



Abel Coal Mine (PA 05_0136) 2019 Independent Environmental Audit Response to Recommendations

Abel Coal Mine hold Project Approval 05_0136. Conditions 9 and 10 of Schedule 6 outlines the requirement for an Independent Environmental Audit (IEA).

The recommendations of the audit are provided in Table 6 of the report. Abel Coal have reviewed these recommendations and provide the following responses.

Ref	Description	Abel Coal Response	Timeline
Previous Audit Recommendations			
Section 4	Annual groundwater reporting in the Abel Mine Annual Review should include graphical presentations of water level data to indicate trends. These should continue to be included in Annual Review's during care and maintenance phase for bores approved in the revised WMP	The Abel Annual Review will continue to provide graphical representation of relevant groundwater bores within the relevant section of the document.	31 March 2019
PA 05_0136 MOD3 Non-Compliance Recommendations			
Various	Work with relevant regulators to resolve where possible all of the non-compliances in Table Error! Reference source not found.	Accept recommendation and continue to work with regulators to resolve non-compliances.	As and when required

Ref	Description	Abel Coal Response	Timeline
Sch 3 Cond 1	<p>Blue Gum Creek and Long Gully – Water Quality Recommend for future Trigger Level EC exceedances, assessment of metals (Fe, Al and Mn) are used to assess whether change in EC is mining induced. Trigger values for metals should also be included for Site 10 in Table 3.7 of the WMP. Further consideration of this trigger level in the revised WMP should be undertaken in consultation with a relevant water specialist and relevant regulators in consideration of distance to active mining.</p> <p>Pambalong Nature Reserve – Groundwater Levels Recommend monthly monitoring at Piezometer C081B or in accordance with approved WMP. Further consideration of this trigger level in the revised WMP should be undertaken in consultation with a relevant groundwater specialist and relevant regulators in consideration of distance to active mining. Recommend the following updates to the WMP:</p> <ul style="list-style-type: none"> • Revision of Piezometer Monitoring Sites for Pambalong Nature Reserve to ensure the piezometer relevant to the feature; and • Clarify Trigger Level 1 and 2 for Groundwater levels for the Pambalong Nature Reserve. 	<p>The Water Management Plan will be reviewed and updated in 2019. This update will include a review of trigger actions that determine if a change in water quality is mining induced.</p> <p>Abel Coal Mine will update the Water Management Plan in 2019 and review comments provided by the audit team. A water specialist will, where relevant, incorporate comments into the updated management plan.</p>	30 April 2019
Sch 4 Cond 10b)	Recommend dust gauges re-sited (if not being removed from program).	<p>A dust gauge audit will be conducted to identify any non complying dust gauges with corrective actions put in place to ensure compliance.</p> <p>An update to the Air Quality Management Plan will propose the removal of Dust Gauges.</p>	31 March 2019 30 April 2019
Sch 4 Cond 23	Coal Transport records are consistently made publicly available on website when production recommences.	All coal transport records are up to date to the end of 2018 on the Donaldson Coal Website. This will occur on an annual basis at the start of the new year.	31 January 2019
Sch 4 Cond 24c)	Audit be undertaken to confirm compliance at lighting components which will operate in next period (e.g. CHPP and rail loadout)	On recommencement of mining, including use of the Bloomfield CHPP and Rail Loadout, Abel will recommission currently disused lights for use at night time. At this point, Abel will conduct an audit against AS4282.	When mining recommences
PA 05_0136 MOD3 Continual Improvement Recommendations			
Sch 2 Cond 4	Follow up with WaterNSW to resolve Certificate of Title for WAL 41525 being incorrectly labelled to a water source.	WaterNSW will be contacted again in February 2019 to follow up on the Abel Certificate of Title for WAL 41525.	28 February 2019
Sch 2 Cond 9	Include a statement in the relevant Annual Review that discusses transportation of product coal produced on the Bloomfield site via the Bloomfield Rail Loop, and Rail Spur and the Main Northern Railway.	Accept recommendation and incorporate statement into the 2018/19 Annual Review.	31 March 2019
Sch 2 Cond 11	Include a statement in the Annual Review that discusses alterations and additions to building and structures.	Accept recommendation and incorporate statement into the 2018/19 Annual Review.	31 March 2019

