

Gardens of Stone Alliance submission

Friday 22 December, 2023

Independent Planning Commission
Suite 15.02, 135 King Street
SYDNEY NSW 2000

email ipcn@ipcn.nsw.gov.au

Dear Commissioners,

Submission as an objection to Modification Western Coal Services (SSD-5579-Mod-6), Springvale Water Treatment Plant Modifications (SSD-7592-Mod-9 and Mod-10)

The Gardens of Stone (GOS) Alliance is a community group whose membership consists of Wilderness Australia, Lithgow Environment Group (LEG) and the Blue Mountains Conservation Society (BMCS), as well as interested non-affiliated individuals. Formed in October 2013, the Alliance secured reservation in a state conservation area of the 'pagoda country' of the Gardens of Stone region in 2021.

The Gardens of Stone Alliance requests confirmation of receipt of this submission when your office reopens and no later than January 16th, 2024. The Alliance requests to be informed of any public meeting or hearing on these modifications and progress regarding deliberations on these modifications. You may contact the Alliance through the address listed at the bottom of this submission.

Given the usual request by Centennial Coal for an expedited determination of these modifications, I have lodged this submission before its formal ratification by Alliance member groups so that our concerns may be considered. In the new year the Alliance and member groups may make further contributions regarding these three modifications.

Position statement on these modifications:

The Gardens of Stone Alliance position is that additional capacity for the reverse osmosis treatment of mine water should have been in train 12 months or more ago. The reason additional capacity isn't approved and operating is a failure by Centennial Coal to properly plan its mine operations.

Suggested regulatory action:

The three modifications should be refused consent. If the Independent Planning Commission of NSW (IPC) determines to grant approval to these mods, the following matters should be incorporated into the consent conditions:

- Stabilise mine water production from Angus Place and Springvale mines at 42ML/day (no additional mine water flows) [amend Sv consent Sch 2 conditions 5, 6 and 6A];
- Lower mining intensity at Springvale mine to prevent further increases in mine water production;
- Continuous flow and salinity monitoring on inflows and outflows from Thompsons Creek Reservoir;
- Lined waste repository for residual deposition;
- Dry the residuals emplacement;

- No additional flows to Cooks Dam or discharges from WCS LDP001;
- No discharges of mine water or partly treated mine water to surface waters other than what is currently prescribed by existing consent conditions.

Background briefing

There is limited storage capacity for Centennial Coal's partly treated mine water storage proposal under mod 9.

Thompson Creek Reservoir (TCR) was 89.82% full on 15 December¹. This limited storage capacity in the reservoir follows "The daily release of approximately 115 ML of water via the Pipers Flat Creek Outlet into the Coxs River system above Lake Wallace will commence on Wednesday, 1 November and continue for approximately 30 days until sufficient capacity is restored in the reservoir"².

Centennial Coal alleges that issues impacting on its Springvale and Angus Place mines developed in the first week of December 2023 to the effect that approval of these three modifications (6, 9 and 10) are now urgent matters. Apparently the Springvale Water Treatment Plant (SWTP) stopped operating during that week and then operated at a reduced capacity.

Centennial seeks emergency permission for continuous use of TCR to store clarified but saline mine water for 60 days while the SWTP is repaired. In this 60 day period, Centennial could potentially use 2520ML (i.e. 42ML x60days) of the 3,067 ML of the approved capacity of partially treated mine water permitted to be sent to TCR under SWTP consent condition 6A. This would leave just 547ML of capacity remaining until 31 October 2026 and lead to further calls for additional discharges of partly treated mine water.

Centennial's Angus Place and Springvale mines are now producing over 40ML/day of mine water, 10ML/day from Angus Place and 31ML/day from Springvale mine. Longwall 427 at Springvale mine was the 25th longwall panel mined and at this point the mine was producing 24ML/day of mine water. Longwall 428 was the first longwall under the eastern end of Marangaroo Creek and Swamp and it produced 7ML/day.

According to a briefing from the NSW Department of Planning and Environment (DPE), Centennial Coal allegedly seeks a letter from the DEP granting relief from potential prosecution for 60 days so the company may operate outside its consent. During this 60 day period the company also seeks a consent from the IPC that would subsequently permit these unauthorised operations through the approval of Western Coal Services modification 6 and Springvale Water Treatment Plant modifications 9 and 10.

