OBJECTION TO THE TAHMOOR SOUTH COAL PROJECT

INDEPENDENT PLANNING COMMISSION, ELECTRONIC PUBLIC HEARING

NEIL PURNELL

REASONS TO OBJECT:

1. Water pollution and lack of adequate EPA regulations

2. Non-Conventional Movements and lack of adequate assessment

3. Significant undisclosed bore and aquifer impacts

1. **WATER POLLUTION**

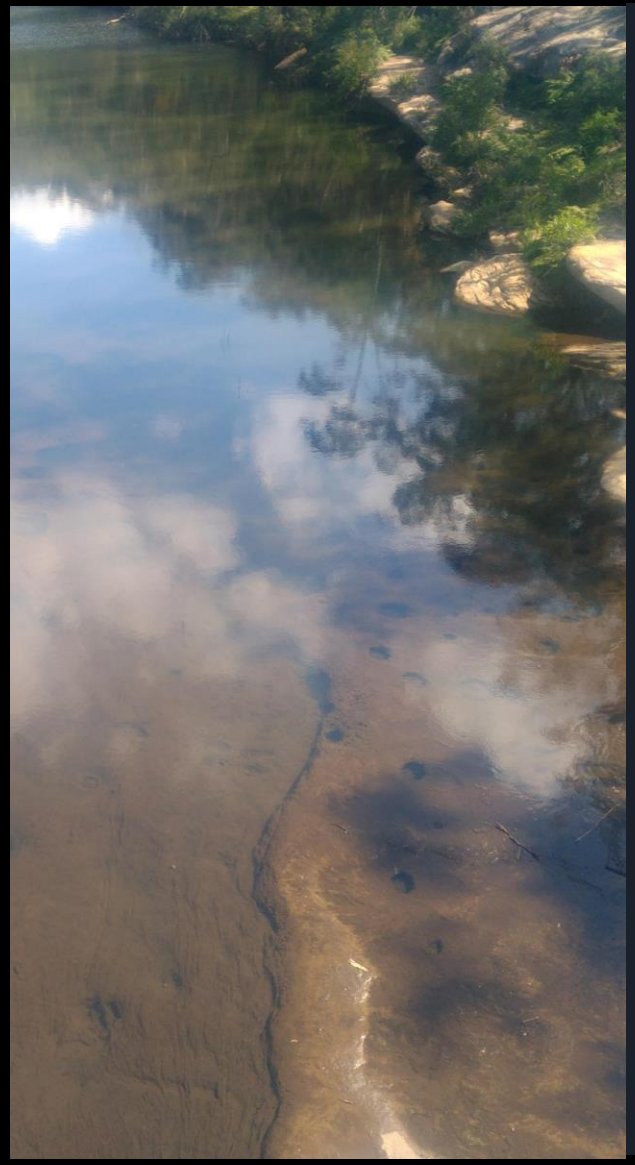
- Incomplete social assessment of public interest/value in recreational waters
- Lack of safeguards for human welfare
- No provision for a "best practice" public warning system
- Inadequate EPA licence regulations/limitations that continue for the proposed Tahmoor South Coal Project, as per Tahmoor North licencing

“Pot Holes” officially established Aug 1921 – a recreational area for all ages and all peoples.

“Pot Holes” – a place where the most vulnerable learn to swim. It`s a place where infants and children are introduced to native waters.

