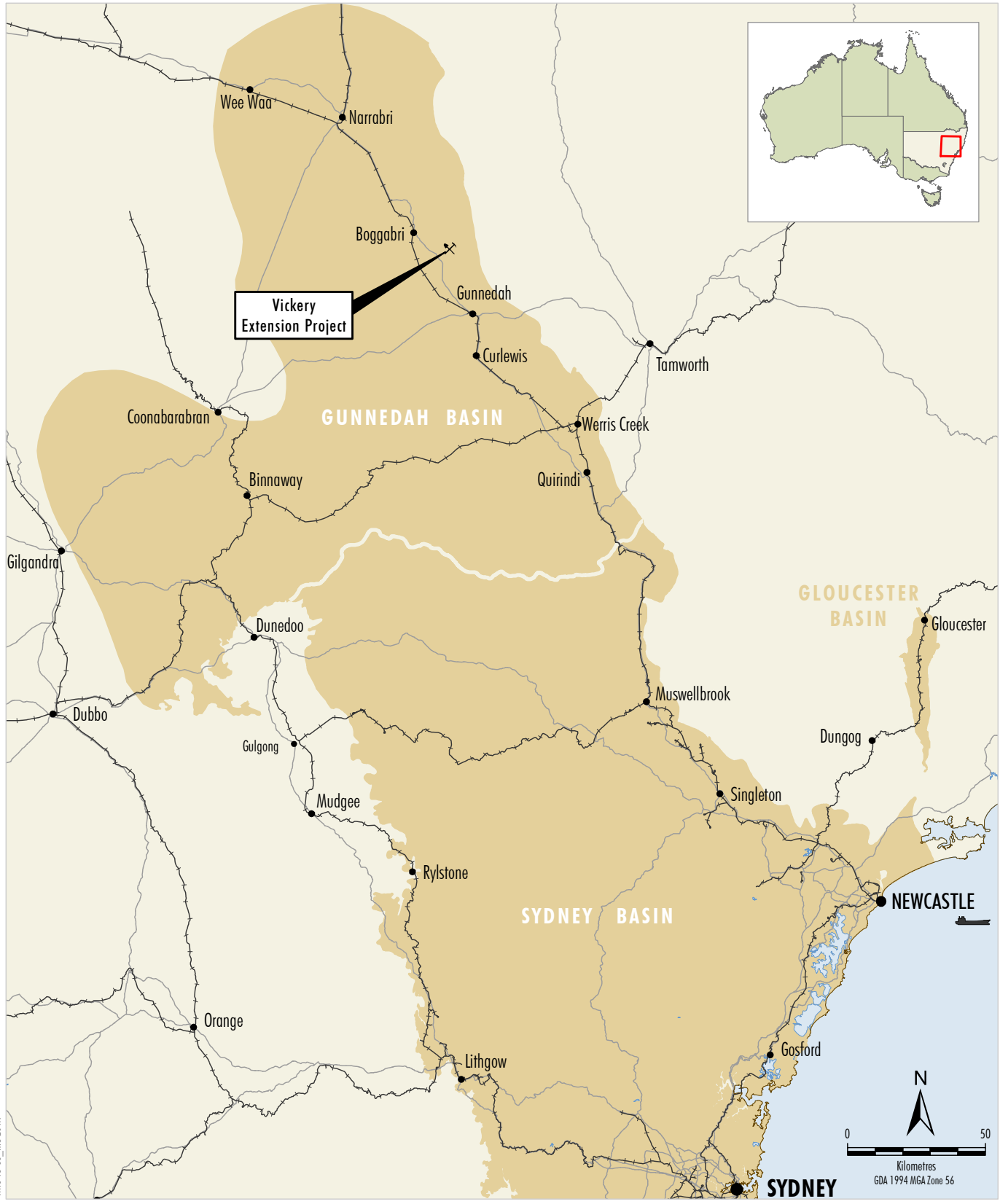
- the disposal of waste heavy vehicle tyres in the waste rock emplacement areas;
- extended run-of-mine (ROM) coal road haulage hours to be consistent with those proposed for the Tarrawonga Coal Mine (which shares the haulage route with the Vickery Coal Mine); and
- the establishment and use of a concrete batching plant to produce concrete for use in construction activities and storage of concrete products.

