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23 June 2026

Mr. Stephen O'Donoghue
Director Resource Assessments
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Submission via the Planning Portal

Dear Stephen,

**RE: WILPINJONG COAL MINE – RESPONSE TO ADVICE ON PIT 8 EXTENSION
MODIFICATION SUBMISSIONS REPORT**

Wilpinjong Coal Pty Ltd (WCPL), a wholly owned subsidiary of Peabody Energy Corporation is the owner and operator of the Wilpinjong Coal Mine, an approved and existing open cut mining operation.

In September 2025, WCPL submitted a Modification Report to support a request to modify Development Consent (SSD-6764) under section 4.55(2) of the New South Wales (NSW) *Environmental Planning and Assessment Act 1979* to seek approval for the extension of the existing Pit 8 (Pit 8 Extension) within Exploration Licence 9399 and development of associated supporting infrastructure and facilities (the Modification).

The Modification Report was placed on public exhibition by the Department of Planning, Housing, and Infrastructure (DPHI) from 2 October 2025 to 30 October 2025. During and following the public exhibition period, submissions on the Modification Report were received from NSW Government agencies and members of the public.

On 6 November 2025, DPHI requested that WCPL prepare a Response to Submissions Report for the Modification. WCPL subsequently submitted the Submissions Report in March 2026 which addresses matters raised in submissions from NSW Government agencies, organisations and members of the public.

Following review of the Submissions Report, the Wollar Progress Association made further submissions on both social and water resources matters as articulated by Dr Richard Parsons and Environmental Data Analysis Pty Ltd (EDA) respectively.

Responses are presented in the attachments as follows:

- Attachment 1 – response to Dr Richard Parsons' advice in relation to social assessment matters.
- Attachment 2 – response to EDA advice in relation to water matters.

WCPL kindly requests the Department to contact the undersigned if any further information or clarification is required.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Jon Degotardi', with a stylized flourish at the end.

Jon Degotardi
Approvals Manager
Peabody Energy

Encl: Attachments

ATTACHMENT 1

Response to Dr Richard Parsons' Advice in Relation to Social Assessment Matters



Wilpinjong Coal Mine Modification 3 Social Impact Assessment: Author Response to “Comments on SIA Aspects of Response to Submissions”

Prepared by Lars Daniel Holm, M. Pol. Sc.

Date: 23 June 2026



INTRODUCTION

1. Square Peg Social Performance Pty Ltd was engaged by Wilpinjong Coal Pty Ltd (WCPL), a wholly owned subsidiary of Peabody Energy Australia Pty Ltd (Peabody) to prepare a Social Impact Assessment (SIA) for the proposed Modification 3 – Pit 8 Extension (the Modification). An SIA Report for the Modification was prepared and finalised on the third of September 2025 (henceforth referred to as the SIA Report or the SIA Report for the Modification). Lars Daniel Holm is the author of the SIA Report, and is the author of this response.
2. The Modification was placed on exhibition between the 2nd of October 2025 and the 30th of October 2025. A submission by the Wollar Progress Association (WPA) contained an Appendix titled *Wilpinjong Mod 3 – Pit 8 Extension Peer Review of Social Impact Assessment* (henceforth the WPA SIA Submission) which was prepared by Dr Richard Parsons¹. This initial submission made a number of assertions pertaining to the SIA Report for the Modification.
3. I prepared a response to these assertions, largely articulating how the SIA Report had been prepared in accordance with the *Social Impact Assessment Guideline for state significant projects* (SIA Guideline) and its *Technical Supplement – Social Impact Assessment Guideline for State Significant Projects* (Department of Planning and Environment (DPE), 2023a, 2023b)², and otherwise good practice SIA. This response was provided to WCPL for inclusion in its Submissions Report. In response, Dr Richard Parsons provided another submission (the Submission), asserting further arguments pertaining to the robustness of the conclusions contained in the SIA Report, and articulating his personal opinion that the Modification should be refused or withdrawn.
4. Here, I provide a brief response to the key assertions made in the Submission pertaining to the SIA Report. I do not comment on the adequacy of the Modification approvals pathway.

