"Reclaiming our Valley"

Hunter Communities Network

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Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

Wednesday 25 July 2018

Submission of Objection
Dartbrook Mod 7

Introduction

The Hunter Communities Network (HCN) is an alliance of community based groups and individuals impacted by the current coal industry and concerned about the ongoing rapid expansion of coal and coal seam gas exploration and mining in the region.

HCN objects to the Dartbrook Modification 7 for the following reasons:

1. Groundwater impacts
2. Increased pollution
3. Social impacts
4. Subsidence
5. Greenhouse gas emissions
6. Planning considerations

Key Issues

1. Groundwater impacts

The Environmental Assessment (EA) notes that 3 ML/wk (or 156 ML/yr) of Hunter River alluvial water has been seeping into the Hunter Tunnel at the Dartbrook Mine. The EA does not describe how long this seepage has occurred for or what volume of alluvial aquifer licences are held by the mine.

HCN is concerned that it is not known whether the alluvium contains water at the location of the proposed new shaft into the Hunter Tunnel. It is critical that this information be gained prior to any further decision-making on this project.

The predicted groundwater seepage from the Permian aquifer into the Hunter Tunnel is considered to be negligible, however, this should be added to the predicted seepage from the

hard rock aquifers into the proposed Kayuga seam workings, so that cumulative volumes of seepage is understood.

The Dartbrook Mine falls within the Muswellbrook area identified by the Federal Bioregional Assessment Report for the Hunter subregion (June 2018) with a potential of hydrological change caused by mining impacts. The area needs to be subject to more localised assessment to understand the cumulative impact on the hydrology of the landscape including the groundwater and interconnected surface water systems.

The assessment of impacts on water sources from this proposal has not included an adequate assessment of cumulative impact in regard to the potential for hydrological change due to mining in the vicinity of the Hunter River.

The high volume of water currently being managed through evaporation ponds on the Dartbrook Mine site indicates a far larger volume of groundwater interaction than outlined. The report indicates that discharge into the Hunter River is unlikely to be required because the mine water balance will use available water.

There needs to be further information on the mine water balance, extraction licences from the Hunter River and available credits in the Hunter Salinity Trading Scheme if discharge of mine water is required.

2. Increased pollution

The project will increase the background noise and dust levels. The Muswellbrook Air Quality Monitoring Network regularly records exceedances of the national standards for PM_{10} dust particles with current mining operations.

The proposal to have an average of 192 truck movements daily, 11 hrs/day, 5 days/wk is a major increase of a noise and dust pollution source close to the town of Aberdeen.

Communities living near mining operations are unfairly treated with no consideration of long term health impacts and increased costs to the public purse.

The Voluntary Acquisition and Mitigation Policy and the Policy for Industrial Noise do not protect the health of mine neighbours.

3. Social impacts

The identification that a large number of nearby residences will be impacted by noise and dust exceedances is unacceptable. The predictions from noise and air quality models are regularly proved to be incorrect. This places an enormous level of stress on surrounding communities and inevitably results in more properties being impacted than predicted.

The level of property ownership by mining companies around the Bengalla, Mt Arthur and Mangoola mines is testament to the scale of cumulative social impact experienced in this area of the Upper Hunter.

HCN objects strongly to extending the life of this mine by 5 years. It has been sitting in care and maintenance, providing no public benefit through royalties, taxes or employment for 12 years. The approval should have expired.

The level of uncertainty for the surrounding community should not be increased.

The EA fails to assess the social impacts of the proposal under the new Social Impact Assessment Guidelines.

4. Subsidence

The further work required to determine the extent of disturbance and size of voids generated by the Wynn Seam longwall panels needs to be carried out prior to any decision being made on this bord and pillar mining proposal.

5. Greenhouse Gas Emissions

The EA fails to address the scale of fugitive methane emissions from the Dartbrook Mine during the period of care and maintenance.

The mine is a very gassy mine and has been flaring methane for many years. The Greenhouse Gas Emissions assessment significantly underestimates the emissions from this mine.

Therefore, the CBA estimate of external costs associated with predicted environmental impacts, including greenhouse gas emissions based on the assessment report, is vastly under stated.

HCN proposes that a gas-fired generator would be a more sustainable use of the coal seams at Dartbrook Mine than the current proposal to produce approx. 1 mtpa product coal.

6. Planning considerations

This proposal should not be assessed as a Part 3A modification under 75W of the NSW Planning legislation. This proposal is for a new form of mine with distinctly different operations and impacts.

It should be required to be resubmitted as a new project.

Conclusion

For the reasons outlined above, this proposal should be rejected because of the existing cumulative environmental and social costs of mining in the Muswellbrook area.

The assessment has a range of missing information and cannot be relied on.

For more information please contact

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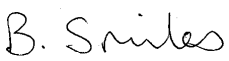
Yours faithfully



Convenor