Ref	Description	Abel Coal Response	Timeline
Sch 3 Cond 1	<ul style="list-style-type: none"> “Minor Cliff” definition be clarified on review of EP/management plans. Whilst mining, AEMR include PA 05_0136 Table 2 and a tabulated summary of impacts and conclusions. Labelling of Water Quality Monitoring Sites 9 and 10 in AEMR are consistent with that shown in the WMP. If mining recommences, a clear definition of GDE's in the Hexham Swamp be documented (impacts and monitoring). 	<ul style="list-style-type: none"> Minor Cliff's will be defined in the next update to the Subsidence Monitoring Program required under the Extraction Plan. The 2018/19 Abel Annual Review and future Annual reviews will include a tabulated summary of impacts and conclusions as outlines in Table 2. Water quality labels of sites 9 and 10 will be reviewed and addressed in the 2018/19 Annual Review. When mining recommences the Water Management Plan (WMP) will require an update. If mining recommences, a definition will be included in the WMP of Groundwater Dependent Ecosystems. 	<ul style="list-style-type: none"> When mining recommences 31 March 2019 31 March 2019 When mining recommences
Sch 3 Cond 4p)	Future TARP's include Trigger Levels for Groundwater Drawdown, especially at bores relevant to Pambalong Nature Reserve (excluded from Area 4 EP).	The next update to the Extraction Plan will review the trigger levels for TARPs relating to the Pambalong Nature Reserve.	When mining recommences
Sch 3 Cond 6	No written evidence was provided that first working in South Mains were designed to DRG's satisfaction. Recommend a response is sought for any future first workings in accordance with this condition prior to works being undertaken.	On the recommencement of mining, Abel Mine will seek a written response from the relevant authority confirming that first workings are designed to the satisfaction of the DRE	When mining recommences
Sch 3 Cond 11	When revising Service Boreholes Management Plan, include mitigation and management measures for visual impacts and compensation for noise, air and visual impacts.	Accept recommendation and incorporate mitigation and management measures into the next update of the Service Boreholes Management Plan.	When mining recommences
Sch 4 Cond 1	Remove Location K from PA 05_0136 Table 4 and any other strategy, plan or program.	There is no proposed modification to PA 05_0136 where Location K will be removed. This recommendation will be considered with any future modification.	noted
Sch 4 Cond 3	Include statement in AEMR that reports on Cumulative Noise Criteria.	Accept recommendation and incorporate into the 2018/19 Annual review.	31 March 2019
Sch 4 Cond 5c)	Clarify noise mitigation process in NMP under meteorological conditions to which noise limits do not apply.	Accept recommendation and incorporate into the 2019 update of the Noise Management Plan.	30 April 2019
Sch 4 Cond 11	Energy efficiency opportunities for the Abel Underground Mine to be identified, assessed and reported through a series of five year assessment cycles in accordance with the Energy Efficiency Opportunities Act 2006 (EEO Act, 2006).	Energy Efficiencies will be identified in the updated 2019 Air Quality Management Plan. Compliance with the Energy Efficiency Opportunities Act 2006 will be managed by Yancoal Corporate who are the ' <i>controlling corporation</i> ' as defined by the EEO Act, 2006.	30 April 2019
Sch 4 Cond 16	Recommend clearly labelling column on water transfer amounts on site spreadsheet e.g. “Transfer from Big Kahuna to Lake Kennerson (ML)” and including pumped volumes in Annual Review.	Accept recommendations and update site water spreadsheet and incorporate into 2018/19 Abel Annual Review.	28 February 2019 31 March 2019
Sch 4 Cond 25b)	Recommend that refresher training provided to any personnel on site to ensure that waste management and waste bins handled correctly (see Plates 7, 8, 10, 14, 15 and 18).	A tool box talk will be provided to all operational personnel onsite in March 2019 to outline the correct handling of waste onsite.	31 March 2019

Ref	Description	Abel Coal Response	Timeline
A1	Recommend that consideration be given to a variation to reduce the 'coal works' scale as mine in care and maintenance status. This assumes that CHPP and rail loadout facilities are included in Bloomfield's EPL.	Abel will review this recommendation and determine the benefits of a license variation. A variation will be applied for if it is determined there is a benefit in reducing the scale of coal works on the sites license.	noted
P1	Recommend updating this condition when management plans updated. Consideration should be given to seek reduction or removal of depositional dust gauges from program.	A variation to the locations of monitoring sites was submitted to the EPA in 2018. The variation is currently being assessed by the EPA. Further review of locations within site management plans may trigger another variation if required.	noted
L2	Recommend updating noise monitoring locations and meteorological condition limit wording to make consistent with those shown in PA 05_0136 whilst operational.	A review of the noise monitoring locations and meteorological condition limit wording will be conducted with the update to the Noise Management Plan.	30 April 2019
O4	Seek removal/amendment to condition O4.2 as no sprays are utilised by the septic system.	There is no plan to remove condition O4.2 from the EPL. Abel Coal may utilise sprays in future adjustments to the Sewerage Treatment Plant.	noted
U1.3-1.5	Recommend requesting U1 removed at next variation as it has been completed	Accept recommendation and incorporate into the next EPL variation.	Noted
ML1618			
11	Date of when mine entered Care and Maintenance is reported in the Annual Mining Lease Group Exploration report as being 02 May 2016, this date is not consistent with other reports e.g. the 2017 AEMR states mine entered care and maintenance on 28 April 2016. Recommend updated in next report.	Accept and incorporate into the next Annual Mining Lease Group Exploration report or Annual Review dependent on a review of the agreed date.	31 March 2019