“Pot Holes” – where a community regularly relaxes & celebrates

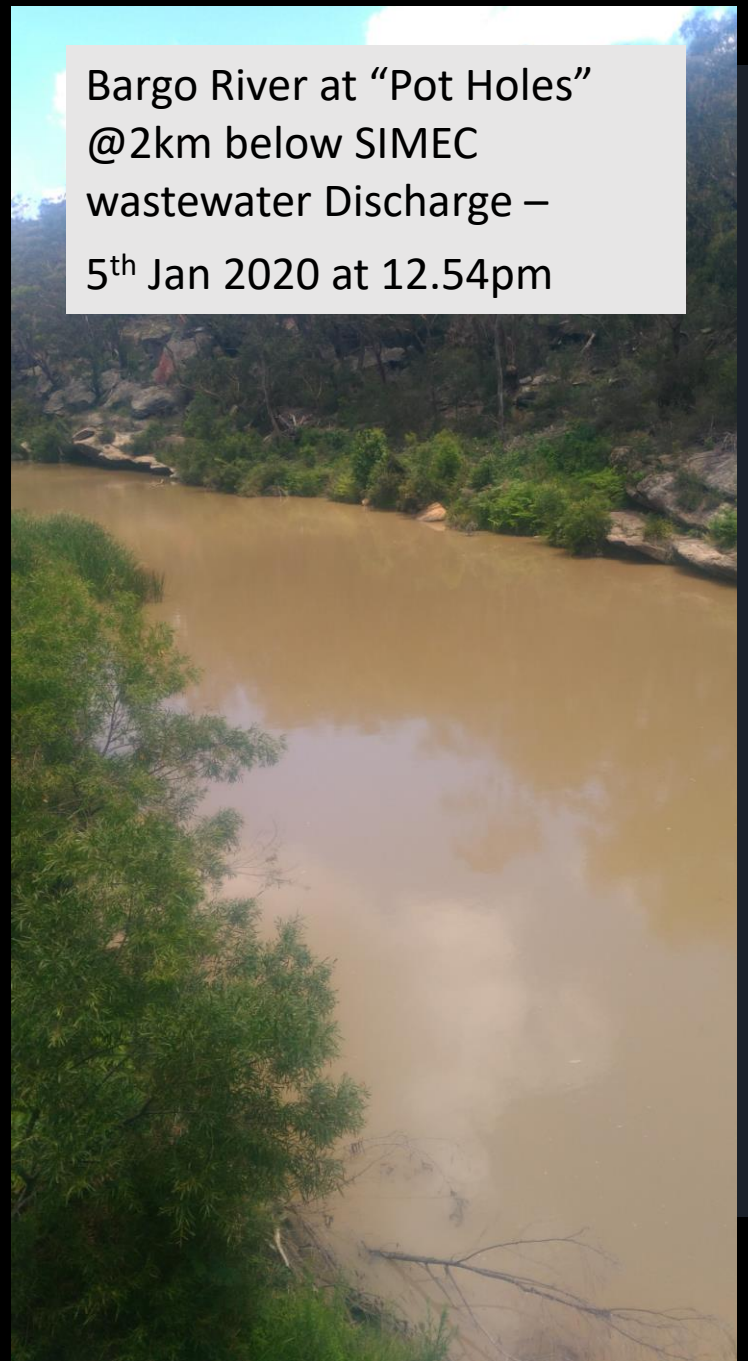
AUSTRALIA DAY 26.01.21



clarity ought to look like most of the time - except when impacted by natural high river flows.

This river represents long standing high value archaeological significance for this country`s “First Peoples”

It is also a highly valued historical & recreational reserve and has remained so for nearly a century.



Bargo River at “Pot Holes” @2km below SIMEC wastewater Discharge –

5th Jan 2020 at 12.54pm

The aspect of TURBIDITY – the ONLY variation between the two “Bargo River Reserves” is the input of SIMEC`s mine wastewater at Tea Tree Hollow.

Images were taken on 5th January 2020 20 minutes apart

Locations are @3km apart. This is the same river, same day and different composition.

Bargo River Reserve @3km Upstream from Pot Holes

5th Jan 2020 at 12.35pm

This is SIMEC`s TURBID mine wastewater discharge on the same day

at Tea Tree Hollow - 5th Jan 2020

Tea Tree Hollow confluence – 31st Jan 2021

Turbid wastewater above Bargo Rivers own turbid flood water due to recent high rainfall.

There is NO public alarm system to alert of mine contamination

Visitors are likely to have NO IDEA of the cocktail of contaminants they are swimming in

Mine discharge to Bargo River 5th April 2020

Extreme Turbidity

SIMEC wastewater turbidity is a **regular occurrence** – 29th April 2020

SIMEC wastewater turbidity is a regular occurrence – 13th May 2020.

SIMEC wastewater discharge – turbidity 23rd Jul 2020

SIMEC`s mine discharge to Bargo River 18th April 2020 - Extreme Turbidity exceeded EPA limits and was NEVER self reported. It continued for days!

EPA requiring SIMEC to provide self reporting of Pollution incidents is a farce – 7th Mar 2020.

EPA requires SIMEC to provide **self reporting of Pollution incidents is a farce** – 8th Mar 2020.
Exceeded EPA Licence TSS by 67%- not reported.

EPA requires SIMEC to provide self reporting of Pollution incidents? – 20th Mar 2020.

