

3 June 2025

Department of Planning, Housing and Infrastructure
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: NARRABRI UNDERGROUND MINE STAGE 3 EXTENSION PROJECT MODIFICATION 2 (MOD 2) BORD AND PILLAR EXTENSION – SCOPING LETTER

Introduction

The Narrabri Mine is an existing underground coal mining operation situated in the Gunnedah Coalfield. The Narrabri Mine is located approximately 25 kilometres (km) south-east of Narrabri and approximately 60 km north-west of Gunnedah, within the Narrabri Shire Council (NSC) Local Government Area (LGA), in the North West Slopes and Plains region of New South Wales (NSW) (Figure 1).

The Narrabri Mine is operated by Narrabri Coal Operations Pty Ltd (NCOPL), on behalf of the Narrabri Mine Joint Venture, and currently employs approximately 562 full-time equivalent (FTE) personnel (including 60 personnel (42 FTE) working 7 days on 7 days off roster with two 12-hr shifts per day, resulting in 30 additional personnel per day for bord and pillar mining operations).

The Narrabri Underground Mine Stage 3 Extension Project (the Project) involves the extension of the underground mining areas at the existing Narrabri Mine to gain access to additional areas of run-of-mine (ROM) coal reserves. The Project also includes an extension to the mine life, development of additional supporting infrastructure and continued use of existing infrastructure.

Development Consent (SSD-10269) for the Project was issued under Part 4 of the NSW *Environmental Planning and Assessment Act 1979* (EP&A Act) by the Independent Planning Commission on 1 April 2022. Development Consent (SSD-10269) authorises underground mining using the longwall mining method with additional bord and pillar mining areas on the eastern margin of the Project (Figure 2).

NCOPL is proposing to extend the current bord and pillar mining operations at the Narrabri Mine to allow for extraction of additional coal reserves within the Hoskissons Coal Seam (the Modification) (Figure 2).

