

Our ref: OUT22/7918

Your ref: SSI-33143123

Gabrielle Allan  
Energy, Resources, and Industry  
Department of Planning and Environment

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## Subject: Denbrobium Mine Extension Project

Dear Gabrielle,

Dams Safety NSW (DSNSW) appreciates the opportunity to make a submission on State Significant Infrastructure Application SSI-33143123. DSNSW was established under the *Dams Safety Act 2015* as an independent regulator of declared dams in NSW and so comments are restricted to the impact of the proposed mining on the structure of declared dams impacted by the proposal.

DSNSW notes the proposed extraction in Area 5 near Avon Dam comes to within 1,000 metres of the dam wall. This presents a concern for the safety of the dam from potential ground movements induced from mining activity. There are numerous examples documented of mining induced ground movements occurring further than 1,500 metres from mining activity that could present an unacceptable risk to dam structures such as Avon that are sensitive to even small ground movements. For this reason, DSNSW's preferred position is that the proposed longwall mining activity should not come within 1,500 metres, as a minimum, of Avon Dam's nearest built structure. In addition we recommend the dam owner, in this case WaterNSW, are supported with adequate resources and information to effectively assess risks to their dam and discharge obligations under *Dams Safety Act 2015*. This may include however not limited to:

- Dam stability assessment using finite element analysis
- Geotechnical investigation
- Geological mapping

- Establishing measurement and monitoring plans, with appropriate triggers, to support risk management and incident reporting requirements
- Reassessment of the dam's risk ratings because of proposal
- Risk management activity
- Independent review of risks by competent persons, e.g., dam's safety engineers

Should you require further information in relation to this submission please contact Muhammad Akber at [Muhammad.Akber@damsafety.nsw.gov.au](mailto:Muhammad.Akber@damsafety.nsw.gov.au)

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Chris Salkovic".

Chris Salkovic  
Chief Executive Officer  
Dams Safety NSW