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Submission of Objection
Mod 8 – Ulan West Continued Operations

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 objects to the proposal to expand the Ulan Coal Mine (Mod 8) further into the catchment of the Talbragar River at the headwaters of the Murray-Darling Basin. The cumulative impact of groundwater and surface water interception is already too great and cannot be sustainably managed. An extension of groundwater interception until 2041 over an additional 1,734 ha of longwall mining is unsustainable.

The Talbragar River is an unregulated water source within the Macquarie River catchment at the headwaters of the Murray-Darling Basin. This major north-easterly rising tributary enters the Macquarie River below Burrendong Dam. It provides freshes to the regulated river system that can provide important natural flows to the Ramsar listed Macquarie Marshes.

The Talbragar River is regulated by the Macquarie-Bogan Unregulated Water Sharing Plan and is divided into the Upper and Lower Talbragar River water sources. The loss of baseflows from the Ulan West operations impacts both the Upper and Lower Talbragar. The Talbragar has been identified as having high instream value.¹

In dry periods the river can be intermittent with natural pools providing drought refuge for native fish species such as the threatened Murray Cod. Rules in the Water Sharing Plan

¹ NSW Office of Water, 2011. Report Cards for the Upper & Lower Talbragar River Water Sources.

prevent water extraction once the river has stopped flowing, to protect pools. The drawdown of base flows cannot be managed and continues to impact these important habitats after the cease to pump rule is in place thus intensifying and extending periods of no flow in the river system during dry times. This impact will become more significant during predicted climate change dry scenarios in the catchment. The purchase of water licences does not offset the impact on the river system when cease to pump rules are in place.

The loss of baseflows also impacts downstream water users and can trigger the cease to pump rule earlier than natural occurrence. The township of Dunedoo also relies on access to the Talbragar River for town water supply.

The Ulan West underground mine approved in 2010 caused a significant drawdown of baseflows to the Talbragar River. Water inflows to the mine have been greater than predicted in modelling. This demonstrates a greater interception of groundwater and surface water than assessed. Each successive mine expansion through subsequent modifications has increased the loss of baseflows to the river. The significance of this ongoing loss has not been adequately assessed for this large expansion of underground mining operations.

The Mod 3 expansion was predicted to cause a further loss of 67.525 ML/year. The Mod 4 expansion added another predicted 1.095 ML/year loss. The Mod 6 expansion model prediction was for increased loss of baseflows by another 54.35 ML/year peak loss in 100 years.

Mod 8 is predicting a further loss of 26.5 ML/year to baseflows. The cumulative loss on top of the original Ulan West approved prediction is another 149.47 ML/year.

It is significant that the modelling for each mine expansion has proven to underestimate the water volumes entering the mine through interception and damage to aquifer systems. The calibration of water models and construction of new models has masked the long term real impact on water sources through water interception and drawdown caused by longwall mining operations and subsidence.

The Talbragar River cannot lose further baseflows that will continue to be drawn down for hundreds of years.

The proposal to release an additional 105 million tonnes of greenhouse gas into the global atmosphere until 2041 will cause increased harm to water availability and river health through increased extreme heat, longer droughts and higher evaporation. The social, environmental and economic costs of climate change to the region have not been assessed.

Ulan Mod 8 must be rejected as an unsustainable development causing permanent damage to water resources in the Murray-Darling Basin.

For further information on this submission contact:
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