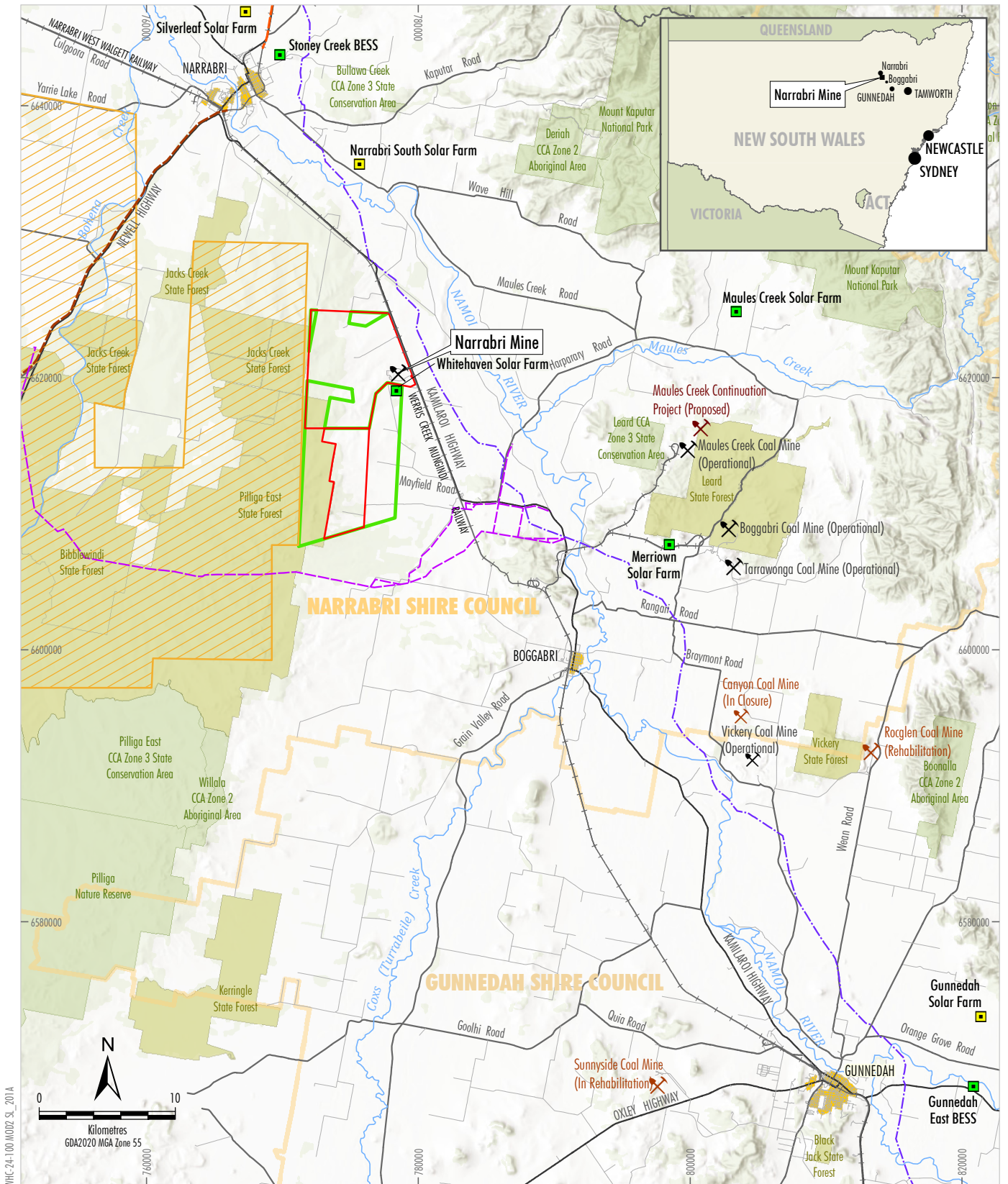
The purpose of this Scoping Letter is to provide an overview of the Modification to Development Consent (SSD-10269). In accordance with the *State significant development guidelines – preparing a scoping report* (NSW Department of Planning and Environment [DPE], 2022), this Scoping Letter identifies the matters that will require further environmental assessment (including the proposed approach to assessment) and describes the engagement that will be carried out during the preparation of the Modification Report.

This Scoping Letter also seeks confirmation of the approval pathway, assessment scope and consultation requirements.

Strategic Context

On 30 June 2021, NCOPL submitted Modification 7 (MOD 7) to modify its Stage 2 Project Approval (08_0144) by changing the approved mining method for two longwall panels (Longwall [LW] 201 and LW 202) to bord and pillar mining. MOD 7 was approved by the NSW Department of Planning, Housing and Infrastructure (DPHI) on 23 November 2021. However, the Project Environmental Impact Statement, which was submitted earlier, proposed longwall mining for LW 201 and LW 202. As a result, the DPHI's Assessment Report for the Project considered longwall extraction for LW 201 and LW 202, despite the later approval of MOD 7.

NCOPL addressed this inconsistency in correspondence dated 16 September 2021, requesting that the MOD 7 approval be recognised and preserved in Development Consent (SSD-10269). The Department supported this request and recommended conditions to reflect MOD 7 in Development Consent (SSD-10269).