OVERVIEW

5. All SIA Reports contain elements of uncertainty, and assessments of social impacts should never be construed of or presented as exact predictions or facts. This uncertainty is acknowledged in the SIA Report (Square Peg Social Performance Pty Ltd, 2025, p. 14). The SIA Report provided reasonable interpretations of the data gathered during the SIA process, and assessed this in relation to the criteria provided in the Technical Supplement (DPE, 2023b, p. 12-13). It provided various evidence to support these assessments (pp. 36-42).

¹ The WPA SIA Submission is available at:

<https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SUB-97908960%2120251030T002422.216%20GMT>

² DPHI issued a revised SIA Guideline in 2026, however both the SIA for the Modification and the WPA SIA Submission reference the 2023 Guideline.

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6. Instead of debating details of how the social data gathered for the SIA Report should be interpreted, I will address the key assumptions and assertions that underlie the alternative assessments or opinions advanced by the Submission. These are:
- A. That the social impacts of the Modification should be assessed together with the social impacts of both the approved Wilpinjong Coal Mine, and application for a future extension of the Wilpinjong Coal Mine into Pits 9 and 10.
 - B. That social impacts of climate change in a geographically contained social locality can robustly be assessed in a social impact assessment that follows the SIA Guideline (DPE, 2023a).
 - C. That the extension of an impact in time, regardless of its extent, duration or severity, means a development compromises intergenerational equity.
 - D. That positive social impacts should be assessed from the perspective of those that do not experience those positive impacts.
7. I discuss each of these assumptions in turn, considering whether they accord with the SIA Guideline and its Technical Supplement (DPE, 2023a, 2023b), and otherwise good practice SIA. Other matters within the Submission, such as some peculiar aspersions pertaining to logical fallacies within the SIA Report or the original response, do not warrant a written response in this forum.

A. THE INCLUSION OF PAST AND FUTURE PROJECTS IN THE ASSESSMENT OF IMPACTS

8. The Submission argues that the overall level of assessment in the SIA Report for the Modification “in general” is appropriate, however asserts that the Modification is the “first opportunity to rigorously assess the social impacts of the mine”. It also asserts that the anticipated future Pit 9 and Pit 10 extension development application “cannot be ignored in the current assessment”, and that therefore, the Modification should be refused or withdrawn (p. 2).
9. The alternative assessments for impacts pertaining to sense of place and community cohesion, amenity, decision making systems and the distributive aspect of these impacts advanced by the Submission all rely, to various extents, on the assumption that these past and future projects form part of the assessment of impacts for the Modification.
10. It is not my role to comment on whether the Modification should be refused or withdrawn, but rather on the adequacy of the SIA.
11. It is incorrect, as the Submission does, to argue that the SIA for the Modification represents the first time for social impacts of the Wilpinjong Coal Mine to be “rigorously assess[ed]”. The EIS for the Wilpinjong Extension Project included an SIA Report, and the assessment of social impacts within that report was considered, in a peer review commissioned by the DPE, to be of “a high standard and align[ed] with leading practice”, as cited in the Secretary’s Environmental Assessment Report and the Planning Assessment Commission’s Determination Report for the Project (Department of Planning and Environment, 2016; Planning Assessment Commission, 2017).

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12. Nevertheless, there is a fundamental difference between utilising a changing social baseline, including a past, already approved project, to *inform* the assessment of social impacts of a project (in this case the Modification), and *assessing* the likelihood or magnitude of that change *in combination* with a project. The submission argues for the latter approach. This is inconsistent with the SIA Guideline, which to the contrary, affirms that a social baseline study “describes the social context *without* the project.” (DPE, 2023a, p. 21) and that social impacts are “the consequences that people experience when *a new project* brings change.” (ibid. p. 7, my emphasis). In this case, the project is the Modification.
 13. In addition, the submission argues that the SIA Guideline “clearly requires an SIA baseline to consider, “the history of the proposed project and the area, ... recent history of the place and people and any ongoing traumas” (emphasis added)” (Submission, p. 4). The inference here is that this requirement has not been addressed in the SIA Report. This is incorrect. Sections 3 and 4 of the SIA Report discuss this history.
 14. The alternative assessments advanced by the Submission also rely on the inclusion of a future extension of the Wilpinjong Coal Mine into Pits 9 and 10 in the assessment. I discuss the reasonableness of this approach in my original response.
 15. It is, however, incorrect to argue that a potential future extension of the Wilpinjong Coal Mine into pits 9 and 10 is “ignored” in the SIA Report for the Modification. On the contrary, it is discussed numerous times, and provides important cumulative and contextual information that has *informed* the identification and assessment of impacts. In accordance with the SIA Guideline (DPE, 2023a), the assessment of the social impacts of the Modification provided in the SIA Report is an assessment of the potential impacts of the Modification, not of other projects, either already approved or yet to be assessed.
 16. As stated in my original response, I maintain that “it is not the role of an SIA practitioner within an SIA Report (or indeed within this response) to opine on the adequacy of certain New South Wales (NSW) approvals pathways, and whether various projects should be assessed separately or in a combined fashion. The Modification Report (Peabody, 2025) discusses WCPL’s engagement with the Department of Planning, Housing, and Infrastructure (DPHI) about the overall scope of the application.”

