



North West Protection Advocacy
PO Box 197 Coonabarabran NSW 2357

Email: [REDACTED]

7 March 2022

Independent Planning Commission
Suite 15.02, Level 15, 135 King Street
Sydney NSW 2001
Email: ipcn@ipcn.nsw.gov.au

Dear Commissioners,

Re: Narrabri Underground Mine Stage 3 Expansion, further submission

The Department of Energy, Resources and Industry Assessments and the Department of Planning and Environment (about whose relationship we are unsure) have provided a joint response to the Commission following the IPC's Request for Further Information.

We thank the Commission for taking the step of seeking further information from the proponent and the Departments, however the responses are not to be relied on. We have perused the Government's 16-page response and accompanying attachments incorporating Whitehaven Coal's 17 February 2022 updated cost benefit analysis.

Unfortunately there is inadequate time to respond to the many assertions made by the Departments in their joint response. However, we would like the IPC to take the following matters into account.

- The Government has provided some answers which are without foundation, such as the statement that there is pool of "broader regional support" for the Stage 3 expansion which somehow has not been included in Whitehaven's own social impact assessment (Question 1) nor in the submission process. We do not think it is admissible for the Government to throw around terms like "broader regional support" without evidence.
- Concerning other questions raised by the Lock the Gate Alliance, it now appears that Whitehaven attempted to deceive the IPC by providing misleading cost benefit analysis until forced to admit that Scope 1 fugitive emissions forecasts used throughout the assessment were incorrect.

- We would ask the IPC to take into account that Whitehaven has not been frank with the Commissioners, nor has the Department which overlooked the fugitive emissions miscalculation (not surprisingly, as the Department's Assessment report is, as usual, full of errors, omissions and false assertions).
- We repeat our objection to the Department's continued attempts to portray the Stage 3 expansion, the majority which is in Pilliga Forest, as a brownfields project. We note that the Department has adjusted its wording to refer to it as "not greenfields" and "not entirely new" (Question 1). The evidence put to the IPC to date strongly supports the view that biodiversity impacts of the proposed expansion have not been properly assessed, and this word play is offensive to us who value the Pilliga Forest in its entirety as well as its ecological services through being a recharge zone for the Great Artesian Basin. Concerning the latter, the DPE relied on statements made during the Narrabri Gas Project as evidence that the area of the Pilliga where the Narrabri mine is situated is not an important part of the GAB recharge zone, because the Warrumbungles get more rain. We object to this reasoning. Just because Warrumbungles experience more rain than the Pilliga, this does not negate the importance of it as a recharge zone.
- Regarding Question 2, the Make Good arrangements seem to assume the availability of the Gunnedah Oxley Basin as a water source, with the DPE continually resorting to deeper drilling as a solution to bore loss. However, we were shocked to learn during the Public Hearing, of a matter that was not raised (explicitly or at all) by DPE, which is that the numerical model for the Stage 3 expansion has not considered the impacts of the mine at depths below the Pambula Formation. If so, it adds weight to the IESC advice of low confidence in Whitehaven's groundwater modelling. We recommend that the entire numerical modeling should be revised to include all water sources including below Pambula.
- At page 12, the Government response is that "*The key issue for Narrabri is the increasing methane concentration...*" which appears to be factually incorrect. If at all, the problem is high CO₂ emissions which make capture and beneficial use of methane technically impossible, not feasible or uneconomically expensive.
- We also reject the absurd argument mounted by the Government response, that its own advice concerning future demand for coal which was relied upon in relation to the Hawkins Rumker coal exploration release area does not apply to Narrabri Stage 3. The Government response to Question 13 is that the suitability of the area for coal mining given infrastructure, environmental and social constraints somehow affects the international coal market demand is nonsensical.
- We also note that the Government response to the IPC admits that both groundwater impacts and greenhouse gas emissions will rise with "higher emissions intensity are in the mid-to later stages of the mine life". This tells us that risks of the mine will increase at the same time that export demand will – by the DPE's own admission "decline at a faster rate than anticipated". We should also expect that this is around the time that Whitehaven – characteristically of exiting coal companies – will seek to divest itself of the assets.
- Make Good arrangements are not to be relied on (Question 14). We already heard Mr David Kitto's nonchalant statement at Narrabri Gas Project Public hearing that when groundwater drawdown modelling proves wrong, just "dig a deeper hole". We urge the IPC not to follow such irresponsible and unscientific thinking which is in contradiction to the Precautionary Principle. They are doing it again. When the time comes and drawdown is excessive, the

Department will take sides with Whitehaven and refuse to enforce planning conditions. That has been the consistent history of Whitehaven Coal, both at Werris Creek and Maules creek mines. To think otherwise is delusional. Digging deeper holes may not always be a solution, nor digging another well. And what if there is another drought and water has to be trucked from afar? The IPC must reject the Make Good promises. Nothing short of full acceptance of all of the IESC's recommendations in the IESC advice will suffice. The IESC recommendations must all be accepted by the IPC.

To conclude, we were shocked to hear submitter, hydrogeologist Mr Stephen Pells tell the Public Hearing that the Whitehaven numerical model underpinning the Narrabri Stage 3 hydrogeology predictions, was cut off below the Pambula Formation. He states there is no geological reason to cut off the model below Pambula. He also stated that Whitehaven had conducted pumping tests which they have not disclosed and which should be used.

Mr Pells further told the IPC that "Packer tests" have unusually low scores which seem to defy credibility (to the expert).

We would like to ask the IPC to address these questions, and to call for further information:

1. Was the IPC aware that Whitehaven Coal's numerical model is cut off at Pambula, and how can this be acceptable when make good arrangements are presumed to include possible take from the Gunnedah Oxley basin?
2. Did the IESC know that the model is cut off at Pambula Formation?
3. Did the DPE understand that the numerical model is cut off at the Pambula formation?
4. Will the IPC call for Whitehaven Coal to disclose the pumping tests that were not used for consideration by the IESC and all other concerned stakeholders, including Mr Pells.

It appears to us that in light of the undisclosed information that exists, that was withheld by the proponent/Department, no assurances of the proponent concerning groundwater matters including subsidence impacts, drawdown, make good arrangements, can be relied upon using an obviously deficient model.

Given concerns about Whitehaven Coal's history of providing false and misleading information to consent authorities, further examination of the hydrogeological numerical model and the possibility that the IPC was wilfully misled, needs examination.

We thank the IPC for considering these matters further.

Yours faithfully,



Maria Rickert
Patron,
North West Protection Advocacy