

7 October 2021

Jack Turner
Resource Assessments
Department of Planning, Industry and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Dear Mr Turner

Subject: Response to Submissions (RtS) Wongawilli Mine Modification 2 (MP_09_0161 MOD 2)

WaterNSW would like to thank the Department for the opportunity to comment on the RtS for the Wongawilli Mine Modification 2.

The project area is partly located within the Metropolitan Special Area of the Sydney Drinking Water Catchment. WaterNSW are part owner and land managers of this special area and have statutory responsibilities under the *WaterNSW Act 2014* to protect and enhance water quantity and quality and to preserve the ecological integrity of the area.

WaterNSW have adopted a set of Mining Principles for mining proposals in the Special Areas to meet its statutory responsibilities which are summarised below:

- 1) **Water supply infrastructure** – mining must not result in the integrity of water supply infrastructure being compromised.
- 2) **Water quantity** – leakage from reservoirs as a result of mining activities must be avoided, and regional depressurisation and diversion of surface water flows must be avoided and minimised by adopting a precautionary approach to mine design.
- 3) **Water quality** – all mining activities must have a neutral or beneficial effect on water quality.
- 4) **Ecological integrity** – of the Special Areas must be maintained and protected.

WaterNSW's concerns relate to the proposed extension of the North West Mains Drive in the Metropolitan Special Area and particularly crossing beneath the Lake Avon storage at Gallaghers Creek and Bellbird Creek.

Key residual areas of concern

In summary, WaterNSW has the following key areas of residual concerns:

1. **Potential Impact to Lake Avon:** Any movement and/or cracking of the base of Lake Avon at Gallaghers Creek and Bellbird Creek undermining and along Flying Fox Creek No.3 resulting in loss of storage water is unacceptable to WaterNSW. The subsidence report (SCT, 2020) concludes that the proposed mining methods would not result in any noticeable subsidence, strain or tilt, stream bed uplift or bed cracking in Gallaghers Creek and that cracking from the void would not extend into the Bulgo sandstone or the higher Hawkesbury sandstone. The supplementary report (SCT, 2021) concludes that the coal seam is immediately beneath the Coal Cliff sandstone and that cracking would not extend past the roof bolts (approximately 2-2.5 metres above the void i.e 58-57.5m beneath the base of Lake Avon at its

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lowest point). This is a significant concern to WaterNSW. It is requested that the Department seeks advice from Dams Safety NSW in this regard and adopt those recommendations.

- 2. Geological Features:** The supplementary Subsidence Assessment Report (SCT, 2021) has stated that most geological intrusions (dykes and faults etc) are dry within the Southern Coalfields. This is not WaterNSW's experience. The RtS proposes mitigation measures to drill ahead 50 metres to determine any areas of elevated hydraulic conductivity, however there is no contingency plan specified should such an area be encountered. WaterNSW remains concerned that geological features such as dykes and the Wongawilli fault could act as conduits for water from Lake Avon storage entering the void. WaterNSW agrees that a water monitoring program be set up to determine if there is any modern water in the mine and the existing mine TARPs, emergency and contingency plans updated to address the issue.
- 3. Groundwater Model:** WaterNSW notes that the groundwater model is a regional model based on all the available data, however it is not specific to the location of this project and hence defers to the comments of DPIE-Water in the adequacy of the model.

Conclusion

WaterNSW does not object to the project proceeding, however requests that its key areas of residual concern above be considered by the Department when making a determination and modified approval conditions on this project and by the applicant in drafting its monitoring and management plans. WaterNSW requests to continue to be listed as a key agency for consultation on this and other projects by Wollongong Coal Limited in the future.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Daryl Gilchrist".

Daryl Gilchrist
Manager Catchment Protection