



Ms Samantha McLean
Executive Director
Independent Planning Commission

By email to: samantha.mclean@ipcn.nsw.gov.au

Dear Ms McLean

Bylong Coal Project (SSD 6367) – Request for Additional Information

The Department refers to the Independent Planning Commission's request for additional information about water management at the Bylong Coal Project, referred to the Department by Mr David Way on 23 November 2018.

The Department understands that the Commission has concerns about a number of issues related to the groundwater impact assessment. The Department has provided a detailed response to the specific issues raised by the Commission in **Attachment A**.

This advice is in addition and complementary to the information provided in the Department's Preliminary Assessment Report and Final Assessment Report.

Overall, the Department considers that the groundwater impact assessment completed for the assessment provides a robust and comprehensive body of work for the Commission to finalise its determination of the project in that:


- iterative changes were made over a 7-year period to the groundwater impact assessment, based on expert input from the proponent's expert (Dr Noel Merrick), the Department's expert (Dr Frans Kalf) and Department of Industry – Lands and Water experts;
- the modelling is based on extensive groundwater monitoring and geological/ hydrological data to inform the predictions;
- extensive uncertainty analysis and sensitivity testing was undertaken to test the range of likely impacts;
- even under extremely unlikely modelling scenarios (based on both climate and hydrological parameters), drawdown impacts on water supply works outside Applicant owned land, and on groundwater dependent ecosystems (GDE) would comply with the minimal impact considerations of the NSW Government's *Aquifer Interference Policy*;
- predicted drawdown in the alluvial aquifer is mainly due to borefield pumping required for mine water supply during open cut operations only, with take of water required to comply with the rules of the relevant Water Sharing Plan, to ensure the take of water from the alluvial water source is sustainable in the long term;
- in the unlikely event that the project impacted on water supply bores outside project owned land, KEPCO has committed to provide compensatory water/ make good arrangements through a proposed voluntary agreement with the landowner; and
- the Department has also recommended a condition requiring KEPCO to provide compensatory water to third parties as soon as practicable after a loss is identified, and that KEPCO must bear the burden of proof demonstrating that the loss is not due to mining

The Department requested further information from the Applicant, KEPCO Australia Pty Ltd (KEPCO) in relation to your request. KEPCO's response is provided in **Attachment B**.

KEPCO's information also provides a response to issues raised in the submission from Mr Doug Anderson (UNSW Water Research Laboratory) to the Commission on behalf of the Bylong Valley Protection Alliance. This includes a detailed technical response to these from KEPCO's groundwater modeller AGE. I note that this information has been previously provided to you for consideration in the groundwater modelling review that has been separately commissioned by the Commission.

If you require any further information or clarification, please contact Stephen O'Donoghue, A/Director – Resource and Energy Assessments on 0477 345 626.

Yours sincerely

 13/2/2019

David Kitto
Executive Director
Resource Assessments and Business Systems

Enclosure:

Attachment A – Detailed Response to Commission's Questions on Groundwater

Attachment B – Bylong Coal Project – Response to IPC Request for Additional Information dated 19 December 2018.