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Wholly object to the Whitehaven Vickery Extension (or Vickery Coal Pty Ltd as they are now working under) and the construction of the Rail spur across the Flood plain:

The Vickery Extension Project if approved, will have serious implications for numerous residents nearby. The implications are much greater than the original approval predominately because of three changes.

1. Doubling of the mines output
2. Repositioning of the CHPP to the South
3. Construction of a rail spur

A total of 22 privately owned residences (not receivers as the EIS refer to) are now much greatly impacted by the mine. The Maules Creek and Boggabri Coal Mines actual zone of affectation is about 7kms, those who used to live there tell us this. The EIS tells us that only one dwelling is affected by the Vickery Extension Coal project. It is clear that the Vickery Mine and the rail Spur will affect us and Whitehaven management will deny it for years, insisting on attended noise measuring, manipulate dust sampling and measurement and emotionally exhausting anyone in their path. The affected landholders become disenchanted with their position, realise that their only option is to reluctantly leave, giving Whitehaven just as they wish. A district of Whitehaven employed occupants so they can go ahead with dust, noise, blasting, fumes and environmental vandalism outside the modelled boundaries shown in the EIS. These are the dirty tricks we have been informed of by previous affected landholders associated with the company Whitehaven. The mine should not be approved where they can continually manipulate data to show compliance due to changing of a word to create a loop hole in their favour.

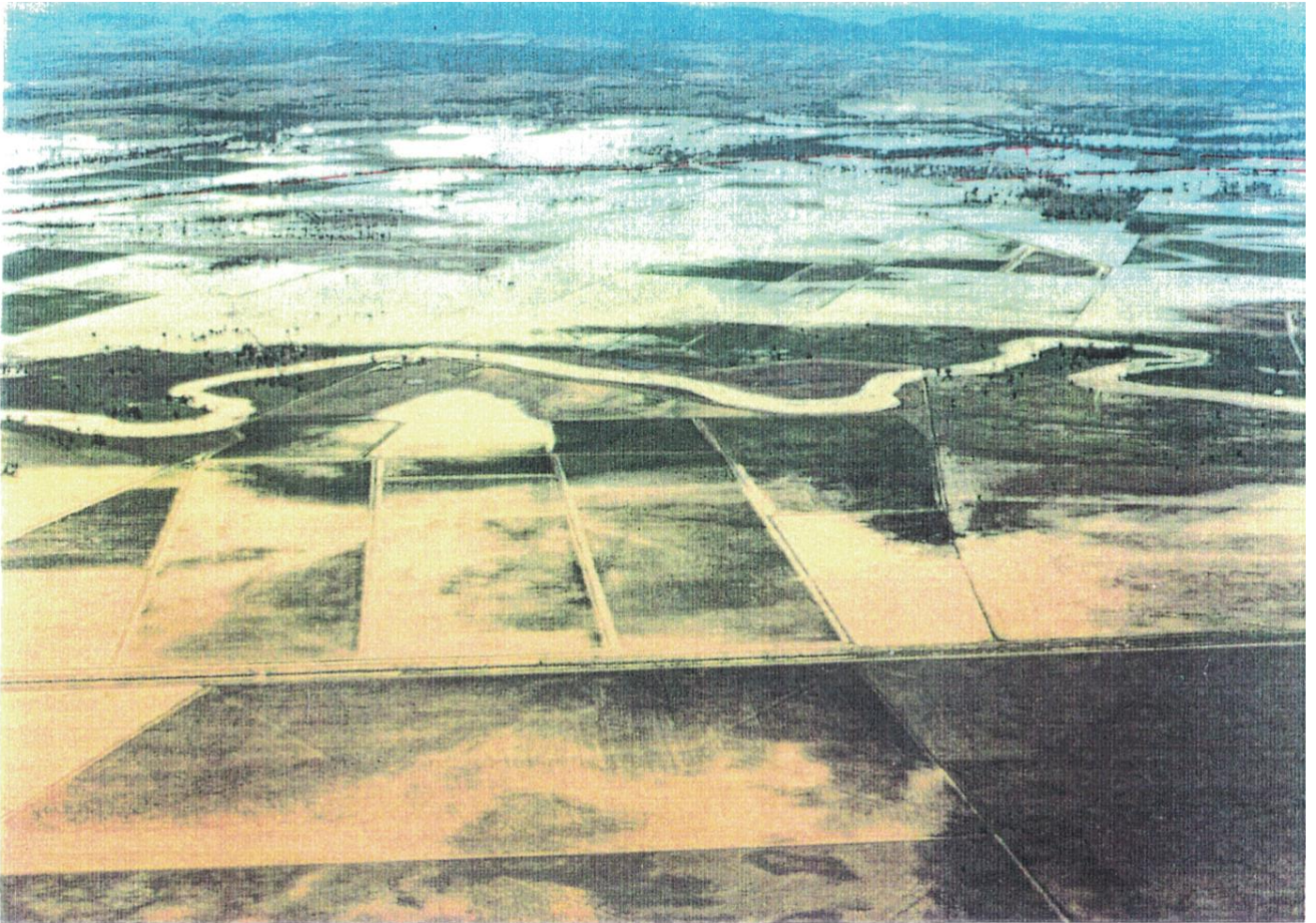
Collygra Creek, Rangari Creek and Flood Plain:

