

9 September 2021

Rose-Anne Hawkeswood
Department of Planning, Industry and Environment
GPO Box 39
PARRAMATTA NSW 2150

Dear Rose-Anne,

Whitehaven Coal Limited (Whitehaven) has prepared this letter to provide **comments** on the *Boggabri Coal Mine Modification 8 to SSD 09_0182 Modification Report* (Modification 8) and associated specialist assessments. Maules Creek Coal Pty Ltd (MCC), operator of the Maules Creek Coal Mine (MCCM) and Tarrawonga Coal Pty Ltd (TCPL), operator of the Tarrawonga Coal Mine (TCM) are subsidiaries of Whitehaven. The MCCM and TCM are located adjacent to the Boggabri Coal Mine (BCM), north and south of the BCM, respectively. The BCM, MCCM and TCM are collectively referred to as the BTM Complex.

It is understood that the following key changes to the approved BCM are proposed:

- Increasing the approved maximum depth of mining down to the Templemore Coal Seam to recover an additional 61.6 Million tonnes of run-of-mine coal within the currently approved Mine Disturbance Boundary. This will result in the extension of the mine life by six (6) years; and
- Construction of a specifically designed fauna movement crossing over the existing haul road between the Overburden Emplacement Area (OEA) and the western side of a regional biodiversity corridor. The establishment of the fauna movement crossing is proposed to improve the movement of fauna from the Leard State Forest through the Southern Rehabilitation Area.

Whitehaven maintains regular dialogue with Boggabri Coal Operations Pty Ltd (BCOPL) in relation to the BTM Complex. In preparation for lodgement of Modification 8, BCOPL consulted Whitehaven on two occasions to provide an overview of the Modification scope, timing and select preliminary assessment outcomes. Whitehaven is committed to continuing this constructive dialogue with BCOPL in relation to Modification 8 and the BTM Complex.

Whitehaven is supportive of the employment and economic benefits associated with the BCM which would continue to 2039 if Modification 8 is approved. Whitehaven provides the following comments on Modification 8 for consideration by BCOPL and the consent authority (Table 1).

Yours sincerely



Tony Dwyer
Group Manager - Approvals and Environment

Table 1
Whitehaven Comments on BCM Modification 8

Reference/Finding	Comment
<p>The Groundwater Assessment¹ found that following recovery of groundwater levels within the backfilled spoil, the BCM final landform would act as a source of seepage that:</p> <p><i>...largely report to the adjacent Maules Creek and Tarrawonga voids...</i></p>	<p>Whitehaven considers that the assessment could be improved through the use of appropriate modelling to estimate the additional seepage quantity and quality impacting on the MCCM and TCM.</p>
<p>The Groundwater Assessment¹ does not appear to consider the Roma or Brighton bores among the potential cumulative impacts on groundwater resources from the BTM Complex.</p>	<p>Cumulative groundwater impacts with the Roma and Brighton bores should be considered.</p>
<p>As per Figure 3.5 of the Surface Water Assessment², the proposed final landform includes a clean water diversion located along the northern boundary of the TCM. However, limited detail regarding this diversion has been described (e.g. size).</p>	<p>Further detail regarding the proposed clean water diversion along the TCM boundary should be provided including whether the use of Whitehaven-owned land is proposed.</p>
<p>The Evaluation of Final Landform assessment³ outlined that:</p> <p><i>...one relatively small area of the proposed OEA... has increased erosion potential, whereas erosion potential is not significantly changed for the remainder of the landform.</i></p> <p><i>Because the area of increased erosion risk is relatively small, practicable and achievable options that could be applied to reduce its erosion risk to a more acceptable level include:</i></p> <ul style="list-style-type: none"> • <i>diversion of flow from the OEA top away from this batter (as indicative in Figure 16 and Section 3.4.5); and/or</i> • <i>rock armouring the short steep section at the toe of the slope.</i> <p>BCOPL committed to consultation with Whitehaven regarding an area of potential erosion risk in the overburden emplacement area adjacent the TCM yet to be resolved⁴.</p>	<p>Whitehaven is supportive of the commitment to ongoing consultation regarding this matter.</p>
<p>The Modification Report describes that a valley will remain between the BCM and TCM waste emplacements. The Evaluation of Final Landform assessment notes that³:</p> <p><i>...some planning will be required to manage runoff reaching that valley from the adjoining batter slopes.</i></p>	<p>Whitehaven is requesting further consultation is undertaken regarding managing this runoff.</p>
<p>Modification 8 seeks to remove Schedule 4, Conditions 9 and 10 of SSD 09_0182. BCOPL alternatively propose that these conditions be amended to require additional noise attenuation only if the monitoring evidences a trend of noise exceedances at privately owned receivers⁴.</p>	<p>The potential cumulative impacts with the MCCM and TCM regarding the removal of this condition should be further evaluated.</p>

¹ Australasian Groundwater and Environmental Consultants (2021) *Groundwater Impact Assessment Boggabri Coal Mine MOD8 to SSD 09_0182*.

² Engeny Water Management (2021) *Boggabri Coal Mine Modification 8 Surface Water Assessment*.

³ Landloch Pty Ltd (2021) *Boggabri Coal Mine Evaluation of Proposed Changes to Final Landform – Modification 8*.

⁴ Hansen Bailey (2021) *Boggabri Coal Mine Modification 8 to SSD 09_0182 Modification Report*.