WMC-24-100 MOD2 SL_201A

LEGEND

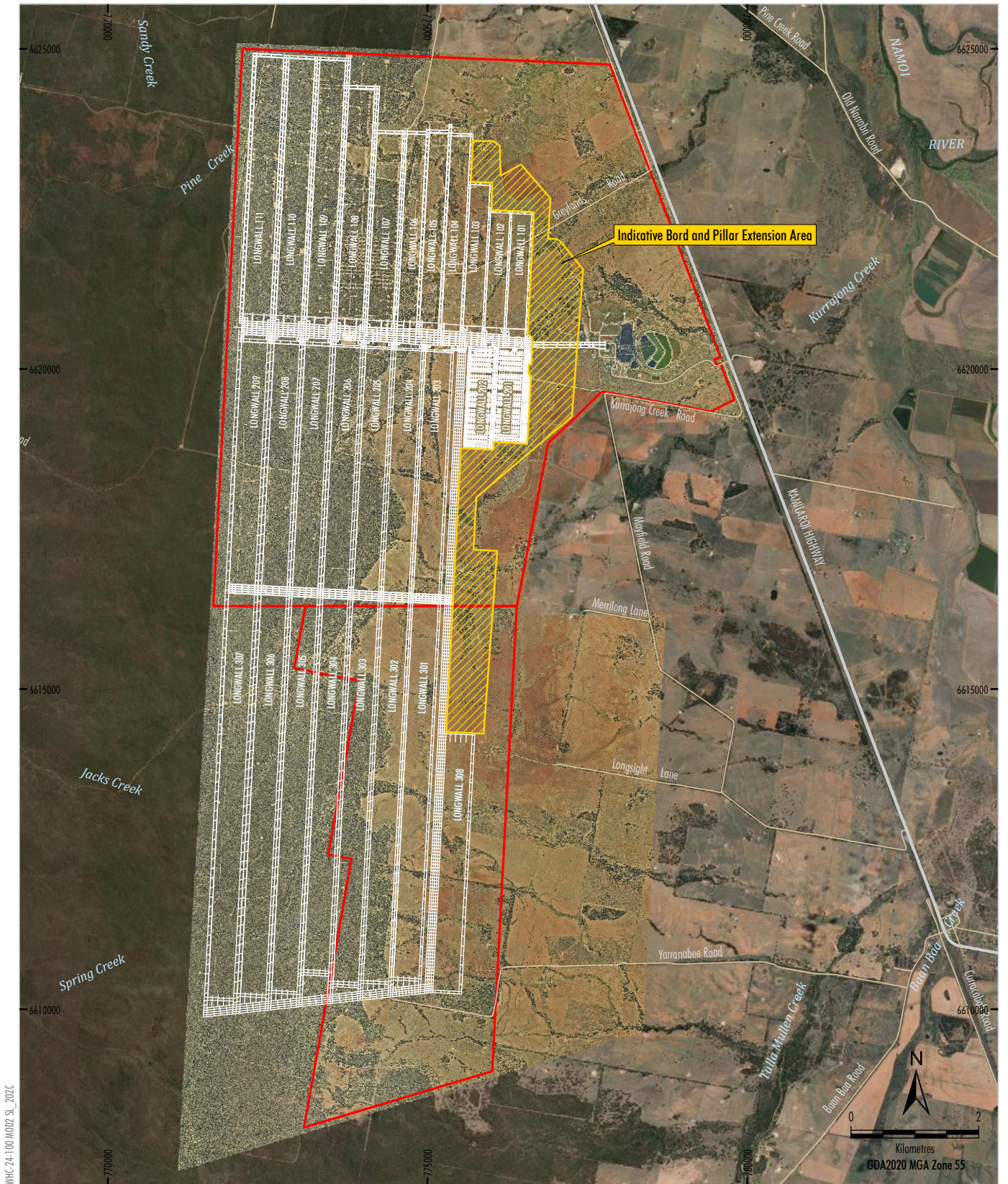
- Mine Site (Operational)
- Mine Site (In Closure/Rehabilitation)
- Mine Site (Proposed)
- Exploration Licence (EL 6243)
- Mining Lease (ML 1609 & ML 1839)
- Local Government Boundary
- State Forest
- State Conservation Area, Aboriginal Area

- Other Major Projects**
- Existing/Approved Energy Generation Site
- Proposed Energy Generation/Storage Site
- Narrabri Gas Project (Santos NSW [Eastern] Pty Ltd) (Approved)
- Queensland Hunter Gas Pipeline (Approved)
- Narrabri Lateral Pipeline (Santos 2022) (Proposed)
- Inland Rail (Narrabri to North Star - Phase 1) (Constructed)
- Inland Rail (Narramine to Narrabri) (Approved)