Collygra Creek is an ephemeral stream that can carry huge amounts of water that can inundate both sides of the Werris Creek to Mungindi Rail line. There are no gauges on this creek.

Flood Photo 1 (1984) shows residual water going through the Collygra flood way under the railway line and inundating the land to the East. The orange brown water is from Collygra Creek whereas the distant water is flooding from The Namoi River



Flood Photo 2 (1 February 1984) shows the extent of inundation on the properties 'Eureka' and 'Elken Downs' in the foreground and over the railway line, 'Milchengowrie'. The coloured water is from Collygra Creek whereas the distant clearer water is flooding from the Namoi River.



Flooding from Collygra Creek also occurs in the January-February 1984 event. After this the owners of 'Woodgrain' constructed a levy to protect the property. The creek also flooded in April 1989 breaching the levee and flooded the whole property. The owners who were down the paddock commented what was the unusual noise they soon after realised that the noise was water flowing through the whole property. I know this because I was share-farming the property at this time and inspected the flood damaged soon after to see the crop devastation.

The next Collygra Creek flood experience was in December 1996 where the creek came down and extensive flooding was experienced at 'Eureka', 'Elken Downs' and 'Binnalong'. This flooding was excessive due to a "flood-way" built on Woodgrain and flood protection on Woodgrain which limited the amount of water that flowed through the Collygra Rail floodway, diverting it onto the three Western properties. I owned 'Elken Downs' at this time.

My experience shows that the volume of water that comes down Collygra Creek cannot be under estimated and has an extreme impact on localise flooding in the immediate location of the western end of the proposed Rail Spur. I was told that during the 1974 January Flood 200 m of railway line was washed away at the Collygra Creek floodway under the Werris Creek Railway line. An adjoining landholder remembers seeing it as a child.

Figure 1 shows land on the flood plain I have farmed and experienced flooding on. This experience gives me the relevant experience to advise on the flood effects of this proposed rail spur.



Flood assessment from the EIS Volume 2, 5.2.4 states that the 'timing of flood events in the Namoi River are not expected to coincide with the tributaries'. What an amazing assumption.

Photo 3 shows this not to be the case. The 'indicative' rail spur location is about half way up the photo travelling in a West to Easterly direction. Any constrictions across this area is short of environmental incompetence.