Introduction

The Vickery Extension Project is located in the Gunnedah Coalfield, approximately 25 kilometres north of Gunnedah, within the Gunnedah Shire Council and the Narrabri Shire Council Local Government Areas, in New South Wales (NSW) (Figure 1).

Whitehaven prepared and submitted an Environmental Impact Statement for the Vickery Extension Project, which was approved by the Independent Planning Commission on 12 August 2020 (Development Consent SSD 7480). The Vickery Extension Project involves the development of an open-cut coal mine and associated on-site infrastructure to allow for the extraction of up to 10 million tonnes per annum (Mtpa) of ROM coal, with a mine life of 25 years.

Whitehaven has undertaken exploration, evaluation and geotechnical activities at the Vickery Coal Mine. Construction-related activity of the Vickery Extension Project has commenced in the form of archaeological heritage salvage works.



LEGEND

- Highway
- Major Railway
- Coalfield

Source: Geoscience Australia (2011)

WHITEHAVEN COAL

VICKERY EXTENSION PROJECT

Regional Location

Figure 1

Proposed Modification – Waste Tyre Disposal

The NSW Department of Planning and Environment (DPE) granted consent to Whitehaven to dispose waste heavy vehicle tyres in waste rock emplacement areas at the following operations:

- Maules Creek Coal Mine – Modification 8 (approved on 14 January 2022);
- Tarrawonga Coal Mine – Modification 9 (approved on 12 May 2021); and
- Werris Creek Mine – Modification 4 (approved on 12 May 2021).

The above Modifications demonstrated that options for the reuse or recycling of waste heavy vehicle tyres are limited given the size and construction of the tyres and the remoteness of the mining operations. Further, tyre recycling facilities are generally designed for smaller tyres from passenger vehicles, and landfills have limited capacity. The on-site disposal of the waste tyres at the mine sites generated results of minimal environmental impact and is managed in accordance with the Development Consent approval conditions and the Environment Protection Licences (EPL). In accordance with these conditions and the EPL, Whitehaven regularly reviews available and feasible recycling or recovery opportunities and reports on the number of waste tyres being managed on the mine sites.

Consistent with the findings of the Modifications described above for its other operations, Whitehaven considers that disposal of waste heavy vehicle tyres at the Vickery Coal Mine could be undertaken with no environmental impacts beyond those already approved for the mine. Further, on-site disposal would prevent stockpiling of large volumes of tyres which can pose a fire risk. Whitehaven commits to continue to investigate available and feasible recycling or recovery opportunities and report on the number of waste tyres being managed at the Vickery Coal Mine, consistent with the commitments at its other operations.

Proposed Modification – ROM Coal Haulage Hours

Whitehaven is currently seeking a modification of the approved ROM coal road haulage hours for the Tarrawonga Coal Mine (Project Approval 11_0047) to authorise additional road haulage hours on the Approved ROM Coal Transport Route for Modification 10. The Approved ROM Coal Transport Route for the Tarrawonga Coal Mine is shared with the Vickery Coal Mine, with the cumulative maximum ROM coal transport rate capped at 3.5 Mtpa.

Submissions on Modification 10 received during the exhibition period are being reviewed by Whitehaven, with the Submissions Report anticipated to be lodged to the DPE by mid-July 2023.