B. THE RIGOROUS ASSESSMENT OF SOCIAL IMPACTS OF CLIMATE CHANGE WITHIN AN SIA

17. The Submission discusses the social impacts of climate change, advancing a number of arguments and again referencing a study which was published after the SIA Report was finalised.
18. The question under consideration here is *not* whether climate change is occurring, its causes or consequences, nor whether greenhouse gas emissions ought to be considered in the environmental assessment for the Modification. The question under consideration *is* whether it is consistent with the SIA principle of rigour (DPE, 2023a, p. 10) to assess social impacts of climate change associated with the Modification within the SIA Report.
19. None of the arguments advanced in the Submission, and none of the two references provided explain or advance how the social impacts of climate change on a reasonably small population in a reasonably small locality can be rigorously assessed in a social impact assessment, following the SIA Guideline or Technical Supplement (DPE, 2023a, 2023b). To the contrary, the case cited in one of the Submission references (Waratah Coal Pty Ltd v Youth Verdict Ltd & Ors (No 6) [2022] QLC 21), did not consider social impacts of climate change within its discussion on the adequacy of the SIA.

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20. Nevertheless, the SIA Report a) described that some residents proximal to the Wilpinjong Coal Mine have observed environmental change, b) described that the impacts of climate change are very important to these residents, and c) referenced the Greenhouse Gas Assessment for the Modification.
21. It remains my view that this is a reasonable treatment of this matter in an SIA Report. I further refer to my original response.

C. THE MEANING OF INTERGENERATIONAL EQUITY

22. The Submission argues that there would be intergenerational equity impacts associated with the Modification. None of the arguments advanced explain how the Modification can, from a social impact perspective, compromise the ability of *future generations* to meet their *needs*, which is the key test in considering whether intergenerational equity impact exist (Vanclay, 2003, p. 10).
23. Consistent with the definition provided by Vanclay (2003), to establish that there are intergenerational equity aspects of social impacts of a Project – in this case the Modification – one must first establish that that impact would extend sufficiently far into the future to encompass “future generations”, and second, establish that the impact compromises the ability of those generations to meet their “needs”.
24. The Submission does not do this. It provides generic, industry wide examples and speculates about how these may be experienced. As an example, the Submission (p. 6) suggests that “those who have only ever worked in mining may not have the skills needed to adapt to new industries as quickly”, without providing any supporting evidence. It seems tenuous to argue that a Modification extending the duration of mining activities at the site by some six months would restrict the ability of people in a future generation to gain certain skills such that their ability to meet their needs relating to employment are compromised.
25. I remain of the view, as expressed in the SIA Report (p. 46), that it is “unlikely that any social impacts of the Modification proceeding would affect intergenerational equity”.

D. WHETHER POSITIVE IMPACTS SHOULD BE ASSESSED FROM THE PERSPECTIVE OF THOSE WHO EXPERIENCE THEM

26. The Submission suggests that the positive impacts associated with employment and business opportunities are “probably overstated”. The key argument in support of this assertion appears to be that these positive impacts would be experienced by some stakeholders, the “economic beneficiaries from the mine”, and not by others, i.e. those who “may not perceive any benefits” (p. 7).
27. The implication of this reasoning is that the positive social impacts associated with employment ought to be evaluated from the perspective of those who *do not* experience those impacts. This is inconsistent with the SIA Guideline, which states that social impacts should be considered “*from the perspectives of likely affected people*” (DPE, 2023a, p. 23, my emphasis).
28. Therefore, the Submission’s critique against the assessment of positive social impacts within the SIA Report remains inconsistent with the SIA Guideline.

