



**Centennial Coal**  
Mandalong

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14 July 2017

Ms. Lauren Evans  
Planning Officer  
NSW Department of Planning and Environment  
GPO Box 39  
SYDNEY NSW 2001

Ms Evans

**RE: Mandalong Mine MOD 5 – Response to Additional Information Request**

Please find attached a response to the additional information requested in relation to the Mandalong Mine Mod 5 application.

If you have any further questions in regards to this matter, please contact me on my mobile, 0407 207 530, or email [james.wearne@centennialcoal.com.au](mailto:james.wearne@centennialcoal.com.au).

Yours sincerely

**James Wearne**  
Group Approvals Manager

**Enclosed**

- Attachment 1 - Response to Additional Information Request
- Revised Flood Assessment Report Figure 35

## Attachment 1

### Mandalong Mine MOD 5 - Response to Additional Information Request

#### Subsidence Predictions

**Issue:** *There appear to be some inconsistencies between the various technical assessments with respect to predicted subsidence impacts. The Subsidence Impact Assessment indicates that the predicted maximum subsidence at the end of Longwall 24A is 884mm. The Flood Assessment Report (FAR) states that the maximum predicted subsidence would be 850mm. The Biodiversity Assessment Report states that there may be a maximum of 960mm of subsidence above LWs 24 & 24A. Please clarify these discrepancies, and whether this affects the accuracy of the FAR.*

**Response:** The Subsidence Impact Assessment (Seedsman Geotechnics, 2017) predicted a maximum vertical subsidence of 884mm. Seedsman Geotechnics provides subsidence contours at 50mm intervals and the same data as grid files (10m grid) for flood modelling. The maximum subsidence shown on the contours is 850mm as stated in the Flood Assessment of the Water Resources Impact Assessment (GHD, 2017). The difference in the maximum predicted subsidence quoted in the subsidence assessment and the Flood Assessment of the Water Resources Impact Assessment has no influence on the outputs from the flood model.

The Biodiversity Assessment Report (RPS, 2017) incorrectly states the maximum predicted vertical subsidence over LW24-24A is 960mm. This is simply a typographical error. The figure is a hangover from the Biodiversity Assessment Report that was completed for Mod 4 (LW22-23), where 960 mm was the maximum predicted vertical subsidence. The correct maximum predicted vertical subsidence should have been stated as 884 mm, as per the Subsidence Predictions Report completed for Mod 5 (Seedsman Geotechnics, 2017). Nonetheless, this typographical error does not influence the outcomes of the biodiversity assessment for Mod 5, which has been based on the Subsidence Predictions Report (Seedsman Geotechnics, 2017) and Flooding Assessment Report (Umwelt, 2017). With the exception of the typographical error stated above, all other relevant inputs to the biodiversity assessment are consistent with the subsidence and hydrology impacts predicted in the abovementioned reports.

#### Flooding Impacts

**Issue:** *The RTS does not appear to address OEH's comments regarding potential flood impacts.*

**Response:** It is acknowledged that the freeboard for Building 219 is predicted to decrease as a result of the proposed Modification for a 1 in 100 year ARI storm even. As part of the development of Extraction Plans, Centennial Mandalong is required to prepare Property Subsidence Management Plans for each individual property. In accordance with Schedule 4 Condition 6(h) of the conditions of consent for the Mandalong Southern Extension Project, the Property Subsidence Management Plans are required to include, amongst other things, a flood impact assessment, including a prediction of the minimum freeboard of the residence in a 1 in 100 year ARI flood event.

Where these predictions show the minimum freeboard at the residence to be less than 0.5 m in a 1 in 100 year ARI storm event, the Property Subsidence Management Plan is required to recommend works to raise, remediate or relocate the residence and/or provide suitable access to the property, prior to undermining the residence. Where these works are unable to be undertaken, offers to acquire the whole of the property, or such part of the property requested by the landowner where subdivision is approved, in accordance with conditions 3 and 4 of Schedule 5.

The Property Subsidence Management Plan for Building 219, to be prepared as part of the Extraction Plan for longwalls 24-24A, will identify strategies, that have been developed in consultation with the

landowner, as to how to manage or remediate impacts associated with a decline in freeboard during a 1 in 100 year ARI storm event.