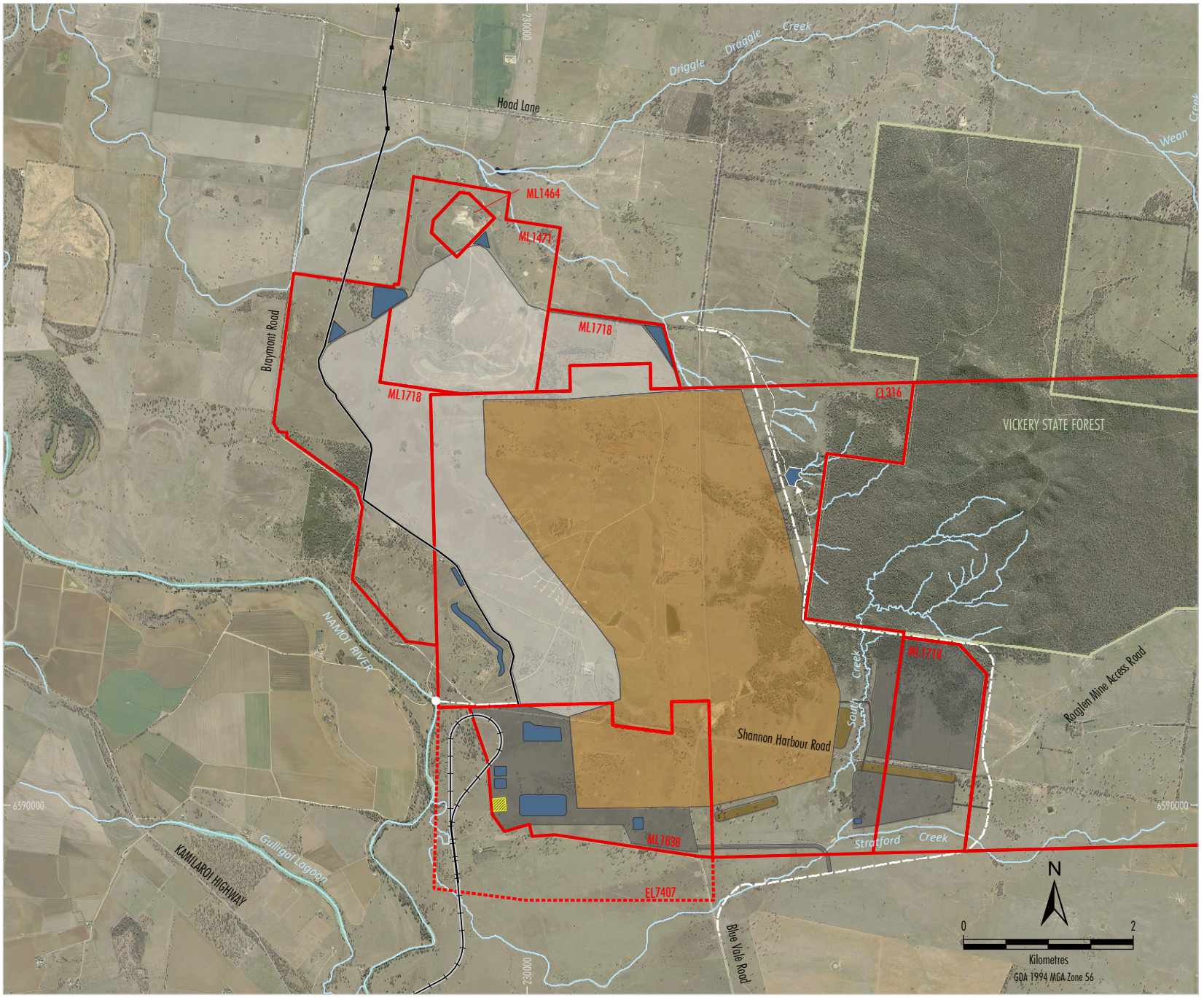
The same constraints to achieving the approved ROM coal haulage volumes being experienced by the Tarrawonga Coal Mine are anticipated to be experienced at the Vickery Coal Mine (i.e. rostering challenges due to limited flexibility provided by the current road haulage hours). Given the Tarrawonga Coal Mine Modification 10 demonstrates that there would be no increase in road traffic or road noise impacts associated with the extended road haulage hours, and the assessments were prepared on the basis of cumulative movements at the maximum approved annual limit for the Approved ROM Coal Transport Route, it is considered that the haulage hours for the Vickery Coal Mine should also be extended.

Whitehaven has, or is in the process of, forming agreements with the landholders that live in proximity of the Approved ROM Coal Transport Route for the extension of the haulage hours. Consistent with the maximum haulage limits along the Approved ROM Coal Transport Route, these agreements cover the transport of up to 3.5 Mtpa of ROM coal across the extended haulage hours.

Proposed Modification – On-site Concrete Batching Plant

Development of Vickery Extension Project mine infrastructure would require a significant number of concrete components. Rather than transporting the significant volumes of concrete from regional manufacturers by agitator trucks to the Vickery Coal Mine, the Modification would allow for the use of an on-site batching plant to produce concrete, within the approved disturbance footprint for the Vickery Extension Project (Figure 2). Concrete produced in the on-site concrete batching plant would be used to produce the rail spur components, foundations for the CHPP and other infrastructure (e.g. hardstand areas).