EPA requires SIMEC to provide self reporting of Pollution incidents – 29th Mar 2020.

EPA requires SIMEC to provide self reporting of Pollution incidents – 4th April 2020

SIMEC never self reported Turbidity Exceedance

- Pollution event continued until Dr Ian Wright reported it to EPA @ 17th April 2020

Scientist measuring pollution levels from recent mine wastewater discharge into Bargo River (April 2020)

EPA Regulations and license limits need to reflect community interest and effectively protect HUMANS within recreational waters

We are entitled to know what is in the water? We expect “best practice” protection from pollution events.

2. LACK OF STUDIES FOR NON-CONVENTIONAL MOVEMENTS (NCM) AT KNOWN UNDISCLOSED GEOLOGICAL FAULTS

- Incomplete assessment of potential mine subsidence impacts
- Lack of inclusion or undertaking of seismic studies at known fault intersection at LW16
- No provision for a best practice public warning system
- Excessive influence of NCM predicted for Tahmoor South above Bargo Township

Prof Philip Pell and Prof Steven Pell - 2011 Thirlmere Lakes Report documents T1 & T2 faults, T1 intersects LWs14 and ultimately strikes LW16

- Pell's terms this NW/SE strike/dyke zone T1 and identified it as a "MAJOR" fault that intersects the mine lease (from Thirlmere Lakes towards the Nepean Fault intersecting the mine transport drift portal).
- SIMEC mine plans (GeoTerra Project TA17 – 2016 Annual Review) confirms the fault extends into Tahmoor South Mine Plan.

