



OUT15/3208

Mr Thomas Watt
Planning Officer
Resource Assessments
NSW Department of Planning and Environment
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SYDNEY NSW 2001

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Dear Mr Watt

**Airly Mine Extension Project (SSD 12-5581)
Response to Submissions Report**

I refer to your email dated 9 February 2015 to the Department of Primary Industries in respect to the above matter.

Comment by NSW Office of Water

The NSW Office of Water (Office of Water) has reviewed the Response to Submissions report for the Airly Mine Extension Project (SSD5581) and provides the following comments for your consideration with further detail at Attachment A.

Surface water

In response to the Office of Water's request for clarification regarding surface water licence requirements, the proponent has re-stated the information originally provided in the EIS. It remains unclear what surface water licences may be required for the project.

Groundwater

While the proponent has adequately addressed the majority of the Office of Water's concerns regarding groundwater impacts raised at the EIS stage, the proponent should also:

- undertake ongoing consultation and liaison with the Office of Water in the development of the Groundwater Monitoring and Modelling Plan (GMMP);
- ensure the GMMP includes rules for the management of groundwater level impacts to protect Groundwater Dependent Ecosystems (GDEs); and
- liaise with the NSW Office of Environment and Heritage for specific advice on the values of the various GDEs impacted by the proposal.

Yours sincerely

A handwritten signature in red ink, appearing to be 'Kristian Holz', written in a cursive style.

Kristian Holz
Director Policy, Legislation and Innovation

Attachment A

Airly Mine Extension Project (SSD5581) Comment on the Response to Submissions Report / Response to Submissions Report Comments by NSW Office of Water

Groundwater

In reviewing the responses made to the submissions presented by the Office of Water, the project proponent has adequately addressed the majority of concerns resulting from the above groundwater related issues.

NOW Submission

The proponent undertakes a further review of the GDEs within and around the project application area, with reference to the potential for impacts relating to baseflow and surface seepage (springs) reductions.

- Specific advice should be sought from OEH about the values and importance of the various ecosystems which may be affected by the base flow losses (including spring discharges, such as Village Spring and others named in the investigation). On this basis the proponent should provide details about whether the potential biodiversity impacts would be of concern if realised.

Comment on response

- The proponent has provided details on 4 communities of GDEs around the project site and has suggested it is unlikely that significant modifications or a reduction in groundwater availability will have any significant impact to their ecological water requirements.
- The proponent has not incorporated management rules around GDEs into the Groundwater Management Plan nor have they sought OEH advice about the values and importance of the various ecosystems which may be affected by the base flow losses.

NOW Submission

The proponent clarifies the expected volumetric take of water from mine inflows after cessation of mining activities. Peak mine inflow of 184 ML is predicted for final year (2030) but the ongoing take post closure is not clear.

Comment on response

- From 2030 (peak year) to 2090, inflows into the mine will reduce from 184 ML/yr (5.8L/s) to less than 3ML/year (~<0.1 L/s).

NOW Submission

The proponent clarifies the proposed mine timeframe. Proposed coal production is due to commence in 2015, and is to extend for 25 years (estimated to cease in 2040) with a recovery of 60 years to 2100. The modelling and subsequent groundwater assessment report detail the production of coal is to last until 2030. This discrepancy needs to be resolved before planning consent is sought or approved.

Comment on response

- The proponent stated, *"the assessed mine plan is based on coal production between 2015 and 2030, although overall development consent for the Project is sought for a period of 25 years (inclusive of the rehabilitation phase). Once coal production is complete in 2030, groundwater will continue to flow into the mine over a period of approximately 60 years"*.

NOW Submission

In preparing a Groundwater Monitoring and Monitoring Plan, the applicant cite the "Groundwater Monitoring and Modelling Plans – Introduction for prospective mining and petroleum exploration activities" document as found on the NOW website:

<http://www.water.nsw.gov.au/Water-management/Law-and-policy/Key-policies/Aquifer-interference>.

- Liaison and/or correspondence with NOW when developing the GMMP is sought for adequacy of the monitoring system.

Comment on response

- *"A commitment has been made in the EIS (refer Table 11.3) to revise the existing Water Management Plan following development consent, and this revision will include the preparation of a Groundwater Monitoring and Management Plan (GMMP). The GMMP will incorporate clearly defined triggers and actions based on monthly and annual reviews of monitoring data. Centennial Airly will liaise with NOW for the development of the GMMP"*.

Recommendation

The applicant has adequately addressed NOW's initial groundwater concerns with the project proposal. Ongoing consultation and liaison with NOW in development of the GMMP is required. One subsequent recommendation the proponent is requested to address in the preparation of a Groundwater Monitoring and Management Plan (GMMP) is:

1. The proponent should include rules for management of groundwater level impacts to protect GDEs within the revision of the GMMP and also liaise with OEH regarding specific advice in relation to the values of the various ecosystems.

End Attachment A
23 February 2015