

10 July 2025

Rose-Anne Hawkeswood  
Department of Planning, Housing and Infrastructure  
GPO Box 39  
PARRAMATTA NSW 2150

**RE: BOGGABRI COAL MINE MODIFICATION 10**

Dear Rose-Anne,

Whitehaven Coal Limited (Whitehaven) has prepared this letter to provide comments on the *Boggabri Coal Mine Modification 10 Modification Report* (Modification 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. MCC currently has a State Significant Development Application on exhibition for the Maules Creek Continuation Project (MCCP).

It is understood that the Modification Report proposes the following key changes to the approved BCM:

- An additional 85 hectares (ha) of disturbance within the Modification Disturbance Footprint which is located within the existing Project Boundary and beyond the approved Mine Disturbance Boundary. The existing Vegetation Corridor will be maintained as conditioned in SSD 09\_0182;
- Continuation of mining to recover coal down to the Templemore Coal Seam within the approved Mine Disturbance Boundary recovering up to approximately 15.4 million tonnes (Mt) of additional run-of-mine (ROM) coal resource;
- Mining within the Modification Disturbance Footprint will recover an additional 14.5 Mt of ROM coal down to the Templemore Coal Seam;
- An additional four years of mining activities until the end of 2040; and
- Changes to the conceptual final landform design (for MOD 8 and changes proposed for MOD 10) to reflect the additional overburden materials to be mined and the increase in mining area.

Whitehaven maintains regular dialogue with Boggabri Coal Operations Pty Ltd (BCOPL) in relation to the BTM Complex, MCCP and Modification Report. In preparation for lodgement of the Modification Report, BCOPL has consulted with Whitehaven to provide an overview of the Modification. Whitehaven is committed to continuing this constructive dialogue with BCOPL in relation to the Modification Report, MCCP application and the BTM Complex.

Whitehaven is supportive of the employment and economic benefits associated with the BCM and are supportive of ensuring that Whitehaven and BCOPL continue to work constructively on matters going forward.

We provide the following comments on the Modification Report in Table 1 below for consideration by BCOPL and the consent authority.

**Table 1: Whitehaven Comments on the Modification Report**

Reference	Comment
Appendix G: Biodiversity Development Assessment Report	Whitehaven acknowledges the detailed Biodiversity Development Assessment Report (BDAR) undertaken by BCOPL. Whitehaven notes the assessment approach differs, in some cases, to that taken by Whitehaven's experts and peer reviewer in the preparation of the MCCP BDAR in accordance with the requirements of the Biodiversity Assessment Method (Department of Planning, Industry and Environment, 2020).
Appendix I: Groundwater Impact Assessment	Whitehaven is appreciative of collaboration in the preparation of the cumulative assessment presented the GIA. Whitehaven welcomes continued engagement and collaboration with BCOPL with respect to the management of predicted cumulative groundwater impacts related to private landholder bores, and ongoing implementation of the BTM Water Management Strategy.
Appendix J: Surface Water Assessment	Whitehaven notes the proposed final landform and associated surface water drainage presented in Appendix J. Whitehaven welcomes continued engagement and collaboration with BCOPL to ensure a suitably integrated and free-draining landform between the BCM and TCM is achieved.
Appendix E: Air Quality and Greenhouse Gas Assessment	Whitehaven notes the cumulative assessment appears to only consider the approved MCCM and the proposed MCCP has not been accounted for in the cumulative assessment.
Appendix F: Noise and Blasting Impact Assessment	Whitehaven notes the cumulative assessment appears to only consider the approved MCCM and the proposed MCCP has not been accounted for in the cumulative assessment. Whitehaven welcomes continued engagement and collaboration with BCOPL with respect to the management of cumulative noise from the existing and proposed BTM operations, and ongoing implementation of the BTM Noise Management Strategy.

Please do not hesitate to contact the undersigned at TDwyer@whitehavencoal.com.au should you have any queries.

Yours sincerely



Tony Dwyer  
General Manager – Approvals

#### **References**

RWDI Australia Pty Ltd (2025) *Maules Creek Continuation Project Noise and Blasting Assessment*.

Todoroski Air Sciences Pty Ltd (2025) *Air Quality Impact Assessment Maules Creek Coal Mine Continuation Project*.