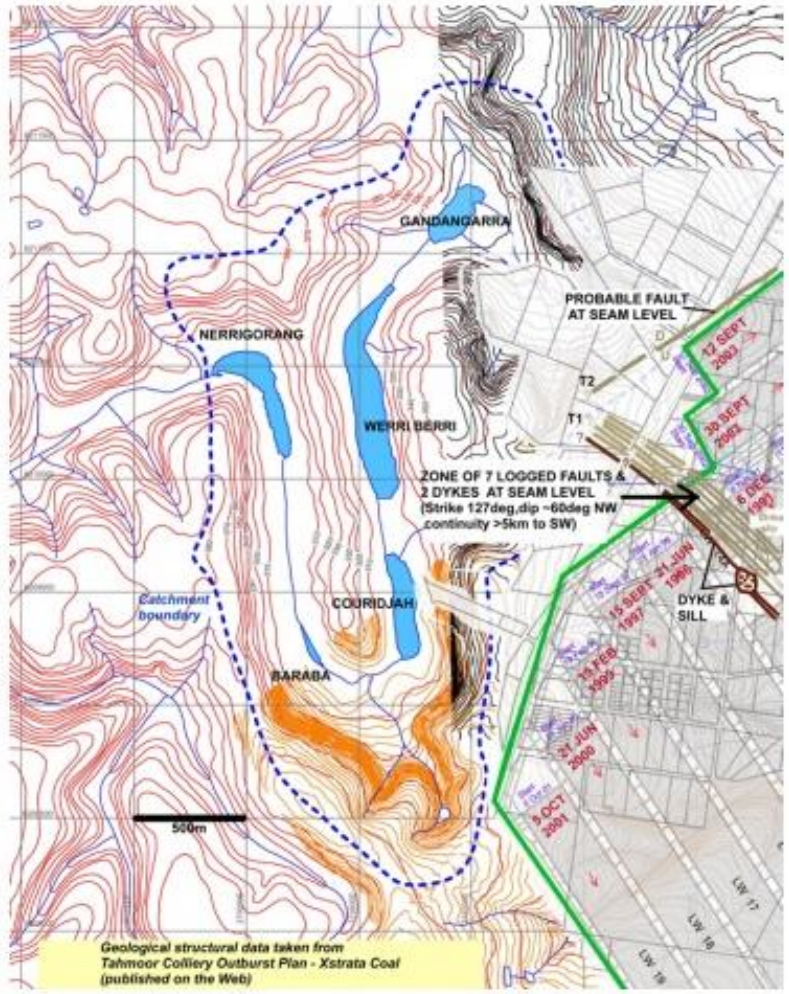
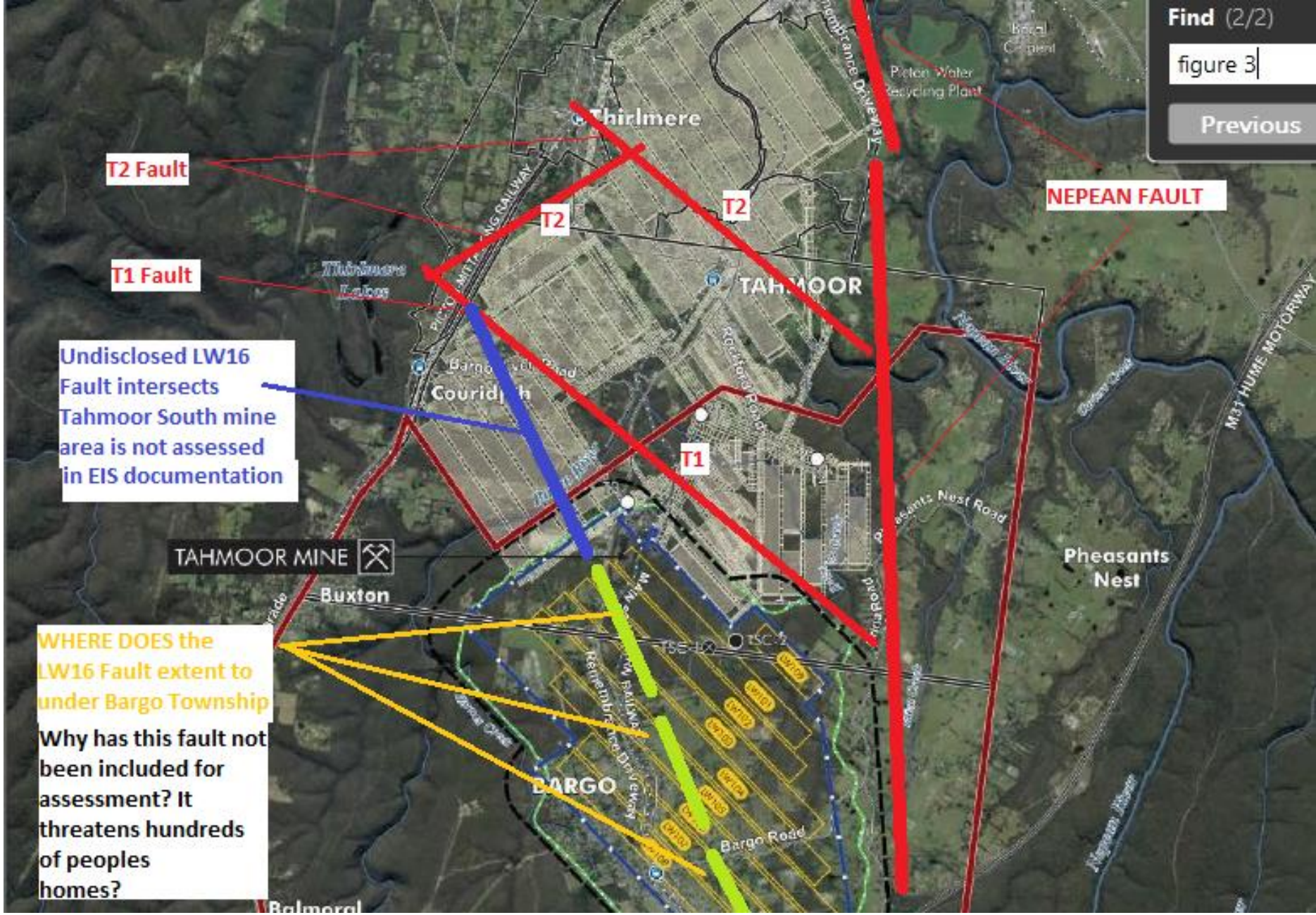
