

**From:** [Geoff Moore](#)  
**To:** [Dennis Lee](#)  
**Subject:** Information to the IPCN in response to email dated 10 September  
**Date:** Wednesday, 18 September 2019 4:31:35 PM  
**Attachments:** [image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)  
[H180048\\_Option1StagedCreditAssessment\\_v1.0.pdf](#)  
[H180448\\_RCCP\\_staged\\_offsets\\_V1.pdf](#)  
[190918\\_RCS\\_Continuation\\_IPCN\\_Additional\\_Information\\_all\\_years.pdf](#)

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Hi Dennis

Please find our response to the information requested in your email of the 10 September addressing the 4 questions repeated below

1) The mine plan shows the proposed plan for each year until 2030, with a legend on the maps showing 'disturbed areas' and 'rehabilitated areas'. Would you please clarify the definition of 'disturbed areas' and 'rehabilitated areas'? For example, have 'disturbed areas' been shaped into a final landform without vegetation growth? Do 'rehabilitated areas' have vegetation growth that is self-sustained?

This would help the assessment of rehabilitation risk in the event of unplanned care and maintenance/closure.

The conceptual mine plans' "Disturbed areas" include indicative in-pit infrastructure, active overburden emplacement areas, unshaped and shaped emplacement areas, topsoiled and potentially un-germinated seeded areas. These areas are noted in the Mining Operations Plan as Phases 1, 2 and 3 of rehabilitation which include landform establishment, drainage formation, and growing media development including preparation of topsoil and blending of ameliorants.

"Rehabilitation areas" indicatively show established vegetation (i.e. with a level of revegetated cover) on the conceptual mine plans. "Rehabilitation areas" include areas as defined in the Mining Operations Plan as Phases 4, 5 and 6 "Ecosystem and Landuse Establishment", "Ecosystem and Landuse Sustainability" and "Rehabilitation Complete". These phases of rehabilitation are further defined below:

Phase 1: Decommissioning – removal of hard stand areas, buildings, contaminated materials, hazardous materials.

Phase 2: Landform Establishment – incorporates gradient, slope, aspect, drainage, substrate material characterisation and morphology.

Phase 3: Growing Media Development – incorporates physical, chemical and biological components of the growing media and ameliorants that are used to optimise the potential of the media in terms of the preferred vegetative cover

Phase 4: Ecosystem and Landuse Establishment – incorporates revegetated lands and habitat augmentation; species selection, species presence and growth together with weed and pest animal control / management and establishment of flora.

Phase 5: Ecosystem and Landuse Sustainability – incorporates components of floristic structure, nutrient cycling recruitment and recovery, community structure and function which are the key elements of a sustainable landscape.

Phase 6: Rehabilitation Complete – Landuse and landscape is deemed as suitable to be relinquished from the Mining Lease.

We reiterate our earlier response in Section 1.4.2 of the “Response to IPCN Queries following Proponent Meeting” dated 5 August 2019 which discusses the provisions in place to manage any unexpected closure or care and maintenance for all coal mines in NSW. This includes requiring the Mining Operations Plan (MOP) and associated Rehabilitation Cost Estimate (RCE) and the bond paid to the Division of Resources and Geoscience (DRG) to cover any rehabilitation liability. In calculating the RCE, the current progress of each area of the rehabilitation is identified and the associated cost for ongoing management of each area is calculated and regularly reviewed. These calculation include the maintenance of established vegetation for a period of 5 years. The rehabilitation risk is therefore assessed, and bond put in place as part of the MOP process.

It should be noted that the RCE is calculated for the year where the highest cost of outstanding rehabilitation is expected within the 5 (five) year period or MOP term. Therefore the worst case scenario is the figure costed as per the RCE.

Therefore, the rehabilitation risk from unplanned care and maintenance/closure from the project is low which is consistent with all other contemporary coal mines in NSW.

2) The mine plan shows the proposed plan for each year until 2030, and then jumps to the final landform. The Commission requested the proposed plan for each of the 21 years. The Commission understands from your email that from 2030, there is no difference between Option 1 and Option 2, however the Commission would like to consider the mine plan for the full 21 years. Would you please be able to provide the mine plan for each year for the full 21 years?

Please refer to the attached document 190917 RCS Continuation IPCN Additional Information\_all years.

3) The Commission understands that the Application requires a further mining lease (mining lease 487). Would you please be able to confirm if this Mining Lease is required for both Option 1 and Option 2, or only for Option 2?

Bloomfield has purchased the land covered by the Mining Lease Application 487 with the view that it would be required for a Western OEA and would seek to utilise this as part of the mine. It is noted that a mining authorisation may be required for ancillary mining activities associated with overburden emplacement as required under the Mining Act 1992 (e.g. mining-related dam or drain). The mining lease would be required to facilitate the emplacement of overburden for Option 2. However under Option 1 the MLA is not required for the direct emplacement of overburden.

4) The Commission understands that information has been provided to DPIE/EES on conceptual staging of surface disturbance for both Option 1 and Option 2. A portion of this information has been included in DPIE’s Recommended Conditions (Condition B42 and Appendix 5) of the DPIE Final Assessment Report SSD 6300. Would you please provide the Commission with a table and mapping of the conceptual staged surface disturbance for both Option 1 and Option 2?

Please refer to the attached reports from EMM.

Option 1 mapping of the conceptual staged surface disturbance and table are presented in the report (H180048\_option1StagedCreditAssessment\_v1.0) dated 17 September 2019, Figure 1 and Table 1.

Option 2 mapping of the conceptual staged surface disturbance and table are presented in the report (H180048\_RCCP\_staged offset\_V1) dated 29 January 2019, Figure 1 and Table 3.1.

Regards

**Geoff Moore**  
Chief Development Officer



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**From:** Dennis Lee [<mailto:Dennis.Lee@ipcn.nsw.gov.au>]

**Sent:** Tuesday, 10 September 2019 3:07 PM

**To:** Geoff Moore [REDACTED]

**Subject:** RE: Information to the IPCN

Hi Geoff,

Thank you for the confirmation on the commercial-in-confidence material. In line with Commission Policy, this will not be published on the website, however I will publish our correspondence so it is transparent that there is a report, that it is commercial in confidence, and why it is held commercial-in-confidence.

Thank you again for providing the mine plans for options 1 and 2 until 2030. The Commission has further questions on the mine plans, would you please be able to provide a response to these by COB Friday 13 September 2019?

1) The mine plan shows the proposed plan for each year until 2030, with a legend on the maps showing 'disturbed areas' and 'rehabilitated areas'. Would you please clarify the definition of 'disturbed areas' and 'rehabilitated areas'? For example, have 'disturbed areas' been shaped into a final landform without vegetation growth? Do 'rehabilitated areas' have vegetation growth that is self-sustained?

This would help the assessment of rehabilitation risk in the event of unplanned care and maintenance/closure.

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Regards,

**Dennis Lee | Team Leader**

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