

NSW Planning Assessment Commission
Level 3 201 Elizabeth St
Sydney NSW 2000.



Dear Members of the Commission

Reference D490-17 Invincible Colliery Southern Extension
Modification (07_0127 MOD 5)

I would like to express my concern regarding the rehabilitation of the existing open cut mine and proposed extension.

As far as I am aware rehabilitation bond money held by the former Department of Resources and Energy (DRE) would be totally inadequate. Based on Cullen Valley mine bond of approximately \$49m and in view of mess at that mine roughly estimated to cost in the region of \$8 to \$9 million by a local earthmoving contractor.

I would guess that the cost of rehabilitation of Invincible would also be in the vicinity of this figure.

Another great concern is that Shoalhaven Coal Pty Ltd trading as Castleough Coal is only a minor subsidiary of the Manildra Group and if approval does not go their way they could walk away and cut their losses leaving the state to complete the rehabilitation. Coalpas did exactly that despite shareholders being very wealthy.

The Mayor of Muswellbrook there has also been very

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spoken about the inadequate bond money held by open cut coal mines in his shirt and has stated that they should be increased four fold.

Another concern that existing open cut workings at Invercible and Cullen/Buller were not rehabilitated in terms of the previous approvals as bound out in Modification Refusal of 17/10/2014.

Since Castlecragh Coal has owned Invercible and Cullen Valley mines there has been no rehabilitation taken place although minimal care & maintenance has occurred despite the company having a number of large mining machines which have only been periodically started and maintained.

In your deliberation I would like you to give consideration to my following concerns:

- i) Increase rehabilitation bond on Invercible Colliery and Cullen Valley mine to a more adequate figure.
- ii) Seek a guarantee from the Manildra Group parent company guaranteeing that mine rehabilitation for both mines will be satisfactorily undertaken.

In closing I would like to mention that I have been a member of the Community Consultative Committee for Cullen Valley mine since it was originally approved and have attended joint Invercible and Cullen Valley meetings in recent times.

I have not made any political donations in the last two years.

Yours faithfully
Reg Harrison