

Upper Goulburn Water Users Association

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Submission Objecting to Ulan Mine Modification 4

Upper Goulburn Water Users Association represents landholders with property fronting the Upper Goulburn River water source who have basic rights access to river flow and licenced entitlement.

The Upper Goulburn River water source is recognised as a groundwater dominated system with high hydrological stress.¹

Our membership has seen the gradual decline in the health and water quality of the Upper Goulburn River since large scale mining operations commenced in 1985 at Ulan Coal Mine. The destruction of the alluvial aquifers at the top of the river and interception of base flows through subsidence of Triassic sandstone aquifers has impacted on the availability of surface flows, particularly through periods of low rainfall.

The Association objects to the proposed expansion of longwall mining at Ulan Mine through the Modification 4 application because the cumulative loss of base flows to the Upper Goulburn water source over time has not been assessed or reported.

The approval of the Wilpinjong Mine in 2006 and Moolarben Mine Stage 1 in 2007 and Stage 2 in 2015 has caused a significant cumulative impact on groundwater sources and surface flows to the river system.

The volume of water now stored across the three mine sites has been removed from the river system. The trading of water licences upstream to compensate for groundwater interception and allow for extraction of surface flows is contrary to the principles of the Hunter Unregulated and Alluvial water sharing plan gazetted in 2009.

The Association objects to the fact that the river is now highly dependent on the discharge of water intercepted by mining, particularly the large volumes held on the Ulan Mine site.

The decision by Ulan Coal Mine to divert water away from releases to the river and onto irrigated land at Bobadeen in December 2017 impacted on downstream water users through the total loss of surface flow.

¹ NSW Department of Water and Energy, 2009. Upper Goulburn River water source - Report Card 30

Although storm events occurred during the summer in parts of the catchment causing flow in tributaries, the main stem of the river was unseasonably dry due to capture of rainfall and base flows on mine sites and the loss of mine water discharge.

The Association objects to further interception of base flows to the river system through this proposed extension of longwall mining operations.

It is imperative that the discharge of intercepted river water be released from the mine sites under a set of legal rules that provide for natural low flows during dry climatic conditions.

The regulated permissible maximum EC 900 $\mu\text{S}/\text{cm}$ of water discharged by Ulan Coal Mine is nearly twice the median ambient stream EC measured upstream prior to the expansion of coal mining in the mid-1980s. The salinity limit for all mine water discharges should not exceed EC 500 $\mu\text{S}/\text{cm}$.

The discharge of large volumes of water from Ulan Mine should be regulated so that they mimic natural flow events and reflect background salinity levels. This is essential to restore variability into the river system, provide good quality water for downstream users in times of low flow and compensate for the scale of flow interception.

We consider that the technical reports provided with the application to expand Ulan operations, yet again, are an inadequate assessment of the cumulative impacts of mining on the Upper Goulburn River water source.

The impacts of mining on downstream water users, over time, has not been addressed.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Ted Finnie', on a light-colored rectangular background.

Ted Finnie

On behalf of Upper Goulburn River water users