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29. On the contrary, following the Technical Supplement (DPE, 2023b, p. 12), the SIA Report (Section 5) has sought to assesses *both* the experiential dimensions (such as levels of sensitivity/importance and concern/interest) from the perspective of those who experience it, *and* more quantifiable dimensions such as duration and extent of *all* social impacts, both positive and negative.
30. I further refer to my original response.

CONCLUSION

31. In conclusion, I remain of the opinion that the SIA Report has been prepared in accordance with the SIA Guideline and its Technical Supplement (DPE, 2023a, 2023b) as was outlined in the Scoping Letter for the Modification, that it provides a reasonable assessment of the social impacts associated with the Modification, and that the recommended mitigation measures are appropriate for the identified impacts associated with the Modification.
32. Other than that, I refer, again, to my original response.

REFERENCES

Department of Planning and Environment. (2016). *STATE SIGNIFICANT DEVELOPMENT ASSESSMENT*

Wilpinjong Extension Project (SSD 6764)—Secretary's Environmental Assessment Report.

<https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachmentRef=SSD-6764%2120190227T081301.599+GMT>

Department of Planning and Environment (DPE). (2023a). *Social Impact Assessment Guideline*. Department of Planning and Environment.

Department of Planning and Environment (DPE). (2023b). *Technical Supplement—Social Impact*

Assessment Guideline for State Significant Projects. <https://www.planning.nsw.gov.au/-/media/Files/DPE/Guidelines/Policy-and-legislation/Social-Impact-Assessment/SIA-Guideline---Technical-Supplement-2v7.pdf?la=en>

Peabody. (2025). *Wilpinjong Coal Mine Modification 3—Pit 8 Extension: Modification Report*.

<https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachmentRef=SSD-6764-MOD-3%2120250925T003636.308%20GMT>

Planning Assessment Commission. (2017). *Wilpinjong Extension Project SSD 6764—Determination Report*.

<https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachmentRef=SSD-6764%2120190227T081253.298+GMT>

Square Peg Social Performance Pty Ltd. (2025). *Social Impact Assessment for the Wilpinjong Coal Mine Pit 8 Extension Modification*.

Vanclay, F. (2003). International Principles For Social Impact Assessment. *Impact Assessment and Project Appraisal*, 21(1), 5–12. <https://doi.org/10.3152/147154603781766491>

ATTACHMENT 2

Response to EDA Advice in Relation to Water Matters

Wilpinjong Coal Pty Ltd's Response to Environmental Data Analysis Advice on Response to Submissions Report

Baseline Data

Comment

The Extension of Pit 8 should not be approved until such time that WCPL has a proper baseline monitoring program in place (and an adequate time series of baseline data) that can rigorously assess the impacts of the proposal on surface and groundwater resources.

This monitoring cannot be left to a post-approval process, especially given the lack of detail as to the monitoring program that will actually be implemented if the Pit 8 extension is approved.

Response

Wilpinjong Coal Pty Ltd's (WCPL's) response to the Independent Expert Scientific Committee on Unconventional Gas Development and Large Coal Mining Development (IESC) Items 1-9 (WCPL, 2026a) outlines how the Surface Water Assessment (WRM, 2025), Groundwater Assessment (SLR, 2025) and response to the IESC address water resources baseline data requirements relevant to the Modification.

Comment

It is recommended that the Independent Expert Panel undertake a thorough review of existing impacts to Wilpinjong Creek flows and alluvial and coal seam aquifers as a result of previous open-cut pit operations at Wilpinjong Coal Mine as well as their implications for impacts to the Wollar Creek water source. This is likely to only be achievable by access to the full dataset on flows (and groundwater level data) in the area (not currently in the public domain).

Response

This recommendation (as well as a number of similar recommendations made by Environmental Data Analysis Pty Ltd [EDA]) is addressed to the NSW Department of Planning, Housing and Infrastructure (DPHI).

Groundwater and surface water monitoring data is analysed and reported in the Wilpinjong Coal Mine Annual Reviews. Refer also to WCPL's response to EDA's comment above regarding baseline data.