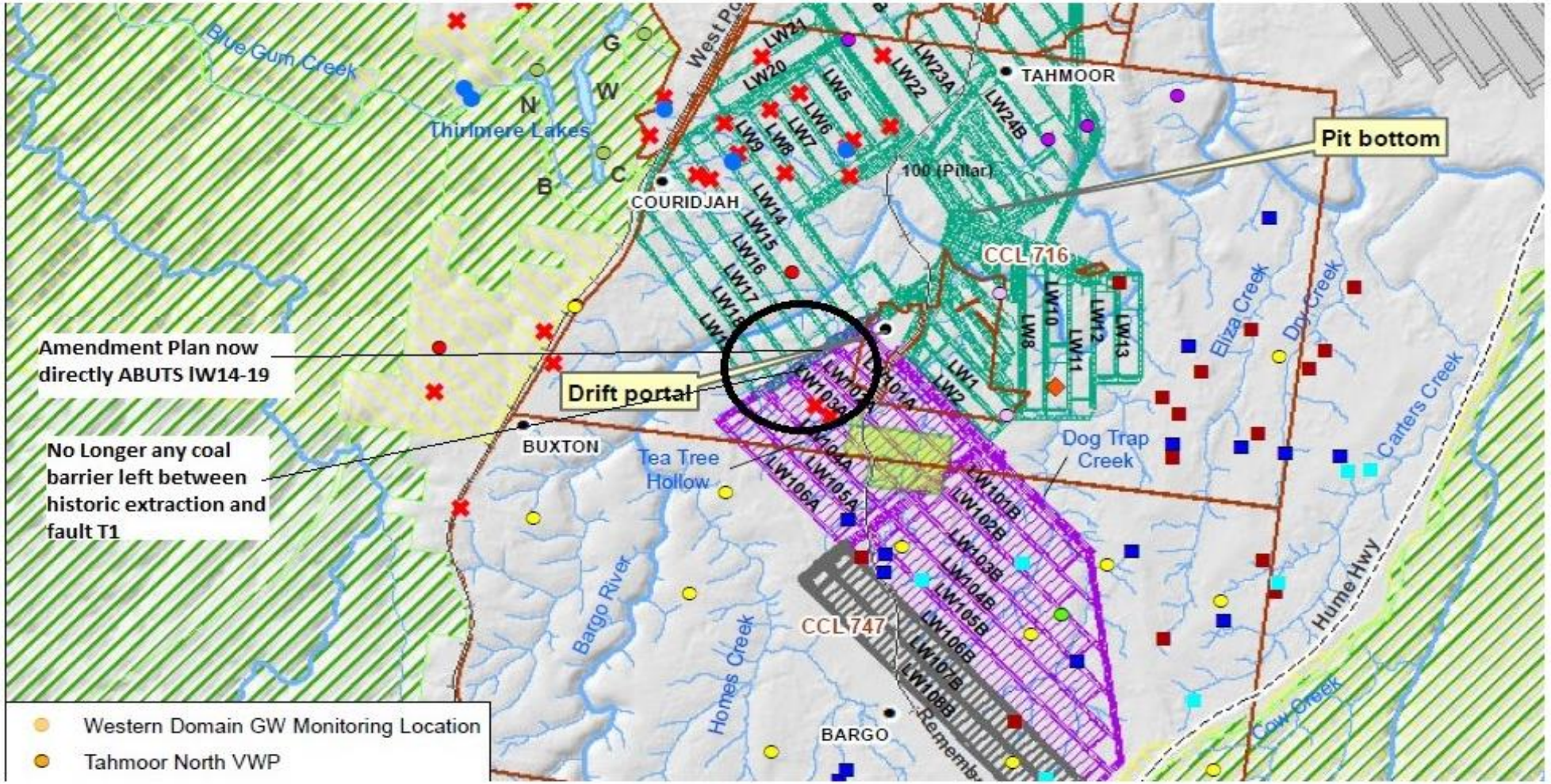


