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Ref: D2014/52968

Mr. Howard Reed
Manager Mining Projects
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Dear Mr. Reed

Springvale Mine Extension Project (SSD-5594)

The Sydney Catchment Authority (SCA) appreciates the opportunity to provide its comments on the Environmental Impact Statement for the Centennial Coal Company Pty Ltd (Centennial) Springvale Mine Extension Project.

The SCA notes that the Springvale Mine's pit top and associated water management structures and spoil management areas are located in the Upper Cocks River sub-catchment, which is part of the Sydney's drinking water catchment (DWC). The proposed longwalls 501 to 503 are fully located in the DWC, whilst the proposed longwalls 427 to 432 are partially located in the DWC. The remaining proposed activities are located outside the DWC. Therefore, the focus of the SCA's assessment for the proposal is related to the project components located within the Sydney drinking water catchment.

The SCA's primary concerns relate to the increased mine water discharges and associated water quality impacts (salinity) to Marangaroo Creek and Cocks River.

The SCA is also concerned about the proposal to transfer mine water to the local power stations (Mt Piper and Wallerawang) which the SCA understands will have limited and reduced availability due to the recent decision to place the Wallerawang power station in care and maintenance. As a consequence, there may be additional discharges of mine water into receiving watercourses of approximately 50 ML/d from this project. These discharges would further impact on the quality of receiving waters and the EIS has not addressed this issue. The SCA considers that the Proponent should either consider an alternative opportunity for mine water reuse or treatment of mine water to a higher level before discharge.

The SCA requests that the Department requires the Proponent to address the SCA's concerns and attached detailed comments. If you wish to discuss any matter in this letter, please do not hesitate to contact Dr Girja Sharma on 47242459 or girja.sharma@sca.nsw.gov.au

Yours sincerely

MALCOLM HUGHES
Senior Manager Planning & Environment

3/4/14

SYDNEY CATCHMENT AUTHORITY DETAILED COMMENTS
for
SPRINGVALE MINE EXTENSION PROJECT
ENVIRONMENTAL IMPACT STATEMENT
June 2014

Discrepancies and issues that need to be addressed are as follows:

- Salinity predictions have not been undertaken for the scenario (1) no upgrade of SDWTS and (2) no SDWTS availability and associated impacts of the full mine water discharge to the Swayers Swamp Creek and Coxs River. This is a major concern to the SCA.
- Salinity predictions have been undertaken upstream of Lake Wallace, not where discharge occurs in Swayers Swamp Creek (LDP009). No predictions are made on what would be an expected increase in salinity compared to the current conditions at the discharge point LDP009 and impacts on water quality in Coxs River downstream of Lake Wallace. The model predictions for average Coxs River salinity should include an envelope around the average showing 10th and 90th percentiles.
- There is no analysis whether elevated salt levels are likely in the Coxs River where it enters Lake Burragorang.
- The EIS states that based on the data available, estimated errors in predictions is approximately $\pm 30\%$. It is not clear if the upper limits would still fall within an acceptable level of impact.
- The absence of any proposed monitoring for Marrangaroo Creek is considered unsatisfactory. It is considered that as a minimum, full hydrological monitoring should again be undertaken for this significant tributary of the Coxs River, and water quality monitoring also undertaken.
- There are some discrepancies presenting assessment results between the main report and some specialist reports and these should be addressed.