



WILPINJONG COAL PTY LTD

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2 November 2015

Minister for Planning
c/- Director, Major Project Assessment
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Attention: Stephen O'Donoghue

Dear Stephen



**RE: Submission - Bylong Coal Project Environmental Impact Statement
[SSD 14_6367]**

Background

The Wilpinjong Coal Mine is located approximately 40 kilometres north-east of Mudgee within the Mid-Western Regional Local Government Area, in central New South Wales (NSW) and is owned and operated by Wilpinjong Coal Pty Ltd (WCPL).

Wilpinjong Coal Mine, in accordance with Project Approval 05-0021, can dispatch an average of six laden trains each day and a maximum of 10 laden trains on any day for railing east on the Sandy Hollow-Gulgong Railway to domestic power generation customers and the Port of Newcastle.

In addition, the Wilpinjong Coal Mine (in conjunction with Mid-Western Regional Council, Ulan Mine Complex and Moolarben Coal Complex) makes financial contributions proportionate to its share of mining-related traffic on Ulan Road in accordance with the Ulan Road Strategy, which is resulting in significant road upgrades and ongoing road maintenance on Ulan Road.

As you would be aware, WCPL is currently preparing an Environmental Impact Statement (EIS) to seek approval from the NSW Minister for Planning for a new Development Consent under Division 4.1 of Part 4 of the NSW *Environmental Planning and Assessment Act, 1979* for the Wilpinjong Extension Project, which includes significant open cut extensions, a seven year extension to the approved Wilpinjong Coal Mine life and continuation of currently approved rail movements (i.e. no change to existing approved average and maximum daily rail movements to and from the Wilpinjong Coal Mine).

Bylong Coal Project

WCPL has reviewed key aspects of the Bylong Coal Project EIS that is currently on public exhibition, and has identified the following items of concern relating to road and rail transport.

Rail

WCPL notes that Section 3.5.3 of the Bylong Coal Project EIS (Hansen Bailey, 2015) states:

Whilst train movements will vary depending on factors such as production, sales and availability in the transport chain, the [Bylong Coal] Project is estimated to require an annual average of two return train movements per day, with a peak of ten return train movements per day to transport the product coal from the site at any one time.

The Bylong Coal Project EIS Noise and Blasting Impact Assessment (Pacific Environment Limited, 2015) also states:

The [Bylong Coal] Project is expected to generate on average up to 500 trains per year with a maximum of 720 trains per year. ...

The report then goes on to explain this equates to a maximum of 1,440 rail movements (i.e. in both directions) in one year, based on a 8,600 tonne payload train.

The above descriptions correspond to a maximum of 20 additional rail movements (in both directions) per day.

Section 7.18.1 of the Bylong Coal Project EIS (Hansen Bailey, 2015) also highlights the following current rail capacity constraint at the Bylong tunnel:

... Capacity constraints which currently exist on the Sandy Hollow to Gulgong Railway are due to ventilation in the Bylong tunnel, with train spacing and track maintenance limited by the 'purge times' for air in the tunnel. Minimum operating frequency of 20 minutes between trains is required to address this ventilation issue.

There is currently adequate capacity for all contracted volume on the rail network.

It is noted that in July 2015, Australian Rail Track Corporation (ARTC) released the 2015-2024 Hunter Valley Corridor Capacity Strategy (ARTC, 2015). This report provides no ARTC resolution of the existing ventilation issues at the Bylong tunnel during its current 10 year planning window.

Accordingly, it is not clear how the above stated rail paths could be accommodated without some potential impact on existing approved operations and WCPL therefore requests the Department seeks clarification from ARTC.

Section 7.18.3 of the Bylong Coal Project EIS goes on to state (Hansen Bailey, 2015):

... the [Bylong Coal] Project will require an average of up to 2.1 trains per day at peak operation, averaging 1.4 trains per day over the period of 2017 to 2027 (i.e. PY 2 to 12). This assumes that standard 96 wagons (9,200 t payload) are used (i.e. the existing ventilation issues as discussed in Section 7.18.1 are resolved).

There is adequate capacity of the Sandy Hollow to Gulgong Railway Line to accommodate the [Bylong Coal] Project as well as other mines in the MWRC LGA.

The above conclusion appears in part to be based on the assumption that the ventilation issues in Bylong tunnel are resolved, and that the approved Cobbora Coal Project may not proceed. Whilst this could be the case, the alternative could also prevail (i.e. the Cobbora Coal Project could proceed, as it has obtained NSW Government approvals).

WCPL therefore requests that the Department seeks confirmation from ARTC and the Hunter Valley Coal Chain Coordinator that KEPSCO can secure sufficient coal train paths on the Sandy Hollow-Gulgong Railway and meet cargo assembly requirements at the Port of Newcastle to efficiently operate the Bylong Coal Project (i.e. up to 1,440 train movements per annum and up to 20 additional rail movements per day). Without in any way adversely affecting the availability of existing and future Wilpinjong Coal Mine coal train paths and scheduling, particularly if the existing ventilation issues at the Bylong tunnel are not resolved, and/or the approved Cobbora Coal Project proceeds.

To reiterate, please note that WCPL is not proposing any change to the frequency of currently approved maximum daily train movements from the Wilpinjong Coal Mine for the Wilpinjong Extension Project.

Road

Figure 4.1 of the Bylong Coal Project EIS Traffic and Transport Impact Assessment shows that some 85% of staff trips and some 80% of heavy and light vehicle deliveries to the Bylong Coal Project would be via Wollar Road and also states (Parsons Brinckerhoff, 2015):

In general, the majority of light vehicle trips generated by staff movements during the operational years are expected to come from Wollar Road from Mudgee and surrounds.

In addition it is noted that this same report also states that a proportion of service and delivery heavy and light vehicles are likely to use Golden Highway, Ulan Road and Wollar Road to access the Bylong Coal Project.

WCPL therefore requests that the Department seeks confirmation from KEPSCO that the Bylong Coal Project would financially contribute to the Ulan Road Strategy road upgrades and road maintenance program proportional to its contribution to total future traffic on the length of Ulan Road.

Summary

WCPL does not object to the proposed Bylong Coal Project.

WCPL however requests that, should the Bylong Coal Project be approved, it would be on the condition that it causes no future restriction on the availability of currently available Wilpinjong Coal Mine train paths and scheduling, and KEPCO would contribute proportionally to the financial costs of Ulan Road Strategy implementation.

Yours sincerely,
Wilpinjong Coal Pty Ltd

A handwritten signature in black ink, appearing to read 'Blair Jackson', followed by a long horizontal line extending to the right.

Blair Jackson
General Manager
Wilpinjong Coal Pty Ltd