



THE COLONG FOUNDATION FOR WILDERNESS LTD.

Tuesday May 16th, 2017

Mr Ross Carter
Chair
Planning Assessment Commission
Level 3, 201 Elizabeth St
SYDNEY NSW 2000

Dear Commissioner Carter,

Springvale Water Treatment Project (SSD 16_7592), Western Coal Services Project Mod 1 (SSD 5594 Mod 1) and Springvale Mine Extension Project Mod 2 (SSD 5594 Mod 2)

SSD 16_7592

The Colong Foundation supports this mine water treatment proposal and its augmentation with storage of treated mine water in Thompsons Creek Reservoir for subsequent reuse at the Mt Piper Power Plant as needed. It is a good scheme but it should be adequately sized to accommodate mine water from other mines under the Upper Cocks River Action and Monitoring Plan (schedule 4, condition 13 of the revised Springvale consent).

In addition to mine water from other mines, all mine water discharges from Angus Place and Springvale must be included in the transfer scheme as described in the EIS report for this project. Springvale Water Treatment Project environmental impact statement states that: "The Springvale Mine water management scheme is integrated with the adjoining Angus Place Colliery operations, with mine water dewatering facilities at both operations transferred to the Springvale Delta Water Transfer Scheme" (page 3-2, Transfer Scheme EIS September 2016).

All mine water from Angus Place must be included in the proposal for this statement to be correct. LDP001 Angus Place is believed to be a potentially significant contributor of mine water discharge to the Cocks River and is not part of the scheme. As Angus Place Mine is hydrologically connected to Springvale Mine, any increase in LDP001 discharge perhaps could indicate that the physical limits of the existing Newnes Plateau transfer scheme may have been exceeded.

It is unclear to the Colong Foundation why the water transfer pipeline from Newnes Plateau to

LDP009 requires duplication, when according to the Springvale 2014 EIS this duplication was only necessary if Angus Place Mine was reopened (see Springvale extension EIS Vol 1, pg 162 para 7 and its Appendix F pages 60 and 62). The decision by the company as agreed by the Department of Planning and Environment (DPE) to only reopen Angus Place when Springvale is completed, should make duplication unnecessary.

The Colong Foundation suspects the Springvale Delta Water Transfer System (SDWTS) has reached its physical limit of the pipeline, which may be a key reason for the pipeline duplication.

The physical capacity of the duplicated SDWTS pipelines off Newnes Plateau to LDP009 is 66ML/day (30ML/day with the current pipeline and the proposed additional capacity of 36ML/day with the new pipeline). The minimum size for the transfer pipeline from LDP009 to the treatment plant should be larger than 66ML/day to cope with contingencies of additional mine water from Angus Place discharges from LDP001, not the proposed 42ML/day. It is inappropriate engineering practice to build a pipeline extension with a smaller capacity than the combined capacity of the existing and proposed duplication pipeline.

The Colong Foundation recommends a minimum capacity of the transfer pipeline of 70ML/day and consent conditions require all mine water from the Springvale and Angus Place Mines to be treated at the proposed facility. These commonsense provisions will ensure the goal of treating and reusing *all* the mine water from these two mines. Otherwise it is possible that a considerable residue of mine water will continue to be discharge from the Springvale and Angus Place coal mines.

Additional capacity would enable discharges from LDP006 and perhaps other mine water discharges to be collected and treated at a future date under the provisions of condition 13 of Schedule 4 of the revised Springvale consent.

SSD 5594 Mod 2

The Colong Foundation objects to Springvale Mine Extension Project Mod 2. This proposal should not be a modification as it would, if approved, cause a significant continuation of mine water pollution to Sydney's Drinking Water Catchment in a manner contrary the development consent. This continued pollution must cause sufficient harm to the Cocks River to fail the definition of a modification under planning law. If this was not the case, then the incremental reduction in mine water pollution would not have been required by the EPA to be included in the 2015 consent.

Further, the DPE claim that the modification would not increase the level of discharge is incorrect (see DPE Mod 2 assessment report, page 5). The DPE in this assessment neglected to consider the concurrent water transfer proposal to duplicate mine water flows under the SDWTS from Newnes Plateau, as well as the underestimate of mine water flows from LDP009

due to the gauging station defects and extra flows from LDP001 as reported in this submission. During the two year operation of Modification 2, flows from LDP009 will increase and the proposal is then not substantially as it was under the current consent.

Compliance with the 2015 development consent can be achieved by the purchase of an additional Reverse Osmosis Water Treatment Plant for temporary use at LDP009 until such as time as the treatment project is completed. The company has accepted that it would make such a purchase in its remarks to a previous PAC on the mine extension.

The case made by the company for Modification 2 is weak. Centennial Coal has agreed in writing that it would achieve the discharge limits by 30 June 2017. Purchase and temporary use of an additional water treatment plant at LDP009 is within the financial means of this company.

The foreshadowed benefits of a proposed treatment project in the coal services area provide no basis upon which to justify relief from consent conditions, as the proposal will only delay improved water quality outcomes for the downstream Cocks River environment within the drinking water catchment.

The company is merely relying on its argument that the proposed pollution 'holiday' is within the bounds of a modification. We disagree, particularly due to the additional mine water flows and to allow a mining company to break its word to the EPA, as reported in the previous PAC review report for the Springvale mine extension would also set a bad precedent.

SSD 5594 Mod 1

The solid waste from the proposed water treatment plant should be placed in a sealed emplacement area to prevent any increase in groundwater contamination. The Coal Services Area is underlain by shallow bord and pillar mines that make the area highly porous. As a result, half the water balance for this Area is accounted by transfers to groundwater.

Groundwater losses compromise water management at the coal services area. Half the water balance is not monitored by LDP006, and these losses are probably an underestimate as LDP006 hardly flows except following an extended period of wet weather.

It is impossible to separate the runoff and groundwater contributions from the proposed emplacement area from those of the coal reject area, and also the ash emplacement area that will extend deep into the Coal Services Area. It is also impossible to separate, in the manner proposed, the clean and dirty runoff in such a contaminated emplacement site, because surface water reports strongly to groundwater. How the EPA intends to reduce groundwater flows in the water balance needs to be further explained.

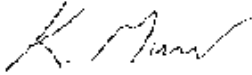
Partly for the above reasons LDP006 must be included in the proposed water treatment project and groundwater from the area contained, so that it does not contaminate Sydney's drinking

water catchment.

Energy Australia and Centennial Coal can well afford to line the proposed solid waste emplacement area, and also ensure high quality water treatment for LDP006 to protect the drinking water catchment and World Heritage Area downstream.

Thank you for considering this submission.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'K Muir', with a stylized flourish at the end.

Keith Muir
Director
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