The input material for the concrete batching plant would be obtained from both local sand and/or aggregate suppliers and suitable material from on-site excavation and waste rock associated with open cut mining. Waste rock would be crushed and screened on-site to the required particle size and used as input material for the concrete batching plant.



LEGEND

- Mining Tenement Boundary (ML and CL)
- Exploration Licence Boundary (EL)
- State Forest
- Railway

Project Components

- Indicative Extent of Open Cut
- Indicative Extent of Out of Pit Waste Rock Emplacement
- Indicative Extent of Infrastructure Area
- Indicative Extent of Soil Stockpile
- Indicative Extent of Water Storage
- Indicative Mine Access Road Alignment
- Indicative Road Realignment
- Indicative Namoi River Pump Station and Pipeline
- Indicative Up-catchment Diversion and Dam Location
- Indicative Rail Spur Alignment
- Indicative Location of Groundwater Bores and Pipeline
- Proposed Concrete Batching Plant Area

Source: Orthophoto - Department of Land and Property Information, Aerial Photography (July 2011); Department of Industry (2015)

WHITEHAVEN COAL

VICKERY EXTENSION PROJECT

Proposed Location Concrete Batching Plant Area

Figure 2

WHC-15-33_MOD1_Stg2_206A

The use of waste rock material generated from mining open cut activities in the production of concrete at the batching plant would reduce the quantity of material that would need to be transported to site via public roads.

Plate 1 below shows an example of a typical concrete batching plant setup which would be similar to that proposed for the Modification.

Plate 1 – Example of a Typical Concrete Batching Plant

Estimated total volumes of concrete (in cubic metres [m^3]) produced from the concrete batching plant for Vickery Extension Project components are shown in Table 1 below.

Table 1 – Estimated Concrete Batching Plant Production

Vickery Extension Project Component	Estimated Volume of Concrete Produced (m^3)
Rail spur	28,000
Mine infrastructure area	8,000
CHPP	10,000
Total	**46,000**

It is anticipated that the concrete batching plant would be in use until the end of construction which would be around 24 months after construction start date.

Benefits of the Modification would include the following:

- beneficial use of waste rock material generated by open cut mining in the production of concrete;
- reduction in the number of trucks required to use the public road network; and
- guaranteed supply of concrete throughout the construction period.

The Modification would not change other elements of the approved Vickery Extension Project, including no change to mine tenements, open cut mining methods, coal extraction rate, coal reserves, or mine life approved under Development Consent SSD 7480.

Attachment A provides a summary comparison of the currently approved Vickery Extension Project and the Vickery Extension Project incorporating the Modification.

Statutory Context

The Modification is proposed to be sought under section 4.55(2) of *Environmental Planning and Assessment Act 1979* (EP&A Act), on the basis that Whitehaven considers the Modification would be "substantially the same" as the approved Vickery Extension Project.

It is anticipated that the Modification application and Modification Report would be lodged in Q3 2023.

Whitehaven does not propose to refer the Modification under the *Environment Protection and Biodiversity Conservation Act 1999*, given the proposed area for the concrete batching plant (approximately 22,500 square metres) and the waste tyre disposal would not impact any matters of national environmental significance, as these activities would be located within the approved disturbance footprint for the Vickery Extension Project.

Proposed Scope of Environmental Assessment

The proposed scope of the environmental assessment of the Modification Report would include the following technical studies.

Noise

RWDI Consulting Engineers & Scientists will assess the potential noise emissions associated with the Modification, to confirm they remain within the approved noise criteria in Development Consent SSD 7480.

Air Quality and Greenhouse Gas

Todoroski Air Sciences will assess any potential air quality associated with the Modification, to confirm they remain within approved air quality criteria in Development Consent SSD 7480.

Greenhouse gas emissions, including any reduction in Scope 3 emissions due to the reduction in deliveries to site, would also be quantified.

Road Transport

A traffic study to confirm expected changes (including reductions) in heavy vehicle movements associated with construction and the extended ROM coal haulage hours (consistent with what was prepared for the Tarrawonga Coal Mine Modification 10).

