

Our Reference: 1880302:CS/DA
Your Reference: MP08_0144-Mod-7
Contact Name: Cara Stoltenberg

Mr. Philip Nevill
NSW Department of Planning, Industry & Environment

Emailed: Philip.nevill@planning.nsw.gov.au

Wednesday, 4 August 2021

**RE: MP08_0144-Mod-7 – NARRABRI COAL MINE STAGE 2 – MOD 7 – BORD
AND PILLAR MINING OF LONGWALLS 201 AND 202 - KURRAJONG CREEK
ROAD, BAAN BAA**

Dear Mr Nevill,

Thank you for the opportunity to comment in response to the abovementioned application. It is understood that the proposed modification would involve the mining of up to approximately 0.7 Mtpa which would be extracted via the bord and pillar method and within the extent of the approved Longwalls 201 and 202 at the Narrabri Mine which is currently operated by Narrabri Coal Operations Pty Ltd (NCOPL),

The current project approval for the Narrabri Mine is that of Project Approval (PA) 08_0144 for Stage 2 of the Narrabri Mine which was previously issued under Part 3A of the *Environmental Planning and Assessment Act 1979* (EP&A Act) in 2010 and allowed the Narrabri Mine to convert to a longwall mining operation. PA 08_0144 has subsequently been modified on six occasions to date. The seventh modification seeks to revise the mining method for two of the approved longwall mining panels from longwall to bord and pillar mining.


The Modification would involve the mining of up to approximately 0.7 Mtpa which would be extracted via the bord and pillar method and within the extent of the approved Longwalls 201 and 202. The bord and pillar mining of Longwalls 201 and 202 would occur concurrently with the existing Narrabri Mine longwall operations,

While the proposed Modification involves no change to many key components of the existing/approved Narrabri Mine project, Council questions how the processing of this request interacts with the current State Significant Development (SSD) Application that NCOPL has also separately lodged for the Narrabri Underground Mine Stage 3 Extension Project (the Stage 3 Extension Project).

As the existing consent (PA 08_0144) would be surrendered as part of the proposed Stage 3 Extension Project application with all relevant approval activities transferred to the new consent as part of that application, Council would like to take this opportunity to request that the continued assessment of both projects will be carried out pursuant to all applicable legislative requirements and that the following comments will be considered in the continued assessment of the operation of the Narrabri Mine;




Narrabri Shire Council
46 - 48 Maitland Street
PO Box 261, Narrabri NSW 2390


P. (02) 6799 6866
F. (02) 6799 6888


E. council@narrabri.nsw.gov.au
www.narrabri.nsw.gov.au

1. Introduced Bush Fire Impact

That NCOPL works provide a minimum separation distance of 100m from all dwellings at the time revegetation works are being carried out. It is requested that a condition be imposed requiring this.

2. Road Maintenance

Council acknowledges that NCOPL proposes to seek reclassification of the section of Kurrajong Creek Road and the highway intersection to be a gazetted B-double route. NCOPL has initiated this process with NSC, who has indicated that NCOPL must lodge a permit request with the National Heavy Vehicle Regulator (NHVR). Once this request is made, the NHVR will be individually assessed by NSC prior to issue.

3. Road Transport

Council acknowledges that NCOPL propose that all coal transported off site is to be by rail and not the road network. It is requested that a condition be imposed on any consent issued to only permit the transport of coal off site by rail.

4. Contributions

Council is amenable to further discussions regarding a VPA for this project with the proponent. Further, if no VPA is entered into for any development consent for the Narrabri Mine it is requested that a condition be imposed requiring payment of contributions in accordance with Narrabri Shire Council's Section 7.12 Fixed Development Consent Levies Contributions Plan 2011.

5. Cumulative Impacts

Council requests that the relevant State Government Department/Agency satisfies itself that there are no cumulative impacts as a result of the interaction of the proposed development and the adjacent Narrabri Gas Project.

6. Mitigation Measures

It is requested that the mitigation measures as outlined in the documentation submitted with both projects are to be conditionally required to be complied with as part of any consent issued.

Council expects that the assessment of the project will be carried out pursuant to all applicable legislative requirements and that these comments will be considered in the continued assessment of this application.

If you require any further information, or wish to discuss these matters further, please contact Mrs Cara Stoltenberg, Strategic and Major Projects Planner, in the first instance on (02) 6799 6866 or caras@narrabri.nsw.gov.au.

Kind Regards,

A handwritten signature in black ink, appearing to read 'Stewart Todd', with a stylized, cursive script.

Stewart Todd
General Manager