

PO Box 290
Newcastle 2300

24 September 2019

Submission: Maxwell underground

Thank you for the opportunity to make a submission on this project.

Lock the Gate Alliance objects to this project.

We believe that the addition of a new underground coal mine in this location at this time is unsustainable and adds to the cumulative impact on water resources already being experienced in the district as a result of extensive coal mining activity. It also adds to a cumulative social and economic impact that is putting pressure on the agricultural industries of the region and contributing to the ongoing decline of diversity and resilience in the Hunter's economy.

We support the thoroughbred breeding industry in its objection to this proposal and urge the Department of Planning and the New South Wales Government to engage in negotiations with that industry to resolve the ongoing conflict and strain being imposed on it by inappropriate mining proposals.

We accept and acknowledge the company's commitment to underground mining to reduce air pollution and amenity impacts of the mine but a longwall mining operation in this location will inflict unacceptable impacts on water resources. Since the proponent is proposing to partially use bord and pillar methods, we suggest an alternative study be presented looking at the potential to use this method exclusively and avoid the fracturing and subsidence caused by longwalling.

The potential impacts of this project include, in the words of the IESC:

- long-term changes, which are severe and irreversible, to Permian hard rock aquifers and surface watercourses, due to subsidence fracturing
- changes to groundwater levels in alluvial aquifers due to leakage through shallow, hard rock fractures into hard rock aquifers;

We note that the proponent does not hold sufficient licences in the Sydney Basin North Coast groundwater source to account for its expected annual water take of 1,096ML (Attachment 8). There would appear to be a shortfall of 505ML a year compared to the licences held by the proponent although in Table A8-3 the proponent relies on carry over provisions to reduce this estimate. The proponent cannot rely on carry-over being available, so the correct figure for the licences required is 505ML. The proponent argues that "a controlled allocation [in this water source] is justified given the inherent conservatism in the calculation of the planned environmental water and associated long-term average annual extraction limit for the Sydney Basin-North Coast Groundwater Source."

The proponent also incorrectly states that there is 20,000ML of unassigned water in this water source. The Rules Summary Sheet for the source clearly states that there is only 3,453ML of

unassigned water and an unknown volume of this was committed by the government in licences that had been applied for and not determined.

The mine's groundwater assessment identifies that it will cause up to 8 metres draw down in the alluvium of Saddler's Creek and Saltwater Creek. The groundwater Assessment (Appendix B) claims there will be "No cumulative drawdown in excess of 2 m predicted within the Hunter River "highly productive" alluvium, but there is extensive draw down in excess of 2 metres already. The Mid-Hunter Groundwater study estimated that the area of the area of alluvial water sources in the Hunter region overlying the >2 m drawdown impact zone was calculated at 123 km².¹ The map provided in that study shows the extent of this drawdown zone reaching its edge at the Drayton South site, so it's reasonable to infer that this project may worsen and extend this impact.

We note that the greenhouse assessment of the project makes no mention of global efforts to reduce greenhouse gas emissions in line with the commitments of the Paris climate agreement over the time frame that this mine is proposed to operate and how these related to the 326 million tonnes of carbon dioxide that will be produced from burning coal from the project. This is crucial context that must be provided for the assessment to be undertaken for the project to be adequately assessed. Similarly, there is no assessment provided against the principle of inter-generational equity.

¹ Mid Hunter Groundwater Study. Prepared by EMM for the NSW Office of Water. April 2015.