

31 January 2023

Rose-Anne Hawkeswood
Department of Planning, Industry and Environment
GPO Box 39
PARRAMATTA NSW 2150

Dear Rose-Anne,

Whitehaven Coal Limited (Whitehaven) has prepared this letter to provide **comments** on the *Boggabri Coal Mine Modification 8 Amendment Report* (Modification 8 Amendment Report) and associated specialist assessments. Maules Creek Coal Pty Ltd (MCC), operator of the Maules Creek Coal Mine (MCCM) and Tarrawonga Coal Pty Ltd (TCPL), operator of the Tarrawonga Coal Mine (TCM) are subsidiaries of Whitehaven. The MCCM and TCM are located adjacent to the Boggabri Coal Mine (BCM), north and south of the BCM, respectively. The BCM, MCCM and TCM are collectively referred to as the BTM Complex.

It is understood that the following key changes to the approved BCM are proposed compared to those previously described and assessed in the *Boggabri Coal Mine Modification 8 to SSD 09_0182 Modification Report* (2021 Modification Report):

- Mining operations at BCM will now step below the Merriown Coal Seam from 2025 (as opposed to 2022 as previously described within the 2021 Modification Report (Hansen Bailey, 2021));
- A three year mine life extension (until the end of 2036) will now be required for the MOD 8 Amendment compared to the six year extension to the approved mine life (until the end of 2039) described in the 2021 Modification Report (Hansen Bailey, 2021);
- Recovery of an additional 28.1 Million tonnes (Mt) of ROM coal below the Merriown Coal Seam compared to the additional 61.6 Mt of ROM coal previously described within the 2021 Modification Report (Hansen Bailey, 2021);
- Maintain the currently approved extraction rate of 8.6 Mtpa of ROM coal (as opposed to the minor increase to 9.1 Mtpa of ROM coal previously described within the 2021 Modification Report (Hansen Bailey, 2021));
- Increase in the peak workforce at BCM to be 875 full time equivalent (FTE) employees from the 770 FTE employees previously considered within the 2021 Modification Report (Hansen Bailey, 2021); and
- Variations to the Conceptual Final Landform Design previously described within the 2021 Modification Report

A number of comments made by Whitehaven on the 2021 Modification Report continue to be relevant to the Modification 8 Amendment Report as summarised in Table 1.

Table 1
Whitehaven Comments on the Modification 8 Amendment Report

Reference/Finding	Whitehaven Comment on the 2021 Modification Report	Whitehaven Comment on the Modification 8 Amendment Report
The Groundwater Assessment found that following recovery of groundwater levels within the backfilled spoil, the BCM final landform would act as a source of seepage that: <i>...largely report to the adjacent Maules Creek and Tarrawonga voids....</i>	Whitehaven considers that the assessment could be improved through the use of appropriate modelling to estimate the additional seepage quantity and quality impacting on the MCCM and TCM.	Comment does not appear to be addressed in the Modification 8 Amendment Report documentation. There is no quantification of volume or quality, further work to quantify is recommended.
The Groundwater Assessment ¹ does not appear to consider the Roma or Brighton bores among the potential cumulative impacts on groundwater resources from the BTM Complex.	Cumulative groundwater impacts with the Roma and Brighton bores should be considered.	Comment does not appear to be addressed in the Modification 8 Amendment Report documentation.
The Surface Water Impact Assessment ² includes variations in the Conceptual Final Landform Design (Figures 3-1 to 3-4) and shows that that the proposed Completed Rehab Area infringes on the northern TCM boundary.	Further detail regarding the Conceptual Final Landform Design Completed Rehab Area along the TCM boundary should be provided including whether the use of Whitehaven-owned land is proposed.	Comment does not appear to be addressed in the Modification 8 Amendment Report documentation.
The Modification Report describes that a valley will remain between the BCM and TCM waste emplacements. The Evaluation of Final Landform assessment notes that ² : <i>...some planning will be required to manage runoff reaching that valley from the adjoining batter slopes.</i>	Whitehaven is requesting further consultation is undertaken regarding managing this runoff.	Whitehaven is requesting further consultation is undertaken regarding managing this runoff.
Modification 8 seeks to remove Schedule 3, Conditions 9 and 10 of SSD 09_0182 ³ . BCOPL alternatively propose that these conditions be amended to require additional noise attenuation only if the monitoring evidences a trend of noise exceedances at privately owned receivers.	The potential cumulative impacts with the MCCM and TCM regarding the removal of this condition should be further evaluated.	Comment does not appear to be addressed in the Modification 8 Amendment Report documentation.

Yours sincerely



Tony Dwyer
Group Manager – Approvals and Biodiversity

¹ Australasian Groundwater and Environmental Consultants Pty Ltd (2022) *Groundwater Impact Assessment Boggabri Coal Mine MOD 8 Amendment to SSD 09_0182*.

² Landloch Pty Ltd (2021) *Boggabri Coal Mine Evaluation of Proposed Changes to Final Landform – Modification 8*.

³ EMM Consulting (2022) *Noise Impact Assessment Boggabri Coal Mine Modification 8 – Amendment*.