Source: Geoscience Australia (2011); NSW Spatial Services (2019)

Whitehaven
 NARRABRI STAGE 3 MODIFICATION 2
 Regional Location

Figure 1



WHC-24-100 MOD2 S1_202C

Source: NSW Spatial Services (2024); Whitehaven (2024)
 Orthophoto: Whitehaven (2018)

- LEGEND**
- Mining Lease Boundary (ML1609 & ML1839)
 - Approved Project Components
 - Approved Underground Mining Layout
 - Modification Components
 - Indicative Bord and Pillar Mining Area Extent

Whitehaven
 NARRABRI STAGE 3 MODIFICATION 2
 Approved and Modified
 Project General Arrangement

Figure 2

NCOPL has identified additional mineable resources within Mining Lease (ML) 1609 and ML 1839 for the Project and is seeking approval to modify Development Consent (SSD-10269) to facilitate access to this resource which could be extracted using bord and pillar mining methods.

The Modification would involve the mining of up to approximately 6.8 million tonnes (Mt) of ROM coal (Figure 2). The bord and pillar mining would occur concurrently with the approved Project longwall operations and is scheduled to commence in 2028. Bord and pillar mining would occur over approximately 7 years. The Modification would allow for the continuity of the bord and pillar mining workforce (i.e. the workforce approved as part of Stage 2 MOD 7 [MP08_0144-Mod-7] would continue into the modified bord and pillar extension area). The Modification would not require additional mining equipment to accommodate the extension areas.

The maximum ROM coal production rate of the concurrent operation of the existing Narrabri Mine and the Modification would remain within the approved annual limit (11 million tonnes per annum [Mtpa]).

The bord and pillar mining would involve developing a series of roadways (or bords) leaving a grid of unmined coal (pillars), followed by the progressive removal of some or all of these pillars. The mining method uses a continuous miner.

The Project (as modified) would use existing/approved infrastructure maximising the potential benefits of previous NCOPL investment and minimising the need for new surface development areas.

Description of the Modification

The Modification would include the following proposed changes to the Project (Figure 2):

- extension of bord and pillar mining operations within the Hoskissons Coal Seam (use of a continuous miner);
- production of approximately 6.8 Mt of ROM coal; and
- use of the existing surface facilities and development of additional surface disturbance associated with extended underground mining area.

The Modification would not change the following approved Project components:

- mining tenements;
- underground mining methods;
- maximum annual coal extraction rate (ROM coal production would remain within existing approved limited [11 Mtpa]);
- processing method;
- management of reject material;
- maximum annual water demand;
- product transport method; and
- mine life.

Attachment A provides a summary comparison of the currently approved Project under Development Consent (SSD-10269) and the Project incorporating the Modification.

Statutory Context

The Modification will be sought under section 4.55(2) of the EP&A Act as NCOPL considers the modified project to be “the same or substantially the same” as the originally approved Project. NCOPL anticipates that the Modification Report will be lodged in Q1 2026.

EPBC Approval (EPBC 2019/8427) was granted for the Project by a delegate of the Minister of for the Environment and Water under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) on 24 September 2024. The Modification would also be referred to the Commonwealth Minister for the Environment and Energy for consideration as to whether the Modification is a ‘Controlled Action’ and requires approval under the EPBC Act.

If the Modification is determined to be a ‘Controlled Action’ requiring approval under the EPBC Act, it is proposed that it be assessed pursuant to the Assessment Bilateral Agreement with the NSW Government (i.e. NSW Government would issue assessment requirements for the Modification for matters relevant to the EPBC Act).

NCOPL is currently seeking a modification to Development Consent (SSD-10269) to allow for revisions to the development footprint phases for the Project and has identified consequential and related amendments/additions required to the conditions of Development Consent (SSD-10269) and proposes a change to the approved ventilation infrastructure for the Project (MOD 1). MOD 1 was submitted to DPHI on 18 March 2025 and is currently undergoing assessment by DPHI.

