

Our Reference: PB:MR  
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19 August 2013

Mr David Kitto  
Director Mining & Industry Projects  
NSW Department of Planning & Infrastructure  
GPO Box 39  
SYDNEY NSW 2001

Dear Mr Kitto,

**Re: Boggabri Coal – Modification 2 – Processing of Tarrawonga Coal**

I refer to the exhibition of the Environmental Assessment (EA) of the Boggabri Coal Project Modification (the Modification). The Narrabri Shire Council appreciates the opportunity to provide comment on the environmental assessment for the Modification.

The Environmental Assessment Report in respect of the Modification has been reviewed and found to address the key environmental concerns. However, Council makes the following comments and requests:

**1. Justification and Need:**

Council supports the use of shared coal handling, processing and transport infrastructure between the two mines resulting in greater efficiencies and fewer environmental impacts. The EA states the Modification will also enable cessation of ROM coal transport along public roads.

***Council requests that the NSW Department of Planning ensure all future coal mining projects in the LGA plan and incorporate these same transport infrastructure efficiencies and resulting reduction in environmental impacts. ROM coal transport is not supported along public roads.***

Council's understanding is that the Modification will enable cessation of ROM coal transport along the public road to Whitehaven's CHPP in Gunnedah, however, there will be no net decrease in coal transport if this is replaced by production from Whitehaven's Vickery coal project (this was addressed in the Council's submission on the Vickery Project).

**2. Water Management/Conservation**

It is noted that the Modification will result in an increased CHPP water demand at the site and an increased water deficit in Years 2 to 17 of the Tarrawonga Coal Project (i.e. 2014 to 2030) due to the processing of Tarrawonga coal at the Boggabri Coal CHPP. Also, in the driest year in year 5, possibly 84% (1,475ML) of the project's water demand (1,755 ML) will need to be sourced externally from

surface and groundwater licences. Water demand for the CHPP has increased from the initial projections (i.e. without the introduction of Tarrawonga coal) and is forecast to use a minimum of 189 ML/yr of raw water (section 5.4.5). Despite the project having enough supply from external water supply licences (depending on the water level in Lake Keepit Dam) and, in the worse case, reducing coal production to match water supply, Council is concerned with the possible pressure on water resources and other users in the driest years.

***Council requests that in addition to describing measures that would be implemented to minimise clean/raw water use on site, that the proponent describes maximum values of raw water to be used in the Boggabri Coal CHPP and a commitment to a program of continual improvement to reduce (through process improvements or management) the raw water demand in the CHPP in any Water Management Plan.***

### **3. Air Quality Impact**

It is noted that the annual dust emissions are forecast to increase by 13% (section 4.1, Appendix C) in comparison to the estimates from the Boggabri Coal Project. Because the location of the sources of the emissions of dust is not changing, the proponent considers the air quality monitoring and management systems required by Project Approval (09\_0182) for the Boggabri Coal Mine to be suitable for the Modification. However, Council is concerned with the incremental increase in dust emission, as in the Modification, and the possible negative cumulative effect on the environment.

***Council again requests that a Regional Air Quality Monitoring Network be established in the Gunnedah Basin due to concerns with loss of amenity and potential health effects from dust emissions emanating from increased open cut coal mining.***

Should you require further information on this matter, please do not hesitate to contact myself on 02 6775 6857 or by email to [paulb@narrabri.nsw.gov.au](mailto:paulb@narrabri.nsw.gov.au) .

Yours sincerely,



Mr Paul Bawden  
**DIRECTOR PLANNING AND DEVELOPMENT**