Mr Paul Freeman
Mining and Industry Projects
NSW Department of Planning and Environment
GPO Box 39 Sydney NSW 2001

10th June 2018

Dear Mr Freeman

RE: ANGUS PLACE MINE MODIFICATION 5 – WATER MANAGEMENT

I reject and object to the above current modification before Dept Planning and Environment on numerous counts.

This area **is** and has been previously used as a dumping ground with contaminated mining discharge and cracking of swamps without any consideration of the upland swamps in this location, or for the aquatic life (meaning headwaters of the Coxs River Ben Bullen State Forest/Newnes State Forest and downstream) or loss of natural surface water. There is no historic data to validate the surface water flow prior to underground mining. However, the swamps are one indicator for surface waterways historically given they were created in the last ice age 20,000 years ago. There is no real evidence of what the natural water flow will be after the connection of STWP or how long it will take water table to stabilise.

I reject the documentation that suggest that Long Swamp is not a listed THPSS – sub section Montane Peatland Swamp: ref: ©JBS&G Australia Pty Ltd | JBS&G54568- 113738 (R01_Rev1) 19

"*Long Swamp One of the largest swamps (wetlands) in the vicinity of the Angus Place pit top is the Long Swamp in the Upper Reaches of the Coxs River, mapped as Typha orientalis Wetland in accordance with DEC (2006)".* **REF 1:**

Wrong, the headwaters of the Coxs River and the Long swamp systems, including Kangaroo and Lambs Creek swamps are in fact Montane Peatland swamps. Hence my previous historic requests and remains a request to not rely on independent consultants which has been a failure for years and a high cost with loss of protected habitats. Just 20 minutes I find one document on the internet that clarifies the MPS (Montane Peatland Swamps) in Ben Bullen State Forest (hence my recommendation 2. Below): *Assessment of Montane Peatlands and Swamps EEC on NSW Crown Forest Estate Survey, Classification and Mapping Completed for the NSW Environment Protection Authority* **REF 2**:*https://cms.epa.nsw.gov.au/-/media/epa/corporate-site/resources/forestagreements/assessment-montane-peatlands-swamps-tec-160631.pdf?la=en*. There are other numerous resources, including Dr Ian Wrights documentation for this area. I am a mere volunteer for the natural areas for our local environment group here and yet I can find this information.

I have rejected and requested over and over again previously with no long wall mining in protected areas/vegetation. That being no underground mining under these

protected habitats full stop, EECs (Endangered Ecological Communities) within a known distance they will not impact those Communities.

I have rejected and requested over and over again previously that all mine water to be treated when discharged from the pit top to equal the same as the natural background which will be of neutral and beneficial effect. The only way to achieve this is desal/RO. It is noted that Centennial Coal includes in this modification by temporary measure. The requirement and be set by state/federal regulation *not* as a temporary requirement but a standard required practice.

Recommendation:

1. Comprehensive study needs to be conducted with initially not approving the current request of 10 mgl per day at this time as there is no real evidence based facts that will show that by allowing of this amount of water the current holding areas that we will not have further loss of surface water dependant habitats. We have over the years had far too many mistakes and errors which resulted in loss of endangered habitats, flora and fauna. Loss of surface water. The rate per day needs to be reduced.
2. Government staff (OEH, EPA, Water, Planning other relevant government agencies) to work alongside independent consultants and applicants in the field until evidence based facts shows no impacts presents. There be full cost recovery fee for service from the dept/s to the applicant. Equally there is a need for legislation of a registered government system for accredited consultants.
3. That there will be a temporary reverse osmosis mine discharge environmental flow until the surface affected areas by long wall mining recover to an identified adequate flow ensuring that below this area will have a adequate flow to support the existing economic sectors those being farming, boating, fishing, sailing, camping, recreational, accommodation and Tourism. This will also ensure continuity of water to achieve a water flow into Lake Wallace.
4. That there will be no emergency mine discharge water that will flow into our natural waterways without being reverse osmosis treated at the pit top.
5. That LDP 6 Western Coal Services discharge point has immediate action until connected to STWP that being comprehensive monitoring/reporting on the impacts it has until it merges near Maddox Lane, Lidsdale. Currently showing the highest level of electricity conductivity with most recent Western Coals Services report at 6,000 EC us/cm. This flows into Wangcol Creek and the Blue Lagoon (whilst it is the property owned by Energy Australia there is no monitoring of who may access legally or illegally to these areas or the contaminated water). Action being that this discharge is treated by a temporary plant for reverse osmosis on site at Western Coal Services. Western Coal Services and Energy Australia to have a monitoring program until temporary reverse osmosis is in place to ensure no person/s are accessing or entering those waterways which may cause immediate or long term health impacts. There are properties that neighbour to this land that may very well be accessing this water those being used for various needs i.e. watering for stock, water a race track to race/trot horses, people pumping to their properties for drinking or swimming in this water. *REF 3*: Maranatha Christian Camp, View St Lidsdale.