The addition of possibly 2.5GL of saline mine water is likely to cause waters in TCR to become unsuitable for discharge to Pipers Flat Creek.

Centennial Coal knew it would need to treat additional mine water for at least twelve months, given the large amount of mine water it has stored at Angus Place mine. This current need to manage additional mine water by additional reverse osmosis plant capacity was a foreseeable event. Angus Place consent mod 5 in 2018 was for a temporary reverse osmosis plant. Centennial should have readily prepared a new mod application for the additional mine water twelve months ago, and sourced the necessary extra RO plant capacity by now.

¹ EnergyAustralia Mt Piper Water Data, 15 Dec 2023

² <https://www.energyaustralia.com.au/about-us/media/news/energyaustralia-commence-managed-release-water-thompsons-creek-reservoir> 31 Oct 2023

Further, with the transition to green energy, the amount of SWTP treated mine water required will diminish in parallel with reductions in coal power generation. Presently daily use of water at the Mt Piper Power Station (MPPS) from the treatment facility is 0.3 Megalitres and 0.8 Megalitres over summer³.

Given the significant amount of saline mine water generated by Angus Place and Springvale Mines, the main regulatory focus must be to ensure continued mine operations do not further increase mine water make and that the RO treatment of produced mine water continues indefinitely.

The mine water make shall continue beyond the life of these mines, and without beneficial reuse and continued treatment, will forever contaminate the Coxs River, the Greater Blue Mountains World Heritage Area and Sydney's drinking water resources.

The IPC should also consider that Centennial's emergency water management issues may be part of Centennial's practice to force a favourable regulatory outcome, as an emergency in coal supply issue coincided with the IPC hearing of the Springvale mine extension in 2015.

Springvale/Angus Place Water management system risks causing unacceptable environmental impacts to Sydney's drinking water and the World Heritage Area due to a large production of mine water.

The paradigm shift in mine water management must be to transition RO treatment of mine water from MPPS to another large user, possibly the Sydney Water Corporation, and to prevent any addition increase in mine water make from the Springvale and Angus Place mines.

If Centennial Coal can not source another end user for RO treated water or itself pay for RO treatment and is unable to prevent increases in mine water make, then the Springvale and Angus Place mines should be closed and rehabilitated, with coal for MPPS being sourced from Airly and Clarence.

EnergyAustralia's, Mark Collette has called for states to set up government-backed strategic reserves of coal power that could be used to avoid blackouts as the build out of firm renewables lags behind the accelerating exit of coal plants. Mr Collette has previously outlined a plan for EnergyAustralia's Mt Piper coal power station near Lithgow to increasingly operate in a "reserve" role, only running when needed to fill in lengthy gaps in supply when renewables output is too low⁴. Such a stand-by role should include consideration of legacy environmental issues, such as management of mine water.

While Airly and Clarence mines may not be able support full operation of MPPS, these mines could support operation of MPPS in a power generation reserve role. Springvale mine may also play a part in such as reserve role, provided that mining intensity is lowered so that mine water make does not increase.

The problem for Angus Place mine, however, is that even the proposed dewatering in preparation for recommissioning this mine shall cause environmental impacts on Coxs River, Lambs and Kangaroo Creeks, associated swamps and nationally endangered plants and animals. The dewatering of Angus Place mine area 800 in 2018 under mod 5 caused near surface groundwater levels to drop 30 metres. The environment problems generated by a

³ [Final Minutes Lithgow CCC Meeting 18 7 23.pdf \(energyaustralia.com.au\)](#)

⁴ <https://www.afr.com/companies/energy/coal-s-long-goodbyensw-generator-blazes-a-trail-20230824-p5dz2t>

recommissioned Angus Place mine would be unacceptable due to impacts on the Coxs River headwaters.

Thank you for the opportunity to comment on these modifications.

Sincerely,



Keith Muir O.A.M.
for the Gardens of Stone Alliance

Gardens of Stone Alliance

C/- Australian Foundation for Wilderness Limited. ACN 001 112 143 ABN 84 001 112 143

*Advocating as Wilderness Australia. Formerly The Colong Foundation for Wilderness Ltd.
PO Box K335, Haymarket, 1240, NSW. Registered Office 10/154 Elizabeth Street Sydney NSW 2000.*

Telephone (02) 9261 2400

www.wildernessaustralia.org.au

contact@wildernessaustralia.org.au

[Alternate contacts during the holiday period only

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