Figure 3.8: Structural geology.

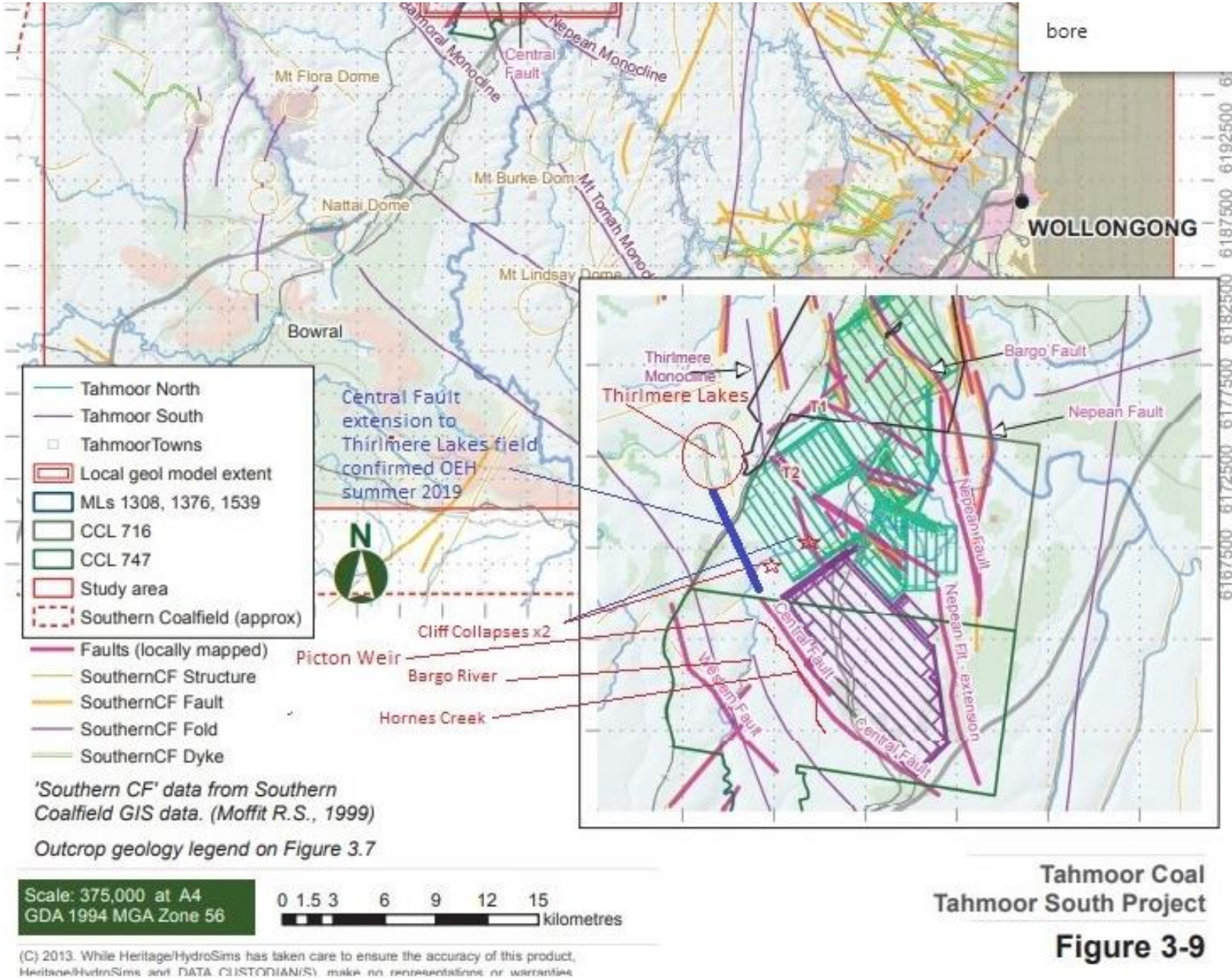
Preliminary Issues Report:
original mine plan



Appendix M – SLR Consulting - Groundwater modelling plan – shows the Coal Barrier has been removed in the Amendment Mine Plan – Tahmoor South now directly abuts undisclosed fault at LW16 – possibility of DESTABILISING T1 fault.



Appendix I – Groundwater Assessment – HydroSimulations Lists the "Geological Faults in Tahmoor South area" but **EXCLUDES** the extension of LW16 fault line passing under Bargo township



Cliff Collapse directly above LW16 – **Not disclosed in EIS studies**

2nd Cliff Collapse adjacent to LW19 – **Not disclosed in EIS studies**

LW19 Cliff Collapse – **Not disclosed in EIS studies,** these are significant undisclosed mine subsidence impacts

LW16 and LW19 cliff collapses blocked important fire trail access

Huge rock mass was displaced

Surface expressions – LW16-19

Riverbed upsidence – Resurfaced in Jan 2020

Significant rock fractures exist at LW16 – 3.5m Ladder, 300mm cans

3. SIGNIFICANT BORE AND AQUIFER IMPACTS

- The extent of known damages to bores have not been fully assessed nor disclosed in SIMEC's EIS

- EIS fails to identify the actual number of bores damaged across Tahmoor Mine areas (reduced bore drawdown).

- The existence of known damage to bores, impacts the validity of the EIS Groundwater Modelling at Thirlmere Lakes – it is certainly of public interest

- SIMEC's own experts advise the risk of using “questionable data” (Thirlmere Lakes drawdown assessment)