

2 September 2021

Department of Planning, Industry and Environment
Locked Bag 5022
PARRAMATTA NSW 2150
Via Email: Stephen.ODonoghue@planning.nsw.gov.au

Dear Steve,

RE: NARRABRI UNDERGROUND MINE STAGE 3 EXTENSION PROJECT – RESPONSE TO FORESTRY CORPORATION OF NSW SUPPLEMENTARY SUBMISSION

As you are aware, the New South Wales (NSW) Department of Planning, Industry and Environment (DPIE) placed the Narrabri Underground Mine Stage 3 Extension Project (the Stage 3 Project) Environmental Impact Statement on public exhibition in late 2020.

In response to submissions received during the exhibition period, Narrabri Coal Operations Pty Ltd (NCOPL) lodged its Submission Report on 31 May 2021.

Following this, Forestry Corporation of NSW (FCNSW) has reviewed the abovementioned documents and provided a supplementary submission on the Stage 3 Project. Responses to the matters raised in the supplementary submission is provided in Attachment 1.

Please do not hesitate to contact the undersigned on 6794 4184, 0448 045 814 or DEllwood@whitehavencoal.com.au should you have any queries.

Yours sincerely,



David Ellwood
Director, NCO Stage 3 Project

ATTACHMENT 1
RESPONSE TO FCNSW QUESTIONS

Question 1.1

FCNSW stated:

- 1.1 *Section 3.3.1 of the Amendment Report introduces the likelihood of the use of flares in a bushfire prone environment. Where will Whitehaven Coal document their flare management procedures? What standards of vegetation clearance will be used? Will FCNSW and the NSW Rural Fire Service be consulted as part of the drafting of flare management procedures?*

Response

Flaring infrastructure would be constructed within the indicative Surface Development Footprint for the Stage 3 Project.

NCOPL would consult with FCNSW when preparing the Bushfire Management Plan. The Bushfire Management Plan would include a description of equipment and other resources to be made available for bushfire detection and suppression. In addition, the Bushfire Management Plan would outline flare management procedures. Notwithstanding, the flares would be constructed via the enclosed flare method, which is described as¹:

An enclosed flare surrounds the burner head with a refractory shell that is internally insulated. The shell helps to reduce noise, luminosity and heat radiation. Enclosed flares allow better combustion by maintaining temperature, air flow and more stable combustion conditions, maximising the conversion of methane to carbon.

Question 2.1

FCNSW stated:

- 2.1 *The RTS describes the expansion of Whitehaven Coal's groundwater monitoring network (p.31). Will any of these sites be on State forest beyond the boundary of MLA2?*

Response

Six additional groundwater monitoring locations are proposed upstream and downstream of the Stage 3 Project on Kurrajong, Pine and Tulla Mullen Creeks. These additional sites are not located in State Forest outside of Mining Lease Application (MLA) 2.

Question 3.1

FCNSW stated:

- 3.1 *FCNSW expressed concerns that windthrown trees could impact above ground electricity transmission lines (ETLs) if cleared corridors hosting ETLs were not wide enough (February 2021). Page 74 of the RTS highlights FCNSW's commentary. The Amendment Report proposes a reduction in the ETL corridor width (p.13). To what degree is ETL corridor width being reduced?*

Response

NCOPL would consult with FCNSW when preparing the Bushfire Management Plan in regard to requirements for bushfire management adjacent to proposed Electricity Transmission Lines (ETLs).

The updated engineering design has informed an improved understanding of the ETL allowing some portions of the proposed surface development associated with Services Corridors from the Stage 3 Project Environmental Impact Statement to be removed. The widths of the Services Corridors have not been reduced compared to the Stage 3 Project Environmental Impact Statement.

In addition, NCOPL would manage ETLs in accordance with the *Guide for the Management of Vegetation in the Vicinity of Electricity Assets* (Industry Safety Steering Committee, 2016)². NCOPL would continue to audit the implementation of the vegetation management protocol in the vicinity of ETLs, as required.

¹ Environment Protection Authority (2015) *Flaring of gas*.

² Industry Safety Steering Committee (2016) *Guide for the Management of Vegetation in the Vicinity of Electricity Assets*.

Question 3.2

FCNSW stated:

- 3.2 *How does Whitehaven Coal propose to reduce the likelihood of windthrown trees impacting the ETLs? Is there opportunity for single tree removal along the ETL corridor (E.g. remove individual trees which are of a height which pose a risk to the ETL)?*

Response

In accordance with Section 3.1 of the Biodiversity Development Assessment Report for the Stage 3 Project³, within the ETL Management Area, trees, shrubs and regeneration would be removed for construction and maintenance of the ETL. In addition, NCOPL would consult with FCNSW when preparing the Bushfire Management Plan in regard to requirements for bushfire management adjacent to proposed ETLs. NCOPL would manage ETLs in accordance with the *Guide for the Management of Vegetation in the Vicinity of Electricity Assets* (Industry Safety Steering Committee, 2016).

Question 3.3

FCNSW stated:

- 3.3 *In response to the proposed reduction in ETL corridor width, Whitehaven Coal proposes to consult with FCNSW regarding bushfire management adjacent to the ETLs (RTS p.74). However for FCNSW, prevention of ignition [is] as much an issue as control of consequential fire. Surveillance and fuel management for example will not necessarily prevent ignition from becoming an uncontrollable fire in many fire weather circumstances. The matter of reducing ETL corridor width and how this effects ignition risk should also be specifically raised with the NSW Rural Fire Service.*

Response

NCOPL would consult with the NSW Rural Fire Service during the preparation of a Bushfire Management Plan for the Stage 3 Project. The consultation would include consideration of ETL corridors and the potential ignition risks of the Stage 3 Project. In addition, NCOPL would manage ETLs in accordance with the *Guide for the Management of Vegetation in the Vicinity of Electricity Assets* (Industry Safety Steering Committee, 2016).

It is also worth noting that the widths of the Services Corridors have not been reduced compared to the Stage 3 Project Environmental Impact Statement.

Question 3.4

FCNSW stated:

- 3.4 *The Amendment Report describes updated ETL engineering design (Unity Power Engineers 2021) (page 13). What are these new design controls and how will Whitehaven Coal prevent trees falling across the ETLs?*

Response

NCOPL would manage ETLs in accordance with the *Guide for the Management of Vegetation in the Vicinity of Electricity Assets* (Industry Safety Steering Committee, 2016). This guide stipulates remediation measures for potential 'grow-in' and 'fall-in' vegetation hazards with powerlines.

It is noted that the updated engineering design has not informed revised controls for ETL management.

³ Resource Strategies Pty Ltd (2020) Narrabri Underground Mine Stage 3 Extension Project Biodiversity Development Assessment Report.