

NSW Government Planning and Infrastructure
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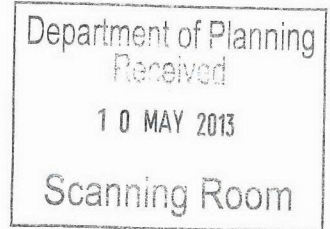
Attention: Director Mining and Industry Projects

**Ref: Shenhua Watermark Coal Mine
Application SSD 4975 Watermark Coal Project**

Submission by **A.A.(Sandy) Blomfield**

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I have no objection to the Department of Planning and Infrastructure using anything contained in this submission as the Department describes in its Privacy Statement.

I have examined the Draft Submission by Earth Systems on behalf of CCAG and support the findings and shortcomings expressed within that submission.

I am not a member of any Political Party and have not made any donations to any Political Party or Independent Member during the past twenty years.

I am a member of Carroona Coal Action Group (CCAG).

I was a member of the Namoi Catchment Water Study (NCWS) Working Group Chaired by Hon Pam Allan, and a member of the NCWS Stakeholders Advisory Group (SAG).

As a member of the NCWS Stakeholders Advisory Group I am fully aware of the findings and limitations of the NCWS model and report by Schlumberger Water Services (SWS) which consistently states that there is insufficient data available to make indisputable reliable predictions about water quality and aquifer impacts as a consequence of coal mining and CSG extraction throughout the Namoi Catchment.

Unless there is indisputable evidence that no surface water and groundwater resources will be contaminated or unsustainably extracted through coal mining or CSG extraction, the *Precautionary Principle* must dictate that project approval should not be granted.

It must also be assumed that BHP Billiton will soon be submitting an EIS for their Carroona Project and that there would be considerable cumulative impact arising from the adjoining developments.

Shenhua Watermark Project cannot therefore be assessed as a stand alone development..

I make the following commentary in reference to the Watermark EIS and some issues raised in the CCAG submission.

- **The reliability (or unreliability) of Aquifer Drawdown levels is not addressed**
- **The model assumes no direct connectivity between permian units and alluvial aquifers within the project area.**

This area (as does BHP Carroona) lies within **Alluvial Zone 7** in which SWS table 5.10 indicates **the potential risk to the groundwater resource to be high.**

SWS report Fig E5 indicates predicted drawdown levels in excess of 5mtrs for the elevated area and in excess of 0.2 – 2mtrs for the alluvium within the Shenhua Watermark Project and BHP Carroona Project areas

SWS report table 5.11 shows that due to insufficient data the degree of predictive confidence is Low for Zone 7.

However in qualifying the risk SWS states: ***This conclusion is derived from a number of factors including the high sensitivity and uncertainty associated with the predictions in these zones as well as the high impacts predicted*** SWS report page 71.

The predicted potential drawdown of greater than 2mtrs within the alluvium and 5mtrs on the ridges are both greater than allowable under NSW Aquifer Interference Policy (AIP).

- **There is a clear discrepancy or contradiction between the statement (table 29) that: “the mine water management system will have the capacity to contain all mine water on site without the need for off-site releases” and “water will only be released from the site if water quality is acceptable or during a rainfall event that exceeds the design capacity of the sediment control systems.” (Apend S)**

Due to seepage alone through disturbed soil structure there would be unacceptable salt and heavy metals contamination of stock and domestic and irrigation aquifers and surface discharge areas. No mine water containing salt or heavy metals and toxins (which do not appear to be adequately considered in the EIS) should be permitted to infiltrate those water resources intentionally or through inadequate provision to contain waste water regardless of the extremity of a rainfall event.

Water quality and quantity sustainability are critical to far reaching environmental issues as well as increasingly critical global agricultural production and domestic requirements. This is extremely significant for the Liverpool Plains which has an area production record 40% above the National Average. (DPI)

I do not have any direct qualifications to make expert comment on Air Quality, Infrastructure and Cultural issues but have confidence to support the CCAG submission on these issues.

My personal observation of apparent mining best practices suggests that no past open cut coal mine has come close to containing dangerous dust levels, adequate noise suppression or lighting containment. I see nothing in the EIS to suggest Watermark would be any different.

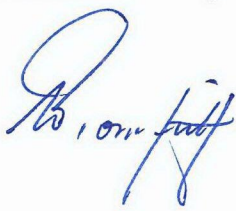
I have not observed adequate upgrade of associated infrastructure, provision for increased related community services or respect of cultural history or practices.

I do not see any strategy to eliminate a two speed local economy while mining is active or to provide a strategy for periodic production downscaling or inevitable mine shutdown.

I have experience and a degree of knowledge in pasture establishment, biological diversity and sustainable pasture management, and I have never seen coal mine site rehabilitation which will create highly productive sustainable agricultural production. I do not see any program in the Watermark EIS which will address the non balance of soil structure and nutrients created by large scale disturbance or the release of salts and non compatible heavy metals.

I do not believe any of the above issues are satisfactorily addressed in the Watermark EIS .

Based on the limited water issues I have mentioned I believe that the potential risk to water resources alone is justification for rejecting the Shenhua Watermark Coal Project EIS.



8/5/13

A.A. (Sandy) Blomfield