Groundwater Modelling & Assessment

Comment

WCPL be required to implement a scientifically rigorous monitoring program that has appropriate baseline data in appropriate areas and is capable of rigorously assessing the impact of the proposal on surface and groundwater resources in and near Wollar Creek.

Response

Refer to WCPL's response to EDA's comment above regarding baseline data above.

As outlined in the response to the IESC Advice (WCPL, 2026a), WCPL will expand its existing monitoring network to assess potential effects of the Modification on Wollar Creek and its alluvium, including:

- four new groundwater bores within and to the east of the Wollar Creek alluvium and/or unconsolidated material along the creek (and the underlying coal measures);
- an expansion of the existing groundwater monitoring network along and to the east of Wollar Creek as a component of environmental baseline data collection in Exploration Licence 9399;
- an additional surface water monitoring point upstream of the proposed new licensed discharge point on Wollar Creek to provide reference water quality monitoring data;
- an additional monitoring bore downstream of the Wilpinjong and Wollar Creek confluence and/or adjacent to the Goulburn River National Park boundary (subject to access and ground conditions); and
- construction of a new gauging station on Wollar Creek.

WCPL would incorporate the additional monitoring sites and parameters into an update to the existing site Water Management Plan to be prepared for the Modification. Groundwater monitoring data along Wollar Creek and Wilpinjong Creek is analysed and reported in the Wilpinjong Coal Mine Annual Reviews.

Groundwater Dependent Ecosystems

Comment

WCPL include rigorous calibration reports for the modelling when assessing their utility for impact prediction in their Project Modification/Expansion. One of the most important ways to incorporate scientific rigour into these assessments is to assess the congruence between modelled and observed data and investigate the reasons behind any serious deviations from model predictions.

Response

A response to comments made on the groundwater model calibration is provided in Section 4.2.3 of the Submissions Report (WCPL, 2026b). In summary, peer reviewer Dr Noel Merrick of HydroAlgorithmics (2025) regarded the model as fit for purpose.

Water and Salt Balance

Comment

It remains unclear whether all water input volumes have been appropriately accounted for, quantified and assessed. It is highly questionable whether there is currently sufficient storage for all on-site water make/retention when Pit 8 is included. Leaving the new Clean Water Diversion System Design to a post-approval process should not be considered acceptable, especially as it does not appear to have been adequately modelled in the Surface Water Assessment or Water Balance Model.

Response

The Surface Water Assessment and WRM's (2026) response to the IESC Advice clearly demonstrate that there is sufficient storage for all on-site water make/retention during the Modification. Further details on the design and operation of the clean water diversion system are provided in WCPL's response to the NSW Environment Protection Authority (EPA) advice on the Submissions Report (WCPL, 2026b).

The Surface Water Assessment does incorporate the four new clean water dams in the water balance model and any projected spills from these clean water dams are accounted for in the Pit 8 Extension water inventory (i.e. the receiving water storage of the clean water dams).

Comment

WCPL be required to assess the effect of ongoing discharges of 14,000 $\mu\text{S}/\text{cm}$ EC concentrate and backwash into Pit 2W.

Response

The Modification does not involve any change to the existing water treatment plant discharge limits and management (including management of concentrate and backwash produced from the water treatment facility). Figure 6.5 of the Surface Water Assessment shows that median water treatment facility discharges under the Modification would range from approximately 1,100 to 700 megaliters per year (ML/year) (i.e. well below the approved discharge limit in Environment Protection Licence [EPL] 12425 of 6.5 ML/day).

The Wilpinjong Coal Mine Annual Reviews present detailed water quality monitoring results each year. Electrical Conductivity (EC) has typically ranged between approximately 3,000 to 5,000 micro-Siemens per centimeter ($\mu\text{S}/\text{cm}$) in Pit 2W as shown on Chart 1.

Chart 1
Monitored Electrical Conductivity in Pit 2W



Comment

WCPL implement a rigorous monitoring program measuring water level, EC level and heavy metal (dissolved and total) levels for Pit 2W (the receptacle of the brine from the RO plant).

WCPL implement a rigorous monitoring program measuring water levels, EC levels and heavy metal (dissolved and total) levels for aquifers adjacent to Pit 2W to assess the potential for leachate from Pit 2W to be migrating to and polluting the underlying groundwater aquifers.