Locals have explained that one flood was impacted by excessive water entering the Namoi by Rangari Creek. Entering the river at the approximate location of the Kamilaroi Hwy and Goochli Rd intersection sending large volumes of water towards, 'Yamba' and 'Emerald Plains'. The "Gunnedah SES Annex A Gunnedah Local Flood Plan, The Flood Threat" says "The flood plain opposite Gunnedah is also affected by Rangari Creek which rises in the Kelvin area as this water enters the flood plain it tends to flow West through a number of channels before reaching Landary and Gunnible Lagoons. This flood plain was about 12kms wide during the 1971 flood". The document goes on to add, "There is no consistent pattern in the floods recorded in recent years in the Namoi Valley. This is due to many sources of flood water, the large catchment area involved and significant variation in the location of storm centres. It is apparent that if all of the up-stream tributaries had a major flood simultaneously, flooding in the flood plain and riverine area could potentially be significantly greater than anything yet recorded." This information endorses the fact that no structure should be built across the flood plain.

Local octogenarian Col Sims, said in the 1955 flood, viewed from 'Kilarney' (near Emerald Hill) a small wave was observed coming across the flood plain. 81-year-old Peter McIlveen has lived in Boggabri all his life and experienced all of the floods during this time. He explained how each flood is different and has grave concerns about a rail spur constructed with any embankments or culverts. His concern is when culverts block with debris and the structure fails what will happen to anyone in its path. He said the Gulligal Causeway on the Kamilaroi Hwy washed away in a flood. Debris has also blocked the crossing over the Namoi River on the Eastern side of 'Mirrabinda'. We do not need a railway line directly across the flow of water which could have catastrophic effect during extreme flooding, again the Vickery Extension should not be approved.

The EIS fails to address the 'Complying Works Criteria' as is written in the 'Boggabri to Carroll Flood Management Plan'. As modelling was impossible due to the lack of details the complying works criteria isn't addressed.

Flooding from extreme weather events is not to be under estimated. Climatologists tell us of higher rainfall intensities, and weather extremes. Storm cells, upper atmosphere troughs and lows can add to the flood flows significantly, obviously anywhere in the catchment, Namoi tributaries included. The Vickery extension should not be approved due to flooding concerns.

Rail Spur:

The rail spur map is labelled 'indicative'. How can we comment on an indicative rail line plan? The EIS gives no details of boxed culverts, earthen embankments, pylons, distance between pylons, depths of pylons etc. There is no information about the construction at all, so how can the flood depths and flow velocity be modelled when this information hasn't been provided. During the construction and drilling for pylons, drilling fluids will be used and this can potentially contaminate the ground water on which we all rely on to be sustainable farmers.

The use of box culverts shouldn't be used in the Rail Spur construction if approved as they block up with debris. This is shown in a state rail line assessment 1984 with comments of: DN (Down Side) blocked by debris (culvert)
Blocked by debris (culvert)
DN Side blocked by tightly packed debris (culvert)

Section 6-13 says that 'a comparative construction cost of approximately \$40 million, so there must be a detailed plan of the Rail spur to make this financial analysis so why isn't it already in the EIS. What is the Whitehaven Company hiding from local landholders and Government regulators? The mine has two alternative coal transport routes. The approved trucking of coal to the Gunnedah CHPP or a railway line to the North through coalmine owned land

The Whitehaven dirty trick plan is to get the approval then build the cheapest option with no regard to flooding, or flood flows on neighbouring properties. Just as they built a cheaper CHPP at Maules Creek, once the approval of the mine was granted.

Lastly, I was told by the Project Manager, that the line was to be built on pylons all the way to the Werris Creek rail line. Then later at a presentation in Boggabri I was told that the line would be mostly built up on the Western side of the Namoi River. Then the EIS gives another story in Section 6.2.2, project Rail spur where the planning starts with the word 'assumed', and no details are given. I was lied to by the Project Manager which gives me much doubt over what information that Whitehaven gives me is to be believed.

NOISE:

Sleep disturbance:

Boggabri Coal Mine Environmental Assessment states that sleep disturbance levels are 15dBA above background noise level. As our background noise level is 30, why is our sleep distance level given as 52dBA not 45dBA

Train sound levels are 126dBA when travelling at 50km/hour (Boggabri Coal Environmental Assessment). Measurements for noise at 450m from a railway track show levels of 71dBAs, projected levels through our property (144b) are 40dBA. This is lower because the reading is for LAeq 9Hr, or average noise over 9 hours. We do not accept this methodology. If approved we expect to have between five and six train movements a night causing sleep deprivation making the hard, physical day to day activities particularly difficult.

