

15 October 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](mailto: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 – REVISED PROJECT DESCRIPTION**

I am writing to advise that the Project Description for the proposed Narrabri Underground Mine Stage 3 Extension Project Modification 2 (the Modification), as outlined in the Scoping Letter provided to the Department of Planning, Housing and Infrastructure (DPHI) on 3 June 2025, has been revised.

Narrabri Coal Operations Pty Ltd (NCOPL) has revised the Project Description based on updated mine planning. The key revisions since the Scoping Letter was lodged are summarised in Table 1.

**Table 1  
 Comparison of the Initial and Revised Scopes**

Project Component	Scoping Letter – June 2025	Revised Scope – October 2025
Bord and Pillar Mining – ROM Coal Production	– Total run-of-mine (ROM) coal production of approximately 6.8 million tonnes (Mt) (258.8 Mt total for Stage 3) from 2028 to 2035.	– Total ROM coal production of 8.9 Mt (260.9 Mt total for Stage 3) from 2028 to 2044.
Surface Development Footprint	– No change to surface infrastructure, however surface impacts from underground mining subsidence would occur.	– As per June 2025 letter. – Construction of five additional boreholes, including access tracks, to support underground mining. Totals approx. 2.8 hectares <sup>1</sup> .

During the revision of the preliminary bord and pillar mine planning and since the Scoping Letter was lodged, NCOPL identified an opportunity to increase coal recovery by updating the pillar sizing and through pillar plunging, which involves decreasing the size of the pillars and extracting coal from pillars left in the initial workings. This approach has the potential to improve resource recovery within the proposed mine footprint with minimal changes to the Project. Preliminary subsidence modelling does not predict a material change in subsidence impacts associated with the change in mine plan.

Attachment A provides a summary comparison of the currently approved Narrabri Underground Mine Stage 3 Extension Project (the Project) under Development Consent (SSD-10269) and the Project incorporating the Modification, which has been revised to reflect the abovementioned changes.

Whitehaven has reviewed the Scoping Letter and confirms that the statutory context, proposed assessment of impacts, technical studies and proposed engagement remain relevant.

Please advise if further information is required or if a meeting would be appropriate to discuss these changes.

<sup>1</sup> These boreholes and access tracks are flexible in their location and will be located to avoid sensitive areas.

Yours sincerely,

**WHITEHAVEN COAL LIMITED**



**Tony Dwyer**

General Manager – Approvals

[tdwyer@whitehavencoal.com.au](mailto:tdwyer@whitehavencoal.com.au)

0475 830 292

## **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 <sup>4</sup>	The Project Incorporating the Modification
Mining Method and Resource	<ul style="list-style-type: none"> <li>- Longwall and bord and pillar mining of the Hoskissons Coal Seam.</li> </ul>	<ul style="list-style-type: none"> <li>- Additional bord and pillar mining of the Hoskissons Coal Seam in the Modification Area.</li> <li>- No change to longwall mining.</li> </ul>
Underground Mine Geometry	<ul style="list-style-type: none"> <li>- Longwall mining of various lengths and widths.</li> <li>- Bord and pillar mining of LW 201 and 202.</li> </ul>	<ul style="list-style-type: none"> <li>- Addition of bord and pillar mining panels to the east of the existing Project.</li> </ul>
Tenements	<ul style="list-style-type: none"> <li>- Mining operations conducted within Mining Lease 1609 and ML1839.</li> </ul>	<ul style="list-style-type: none"> <li>- No change.</li> </ul>
Mine Life	<ul style="list-style-type: none"> <li>- Mining operations until 2044.</li> </ul>	<ul style="list-style-type: none"> <li>- No change.</li> </ul>
ROM Coal Production	<ul style="list-style-type: none"> <li>- Total ROM coal production of approximately 252 Mt*.</li> </ul>	<ul style="list-style-type: none"> <li>- Total ROM coal production of approximately 260.9 Mt (an 8.9 Mt increase).</li> </ul>
ROM Coal Production Rate	<ul style="list-style-type: none"> <li>- ROM coal production of up to 11 million tonnes per annum.</li> </ul>	<ul style="list-style-type: none"> <li>- No change.</li> </ul>
Underground Mine Surface Infrastructure	<ul style="list-style-type: none"> <li>- Ventilation shafts, pre-drainage and post-drainage sites, mine safety pre-conditioning sites, access roads and electricity transmission lines.</li> <li>- Removal of an approved ventilation shaft no longer required.</li> </ul>	<ul style="list-style-type: none"> <li>- No change.</li> </ul>
Underground Mine Access	<ul style="list-style-type: none"> <li>- Via three drifts at the box cut.</li> </ul>	<ul style="list-style-type: none"> <li>- No change.</li> </ul>
Coal Washing	<ul style="list-style-type: none"> <li>- Continued use of existing facilities (e.g. Coal Handling and Preparation Plant and secondary crusher/screen), with replacement or upgrades of components as required.</li> </ul>	<ul style="list-style-type: none"> <li>- No change.</li> </ul>
Coal Handling and Stockpiling	<ul style="list-style-type: none"> <li>- ROM coal stockpile capacity of approximately 700,000 tonnes (t).</li> <li>- Product coal stockpile capacity of approximately 500,000 t.</li> </ul>	<ul style="list-style-type: none"> <li>- No change.</li> </ul>
Reject Management	<ul style="list-style-type: none"> <li>- Coal rejects, exploration drilling waste from on-site and off-site placed in reject emplacement area.</li> </ul>	<ul style="list-style-type: none"> <li>- Additional rejects to be placed in rejects emplacement area.</li> </ul>
Product Coal Transport	<ul style="list-style-type: none"> <li>- Product coal transported from site by rail.</li> <li>- Average of four trains per day.</li> <li>- Peak of eight trains per day.</li> </ul>	<ul style="list-style-type: none"> <li>- No change.</li> </ul>

