

Mr Mark Bulkeley  
Operations Manager – Baal Bone Colliery  
The Wallerawang Collieries Pty Limited  
PO Box 13  
LITHGOW NSW 2790

15/12/2020

Dear Mr Bulkeley

**Baal Bone Coal (09\_0178)  
Proposed Changes to Groundwater Monitoring Program**

I refer to your letter dated 17 November 2020 regarding proposed changes to the groundwater monitoring program at the Baal Bone Colliery (09\_0178).

I understand that changes are being proposed for monitoring bores in the vicinity of the Cocks River Swamp, in response to recommendations from the site's 2019 Independent Environmental Audit (IEA), including:

- cessation of groundwater quality and level monitoring at monitoring bores BBP1, BBP2, BBP5 and BBP6, as monitoring has shown no recent evidence of mining-related impacts; and
- reducing the frequency of monitoring at monitoring bores BBP3 and BBP4 from monthly to every two months, due to relatively consistent elevated concentrations of zinc indicating natural geochemical processes to be a likely cause.

The Department acknowledges the findings made by Umwelt Australia Pty Ltd in *Investigation of Cocks River Swamp Monitoring Program June 2020* prepared in response to IEA recommendations, including that elevated zinc concentrations have been recorded at some of the bores in times pre, during and post mining. However, it is unclear whether mining may have exacerbated natural geochemical processes that would contribute to these elevated concentrations.

The Department does not disagree in principle to reducing the frequency of monitoring at locations where data indicates that water-related mining impacts have stabilised. However, it is considered that ceasing monitoring at the proposed sites (ie BBP1, BBP2, BBP5 and BBP6) altogether may be premature given sporadic triggers of elevated zinc concentrations over time and the uncertainty associated with the contribution of mining to these impacts. On this basis, the Department considers that monitoring at these sites should continue on at least a quarterly basis.

The Department notes that elevated zinc concentrations at BBP3 have been frequent since the completion of mining and therefore questions the option to reduce frequency during the remaining stages of mine closure.

In order to amend the site's groundwater monitoring program, a revised Water Management Plan is required to be submitted to the Planning Secretary for approval, as per condition 16 of Schedule 3 of development consent 09\_0178. This plan must be prepared in consultation with relevant government agencies, including the Department's Water Group (DPIE Water) as the expert agency for water-related matters.

To determine the appropriate monitoring program for Cocks River Swamp, the Department requests that a revised monitoring program is submitted within an amendment to the site's Water Management Plan, following consultation with DPIE Water, particularly in relation to future monitoring requirements at BBP3.

Should you wish to discuss this matter further, please contact Andrew Rode on 02 8289 6744 or at [Andrew.Rode@planning.nsw.gov.au](mailto:Andrew.Rode@planning.nsw.gov.au).

Yours sincerely

A handwritten signature in black ink, appearing to be 'S O'Donoghue', written in a cursive style.

Stephen O'Donoghue  
Director  
Resource Assessments  
As nominee of the Planning Secretary