



I N L A N D  
R I V E R S  
N E T W O R K

---

PO Box 528, PYRMONT NSW 2009  
ph 0428 817 282  
email inlandriversnetwork@gmail.com  
web inlandriversnetwork.org  
ABN 34 373 750 383

Att: Contact Planner  
Jack Turner  
Department of Planning and Environment  
Locked Bag 5022  
Parramatta NSW 2124

Thursday 15 December 2022

Dear Mr Turner

**Objection:** Ulan Mod 6 – underground mining extension (SSD MP08\_0184-Mod-6)

The Inland Rivers Network (“IRN”) is a coalition of environment groups and individuals that has been advocating for healthy rivers, wetlands and groundwater in the Murray-Darling Basin since 1991.

IRN is very concerned about the permanent impacts of mining on groundwater sources and connectivity to surface water streams. The assessment for the modification identifies increased drawdown of groundwater. The report recognises that:

‘Groundwater intercepted from the mining area is considered a direct take (or incidental take) from the Permian groundwater system, whilst the changes in flow occurring within the Quaternary alluvium and rivers resulting from depressurisation of the underlying Permian is considered an indirect or passive take of water.’<sup>1</sup>

IRN objects to any further modification to Ulan underground mining operations because of the cumulative impact on groundwater sources drawing down base flow to the Talbragar River, an important tributary of the Macquarie catchment in the northern NSW Murray-Darling Basin.

The cumulative loss of base flows to the Talbragar River from the Ulan West underground mining operations and subsequent modifications has not been adequately reported or assessed in regard to the additional interception proposed in the Mod 6 underground extension.

Base flows to the Talbragar River are protected as planned environmental water under the NSW Water Management Act 2000. The cumulative loss of baseflows from mining activity is permanent over a very long timeframe and will not be returned through the holding of

---

<sup>1</sup> Glencore Ulan Coal. November 2022. *Modification Report* p54

groundwater licences. These losses are a net reduction in planned environmental water and therefore, do not meet the requirements of the Basin Plan.

IRN considers that the issue of increasing loss of planned environmental water through drawdown or 'indirect/passive take' of base flows must be reflected in the Water Resource Plan being developed for surface water sources in the Macquarie Valley.

The NSW Government has obligations under the Federal *Water Act 2007* to protect the health of inland river systems through Basin Plan agreements. The continuing impact on base flows to rivers will be extended through more extreme droughts and predictions of a drying climate in the Macquarie Valley.

IRN is concerned that the assessment report identifies that:

'Peak simulated inflows from the NSW Murray-Darling Basin Porous Rock Groundwater Source with the Proposed Modification will increase by 2,735 ML/year to a peak of 8,339 ML/year in 2026/27 and then reduce as the Ulan Seam becomes increasingly unsaturated at the end of mining and the groundwater system reaches a new equilibrium. UCMPL currently holds licences for 6,950 units of water allocation in this source. If the ML/unit share in that water source decreases below 1.2 ahead of 2026/27 (currently 1.25 ML/unit), UCMPL will need to acquire licence allocation in the NSW Murray Darling Porous Rock – Sydney Basin MDB Groundwater Source to support the extraction associated with the Proposed Modification.'<sup>2</sup>

The indirect/passive take of up to 8.3 GL of base flow to the Talbragar River from this porous rock aquifer is a critical issue that is not adequately addressed.

The increase in extreme weather events in the region can be attributed to a changing climate caused by coal extraction and combustion.

There is no acceptable justification for increasing mining extraction from Ulan underground operations to access a further 25 Mt of sequestered greenhouse gases and extend the mine life and its environmental impacts by a further 2 years.

Glencore has approval to extract 20 Mtpa of coal until 2033. There must be no further approvals allowing for increased extraction or an increased period of mine operation. This is critical for providing certainty to the surrounding community and to water management agreements to protect the health of river systems.

Yours sincerely

Brian Stevens

Secretary  
Inland Rivers Network

---

<sup>2</sup> Ibid p 55