



# **Narrabri Coal Mine Stage 3 Expansion**

## **NSW Independent Planning Commission**

### **Leard Forest Research Node - Further Submission**

## **Whitehaven Coal & DPE Responses to Independent Planning Commission and Lock the Gate Alliance**

### 1. Introduction

The Independent Planning Commission invites submissions on:

1. Responses to Matters From the Narrabri Underground Mine Stage 3 Extension Project IPC Hearing, Whitehaven Coal, 25 February 2022 incorporating Ashurst “Narrabri Underground Mine Stage 3 Extension Project (SSD-10269)” dated 25 February 2022.
2. Narrabri Underground Mine Stage 3 Extension Project Response to IPC information request and tabled Lock the Gate questions, 28 February 2022

We regret that such a short time is allowed for the public to consider the new information and DPE’s response to the questions posed by lock the Gate Alliance. These are our brief responses to some matters within our knowledge and concern.

### 2. Responses to Matters From the Narrabri Underground Mine Stage 3 Extension Project IPC Hearing, Whitehaven Coal

#### **Make Good**

Whitehaven’s justification that its Make Good undertakings would be sufficient to compensate for damage to stock and domestic bores is not borne out by experience.

Serious drawdown not predicted by Whitehaven has occurred at two of the company's mines, and affected both irrigation and stock and domestic bores. In both the Werris Creek and Maules Creek communities, have resulted in localised (Quipolly Aquifer) or widespread (Maules Creek groundwater source) that it refused to take responsibility for despite evidence of its likely responsibility. As the Commissioners know, matters underground are difficult to prove. That is why the advice of the Independent Expert Scientific Committee should be explicitly followed. Unlike the proponent itself, the IESC did not have confidence in Whitehaven Coal's hydrogeological modelling.

Leard Forest Research Node already pointed out in its submission to the IPC that the NSW Environment Protection Authority did not provide information in its agency advice concerning groundwater migration from the Narrabri Mine to Digby Formation via an unknown pathway. The EPA also did not provide information about leakage from a mine water storage into Napperby Formation. These matters should have been central to the EPA's advice. They have bearing on the potential for migration of contaminants from the mine to spread through connected aquifers. As the matters were only revealed publicly as a result of public disclosure under Government Information Public Access, we do not have confidence that proper disclosure is being made.

As a result of the EPA's silence on the migration of mine water to other aquifers, the potential contamination has not been adequately addressed by the IPC.

Then at the Stage 3 Expansion Public hearing we learned of some dubious practices that we now request the IPC to investigate.

We learned, for example, that the numerical model for the Stage 3 Expansion cuts off at the Pamboola Formation. According to one expert Mr Stephen Pells there is "no geological reason to cut off the numerical model below Pamboola Formation". Clearly those designing the model designed it with certain assumptions in mind which led them to discount the need to include lower groundwater in the calculations.

We have some questions about the numerical model, which we hope the commission will address:

1. Does the IPC have an understanding of the assumptions behind the numerical model which resulted in the Pamboola Formation not being included in modelling?
2. Did the IESC know about the modelling assumptions and were they agreed to by the IESC?
3. Before Mr Pells pointed out the groundwater modelling assumptions, did the Commissioners think it was acceptable for the numerical model to be cut off below Pamboola?

Other evidence was presented to the Public Hearing which also casts doubt on the groundwater model, and accordingly lack of confidence in the Make Good scheme.

Whitehaven continues to insist that it has “high level of confidence” that make good can be achieved at each of the bores. However, lack of confidence in the numerical model accordingly casts doubt on Whitehaven’s ability to cure bore impacts through deeper drilling or drilling another bore. The other third feature of Whitehaven’s Make Good scheme. If only the IPC can imagine how unpopular it was for a mine to be draining water from farm water entitlements to produce coal during the drought. A divisive and inflammatory approach which pitted coal mines and all other water users against each other, and one which should not be treated as an option at all.

We also raise concerns about information submitted to the Public Hearing about cherry-picking of testing results from drill stem tests or packer tests. Mr Pells stated that (i) there were pumping tests done and Whitehaven has them but did not disclose them, and (ii) some packer tests exhibited very low scores that appear to be aberrations from what might be expected.