The EPA modify EPL 12425 to include requirements for a rigorous monitoring program measuring water level, EC level and heavy metal (dissolved and total) levels for Pit 2W and the underlying/surrounding aquifers.

Response

The above EDA comments relate to the existing/approved Wilpinjong Coal Mine operations and/or are directed to the NSW EPA. Notwithstanding, WCPL undertakes comprehensive monitoring of water quality in on-site storages. The monitoring results are analysed and reported in the Wilpinjong Coal Mine Annual Reviews.

Other Issues

Comment

WCPL provide a rigorous assessment of the impact of all discharges on the Wilpinjong Creek and Wollar Creek receiving environment.

Response

Detailed water quality monitoring and gauging results for the existing/approved Wilpinjong Coal Mine are reported in the Wilpinjong Coal Mine Annual Reviews. The Modification would include the establishment of a new discharge point on Wollar Creek, solely for the release of diverted upslope (i.e. clean) water.

Comment

*Alteration to the natural flow regime of rivers is listed as a **key threatening process** under the Biodiversity Conservation Act - Schedule 4 Key threatening processes (Alteration to the natural flow regimes of rivers and streams and their floodplains and wetlands [as described in the final determination of the Scientific Committee to list the threatening process]). Under Section 5A of the EP&A Act **key threatening processes** must be assessed for developments that may impact aquatic ecosystems.*

Response

The Modification does not propose any change to the discharge regime at the Wilpinjong Coal Mine with the exception of clean water discharges from the proposed clean water management system to be constructed upslope of the Pit 8 Extension. A response to comments made on Wollar Creek gauging and monitoring including flow data is provided in the Submissions Report (WCPL, 2026b).

Comment

WCPL provide a rigorous assessment of the impact of the current salt load to the downstream environment and its potential to increase as a result of the Pit 8 Extension Modification.

Response

This recommendation relates to the existing/approved Wilpinjong Coal Mine. Notwithstanding, as outlined in the Surface Water Assessment and response to the IESC Advice, approved releases from the Reverse Osmosis plant tend to significantly reduce salinity in Wilpinjong Creek downstream of the Cumbo Creek confluence. Additionally, all discharges of water are managed in accordance with the existing Water Management Plan (Peabody, 2017) to protect the integrity of local and regional water sources. Detailed water quality monitoring results are reported in the Wilpinjong Coal Mine Annual Reviews.

As outlined in the response above, the Modification does not seek to change the approved discharge regime under EPL 12425.

Comment

The EPA, as regulator, investigate the accuracy of reporting of flow discharges for LDP24 for the period April 2023 and August 2024.

The EPA, as regulator, address the consistent non-compliances with EPL12425 (which have occurred each and every year since 2006).

Response

These recommendations relate to the existing/approved Wilpinjong Coal Mine and are addressed to the NSW EPA.

Cumulative Impacts

Comment

DPHI address the cumulative impacts of current mining together with the likely consequences to the Wollar Creek water source due to WCPL's intended expansions of open cut mining to even larger areas of the Wollar Creek catchment.

Response

This recommendation is addressed to DPHI. Notwithstanding, cumulative impacts of the existing/ approved Wilpinjong Coal Mine and proposed Modification has been assessed by WRM (2025).

References

- HydroAlgorithmics (2025). Wilpinjong Coal Mine Pit 8 Extension Modification – Groundwater Peer Review, 2025.
- Peabody (2017). Wilpinjong Coal - Water Management Plan, August 2017.
- SLR Consulting Australia (2025). Pit 8 Extension Modification Groundwater Impact Assessment.
- Wilpinjong Coal Pty Ltd (2026a). Wilpinjong Coal Mine – Response to IESC Advice on Pit 8 Extension Modification, May 2026.
- Wilpinjong Coal Pty Ltd (2026b). Wilpinjong Coal Mine Modification 3 – Pit 8 Extension – Response to Submissions Report, March 2026.
- WRM Water and Environment (2025). Wilpinjong Coal Mine, Pit 8 Extension Modification – Surface Water Assessment, August 2025.
- WRM Water and Environment (2026). Wilpinjong Coal Mine – Response to IESC Advice on Pit 8 Extension Modification – Surface Water and Flooding, April 2026.