



013

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

APPLICATION

DE-2022/28

Date

15 March 2022

Dear Sir/Madam

Development	State Significant Development - Dendrobium Mine - Modification 9 - Gas Management Infrastructure - DA60-03-2001-Mod-9 Provide Advice on Modification Report
Location	4 Stones Road, MOUNT KEMBLA NSW 2526

Thank you for providing Council with the opportunity to make comment on the modification report.

Council has reviewed the report and understands that:

- Illawarra Metallurgical Coal (IMC) has consulted with relevant government agencies and stakeholders including NSW Environment Protection Authority; Water NSW, Regional NSW – Mining Exploration and Geoscience; DPE – Biodiversity Conservation Division, Natural Resources Access Regulator and the Dendrobium Mine Community Consultative Committee ;
- All construction activities and infrastructure would be located wholly within the previously approved and previously cleared area associated with Dendrobium No. 2 and 3 Shafts;
- Clearance of vegetation (and management of vegetation for bushfire control purposes) is required within areas of revegetation (i.e. revegetation that has occurred following the approved clearance activities to establish the existing ventilation shaft infrastructure;
- There may be need to provide for temporary bracing of the Sandy Creek bridge and electricity transmission upgrade infrastructure works,
- A new access protocol with WaterNSW is required under the WaterNSW Special Areas Wet Weather Access Plan
- IMC has considered various options for reducing the methane gas from mine operations and has also considered using the gas for power generation using a gas turbine rather than a flare.
- Implementation of the post-drainage programme provides an alternate pathway for some of the gas such that it is directed to a gas drainage range rather than mine ventilation (substitution of the hazard for a lower gas make in the mine ventilation) provides the lowest risk practically achievable and is the preferred option; and
- The same gas management infrastructure may be used to assist to pre-drain Long Wall blocks for the Dendrobium Mine Extension Project State Significant Infrastructure (SSI)- 33143123, if approved.

Council considers that whilst the preferred option proposed could be perceived as facilitating ecologically sustainable development, as it may reduce Scope 1 greenhouse gas emissions via methane flaring (28 times global warming potential comparatively) being converted to CO₂ with no significant change to the currently accepted environmental impacts, and not increase in the duration of existing impacts of the Project, further consideration is required of cumulative impacts should the same infrastructure be required assist with gas drainage from the proposed Dendrobium Mine Extension Project currently under assessment by the Department.

There may opportunity for the Department to encourage IMC towards exploring and further developing technology to both capture and reuse mine gas emissions for electricity production such as has been trialled at the Appin mine facility. In doing so future operations may better align with and assist Council's Global Covenant of Mayors for Climate and Energy (GCoM) emissions reduction target for the Wollongong Local Government Area, the Wollongong Climate Change Adaptation Plan and Our Wollongong 2028 Community Strategic Plan Goals.

This letter is authorised by

John Wood
City Wide Development Manager
Wollongong City Council
Telephone (02) 4227 7111



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