

20 March 2019

Independent Planning Commission
3/201 Elizabeth Street
SYDNEY NSW 2000

Attention: Mr Gordon Kirkby

Dear Gordon,

**Bylong Coal Project
Comments on the Independent Groundwater Review**

We refer to the independent groundwater review in relation to the Bylong Coal Project (the Project) which was placed on the Independent Planning Commission (IPC) website on 10 March 2019.

KEPCO Bylong Australia (KEPCO) welcomes the additional independent groundwater review completed by Dr Lloyd Townley of GW-SW Pty Limited (dated 5 March 2019) which has found that KEPCO's assessment of potential groundwater impacts *"is defensible and consistent with other similar projects"*.

It should be reassuring to all that this latest independent groundwater review has drawn the following conclusions:

- *"There are no glaring inconsistencies that suggest that the outcome of the assessment should be different."*
- *"The Applicant has prepared an assessment of groundwater impacts using methodologies that are accepted in Australia as best practice."*
- *"Questions raised by consultants on behalf of Bylong Valley Protection Alliance (BVPA), about groundwater model parameters, should not affect the outcome of the assessment."*

It is recognised that Dr Townley has concurred with KEPCO's responses to submissions made to the IPC on behalf of the BVPA as well as confirming that KEPCO *"is right to believe that there will be no effect on irrigation bores in the Eagle Hill property"*.

Dr Townley, in his independent review, has recommended a number of items for inclusion within the Project's Groundwater Management Plan, including:

- A list of potential groundwater issues and how each will be managed;
- Descriptions of the conceptual hydrogeological model in layman's language to enable all stakeholders to understand the issues and management process; and
- A more prescriptive indication on how monitoring and modelling will be undertaken to enable an auditor to identify if impacts are occurring as expected, or not as expected.

KEPCO is accepting of the recommended mitigation and management measures set out within this review.

It is unfortunate that the draft Water Management Plan (Appendix F of the Response to PAC Review Report (Hansen Bailey, 2018)) was not included within the documents reviewed by the independent groundwater review, as it already addresses a number of Dr Townley's recommendations. Regardless KEPCO propose to review the draft Water Management Plan and comprehensively incorporate all of Dr Townley's recommendations.

Please do not hesitate to contact us should you have any questions or require any further information.

Yours faithfully

HANSEN BAILEY



Nathan Cooper
Principal



James Bailey
Director

CC: Stephen O'Donoghue – NSW Department of Planning and Environment