Proposed Scope of Modification Report

A Modification Report will be prepared to address the potential environmental impacts of the Modification and include:

- a description of the Vickery Extension Project and proposed Modification;
- a description of the strategic and statutory context of the Modification;
- a summary of the stakeholder engagement undertaken for the Modification;
- an assessment of the potential environmental impacts of the Modification, including comparison with the Vickery Extension Project potential environmental impacts;
- a description of the measures that could be implemented to avoid, mitigate, rehabilitate/remediate, monitor and/or offset the potential impacts of the Modification; and
- justification for the Modification and an evaluation of its merits.

Stakeholder Engagement Proposed

Whitehaven has already consulted with the Gunnedah Shire Council and Narrabri Shire Council, as well as the Community Consultative Committee and landholders located in proximity to the Approved ROM Coal Haulage Route.

Engagement will continue for the Modification and will include, but not necessarily be limited to:

- surrounding landholders and community members;
- the Vickery Coal Mine Community Consultative Committee;
- Gunnedah Shire Council and Narrabri Shire Council; and
- NSW Environment Protection Authority.

The Modification Report will address the key issues raised in consultation with these stakeholders.

Action

Whitehaven is seeking confirmation of the following from DPE:

- That the Modification can be lodged and considered by DPE under section 4.55(2) of the EP&A Act.
- The proposed scope of the Modification Report is suitable.
- The proposed consultation for the Modification is suitable.

Please do not hesitate to contact the undersigned if you have any queries or would like to discuss.

Yours sincerely,

WHITEHAVEN COAL LIMITED

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Group Manager – Approvals and Biodiversity
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ATTACHMENT A

SUMMARY OF THE APPROVED AND MODIFIED VICKERY EXTENSION PROJECT

Whitehaven Coal Limited ABN 68 124 425 396

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Table A-1
Comparison of the Approved Vickery Extension Project and the Modification

Project Component	Summary of Approved Vickery Extension Project (Development Consent SSD 7480)	Summary of the Modification
Mine life	Approximately 25 years.	No change.
Mining method	Open cut mining to a depth of approximately 250 metres below ground level.	No change.
Operating hours	Mining would occur 24 hours per day, 7 days per week.	No change.
Open cut extent	One open cut.	No change.
Annual production rate	Up to approximately 10 Mtpa ROM coal.	No change.
Total resource	179 million tonnes ROM coal.	No change.
Management of waste rock, coal rejects and final landform	Co-disposal of waste rock and coal rejects within the Western Emplacement and within the footprint of the open cut void. No requirement to construct the approved Eastern Emplacement. Final landform with two final voids (the Vickery Extension Project open cut final void and the existing Blue Vale final void) and incorporating micro- and macro-relief.	Waste rock would also be crushed and screened then used as input into the concrete batching plant. Stockpiling, ongoing management and disposal of heavy vehicle waste tyres within waste rock emplacement areas.
Coal handling, processing and transport infrastructure	Use of the Approved Road Transport Route to haul ROM coal from the Vickery Extension Project to the Whitehaven CHPP until the Vickery Extension Project CHPP, train load-out facility and rail spur infrastructure reach full operational capacity. Ability to receive ROM coal via road from other Whitehaven mining operations for stockpiling and/or processing at the Vickery Extension Project CHPP. On-site processing of up to approximately 13 Mtpa of ROM coal (combined) from the Vickery Extension Project and other Whitehaven mining operations. Use of the Vickery Extension Project train load-out facility and rail spur infrastructure to transport up to approximately 11.5 Mtpa of product coal (combined) to market from the Vickery Extension Project and other Whitehaven mining operations.	No change.
Water management	On-site water management system, comprising water management storages and collection drains, up-catchment diversions, sediment control and open cut dewatering. Construction and use of a groundwater supply borefield to the north of the Vickery Extension Project.	No change.
Water supply	Mine water supply to be obtained from inflows to open cut areas, sediment dams and storage dams, plus surface water and/or groundwater licences as required.	Water required for the concrete batching plant would be supplied from the Vickery Extension Project Water Management System.
Workforce	Up to 500 full-time equivalent construction personnel. Up to 450 full-time equivalent on-site operational personnel.	No change.