

Our Ref. D2015/75867

7 July 2015

Paul Freeman
A/Team Leader, Resource Assessments
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Mr Freeman

**Wongawilli Colliery Continued Operations Project Modification Application – Nebo Area
Application Number MP 09_0161**

I refer to your email dated 19 June 2015 providing a modification application for Wongawilli Colliery's Continued Operations Nebo Area and inviting WaterNSW's comments on the proposal, including advice on recommended conditions of approval.

WaterNSW objects to the mining of the north east corner of longwall 3 which is located within the Cordeaux Dam Notification Area. WaterNSW is concerned that longwall mining within the notification area poses unacceptable risks of interaction between surface and ground waters and mine impacted strata with a consequent loss of stored waters.

WaterNSW is concerned with the statement that the "modification application will also allow mining operations at Wongawilli to continue until the necessary approvals are prepared and sought for future mining in the Western Area".

WaterNSW reiterates the advice it provided in its primary submission to the Department in December 2010, objecting to the development of Western Drivage due to the following concerns:

- Prior approval of the drivage will result in considerable pressure being placed on assessment and approval authorities to approve future mining projects, which could compromise water quality and quantity.
- The piecemeal nature of the proposal means it would not be possible to assess the entirety of the impacts of the proposal (to understand the cumulative impacts) and for a more integrated approach to be taken to the management of impacts.
- There is potential for water from Avon reservoir to enter the Western Drivage. Mining occurred under Avon Reservoir in the late 1970's and early 1980's and there was a period when high inflows to the mine occurred over a protracted period. The then mine operator considered there was no hard evidence to prove the water make was from the reservoir, but the Dams Safety Committee considered this to be the source.

WaterNSW notes that this issue was addressed in the PAC determination report (dated 2 November 2011) which stated that their approval of the six longwalls and the drivage 'cannot be

construed as any form of endorsement of any aspect of future expansion project. 'WaterNSW also notes that the modification application does not address this issue.

If the modification application is recommended for approval please amend all references to the former Sydney Catchment Authority to reference Water NSW.

WaterNSW would appreciate being involved with any further environmental assessment and consultation process associated with the modification application and any further opportunity to provide comments.

Yours sincerely



ROSS WALLIS
A/Manager Catchments