



# Goulburn River Stone Cottages

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## **Submission – Moolarben Coal Stage 1 Mod 15**

We own and operate Goulburn River Stone Cottages and object to the MOD 15 proposal.

It is difficult to assess the full impacts of infrastructure works along Saddlers Creek Road (access track~10m, buried pipeline and powerline) involved in the installation of the dewatering bore site (MOD 15) from the information provided.

Removal of native vegetation along the main and only entrance road to our eco – tourism business will affect the biodiversity and visual sensitivity (aesthetics) and is likely to disrupt and impede access during construction for our guests, some arriving late at night to an unfamiliar destination. The only telephone communication line to our home and business is also located along Saddlers Creek road (we have no mobile reception). As an active volunteer firefighter I frequently need to drive urgently along our access road when responding to fire-calls (40 fire-calls received since June).

The land area above UG4 is part of the biodiversity offset area (2) in the Moolarben Coal Complex (MCC) as shown in the conditions of approval (Appendix 8). Allowing native vegetation to be cleared within a biodiversity offset zone makes a mockery of planning conditions, eroding public confidence in the planning approvals process and laws. In addition Saddlers Creek Road has been designated a significant roadside by Mid-Western Regional Council. Significant net gain offsets must be established **before** there is further net loss of biodiversity from clearing mature native vegetation in an existing offset area. If there is no permanent protection and no net gain is achieved, it is not an offset.

We are also concerned about the location of the Remote Service Infrastructure Site S1MC-230 on Bora creek, and dewatering bore site opposite The Drip gorge in an area considered as high scientific and cultural value. Once these places are destroyed they are gone for good.

The Moolarben Coal MOD 15 is planning to drill a cluster of 3 dewatering boreholes opposite The Drip and at another 3 sites across the Underground No 4 Mine. Decades of evidence, both here and in the Southern Coalfield region, have irrefutably demonstrated

depressurisation and dewatering of the groundwater system by underground mining so close to a river system (the Goulburn River) will significantly lower groundwater levels for many kilometres. Everyone involved in this approval process must be aware that the execution of Underground 4 as described in this modification document will permanently alter the groundwater system and potentially the water supply to The Drip and Goulburn River National Park and that the planned dewatering boreholes located opposite The Drip are inconsistent with 'nil impacts' on The Drip (as required by MCC approval conditions). In this Mod 15 document and after personal consultation by MCC representatives, Moolarben has failed to show (other than by assertion) how their proposed landscape-scale dewatering will be restricted southward solely to the site of UG4 and also have failed to explain how 'nil impacts' on The Drip water supply will be achieved.

The 2-3 page groundwater review is inadequate. It is predicated on a 2007 approval based on questionable groundwater modelling while ignoring recent monitoring and increased water make greater than predicted and the significant groundwater impacts experienced at the adjacent Ulan Coal Mine. Original approval of this underground coal mine was based on water predictions that were a mix of speculation, poor data and flawed concepts. To continue to approve modifications wilfully blind to compelling new evidence is a denial of the principles of NSW Protection of the Environment Act Ecological Sustainable Development –intergenerational equity and the precautionary principle. Irreversible damage to irreplaceable water resources will not be avoided if this project proceeds.

An independent groundwater investigation of the impacts of mine depressurisation on Triassic/Upper Permian aquifers; potential interference to The Drip water supply and interaction with the Goulburn River is necessary to inform this application and before any approval can be considered.

Thank You

Colin Imrie