



7 February 2019

Ms Ellen Jones
Environmental Assessment Office
Department of Planning and Environment
Resource and Energy Assessments
GPO Box 39
Sydney NSW 2001

Dear Ms Jones

Re: Eraring Power Station Ash Dam Expansion MOD 1 (PA 07_0084)

Origin Energy (Origin) owns and operates Eraring Power Station and the associated Eraring Ash Dam. In September 2018, Origin submitted an Environmental Assessment to the NSW Department of Planning and Environment in support of an application to augment the Eraring Ash Dam (Project Approval 07_0084 MOD 1).

Centennial Coal (Centennial) has reviewed the Environmental Assessment for the Eraring Ash Dam Augmentation Project and, although Centennial does not object to the proposed project, provides the following comments for consideration.

Awaba Workings and Mine Subsidence

As is identified in the Environmental Assessment, disused mine workings in the Great Northern Seam from the former Awaba Mine lie beneath part of the proposed augmentation area for the Eraring Ash Dam. These workings include areas of full extraction and areas of standing pillars.

To reduce the potential for water connectivity between the Eraring Ash Dam and the workings of the Awaba Mine, Origin has identified a range of mitigation techniques to be implemented including:

- Filling of mine voids with stabilised fill material
- Excavating and collapsing of shallow mine workings; and/or
- Installing an impervious barrier using clays or suitable stabilised fill materials.

Centennial Newstan, a subsidiary of Centennial Coal, currently hold Consolidated Coal Lease 746 (CCL746) over the proposed Eraring Ash Dam augmentation area. Since 2008, Centennial Newstan has been investigating a potential extension of underground mining operations of the Newstan Colliery within CCL746 which includes the area beneath the proposed Origin Energy Ash Dam Augmentation Project. Any future mining by Centennial Newstan would be within the West Borehole Seam, located approximately 200-230metres below the disused workings of the Awaba Mine. When mining beneath the workings of the Awaba Mine, the potential exists for there to be subsidence related interactions within the Awaba Mine workings. These interactions could jeopardise the effectiveness of any mitigation measures implemented by Origin Energy designed to reduce the potential for water connectivity between the Eraring Ash Dam and the Awaba Mine workings.

These mitigation measures and proposed ash containment embankment walls should be designed in consultation with Centennial Newstan and the Mine Subsidence Board to withstand subsidence generated by future extraction in the West Borehole seam to prevent sterilisation of coal reserves.

Proposed Grouting of Mine Voids

If grouting of mine voids is selected by Origin as its preferred mitigation technique, any material used to fill the mine voids should be of a benign nature so that it does not adversely impact the quality of the water within the Awaba mine workings.

Biodiversity Offsets

Origin is required to offset the impacts of vegetation clearing associated with the Eraring Ash Dam Augmentation Project. Origin has identified areas of potential offsets on Crown land to the north of the existing Ash Dam. A large portion of these offset areas are within the proposed future Newstan mine extension area where Centennial Newstan holds surface title via mining leases. Underground mining within this area, as well as impacts associated with ongoing subsidence monitoring, has the potential to impact on these vegetation communities. If areas above future proposed mining area are offset, the mining operations and associated monitoring activities could be significantly restricted. Potential offset areas are available outside of the proposed future mine workings and a collaborative approach to identifying areas is proposed that precludes the unnecessary sterilisation of coal reserves. Any offset areas should not be allowed to sterilise coal reserves.

Conclusion

Centennial are currently engaging regularly with Origin in relation to both the Eraring Ash Dam Augmentation Project and the potential extension of mining associated with the Newstan Colliery. It is proposed for this ongoing engagement to continue. It is however recommended that the Department of Planning and Environment give consideration to the potential implications of this Project on the sterilisation of future coal reserves and that the Department ensures any biodiversity offsets are not located above areas of future potential mining areas associated with the Newstan Colliery.

If you have any questions in regards to the matters raised in this submission, please contact me on my mobile 0407 207 530 or email james.wearne@centennialcoal.com.au.

Yours sincerely



James Wearne
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Centennial Coal