



5 November 2020

Emeritus Professor Jim Galvin
Expert Panel Chair
Independent Expert Panel for Mining in the Catchment

via email: [REDACTED]
cc: [REDACTED]

Dear Professor Galvin,

Russell Vale Underground Expansion Project

I write in relation to the above application which is currently before the Independent Planning Commission (**Commission**) for public hearing and determination. The Commission has received submissions from the public raising concern in relation to the risks and impacts associated with subsidence.

The Commission is now writing to you to seek the Panel's expert advice having regard to the attached documentation (see below) and noting that:

- (a) the Applicant proposes to use a first workings bord and pillar approach with enduring, stable pillars in the mining of the Wongawilli Seam which lies below the previously mined Balgownie and Bulli Seams; and
- (b) that marginal pillars may continue to exist in sections of old workings in the Bulli Mine (i.e. full collapse of the Bulli Seam may not have occurred).

In its consideration of the Application, the Commission would be assisted by the IEPMC providing clarification on the matters set out below:

1. In terms of the STC report and Dr Hebblewhite's peer review, are the risk and extent of the predicted subsidence impacts in the catchment reasonable? This needs to be considered in two scenarios:
 - (i) that all the overlying Bulli Seam pillars have collapsed; and
 - (ii) that some of the pillars have not collapsed.
2. Is it likely that the Applicant will be able to develop a Mine Plan and Principal Hazard Management Plan that meets the requirements of the Resources Regulator and limits the level of subsidence to 100mm?
3. Beyond a 100mm target what is likely to be the worst-case local subsidence scenario if residual pillars in the Bulli Seam collapse?



4. Dr Gang Li has made comments and raised concerns relating to the local subsidence impacts and mine stability due to the possible existence of un-collapsed “marginally stable pillars”. Are these concerns adequately addressed by the approach proposed by the Applicant and the guidance given in the Resource Regulator’s *Letter to Commission from Resources Regulator on 16 October, 2020*?
5. We note that the Resources Regulator has recommended that the applicant undertake investigations to identify and define the existence and distribution of any marginally stable pillars in the overlying Bulli Seam. Are there proven non-invasive methods available to determine the subsurface presence of voids either from existing surface access points or from underground prior to development commencing in sections of the mine which may undercut areas identified as ‘unconfirmed’ with respect to pillars in the Bulli Seam?
6. To what extent should the status of any voids in sections of the old Bulli workings be determined before mining commences or is it appropriate to do this by measurement (and observation) of abutment stresses once mining commences?
7. Is the claimed stability of the pillars in the current application likely to be realised given the ground conditions expected in the poorer quality coal remaining in the Wongawilli Seam above that part of the Wongawilli Seam that is proposed to be mined?
8. Could any of the above matters be reasonably addressed through conditioning, and if so, how?

The Commission would appreciate if you could provide a response to these matters by 5pm, 13 November 2020.

If you have any questions, I have asked Mr Brad James, [REDACTED] to liaise directly with you.

Yours sincerely,

Stephen Barry
Acting Executive Director

Attachments:

- A) Applicant’s response to the Independent Expert Scientific Committee Advice, dated 15 June 2020;
- B) SCT Report, 12 dated June 2020;
- C) Dr Hebblewhite Peer Review Report, dated 7 April 2020;
- D) Transcript of Verbal Submission by Dr Gang Li to the Commission, dated 13 October 2020; and
- E) Resources Regulator letter to the Commission, dated 16 October 2020.