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

Project Component	Summary of the Approved Project <sup>^</sup>	The Project Incorporating the Modification
Water Management	<ul style="list-style-type: none"> <li>Conducted in accordance with the Water Management Plan (including discharge under the conditions of Environment Protection Licence 12789 and Project Approval 08_0144).</li> </ul>	<ul style="list-style-type: none"> <li>Expected additional groundwater intake to facilitate extended bord and pillar mining panels.</li> </ul>
Water Supply	<ul style="list-style-type: none"> <li>Make-up water demand to be met from mine dewatering, runoff recovered from operational areas, and licensed extraction from Namoi River and Namoi Alluvium.</li> </ul>	<ul style="list-style-type: none"> <li>No change.</li> </ul>
Power	<ul style="list-style-type: none"> <li>Permanent mains power supplied via a spur line from a 66 kilovolt (kV) powerline located to the east of Kamilaroi Highway.</li> <li>Power converted from 66 kV to 11 kV on-site and reticulated, using progressively developed 11 kV powerlines to service the underground mining area.</li> </ul>	<ul style="list-style-type: none"> <li>No change.</li> </ul>
Hours of Operation	<ul style="list-style-type: none"> <li>24 hours per day, seven days per week.</li> </ul>	<ul style="list-style-type: none"> <li>No change.</li> </ul>
Employment	<ul style="list-style-type: none"> <li>Operational workforce (employees and contractors) of approximately 562 full-time equivalent personnel.</li> <li>Possible short-term increases in employment for development activities and development requirements.</li> </ul>	<ul style="list-style-type: none"> <li>No change.</li> </ul>
Site Access	<ul style="list-style-type: none"> <li>Primary access via a sealed mine access road connected to the Pit Top Area.</li> <li>Use of buses to transport bord and pillar workforce.</li> </ul>	<ul style="list-style-type: none"> <li>No change.</li> </ul>
Surface Development Footprint	<ul style="list-style-type: none"> <li>Approximately 609 hectares of additional surface development footprint to support underground mining.</li> </ul>	<ul style="list-style-type: none"> <li>Construction of five additional boreholes, including access tracks, to support underground mining. Totals approx. 2.8ha<sup>#</sup>. Total Stage 3 footprint of approx. 611.8 hectares.</li> </ul>
Gas Management	<ul style="list-style-type: none"> <li>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.</li> </ul>	<ul style="list-style-type: none"> <li>No change.</li> </ul>
Rehabilitation Strategy	<ul style="list-style-type: none"> <li>Conducted in accordance with the Rehabilitation Management Plan (RMP).</li> </ul>	<ul style="list-style-type: none"> <li>No change.</li> </ul>
Capital Investment Value	<ul style="list-style-type: none"> <li>\$404 million.</li> </ul>	<ul style="list-style-type: none"> <li>No change.</li> </ul>
Offset Phases	<ul style="list-style-type: none"> <li>Six development footprint phases.</li> </ul>	<ul style="list-style-type: none"> <li>No change.</li> </ul>

\* 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).

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

<sup>#</sup> These boreholes and access tracks are flexible in their location and will be located to avoid sensitive areas.