**Issue:** *The note accompanying Table 4.6 indicates that proposed monitoring locations (relevant to MOD 5) are shaded. However, there is no shading in the table. It is assumed that Locations H to O are proposed as part of MOD 5. Please confirm.*

**Response:** Centennial Mandalong can confirm that the additional monitoring points, specific to Mandalong Mod 5, contained within Table 4.6 of the Flooding Impact Assessment (Umwelt 2017) are points H to O.

**Issue:** *Error in Figure 35 of the Flood Assessment Report. The legend shows that predicted ponding for MOD 5 is shown in green. The 'approved' and 'proposed' colours have been switched. Request a revised Figure 35 to be provided.*

**Response:** A revised Figure 35 from the Flood Assessment Report (Umwelt 2017) has been attached.

### **Structural Inspections**

**Issue:** *How was it determined that wall linings were not asbestos? Was this through a visual inspection?*

**Response:** A structural inspection of the dwelling was conducted by ACOR Consultants on 27 June 2016. The structural / civil engineer visually inspected the dwelling and advised the landowner it was highly unlikely that the building contains asbestos based cladding materials. This assessment is based on the inspection and landowner advising that the building was constructed circa 1900, a time which pre dates considerably the introduction of asbestos based cladding materials into Australia in the 1920s and gaining favour particularly in the 1940's. ACOR Consultants advised that it was generally accepted that there is an unrealistic level of concern at the potential for harm from bonded asbestos products, such as the old James Hardie cladding materials.

Further consultation with the landowner will be undertaken during the development of the Property Subsidence Management Plan for LW24-24A.

### **Transmission Towers**

**Issue:** *Who will be undertaking the work, and what legal basis they have for doing so (e.g. Is the work permitted without consent under the Infrastructure SEPP? Are all works contained within an easement?)*

**Response:** The subsidence mitigation work on TransGrid 330kV transmission line No. 24 is being undertaken and managed by TransGrid under their own authority. The works on the landowner's property are entirely within the transmission line easement as defined on the title search of Lot 17 DP 755238.

The rights to undertake work and access to undertake work by TransGrid to their electricity supply network are authorised under the Electricity Supply Act 1995 and associated Regulations. Specifically Section 45 of the Electricity Supply Act 1995 grants a network operator the right to carry out work and Sections 54-63 make provisions for powers of entry onto land in respect of electricity works.

TransGrid has consulted with the landowner before commencing the mitigation works and during the project. It is understood that TransGrid's legal department has provided the landowner's legal

representative with advice regarding their legal entitlement to access the transmission line easement to conduct the mitigation works.

**Issue:** *Who will be monitoring the work?*

**Response:** TransGrid.

**Issue:** *The RTS suggests that work will be completed in August 2017, however, the landowner is of the understanding that this may take up to two years.*

**Response:** The construction of the three cruciform footings was completed in June. The final mitigation works to install sheaves on the optical fibre cable is scheduled for completion by early August 2017. Following the completion of subsidence from LW24A during December 2018, the soil excavated from around the cruciform footing on Tower 45 will be filled in and the site rehabilitated.

The photograph below shows Tower 47 with retrofitted cruciform footing and excavation to allow the tower to freely move during subsidence.



**Issue:** *Will any further compensation be offered?*

**Response:** Two of the three towers requiring mitigation works are located on private property. Centennial Mandalong offered the same compensation agreement to both affected landowners. While there is no legal requirement for Centennial Mandalong to provide a compensation agreement for the TransGrid works conducted under their own authority, the compensation amount was offered to the landowner as a sign of goodwill for any possible inconvenience they might experience.

Following correspondence from one landowner's legal representatives that, amongst other things, advised that their client was unlikely to agree to the terms of the current agreement, Centennial Mandalong withdrew the Compensation Agreement offer. No further offer is anticipated.



