

Friday 6 November 2015

SUBMISSION OBJECTING TO: BYLONG COAL PROJECT: SSD 14_6367

Thank you for the opportunity to make the following comments on the proposed Bylong Coal Project.

The proposal by KEPCO to construct and operate an open cut and underground mine in the environmentally unique Bylong Valley, a highly productive agricultural ‘green-field’ site rimmed by spectacular fragile sandstone cliffs and escarpments is neither a compatible nor sustainable land use based on environmental, social and economic reasoning.

In summary:

- There is a direct conflict between the mines predicted water use (that equates to 75% of estimated recharge) and the legal requirement to protect the hydrological function of the Bylong alluvial water source. The requirements of the mining industry appear to be placed above the needs of other water users including irrigators and the environment including floodplain GDEs.
- The hydrological modelling has not presented the true range of possibilities and uncertainties that may result from this project on which an informed decision should be based. This includes the extent and depth of the drawdown footprint, change to water quality over time, cumulative impacts on low flows and sustainable groundwater yield. The proximity of Lee Creek and Bylong River alluvial water source to the open cut places them at high risk of permanent irreparable damage. The downstream Goulburn River water source is also vulnerable to increasing cumulative salt loads and loss of base flows during critical low flows. **Models cannot be relied upon to predict what will happen in the future but rather to identify what is unlikely to happen.**
- The stratigraphic profile and ‘interburden geology’ above the longwall panels has not been characterized or adequately assessed. Specifically there is minimal if any

detailed characterisation of the Triassic sandstones (Narrabeen Group) and Tertiary basalt hydrogeological units and groundwater inflow to the alluvial system, and contributions to stream baseflows in the valley floor.

Predicting the interaction between hydrogeological units, alluvium and surface water resources is speculative without suitable baseline assessment of all groundwater units. It is entirely possible that the Narrabeen Group hydrogeological units are contributing valuable 'fresh' groundwater flows to the alluvial system in the valley floor.

In conclusion the proponent has not established that the long term impacts of this project on water resources, agricultural land, social amenity and environmental values is outweighed by the claimed economic benefits.

Yours sincerely,

J E Imrie