



Mr Tony Sutherland
Regional Technical Services Manager
Yancoal Australia Limited
PO Box 2275
GREENHILLS NSW 2323

Dear Mr ^{Tony}Sutherland

**Abel Coal Project (05_0136)
Area 4 Extraction Plan Variation**

I refer to the *Abel Mine Area 4 Extraction Plan Variation 2* and *Abel Mine Area 4 Extraction Plan Variation 3*, submitted on 30 June 2015 and 7 August 2015, respectively, under conditions 4 and 5, Schedule 3 of project approval 05_0136. The Department has reviewed the information that you provided, including the:

- Variation Main Reports;
- Subsidence Predictions and Impact Assessments Reports;
- Graphical Plans;
- Built Features Management Plan (condition 4(i));
- Water Management Plan (condition 4(j));
- Biodiversity Management Plan (condition 4(k));
- Land Management Plan (condition 4(l));
- Heritage Management Plan (condition 4(m));
- Public Safety Management Plan (condition 4(n));
- Subsidence Monitoring Program (condition 4(o)); and
- Mining Operations Plan (condition 4(q)).

The Department notes the landowner's agreement to second workings being undertaken beneath the principal residence C04h01 located on Lot 611 DP 1035588.

The Department considers that the above documents provide an appropriate impact management framework for the proposed *Variation 3*. The Secretary has accordingly approved *Variation 3* to the Area 4 Extraction Plan.

The Department of Primary Industries, Water reviewed the Water Management Plan in light of the proposed *Variation 2* at the request of the Department and identified a number of concerns over its content. However, the Department is of the view that these matters are not so significant as to delay its approval of the proposed extraction activities. Consequently, the Secretary grants interim approval for extraction to be undertaken in accordance with the *Variation 2* Extraction Plan as submitted, until 12 December 2015.

The Department considers that the Water Management Plan should be further developed and requires a revised Water Management Plan to be submitted to the Department by 12 October 2015. The revised Water Management Plan must address the Department of

Primary Industries, Water's comments detailed in Attachment A to the satisfaction of the Secretary.

The Department will review the revised Water Management Plan with a view to enabling its final approval prior to 12 December 2015. The mine should therefore prepare itself to implement the revised plan from that date.

If you wish to discuss the matter further, please contact Hamish Aiken on 9228 6373.

Yours sincerely



Howard Reed *13-8-15*
Director Resource Assessments
as nominee of the Secretary

**ATTACHMENT A: NSW DEPARTMENT OF PRIMARY INDUSTRIES, WATER DETAILED
COMMENTS ON ABEL COAL MINE AREA 4, VARIATION 2 TO EXTRACTION PLAN FOR
PANELS 28 – 35**



Department of Planning & Environment
GPO Box 39
SYDNEY, NSW 2001

Attn: Mr Hamish Aiken

Contact Alison Collaros
Phone (02) 4904 2527
Fax (02) 4904 2501
Email Alison.collaros@dpi.nsw.gov.au

Our ref ER21745
Your ref

Dear Mr Aiken

Abel Underground Coal Mine Area 4 – Variation to Extraction Plan (Panels 28 to 35)

Reference is made to your email dated 16 July 2015 requesting comment on the application submitted by Donaldson Coal to vary the Extraction Plan for Panels 28 to 35. DPI Water has reviewed the documents and provides the following comments. Detailed comments are provided in Attachment A.

- The Modification Report must demonstrate that appropriate licensed entitlement is held or can be obtained to account for all take of surface water and groundwater, including incidental take.
- The report must demonstrate that sufficient licensed entitlement is held or can be obtained to account for a potential 100% increase in excess of predicted inflows over a 3 month period to justify the 100% mine inflow trigger.
- A copy of the Groundwater Assessment report (HydroSimulations, 2015) for the modification should be provided to DPI Water to validate the assessed impacts.
- The Modification must be assessed against the Aquifer Interference Policy for any changes to impacts
- Justification must be provided for the 'overburden' groundwater level trigger of 5m.
- The Modification Report must provide detail of proposed monitoring plans to monitor impacts on watercourses affected by reversal of grade and ponding. The Monitoring Plan should identify triggers for remediation.
- Trigger Action Response Plans should clearly identify reporting requirements in relation to exceedance of triggers.

For further information please contact Alison Collaros, Senior Water Regulation Officer (Newcastle) on (02) 4904 2527 or Alison.collaros@dpi.nsw.gov.au.

Yours sincerely

Mitchell Isaacs
Manager, Strategic Stakeholder Liaison
5 August 2015

**Abel Underground Coal Mine Area 4, Variation to Extraction Plan for Panels 28 to 35
NSW Department of Primary Industries, Water Detailed comments**

Comments on Groundwater Management Plan

- The modification should be assessed against the Aquifer Interference Policy for any potential changes to impacts and should include assessment of the potential impacts on high priority GDEs and groundwater quality.
- The Groundwater Assessment Report by HydroSimulations (2015) should be provided to DPI water for review.
- The report does not provide justification for the selection of the 5m trigger for a decline in the overburden relative to predicted drawdown. Background discussion and justification for selection of this trigger should be provided to DPI Water.
- A summary of water quality data for DPZ has been presented, showing significant variation in electrical conductivity and TSS values. Additional water quality data is required to identify trends and causes of fluctuations in water quality.
- The mine water inflow trigger is set at 100% in excess of predicted flow rates at any stage during mine life sustained for 3 consecutive months. The proponent must demonstrate that sufficient licensed water entitlement is held or can be obtained to account for this scenario. Water entitlement must be held within relevant hard rock and alluvial groundwater sources and relevant surface water sources from which inflow occurs.

Comments on Surface Water Management Plan

- The Surface Water Management Report identifies impacts on surface flow including loss of runoff and ponding as a result of surface cracking and subsidence. The report should quantify the volumes of water lost as a result of surface cracking and ponding and should demonstrate that appropriate licensed entitlement is held or can be obtained from the affected water sources to account for the loss.
- Section 4.3 of the Surface Water Management Plan identifies potential impacts to water courses as a result of reversal of grade and ponding caused by surface cracking and subsidence. The Report should include a proposed monitoring plan to identify baseline conditions and monitor change to geomorphology and channel condition. This should include identification of triggers for additional monitoring and/or remediation.
- Trigger Action Response Plans should clearly identify reporting requirements at each trigger exceedance. TARPs should also identify additional monitoring or investigation to be undertaken as a result of exceeded trigger levels.

**End Attachment A
5 August 2015**