Proposed Assessment of Impacts

NCOPL will prepare a Modification Report to address the potential environmental impacts of the Modification in accordance with the *State Significant Development Guidelines* (DPHI, 2024), including *Appendix E – Preparing a Modification Report* (DPE, 2022).

The Modification Report will include:

- a description of the Project, an overview of the Modification and an explanation of any interactions with other developments;
- a description of the strategic context in relation to the Project and the Modification;
- a detailed description of the Modification;
- a description of the statutory context of the Modification;
- a summary of the consultation undertaken for the Modification;
- an assessment of the potential environmental impacts of the Modification, including a comparison with potential environmental impacts of the approved Project; and
- a justification for the Modification and an evaluation of merits.

Proposed Technical Studies

NCOPL has reviewed the potential matters impacted by the Modification to identify those requiring further assessment in the Modification Report. The review considered:

- the scale and nature of the likely impacts of the Modification and the sensitivity of the receiving environment;
- whether the Modification is likely to generate cumulative impacts in accordance with the *Cumulative Impact Assessment Guidelines for State Significant Projects* (NSW Department of Planning, Industry and Environment, 2022);
- the ability to avoid, minimise and/or offset the impacts of the Project to the extent known at the scoping stage; and
- the complexity of the technical assessment of the Modification.

The matters that were identified as requiring further assessment in the Modification Report and the proposed approach to assessing each of these matters are provided below.

Subsidence

A Subsidence Assessment would be prepared to quantitatively assess the potential subsidence effects of the Modification and associated impacts to surface features using a calibrated subsidence model. The impact assessment would outline incremental and cumulative subsidence impacts and include assessment of far-field horizontal movements and surface cracking.

Groundwater

A Groundwater Assessment would be prepared to quantitatively assess the potential groundwater impacts associated with the Modification and assess the potential cumulative local and regional hydrogeological impacts of the Modification, including potential impacts to other groundwater users and hydrological features.

Surface Water

A Surface Water Assessment would include assessment of the potential surface water resource impacts associated with the Modification, with consideration of any associated incremental change to impacts on regional water availability, stream flow, water quality and flow regimes.

Biodiversity

A Biodiversity Development Assessment Report (BDAR) would be prepared to comprehensively assess potential impacts to biodiversity values due to additional surface development and potential indirect prescribed impacts of the Modification in accordance with the NSW *Biodiversity Conservation Act 2016* and the EPBC Act (if the Modification is deemed a 'Controlled Action'). The BDAR will include an overview of the biodiversity impact avoidance measures implemented as part of the Modification.

Aboriginal Cultural Heritage

An Aboriginal Cultural Heritage Assessment (ACHA) would be prepared to assess potential impacts on Aboriginal cultural heritage values. The ACHA, including Aboriginal heritage consultation and surveys, would be conducted in accordance with the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (Consultation Guidelines), *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (Department of Environment, Climate Change and Water, 2010); and *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* (Office of Environment and Heritage, 2011). Whitehaven will consult with Registered Aboriginal Parties (RAPs) during the preparation of the ACHA, for the purposes of meeting its consultation requirements as set out in the Consultation Guidelines and the NSW *National Parks and Wildlife Regulation 2009*.

Greenhouse Gas

A Greenhouse Gas Assessment would be conducted to assess the incremental greenhouse gas emissions associated with the Modification, inclusive of consideration of the *Climate Change (Net Zero Future) Act 2023*, and the NSW EPA's *Climate Change Policy and Climate Change Action Plan 2023-26*. The assessment would also consider the *NSW Guide for Large Emitters* (Environment Protection Authority [EPA], 2025).

