



Our reference: : DOC18/789140; SF14/13848
Contact: : Duncan McGregor – 02 6773 7000 – armidale@epa.nsw.gov.au
Date : 18 October 2018

Planning Services
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Attention: Rose-Anne Hawkeswood

ELECTRONIC SUBMISSION

Dear Ms Hawkeswood,

RE: Invitation to comment – Boggabri Coal Mine – MP09_0182 MOD 7

I refer to your email on behalf of the Department of Planning and Environment (DoPE) to the Environment Protection Authority (EPA) on 4 October 2018 inviting comment on the modification application for the Boggabri Coal Mine (BCM).

The proposed modification would include moving a boundary with Tarrawonga Coal Mine (TCM), allowing alternative methods to secure biodiversity offsets, using areas previously approved as product stockpiles for TCM, ongoing drilling and exploration activities, and road transport of coal samples.

The EPA does not object to the proposed modification, so long as the applicant complies with the conditions of their environment protection licence number 12407 (licence). If the modification is approved, the applicant will need to apply to the EPA to change its licence conditions to reflect the modification.

Additional drilling and exploration activities are discussed in the Environmental Assessment. Activities that occur on the licensed premises will be regulated by conditions of the licence.

Drilling and exploration activities outside the licensed premises must comply with all the requirements of the *Protection of the Environment Operations Act 1999*. This includes implementing appropriate controls to address water, air and noise impacts; and treatment / disposal of wastes from the activities.

DoPE may wish to consider any additional impacts from transport of coal samples on public roads. Any adverse impacts may be mitigated by restricting the type of loads, times when transport can occur and / or the number of loads each day.

The modification makes changes to existing approved joint operations between BCM and TCM. It is unclear if this modification will have implications for TCM. I recommend that DoPE consider if TCM need to submit

an application to cover any changes to their operations as a result of this modification. The EPA will review TCM's licence if this modification is approved.

Please note that the EPA's comments do not cover Biodiversity offset arrangements. Biodiversity offsets are reviewed by the Office of Environment and Heritage.

If the applicant wishes to meet with the EPA to discuss the additional information requested, please call Duncan McGregor on 6773 7000 or email armidale@epa.nsw.gov.au.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Robert O'Hern'.

ROBERT O'HERN
Head Regional Operations Unit – Armidale
Environment Protection Authority