



- 5 SEP 2013

OUT13/26249

Mr Stephen O'Donoghue
Mining and Industry Projects
NSW Department of Planning and Infrastructure
GPO Box 39
SYDNEY NSW 2001

Steve.O'Donoghue@planning.nsw.gov.au

Dear Mr O'Donoghue,

**Cobbora Coal Project (MP 10_0001)
Comment on the Revised Preferred Project Report**

I refer to your email dated 14 August 2013 to the NSW Office of Water, a division within the Department of Primary Industries, in respect to the above matter.

Comment by NSW Office of Water

The NSW Office of Water advises the following key comments, and the detailed comments in Attachment A.

- Peak water demand has decreased from 4340ML/a in the initial Preferred Project Report (PPR) to 3930ML/a in the revised PPR. It is understood this is due to a decrease in predicted dust suppression requirements associated with a reduction in disturbed areas and more rapid mine development in the early years. This will reduce peak demand on water supply from the Cudgegong River and minimise the risk of inadequate entitlements in dry years.
- Groundwater inflows into the mine workings and resultant drawdown over the mine life are described to be similar or less than predicted in the initial PPR. Differences are predicted to occur on an annual basis however these do not seem to be quantified.
- A dewatering borefield is proposed to intercept groundwater before it flows into the mining areas to prevent its loss to evaporative processes. Details have not been provided in terms of the borefield's location, operation and impacts of this borefield in accordance with the requirements of the NSW Aquifer Interference Policy.
- Development of the Aquatic Monitoring Strategy and appropriate triggers and contingency responses will be a key aspect to addressing the potential impacts to the surface water system.
- Licences may be required for the raw water dam.

For further information please contact Tim Baker, Senior Water Regulation Officer (Dubbo office) on 6841 7403, or at: tim.baker@water.nsw.gov.au.

Comment by Fisheries NSW

Fisheries NSW advise no further comment.

For further information please contact David Ward, Fisheries Conservation Manager (Tamworth office) on 6763 1255, or at: david.ward@industry.nsw.gov.au.

Comment by Crown Lands

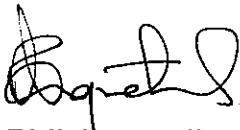
Crown Lands advise no further comment, with the proponent being aware of Crown Lands requirements and conditions.

For further information please contact Rebecca Johnson, Coordinator Client Services (Newcastle office) on 4920 5040, or: rebecca.johnson@lands.nsw.gov.au.

Comment by Office of Agricultural Sustainability & Food Security

In accordance with procedures for mining applications that affect agricultural land, the Office of Agricultural Sustainability & Food Security has responded direct to your Department by letter dated 30 August 2013.

Yours sincerely



Phil Anquetil
Executive Director Business Services

Attachment A

Cobbora Coal Project (MP 10_0001) Revised Preferred Project Report (PPR) Additional comment by NSW Office of Water

Groundwater Assessment

- To prevent evaporative losses of groundwater pit inflows a de-watering borefield is proposed. However the objective of the dewatering borefield, integration within the site water management system and water balance are not identified in the revised documents. A dewatering borefield if used to keep pit operations dry is likely to extend a greater drawdown influence and potentially result in longer flow paths for any contaminants that may leak from in-pit tailings emplacements. No details of the borefield's location, extraction rates, groundwater sources or impacts on neighbouring groundwater users or water sources in accordance with the NSW Aquifer Interference Policy or *Water Management Act 2000* are provided. These details are requested to enable NSW Office of Water to assess the acceptability of the impacts and potential mitigation and management requirements.
- Appendix B of the revised PPR indicates groundwater extraction via the proposed borefield is expected to compare favourably with the inflow volumes presented in the initial PPR. This statement requires further justification and relates to the requests in the previous point.
- A table detailing the revised annual groundwater inflows is requested with preference for revision of Table 6.3 presented in the Groundwater Assessment (January 2013). It is expected this may need to be explained in conjunction with operation of the proposed borefield. Confirmation of groundwater inflows into the final void post mining and at equilibrium is also requested.
- Other changes in the revised PPR include reconfiguration of the final saline void lake dimensions and surrounding landform. The worst case scenario final water level is similar to the previous design. The reduced freeboard (to 6 metres) from this revised design still holds considerable storage before overtopping. The final void in the southern extent of mining area B remains a regional groundwater sink.
- A revised cross-sectional diagram of the final landform across mining area B is requested to illustrate the regional surface and groundwater features and revised final void geometry.
- The Office of Water is aware of a proposal to source groundwater via bores for construction purposes. If this proposal is to be implemented it is recommended detail be provided as part of the revised preferred project report on the number of bores, predicted demands, and an impact assessment completed in accordance with the NSW Aquifer Interference Policy.

Surface Water Assessment

- Section 3.11.3 refers to proposed clean water diversions around the Mine Infrastructure Area and Coal Handling and Preparation Plant. A map is requested detailing the location of these drains and proposed management measures to convey water into the creek system.
- It is recognised an additional refuge pool is predicted to be impacted by drawdown and another pool would be affected earlier than the previous proposal. The NSW Office of Water supports the proposal to develop an Aquatic Monitoring Strategy and the implementation of suitable contingency measures. A comprehensive groundwater monitoring plan will provide valuable data to inform potential impacts in the surface water system and support triggers for implementation of contingency and compensatory protocols.

Water Licensing

- Point 4 in Section 3 of Appendix D indicates Clean Water Dam 10 is to have a capacity of 357ML and this is to be authorised under the harvestable rights provisions. This is acceptable on the basis the combined volume of the harvestable rights dams are within the Maximum Harvestable Rights Dam Capacity (MHRDC) for the property and it is on a first or second order stream.

- The NSW Office of Water has advised previously of the need for the raw water dam to be considered for licensing based on consistency with the MHRDC for the property or additional licensed entitlement. Based on the current proposal it appears the capacity of the raw water dam will significantly exceed the MHRDC. The proponent will therefore be required to ensure adequate entitlement is held within the Lower Talbragar water source of the *Macquarie-Bogan Unregulated and Alluvial Water Sharing Plan* to account for the total capacity of the raw water dam.
- Point 7 in Section 3 of Appendix D refers to the temporal constraint of accounting for the impact to baseflows in the Talbragar River. The proponent is advised the maximum of the predicted water take is to be licensed from the commencement of the activity in accordance with the NSW Aquifer Interference Policy.

End Attachment A