

Your reference: Our reference: Contact: Date: 05\_0117 / 08\_0135 DOC15/286018 David Geering 6883 5335 31 July 2015

Paul Freeman Senior Planner, Resource Assessments NSW Department of Planning & Environment GPO Box 39 Sydney NSW 2001

Dear Paul

## RE: Moolarben Coal Project Modifications (05 0117 MOD 12 & 08 0135 MOD 2)

Thank you for your invitation for the Office of Environment and Heritage (OEH) to comment on the proposed modifications to the Moolarben Coal Project (05\_0117 MOD 12 & 08\_0135 MOD 2).

OEH is concerned about the number of modifications that have been lodged for Moolarben. OEH considers that it is inappropriate for a modification application to be lodged over an area also subject to an application of another modification that has yet to be determined by the Department of Planning & Environment (DPE). There is an assumption by the proponent that 05\_0117 MOD 11 & 08\_0135 MOD 1 will be approved.

OEH understands that this modification proposes to:

- relocate the central mains heading to the north-east of the proposed UG1 ModML longwalls so that there will now only be five longwalls,
- lengthen the longwall panels to the north-east by approximately 150 to 500 metres,
- lengthen two of the longwall panels in the southwest by approximately 75 metres,
- widen the longwall panel void from 305 metres to 310.8 metres,
- increase the coal seam extraction height by approximately 300 millimetres to a maximum extraction height of 3.5 metres and
- construct remote services facilities, rear air intake shaft and associated fan and a coal conveyor.

The total surface disturbance area to native vegetation will be approximately 8.4 hectares while an additional 115.7 hectares will be subject to subsidence. OEH understands that the impacts of this modification will not have any implications in the current offsetting ratios within the existing Biodiversity Offset Strategy (BOS) as this modification results in less surface impact than the approved Stage 2 components no longer being implemented, e.g. the realigned haul road proposed in Mod 11. The current BOS developed for the Stage 2 Project, adequately covers the proposed impacts from the proposed modification.

OEH has no specific concerns regarding the impacts to native vegetation or biodiversity as a result of this modification. However, OEH notes that the proposed modifications to UG1 have resulted in increased subsidence predictions over the UG1 panels. The maximum predicted subsidence has

PO Box 2111 Dubbo NSW 2830 Level 1 48-52 Wingewarra Street Dubbo NSW Tel: (02) 6883 5312 Fax: (02) 6884 8675 ABN 30 841 387 271 www.environment.nsw.gov.au increased by 20% from 1980mm to 2380mm. This increase has been influenced by the increased panel width to depth ratios, increased panel lengths and the reduced pillar width to depth ratios.

OEH notes that the 26.5 degree angle of draw line has been conservatively determined to be at a horizontal distance of between 18 and 88 metres from the edge of the proposed longwall voids. OEH therefore understands that significant natural features such as The Drip are not expected to be adversely impacted by this proposal. However, OEH does note that there are additional areas that lie outside the UG1 study area that are expected to experience either far-field movements, or valley related upsidence and closure movements. A number of surface features that may be impacted have been identified in the report. While natural features such as The Drip are not included, OEH would appreciate assurances that no significant natural features are likely to be adversely impacted by underground mining.

Should you require further information regarding issues that are the responsibility of the OEH please contact David Geering, Conservation Planning Officer on (02) 6883 5335 or david.geering@environment.nsw.gov.au.

Yours sincerely,

SONYA ARDILL Senior Team Leader Planning North West Region