

Stephen O'Donoghue
Director
Resource Assessments

2nd March 2021

Dear Stephen,

Maules Creek Coal (10_0138)
Modification 7 – Landform

I object to the Modification 7 – Landform for the following reasons.

1. Fistly the proposed height increase of just 1 metre is deceptive. This height increase to 439 m is not the the highest mAHD just the 'average'. It is clearly stated that the intention to have areas of this unsightly overburden reach heights of 455 mAHD, which is clearly much more than just 1 metre, in fact, 16m. This photo below taken form the 'THERRIBRI 8936-IV-N Topographic map, clearly shows that prior to the Maules Creek Project, the highest elevation in close proximity to the northern overburden to the west is a mere 353m and only 380m to the east of the project.



THERRIBRI 8936-IV-N Topographic map

Altering this landscape with elevations of between 59m to 75m higher than the original landscape will ultimately alter the way water is carried to Back Creek and affect the floodplains downstream, with unknown flooding and erosion impacts in times of heavy rain. It will take the best part of 100years to grow a 'forest' on this overburden, (if ever) it is most likely that much of this 'hill' will end up downstream before any real vegetation can prevent rills and gullies forming.

A section 240 notice (NTCE0005466) was issued by the Resources Regulator on 28 May 2020 under the NSW *Mining Act, 1992*, and it is noted that overall, 10,233 loose cubic meters (LCM) of topsoil was lost during this erosion event. Hence the need to modify the overburden.

Increasing the height does not ensure that topsoil will not be lost again in the event of a heavy down rain event, nor will it enhance the environment or improve the amenity for the community. The reason for the increase is solely for economic value to Maules Creek Coal Mine.

*'Changes to final landform to incorporate macro- and micro-relief (i.e. gently undulating surfaces) into final landform design, including localised higher points on the Northern **Emplacement (up to approximately 455 mAHD)** to replicate natural drainage systems and improve integration with the surrounding environment. (page. 10 Mod. Report.)*

Without contour banks there will be little moisture captured on the steep slopes and considerable erosion will most likely be the outcome of this experiment just using 'undulating surfaces'.

This is the 7th Modification this Project has requested, and with each of these modifications comes more cumulative impacts to the environment and the local community. Small incremental changes add up to major impacts at the end of the day. I ask you to reject this further modification to increase the height and footprint of the northern overburden, for the sake of the environment and the Maules Creek Community that have to bear the burden of these impacts.

This excerpt below from the modification report leaves open even more scope for changes to facilitate profit above environmental rehabilitation of the Leard State Forest – '*coal market volume and quality requirements, mining economics*' that won't require further approval if this modification is approved, again only in the interest of the mining company not the environment. The wording that uses 'GENERAL' is the way things become sloppy and blurred and should not be allowed in any Modification or Management Plan

*'The mining layout and sequence shown on Figures 2-1 to 2-3 **may vary** with consideration of localised geological features, coal market volume and quality requirements, mining economics and detailed engineering design. (page. 9 - Modification Report)*

Visual impact as the North/western overburden rises high above the Back Creek treeline where prior to Maule Creek Coal Mine, no 'hill' could be seen.



Overburden – taken from Teston Lane – 14-9-2017



Overburden – taken from Teston Lane – 14-01-2018



Overburden – taken from Teston Lane – 03-03-2019



Overburden – taken from Teston Lane – 21-12-2020

2. The relocation of the explosives reload area, that is presently on the north/eastern side of the mine is of particular concern to me.

This, explosives reload area was the cause of the 'pollution' event of polystyrene balls along back creek in early 2020 after a heavy rain event. I believe that this reload area had a small dam above it and was situated at a lower level and possibly the down-hill flow from either the dam overflowing or just the lower elevation of the explosives area after heavy rain allowed this pollution even to occur. It is with this in mind my great concern is that if the explosives reload area is relocated to below not one small dam, but two much larger dams (raw water dam – clean water dam) that in the event of a heavy rain event there could be an even larger pollution event that would ultimately end up in Back Creek, should these dams overflow.

The explosives reload area if relocated would be in much closer proximity to my residence, and that gives me cause for concern in itself, having explosives stockpiled in this area.

3. The final void,

Previously assessed MCCM final landforms (e.g. former infrastructure areas, water management infrastructure, former waste rock emplacements, and the final void) **would not be changed by the Modification**. Consistent with the approved MCCM, the size and depth of the final void, and its drainage catchment, would continue to be minimised as far as is reasonable and feasible over the remainder of the MCCM life.

The additional out-of-pit emplacement capacity would not change the approved final void depth, **but would result in a nominal increase in the final void volume and surface area compared to the previously assessed final void volume**. An assessment of the minor change to the - final void was carried out by Australian Groundwater and Environmental Consultants Pty Ltd (AGE). The assessment is provided in Appendix C and summarised in section 6.3. (page 14. Modification report)

I would like an explanation as to how these two conflicting statements can be considered. 'would not be changed by the modification' and 'would result in a nominal increase in the final void volume and surface area compared to the previously assessed final void volume'

It is either changed or not changed! The community was against having a final void in the first place, and for this company to change the volume and surface area by using words that they think the community and myself either won't see or overlook is by saying that this modification would not change the void, suggests that they will change it in the future.

So, I ask that this modification be rejected on the basis of increasing the footprint, height and the volume of the void. None of which will improve or benefit the environment and will impact the community even more that it already has.

Regards

Roselyn Druce

Maules Creek, Boggabri NSW 2382