

Dear Dept of Planning and Environment,

Please accept this letter as a response to the proposed establishment of the Boggabri Coal bore field and its implications.

We are not supportive of the establishment of a bore field as outlined in the documents provided as Modification 5. The reasons for this are;

- We have great reservations as to the ability of any hydrological study to accurately (without uncertainty) predict the water drawdown and hence impact on neighbouring properties. The study itself states that 'model predictions are subject to uncertainty' and that there is 'significant uncertainty regarding the properties of the groundwater system in locations where data have not been collected and under conditions not encountered during the monitoring period.'. Given that neither of our two bores listed in the study have been tested, and that there is an additional bore located on our property that is located well within the 2m (average weather) drawdown contour line, is of great concern.
- We believe that the extensive Plains Grass community located in close proximity to the bore field has some interaction with the present groundwater system. The hydrological study includes Plains Grass communities as having potential to have reliance on subsurface groundwater. The study dismisses the importance of these communities. However, as these Plains Grass communities are a major resource for grazing enterprises, any impact on the productive nature of these grasses has a direct and measurable affect on grazing businesses. This is of great concern.
- The mapping provided for ground water dependent ecosystems (Shown in submission as Fig 5.5) depicts a very different representation to that of the visual topography. This figure indicates that the elevated rocky outcrop known as Barber's Pinnacle has a greater potential connectivity to groundwater than the low lying Plains Grass communities. This illustration seems to be erroneous.
- We note that the proposed bores are located within the 200m neighbouring property boundary limits set out in the Namoi Water Sharing Plan and this of concern.
- The water drawdown predictions indicated in the hydrological study show that the groundwater is predicted to be lowered by >2m (at either average weather or dry period scenarios) at all bores located on our property. This is unacceptable as it poses a potential significant impact on our production capacity.
- The make good provisions indicated are not viewed by us as sufficient. It is our view that by the time make good provisions are implemented it is too late. Water is essential to neighbouring businesses and by the time make good provision/s are implemented there would have already been economic loss suffered.

If the Dept of Planning and Environment is to approve the bore field we seek that a condition of the approval be that Boggabri Coal must first gain the consent of neighbouring landholders that are potentially affected by >2m water drawdown (in either average or dry scenarios). We would seek that the Department include a compulsory acquisition clause including neighbouring properties affected by >2m water drawdown (in either average or dry scenarios).