Social

A Social Impact Assessment (SIA) will be prepared in accordance with the *Social Impact Assessment Guideline* (NSW Government, 2023) to understand the likely social and economic implications of the Modification. The social impact of the Modification is expected to be minor, with only about 30 FTE employees housed in the existing camp, in line with current practice. As a result, no significant impact on local housing or community services is anticipated.

It is expected in accordance with *Social Impact Assessment Guideline* (NSW Government, 2023), a 'basic SIA report' would be required.

Road Transport

A Road Transport Assessment would be conducted to review and assess traffic conditions associated with the Modification.

Other Environmental Aspects

Consideration and assessment (where required) of potential impacts to other environmental aspects (e.g. land resources and agriculture, air quality, visual, historic heritage, economic, hazards and risks) will be included in the main text of the Modification Report.

Engagement

NCOPL will consult with DPHI on 5 June 2025 to provide an overview of the Modification, proposed approval pathway and the proposed scope of the environmental assessment. NCOPL will also provide an overview of the Modification to the Narrabri Community Consultative Committee on 4 June 2025.

NCOPL will consult with relevant NSW Government agencies and local councils during the preparation of the Modification Report in consideration of the *Undertaking Engagement Guidelines for State Significant Projects* (DPHI, 2024). Consultation will include, but not necessarily be limited to, the following government agencies and stakeholders during the preparation of the Modification:

- NSC;
- DPHI, including:
 - Resource Assessments; and
 - Crown Lands.
- NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW), including:
 - Conservation Programs, Heritage & Regulation Group;
 - Heritage NSW;
 - EPA; and
 - DCCEEW Water Group.
- Department of Primary Industries and Regional Development, including:
 - NSW Resources; and
 - Resources Regulator.

- Transport for NSW;
- Narrabri Mine Community Consultative Committee;
- the Aboriginal Community and RAPs; and
- surrounding landholders and community members.

NCOPL will also consult with the Commonwealth DCCEEW regarding approval required under the EPBC Act.

Next Steps

Whitehaven/NCOPL is seeking confirmation of the following from DPHI:

- That the Modification can be lodged and considered by DPHI 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



Scott Mitchell

Manager – Approvals

smitchell@whitehavencoal.com.au

ATTACHMENT A

SUMMARY OF THE APPROVED AND MODIFIED PROJECT

Table 1
Summary of the Approved Project and the Project Incorporating the Modification

Project Component	Summary of the Approved Project ⁴	The Project Incorporating the Modification
Mining Method and Resource	<ul style="list-style-type: none"> Longwall and bord and pillar mining of the Hoskissons Coal Seam. 	<ul style="list-style-type: none"> Additional bord and pillar mining of the Hoskissons Coal Seam in the Modification Area. No change to longwall mining.
Bord and Pillar Mining	<ul style="list-style-type: none"> Total run-of-mine (ROM) coal production of approximately 3.5 million tonnes (Mt) from 2022 to 2027. 	<ul style="list-style-type: none"> Total ROM coal production of approximately 6.8 Mt from 2028 to 2035.
Underground Mine Configuration	<ul style="list-style-type: none"> Longwall mining of various lengths and widths. Bord and pillar mining of LW 201 and 202. 	<ul style="list-style-type: none"> Addition of bord and pillar mining to the east of the existing Project.
Tenements	<ul style="list-style-type: none"> Mining operations conducted within Mining Lease 1609 and ML1839. 	<ul style="list-style-type: none"> No change.
Mine Life	<ul style="list-style-type: none"> Mining operations until 2044. 	<ul style="list-style-type: none"> No change.
ROM Coal Production	<ul style="list-style-type: none"> Total ROM coal production of approximately 252 Mt*. 	<ul style="list-style-type: none"> Total ROM coal production of approximately 258.8 Mt (a 6.8 Mt increase).
ROM Coal Production Rate	<ul style="list-style-type: none"> ROM coal production of up to 11 million tonnes per annum. 	<ul style="list-style-type: none"> No change.
Underground Mine Surface Infrastructure	<ul style="list-style-type: none"> Ventilation shafts, pre-drainage and post-drainage sites, mine safety pre-conditioning sites, access roads and electricity transmission lines. Removal of an approved ventilation shaft no longer required. 	<ul style="list-style-type: none"> No change.
Underground Mine Access	<ul style="list-style-type: none"> Via three drifts at the box cut. 	<ul style="list-style-type: none"> No change.
Coal Washing	<ul style="list-style-type: none"> Continued use of existing facilities (e.g. Coal Handling and Preparation Plant and secondary crusher/screen), with replacement or upgrades of components as required. 	<ul style="list-style-type: none"> No change.
Coal Handling and Stockpiling	<ul style="list-style-type: none"> ROM coal stockpile capacity of approximately 700,000 tonnes (t). Product coal stockpile capacity of approximately 500,000 t. 	<ul style="list-style-type: none"> No change.
Reject Management	<ul style="list-style-type: none"> Coal rejects, exploration drilling waste from on-site and off-site placed in reject emplacement area. 	<ul style="list-style-type: none"> Additional rejects to be placed in rejects emplacement area.
Product Coal Transport	<ul style="list-style-type: none"> Product coal transported from site by rail. Average of four trains per day. Peak of eight trains per day. 	<ul style="list-style-type: none"> No change.