6. There is no doubt Long Swamp is still being affected by current and historic long wall mining with as recently as March 2018 side opposite to Maiyingu *Marragu* – Blackfellows Hands. Our group has monitored this part of the swamp, flow, EC, PH, flora and fauna for over 13 years and noted in March 2018 that the water table in this specific part of Long Swamp had drop in a matter of 2 weeks for a slow water flow, with a drop of ½ metre in water to bone dry. A swamp does not naturally dry out overnight, something has altered the flow to drop significantly. EPA and Centennial have been advised still waiting on a response on why this happened.*REF:4*
7. Comprehensive studies on the interconnection of water flow between old mine workings and new.

Thank you for accepting my submission.

Yours truly

Julie Favell

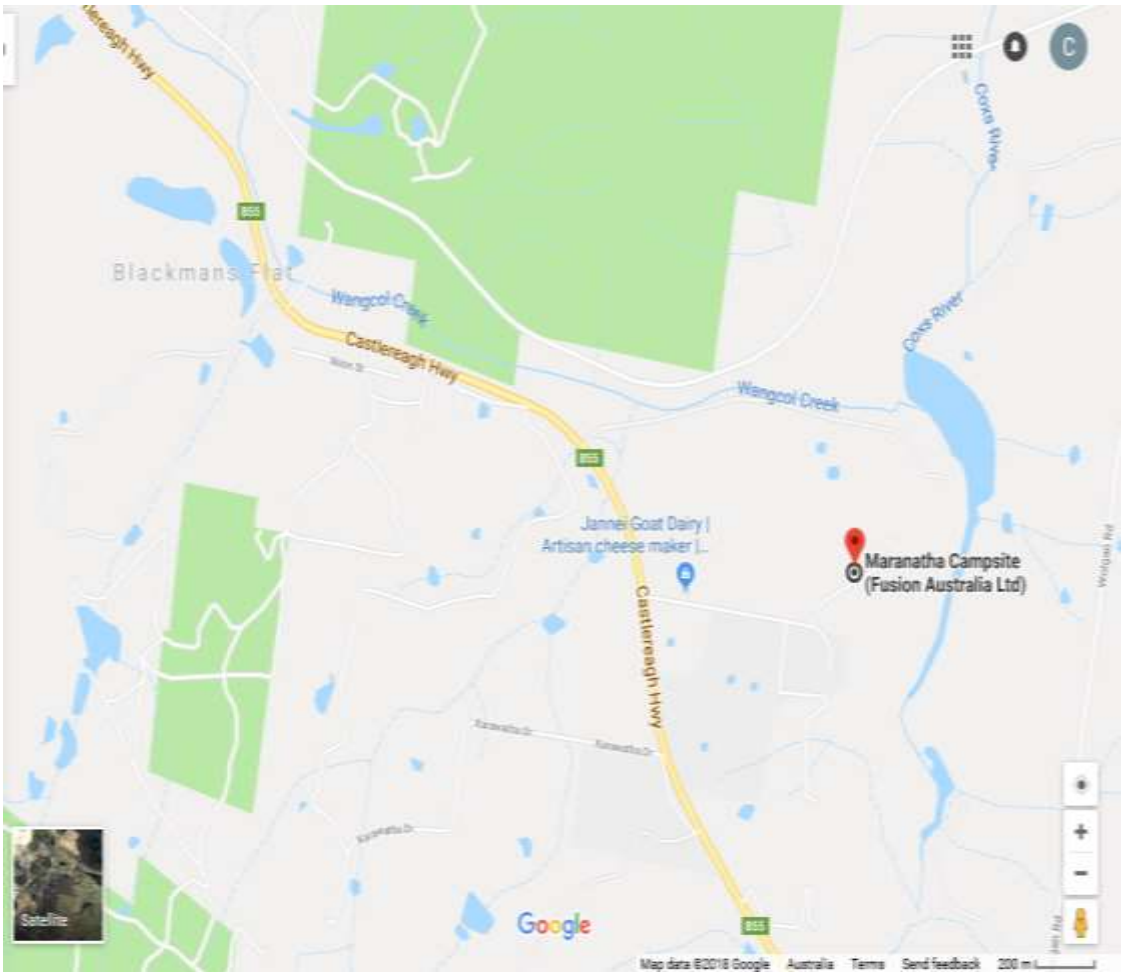
Lithgow

Ref 1:

Long Swamp One of the largest swamps (wetlands) in the vicinity of the Angus Place pit top is the Long Swamp in the Upper Reaches of the Coxs River, mapped as Typha orientalis Wetland in accordance with DEC (2006). Long Swamp is located on the Coxs River from above the confluence with Kangaroo Creek through to below the Haul Road Culvert. It is understood that Long Swamp is not considered to conform to an Endangered Ecological Community (EEC) under State or Commonwealth legislation, nor is listed as a high priority groundwater dependent ecosystem under the relevant schedule of the Water Sharing Plan for the Greater Metropolitan Region Groundwater Sources 2011 (NSW). The elevation of the thalweg, the line of lowest elevation, of Long Swamp ranges between 906mAHD at the upstream end to 896mAHD at the downstream end. The Coxs River, and Long Swamp, flows from north to south. In comparison, the elevation of Lithgow Seam, which is the