Agricultural Flow-on Affects:

If the water licence was used for agricultural purposes rather than mining, a cotton crop worth \$1.216 million would be grown. This is almost double the total of lost agricultural land quoted in the EIS Assessment. Then there is the additional agricultural production forgone by the mine site and biodiversity offsets. These numbers are not overly important but it shows that Whitehaven will manipulate data to achieve their objectives.

Green House Gas Omissions:

Greenhouse Gas Omissions are shown to be approximately 20 million tonnes of CO₂ per annum. This number must assume all the coal is processed in some reduced emission power station. Actual CO₂ production, given that 1 Tonne of coal produces 2.86 Tonne of CO₂ increases the estimate to 28 million Tonnes of CO₂ emissions. Some 'clean coal' Power Stations have had difficulty achieving their projected outcomes where one major example was converted to natural gas. Also, no mention is made of Methane emissions. Methane has 25 times more effect on global warming than CO₂ so why isn't it measured and documented? Coal seams, once exposed emit high levels of methane. Measurements are made in the Hunter Valley, and are excessive due to venting of underground coal mines otherwise these mines could explode. Nitrous Oxide, carbon monoxide and sulphur dioxide should also be measured and reported.

Social Impacts:

The Emerald Hill Community is already showing signs of division, with those who gave access to the rail spur are obviously uncomfortable when the mine is discussed. Jenny has not attended Book club since the plans were released. The mine development will put an end to parties/ neighbourhood gatherings at 'Barlow's Beach' on the Namoi as the mine CHPP, Railway line will be just opposite. Life will change for us with train noise waking us at night as well as those living close to the mine.

Property Devaluation:

Our property 'Merrigle' listed as 144a and 144b in the EIS consists of three separate portions. If family circumstances change, and our property was to be divested then it would be sold as three lifestyle blocks, two with a house and one with a building entitlement. The rail spur construction would greatly reduce the value obtained if this was to happen.

Other Matters of Concern:

There are numerous pages of this EIS that I have not had the time to read and consider. The time frame for this evaluation is unrealistic and insulting.

Further points that need to be fully assessed:

1. How is the Namoi River protected from runoff and erosion from the over-burden? Will high intensity rainfall events wash some of this into the river?
2. How did Whitehaven get a 600 Mega Litre porous rock licence?
3. Does the name change to Vickery Coal Pty Ltd mean that all previous breaches are not recorded against the company?
4. Aboriginal cultural heritage assessment (indicative) shows that assessment was done on our property when it certainly wasn't.
5. Dust off the mine will affect my health as a group of doctors in the Muswellbrook/Singleton area says it will.

6. Will the rail line to the North be joined up with the proposed line to form a loop so all trains go by our property, 'Merrigle'?
7. Will the rail way line be dismantled when the Vickery mine be finished or will it be used to transport the coal from under the Vickery State Forest?
8. Whitehaven have bought over seventy farms in the Boggabri district. This has been very detrimental to farmers wanting to expand locally as other family members search for an opportunity in agriculture. Also, as properties have been acquired by Whitehaven many families have left the area which has depleted our social network.
9. There has been no dust monitor for Boggabri. Is Whitehaven afraid of what it may find?
10. Whitehaven made a donation to the Liberal Party in 2016-17. Was this an attempt to get their extension approved?
11. Is the Whitehaven stated Water Licence the total held by the company or the proportion assigned to the Vickery Mine?
12. Table 3 Appendix H 'Agricultural use in the Namoi River catchment 2001-2006'. Relevant information needs to be provided, where is it.
13. If approved a no-blast zone must be established around the Gulligal residents, the River and Kamilaroi Hwy

Conclusion

We are still in the process of reviewing the EIS documentation and may wish to make a supplementary submission at a later date. For more information, submission please do not hesitate to contact Errol Darley on 0427431752 or darleyfamily@bigpond.com

Yours sincerely,

Errol Darley

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