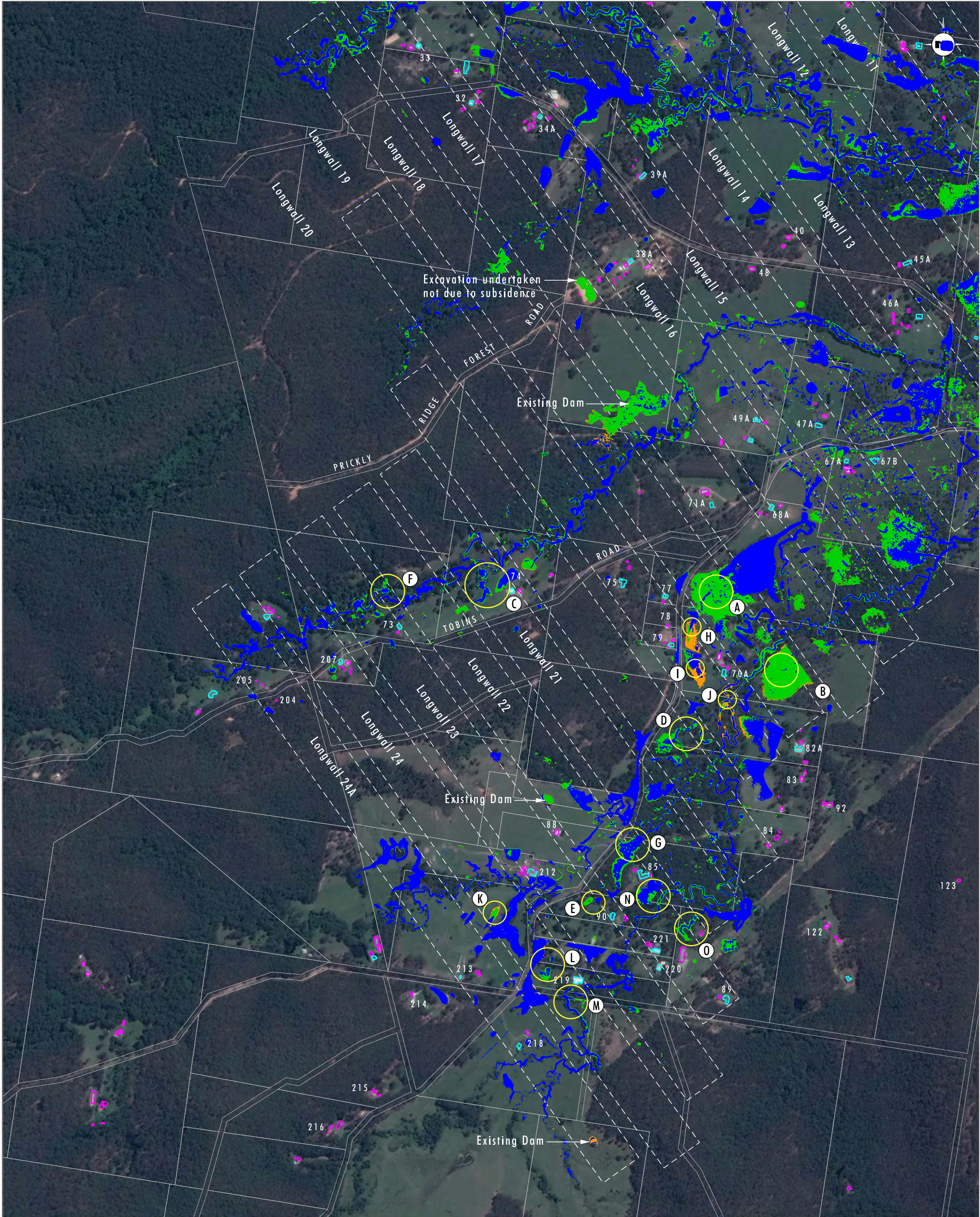


Image Source: Google Earth - CNES/Astrium (2015)  
Data Source: LPI NSW (2009), Centennial Mandalong (2016)

- Legend**
- |                    |   |
|--------------------|---|
| Longwall Locations | Premining Ponding                                 |
| Dwelling           | Predicted Subsidence Approved LW18 to 24 Ponding  |
| Other Structure    | Predicted Subsidence Proposed LW18 to 24a Ponding |
| Cadastral Boundary |   |
| Observation Point  |   |

**FIGURE 35**  
**Potential Remnant Ponding and Observation Points**  
**Longwalls 18 to 24a**