mined seam at Angus Place, is 843mAHD at the upstream end of Long Swamp and is 859mAHD at the downstream end of Long Swamp. This means that Long Swamp lies above the Lithgow Seam. It is noted that the gradient, or dip, of the Lithgow Seam is from south-west to the north-east.

REF 2:*https://cms.epa.nsw.gov.au/-/media/epa/corporate-site/resources/forestagreements/assessment-montane-peatlands-swamps-tec-160631.pdf?la=en*

REF 3: Maranatha Christian Camp, View St Lidsdale..



Ref 4

The current groundwater level beneath Long Swamp is not known. It is possible that the vertical hydraulic gradient between Long Swamp and the Lithgow Seam has been impacted by mining activity in the past, since the mine portal (841mAHD at Angus Place pit top) was established in 1979. Prior to that, mining was undertaken at the Newcom Colliery to the immediate southeast of Angus Place pit top.

from 1949 to 1978

LONG SWAMP APRIL 2018 WOLGAN ROAD – OPPOSITE Maiyingu *Marragu* – Blackfellows Hands. Loss of water table within 2 weeks from slow constant flow to 1/2metre drop in water table to bone dry.

LONG SWAMP APRIL 2018 WOLGAN ROAD – OPPOSITE Maiyingu *Marragu* – Blackfellows Hands

LONG SWAMP APRIL 2018 WOLGAN ROAD – OPPOSITE Maiyingu *Marragu* – Blackfellows Hands

LONG SWAMP JAN 2017 WOLGAN ROAD – OPPOSITE Maiyingu *Marragu* – Blackfellows Hands

Grevillea acanthifolia subsp.*acanthifolia – Long Swamp, Wolgan Road, Lidsdale.* OPPOSITE Maiyingu *Marragu* – Blackfellows Hands

LONG SWAMP OCTOBER 2016 WOLGAN ROAD – OPPOSITE Maiyingu *Marragu* – Blackfellows Hands

LONG SWAMP MAY 2015 WOLGAN ROAD – OPPOSITE Maiyingu *Marragu* – Blackfellows Hands

LONG SWAMP MAY 2015 WOLGAN ROAD – OPPOSITE Maiyingu *Marragu* – Blackfellows Hands

LONG SWAMP DECEMBER 2014 WOLGAN ROAD – OPPOSITE Maiyingu *Marragu* – Blackfellows Hands