1. Will the Commission will request Whitehaven to provide all pumping tests for the consideration of the IESC?
2. Will the Commission request the IESC to review and report on the packer tests with the very low scores?

### Pre-drainage gas characteristics

With due respect to the Commissioners who are highly knowledgeable and experienced engineers and scientists, it was nevertheless pointed during the IAPUM interviews that the independent experts on underground mining panel did not include a gas drainage expert.

If ever there was a need to have a gas drainage expert, this is when it is needed. The transcripts from the IAPUM meeting with IPC reveal a poor level of knowledge of the specific drainage challenges of the Narrabri mine. The experts did not even have a chance to view the mine, and were provided with a sanitised virtual tour by the proponent which did not reflect the reality of the operations at Narrabri Underground.

One expert contradicted the often repeated claim that Narrabri is a “gassy mine”. A quick literature review reveals there is industry knowledge which was not canvassed at either the IAPUM meeting nor does it appear to have been submitted by the proponent or the Department. This is a serious gap in the assessment of gas drainage and resulting fugitive emissions from Narrabri mine.

The further information provided by Whitehaven is a rehash of the company’s October 2021 RFI Response. No further detail has been provided as to the gas composition, and the science of separating CO<sub>2</sub> and CH<sub>4</sub> using membrane technology.

Whitehaven’s response proposing mobile extraction units which will allow the release of fugitive emissions at a height of 4.5 to 6m obviously does not mitigate the greenhouse gas emissions from the gas drainage operation.

We recommend that:

1. IPC urgently reconvene the IAPUM with a gas drainage expert on the panel, for purposes of assessing the gas drainage aspects of the EIS.
2. That IAPUM be provided with the opportunity to respond afresh to the Narrabri Mine EIS.
3. IAPUM experts be provided with the aerial photography provided by Leard Forest Research Node to assist in their assessment of the gas drainage practices.

## 2. Narrabri Underground Mine Stage 3 Extension Project Response to IPC information request and tabled Lock the Gate questions

### Site suitability

The Department of Planning defends the site suitability, repeating that this is not an “entirely new” mine nor is it a “greenfields” site. However, we repeat, this coal mine expansion will be predominantly in Pilliga Forest. The biodiversity values have been discussed by others expert in the field.

What hasn’t been addressed is the scale and intensity of vegetation clearing and how this is regulated. So far it does not appear to have been regulated at all.

As referred to in the LFRN submission to the IPC, there are no limits or monitoring criteria from the gas drainage operation in the mine’s Environmental Protection Licence, and apparently no revision of the biodiversity offsets to account for the progressive increase in access tracks, roads and new pads. This falls to the DPE, yet the DPE does not appear to have been called to account over its failure to regulate this aspect of the gas drainage which has excessively cleared forest.

The Pilliga Forest is not a suitable place for a gas drainage field for an underground mine.

### Lock the Gate Q. 6 material risk of impacts to water resources which could impact ecosystems

Narrabri Mine has recently successfully sought approval to use bord and pillar mining method. Despite this the Department is insistent that Narrabri mine should not be required to consider bord and pillar.

The Department has not responded adequately to the question, and should be requested to justify its response in the light of the fact that bord and pillar is already being done at that very mine.

### Lock the Gate Q. 14 make good agreements

We believe the Department is misrepresenting the situation in Turrawan. While the Department says “the Proponent has confirmed that it is well progressed in its negotiation

of make good agreements with several of the potentially impacted groundwater users”, there is no detail about how many of the allegedly “only 9 privately owned stock and domestic bores” are “well-progressed” in make good agreements and how many are not.

The Department does not define what is meant by “well-progressed”.

We recommend that the IPC ask Whitehaven to provide this information, missing from its own response to the IPC’s Request for further information.

Certainly one Turrawan farm which supports 5 families, the Avendano farm business 7 km from the mine, has not agreed on make good arrangements.

Overall, the Department’s response to Q. 14 is insufficient and inadequate.

We recommend:

The Commission should seek more details about the status and not rely on the Proponent’s general statement that make good agreements are “well-progressed”.

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We thank the Independent Planning Commission for the opportunity to comment on the new information provided.

**Leard Forest Research Node  
7 March 2022**