

**Clay Preshaw - GUJERAT NRE - Project Application No. MP 10\_0046 MOD 1 - longwall mining LW 4+ 5 at No 1 Colliery in Russell Vale..**

---

**From:** "Rowan Huxtable" <thuxtable55@optusnet.com.au>  
**To:** <plan\_comment@planning.nsw.gov.au>  
**Date:** 9/2/2012 10:13 PM  
**Subject:** GUJERAT NRE - Project Application No. MP 10\_0046 MOD 1 - longwall mining LW 4+ 5 at No 1 Colliery in Russell Vale..  
**Attachments:** handwritten submission.JPG

---

Dear Sir/Madam,

**Project Application No. MP 10\_0046 MOD 1**

I wish to add more to my objection (attached.) to this application by Gujerat NRE to allow for longwall mining LW 4+ 5 at No 1 Colliery in Russell Vale..

**NOISE AND DUST**

The treatment of the local community to date by Gujerat shows that this company's approach is to get away with what it can.

The noise and dust monitoring of operations to date has been totally inadequate. The monitoring is in the wrong place. There has been no "before" benchmark. The coal from Bellambi colliery is trucked down Bellambi lane. The company has claimed that it has no responsibility for the trucking contractors operations and has not controlled the trucking contractors properly. And because of the inadequate monitoring it is impossible to objectively assess the actual effect of the mining and trucking.

The result has been significant loss of amenity for the local residents, with the onus of proof always on the residents.

It is a disgrace for state and local governments to let this sort of thing happen to residents when it is possible to do it better.

A company that washes its hands of its responsibilities in this area is likely to try to avoid responsibility should problems arise with new mining.

**METHANE EMISSIONS**

The application does not address methane emissions and their GHG effect.

**MONITORING**

I submit that applications like this one must include for a monitoring regime with "before" and "AFTER" measurements that allow objective assessment of the claims of the application – for example

"no significant noise increase"

"no significant dust increase"

"no significant water flow loss"

**EFFECT ON THE ESCARPMENT**

The sandstone country around Sydney is unique beautiful country and its hanging lakes and streams are very valuable. Other countries do not trash their natural assets. Why do we? The application says that the expected subsidence and cracking is not a major problem. This is a value judgement. The application should quantify the expected and worst case subsidence and cracking and leave it to the community to make the value judgement.

**WATER CATCHMENT**

The value we place on the water catchment is evidenced by the restrictions we place on individual access to the catchment area. World population will be over 9 billion soon. We need all our good water and topsoil, and more.

The proposed mining is very close to Cataract dam. The maps showing mining extent do not show the extent of any methane depressurisation. The depressurisation would almost certainly extend under the dam.

The proposed mining technique(mining ) will result in 3 voids over each other in an area where we KNOW that

unexpected cracking and subsidence are quite likely. The risk of pile run has already been identified.

Gujarat has already made one mistake in its mining of longwall 4, resulting in a lot of coal being wasted. The coal mining industry does not have a good track record of predicting ,managing or responding to subsidence, water flow loss or gas leaks. It is left to others to point out problems. The onus of proof lies with the community. The disappearance of Thirlmere lakes and bore water close to Tahmoor colliery is a case in point.

The application has not identified a test regime to proactively identify whether unexpected additional subsidence is occurring or is likely to occur, or whether water flow into cataract dam is being significantly affected. The subsidence monitoring plan is missing from the application. Neither does the plan identify what measures the company would take in the event of a problem - or what would trigger such events.

It is quite likely given the track record and the lackadaisical attitude to risk management that:

- a) Significant damage to the water catchment would not be discovered for a long time afterwards
- b) After the discovery, the onus of proof would be on the community to prove the damage.
- c) During this time further mining would continue and further damage would occur
- d) The damage would be irreparable

It is one thing for a company to take such an approach but it is totally unacceptable for the NSW dept of planning, charged with managing changes for the benefit of the community as a whole, to accept such a risk on our behalf.

I submit that if this company or any company wishes to mine the wongawilli seam in this location then it should be required to mine it by means that reduce the risk. One possibility is to leave more pillars.

Yes, such mining would be more expensive. But the coal is high quality coking coal. It won't go away and its value will increase in future, not decrease. So what is the rush to mine it NOW, on the cheap?

#### EMPLOYMENT

If the Wongawilli seam were mined properly it would employ more people, not less

It would employ more people to run the trucks cleanly and quietly and suppress dust, not less

It would employ more people to do proper environment monitoring, not less.

Doing things properly usually costs more. But the increased cost usually takes the form of increased employment. This means less profit for the miner but more benefits to the local community.

#### COMMUNITY DUTY

The community did not force Gujarat to buy its long wall equipment. The community and the taxpayer does not have a duty to ensure Gujarat profitability . The community does however have a duty to protect its water catchments for the future. And the government does have a duty to provide objective information to the community to allow the community to make value judgements.

#### SUMMARY

This is not a decision between mining and not mining. It's a decision about whether to do things properly, carefully and in a way that maximizes benefit in the long run– or whether to run roughshod over the local community and risk our water catchment in order to rip it out NOW and on the cheap.

I ask the planning department to reject this application.

<<...>>

#### POLITICAL DONATIONS

I have not made political donations exceeding \$1000 in the last 5 years combined.

Rowan and Theresa Huxtable

ph +61-2-42267051(h) +61-408372792(rowans mobile) +61-421655149 (theresas mobile)