Table 1 (Continued)
Summary of the Approved Project and the Project Incorporating the Modification

Project Component	Summary of the Approved Project [^]	The Project Incorporating the Modification
Water Management	<ul style="list-style-type: none"> Conducted in accordance with the Water Management Plan (including discharge under the conditions of Environment Protection Licence 12789 and Project Approval 08_0144). 	<ul style="list-style-type: none"> Expected additional groundwater intake associated with the extended bord and pillar mining area.
Water Supply	<ul style="list-style-type: none"> Make-up water demand to be met from mine dewatering, runoff recovered from operational areas, and licensed extraction from Namoi River and Namoi Alluvium. 	<ul style="list-style-type: none"> No change.
Power	<ul style="list-style-type: none"> Permanent mains power supplied via a spur line from a 66 kilovolt (kV) powerline located to the east of Kamilaroi Highway. Power converted from 66 kV to 11 kV on-site and reticulated, using progressively developed 11 kV powerlines to service the underground mining area. 	<ul style="list-style-type: none"> No change.
Hours of Operation	<ul style="list-style-type: none"> 24 hours per day, seven days per week. 	<ul style="list-style-type: none"> No change.
Employment	<ul style="list-style-type: none"> Operational workforce (employees and contractors) of approximately 550 full-time equivalent personnel. Possible short-term increases in employment for development activities and development requirements. 	<ul style="list-style-type: none"> No change.
Site Access	<ul style="list-style-type: none"> Primary access via a sealed mine access road connected to the Pit Top Area. Use of buses to transport bord and pillar workforce. 	<ul style="list-style-type: none"> No change.
Surface Development Footprint	<ul style="list-style-type: none"> Approximately 609 hectares of additional surface development footprint to support underground mining. 	<ul style="list-style-type: none"> No change to surface infrastructure, however surface impacts from underground mining subsidence would occur.
Gas Management	<ul style="list-style-type: none"> Gas currently vented to the atmosphere, however investigation of developments in flaring technology to determine if flaring is a viable gas management option would be undertaken. 	<ul style="list-style-type: none"> No change.
Capital Investment Value	<ul style="list-style-type: none"> \$404 million. 	<ul style="list-style-type: none"> No change.
Offset Phases	<ul style="list-style-type: none"> Six development footprint phases. 	<ul style="list-style-type: none"> No change.

* Refer to Condition A6, Schedule 2 of Development Consent (SSD-10269) referencing bord and pillar mining operations may be carried out within the area approved for those operations under Project Approval 08_0144 (MOD 7).

[^] Excludes MOD 1 (under assessment) which would result in changes (i.e. Phase 6 being split into three sub-phases).