

Submission Addendum Moolarben Coal Mod 14/Mod3 - IPC 2 April 2019

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In addition to my presentation and written submission to the IPC and after the site visit I would like to contribute the following information:

- The proposed mine water discharge point at the mouth of Bora Creek is poorly described and designed. The edge of Bora creek is an unstable coal bed, with a 12 metre drop into an unstable Goulburn River diversion. Highly dispersal clays and saline sediments in strata lining the channel and susceptibility to bank undercutting are on-going issues within the diversion channel. Recent work by UCML to rehabilitate some sections of the diversion channel is commendable however sections of the channel are still fragile and vulnerable to erosion with downstream water quality highly dependent on the presence of a healthy reed bed.
- UG4 mine is the central reason for the increase in mine water make and directly related to the depressurisation, dewatering and destruction of a good quality and productive groundwater, a valuable irreplaceable resource considering the coming climate crisis. The approval 12 years ago requires reassessment in the light of the unpredicted increase in water make and the experience of drawdown and subsidence at the neighbouring UCML.
- Establishing a substantial buffer area over a kilometre from the Goulburn River at the northern end of UG4 footprint would substantially reduce the risk of bed leakage and base flow losses to Goulburn River National Park, the interception of aquifers supplying The Drip gorge, as well as potential rock fall and cliff collapse from far field movements (Pells, 2006).
- Currently the monitoring of major ions, metals and pollutants contained in mine discharge water is not a requirement under current mine EPLs. The regular monitoring and reporting of these parameters needs to be a requirement in all mine discharge licenses into the Goulburn River.

Pells, P., 2006. *Moolarben Coal Project - Environmental Assessment Report, Subsidence Impacts*, Pells Sullivan Meynink Pty Ltd.,