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### **Hume Coal Project and Berrima Rail Project: Response to submissions**

Dear Clay

I refer to the Department's email dated 25 July 2018 inviting the Resources Regulator to comment on the response to submissions received for the above project.

Hume Coal Pty Limited (Hume Coal) is seeking development consent for a state significant development project (SSD 7172) – the construction and operation of an underground coal mine and associated mine infrastructure in the Southern Coalfield of New South Wales.

The Hume Coal Project is the proposed development of a low-impact, underground coal mine. Hume Coal plans to extract high-quality coking and industrial coal from the Wongawilli seam 70 to 180 metres below ground, using an extraction method, which Hume Coal refer as 'pine-feather', designed to preserve the long-term stability of the overlying strata and landscape above.

The proposed coal extraction area extends from the Illawarra Highway in the south to the Belanglo State Forest in the west.

#### Environment

The Environmental Assessment for the Hume Coal and Berrima Project was reviewed by the Resources Regulator for adequacy and a request for further information was submitted by the Regulator on 29 May 2017 (refer INT17/82424/DOI). Specifically this required the applicant to provide further justification for the proposed reduction in Land and Soil Capability (LSC) for approximately 58 hectares of land subject to disturbance associated with establishment of surface facilities.

The Resources Regulator advises the Department of Planning and Environment – Resource Assessments that the Response to Submissions adequately address the requirements for rehabilitation. Specifically, providing sufficient justification that the rehabilitated project area will be capable of supporting the intended final land use of grazing.

#### Mine Safety

The Resources Regulator Mine Safety Operations is responsible for ensuring mine operators manage the risk to worker health and safety through compliance with the *Work Health and Safety Act 2011* and the subordinate mining legislation. In particular the effective management of risk associated with the principal hazards as specified in the Work Health and Safety (Mines and Petroleum Sites) Regulation 2014.

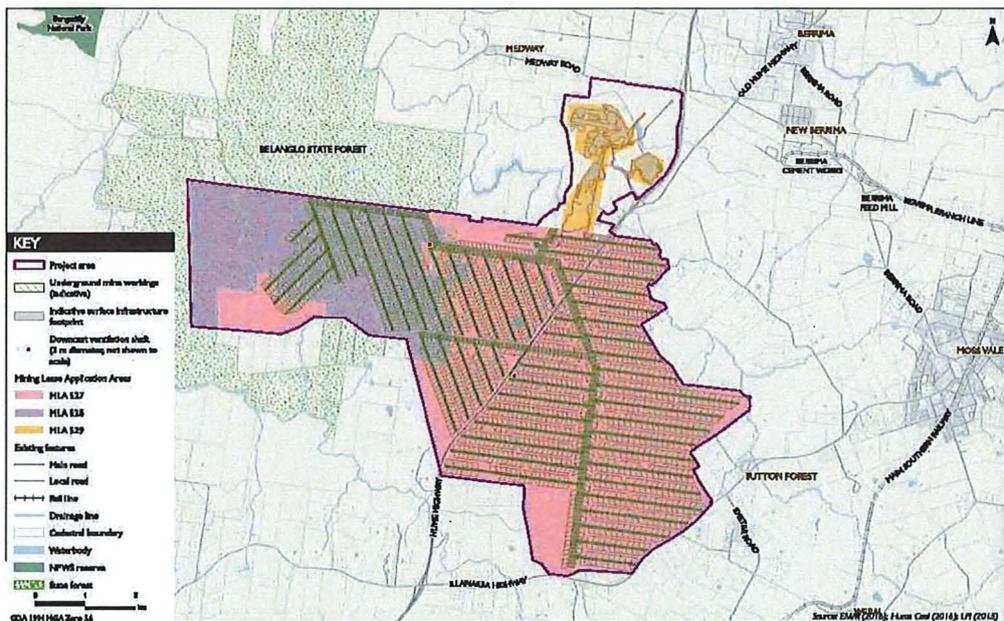
Hume Coal Project has proposed a mine plan in the EIS (see fig 2.1 from EIS). Based on the proposed area of extraction the Resource Regulator would normally only comment on one specific area of risk – subsidence, but due to the fact that the proposed method of extraction has not been undertaken in NSW does pose a number of specific concerns that will need to be addressed prior to commencement of production operations.

Subsidence, as a result of extraction, may impact on built features and public infrastructure. Based on the proposed area of extraction there are a number of public roads that the proposed extraction area will undermine including the Old Hume Highway; transmission towers; gas pipeline (Moomba to Sydney); and local and regional water pipelines. At this point in time subsidence levels can only be theoretical as the method of mining has not been undertaken to draw comparisons.

The second area of safety concern relates directly to the method of mining. As stated this method is untested and as such work health and safety concerns relating to the following areas would need to be addressed:

- Drivage – The proposed 120 metres run-outs will be developed remotely and as such technical challenges will need to be managed to ensure that the development of subsequent intra-panel pillars will be sufficient to ensure they are fundamentally stable. These pillars will have a significant role in the management of subsidence.
- Panel Design - The proposed method is limited in dealing with variations of geology and as such a change in geology may result in the abandonment of a runout. This may have an impact on stress distribution and hence potential impacts on subsidence behavior.

It should be noted that the proposed mining method to be utilised by Hume Coal is stated as *consisting of alternative web pillars and drives using continuous miners*<sup>i</sup>. This method of mining is a variation of the Wongawilli Pillar Extraction method and as such is secondary extraction. As such Hume Coal will be required to notify the Resources Regulator as part of the High Risk Activity notification process. This process will need to address the health and safety concerns as outlined above.



Indicative project layout  
Hume Coal Project  
Environmental Impact Statement  
Figure 2.1

Should you require any further information please contact me on 02 4063 6444.

Yours sincerely

A handwritten signature in black ink, appearing to be 'Matthew Newton', with a horizontal line extending to the right.

Matthew Newton  
Director Compliance Operations  
NSW Resources Regulator

2 October 2018

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<sup>i</sup> Hume Coal Project Volume 1 – Environment Impact statement- Main Report page 9.