

Stephen O'Donoghue
Director Resource Assessments
Department of Planning
12 Darcy St., Locked Bag 5022.
Parramatta, NSW 2124.
stephen.odonoghue@planning.nsw.gov.au

Dr Peter Turner
NPA Head Office
PO Box 528
Pyrmont, NSW 2009
petert@npansw.org.au

4/2/21

RE: PA 09_0161 MOD 2 - Wongawilli Colliery Modification North West Mains Development

Dear O'Donoghue,

I write on behalf of the National Parks Association of NSW (NPA) to register the following key concerns regarding the proposed North West Mains Development for the Wongawilli Colliery (Mod-2):

- (i) The inrush and inflow hazard posed by dyke intersection.
- (ii) The piecemeal approach to mine expansion.

SCT's subsidence assessment considers the potential for inflow associated with dyke intersection. The consultants conclude that the risk is low, provided drilling ahead of extraction is undertaken. In its 1986 assessment of the Blue panel inflows the DSC commented as follows; *"This situation at Wongawilli Colliery emphasises the inherent problem in underground extraction that the full geological and hydrogeological situation cannot be ascertained prior to mining. Even the development phase may not foresee future problems."*[1] The paper expresses puzzlement at the presence of significant surface cracking when *"surface subsidence and tensile strains are low"* and suggests *"strata disruption has been more severe than would be expected from the small area of extraction"*. [1]–[4] In 2014 the mine's longwall machine was irretrievably buried following the collapse of a roof that had been assessed as sound.[5] The 1986 paper cautions that *"The geology of the area is complex and though it appears that the dykes and sill are inter-related, their role in the movement of water from surface to seam is not fully understood."* While the risk may be reduced with pre-drilling, the consequence of unanticipated inflows could be significant.

The NPA is further concerned by the piecemeal approach being taken in pursuing what will be a State Significant Development (SSD) project. This approach would prejudice the subsequent assessment of the SSD. Compounding this concern, the mining company faces considerable financial difficulties and has a record of compliance failures. The NPA urges the Department to require the company to submit the first workings proposal as part of the SSD project.

Thank you for your consideration. Yours sincerely,

Dr Peter Turner
Mining Projects Science Officer
NSW National Parks Association

References

- [1] L. M. Whitfield, "Monitoring and investigation of water inflow into a coal mine in New South Wales, Australia," *Groundw. Eng. Geol.*, pp. 417–421, 1986.
- [2] D. Anderson, D. H. . S. Stapledon, and N. S. Mattes, "Coal Mining Beneath Reservoirs New South Wales Australia 1979 - 1989," Dams Safety Committee, 407/JG/JENNY.AA9/MASS, May 1989.
- [3] L. M. Whitfield, "The Role of Algae in the Investigation of Water Inflow into a Coal Mine," presented at the The Third International Mine Water Congress, Melbourne Australia, Oct. 1988.
- [4] L. M. Whitfield, "The Effect of Coal Mining on the Hydrogeological Regime of the Southern Coalfield, New South Wales," in *Fifth Australia-New Zealand Conference on Geomechanics: Prediction Versus Performance; Preprints of Papers*, Sydney NSW, Aug. 1988, pp. 78–82.
- [5] B. K. Hebblewhite, "Crinanite Assessment Peer Review," On behalf of Gujarat NRE Coking Coal Ltd, May 2010.