

20 June 2012

NSW Department of Planning and Infrastructure  
Major Projects Assessment Mining  
23-33 Bridge Street  
SYDNEY NSW 2001

**Attention: Mr Howard Reed, Manager Mining, Major Development Assessment**  
**Also by email: [Howard.Reed@planning.nsw.gov.au](mailto:Howard.Reed@planning.nsw.gov.au)**

Dear Howard

**RE: METROPOLITAN COAL PROJECT APPROVAL (08\_0149) – INDEPENDENT ENVIRONMENTAL AUDIT**

In accordance with Condition 8, Schedule 7 of the Project Approval, an Independent Environmental Audit of the Project was carried out during December 2011 and February 2012, by a team of experienced and independent experts endorsed by the Director-General. The Independent Environmental Audit was commissioned and paid for before the end of December 2011.

The Independent Environmental Audit concluded;

“The audit review, assessment of the documentation and performance of the Metropolitan Coal operations demonstrated a high degree of compliance with the Project Approval and other environmental approvals granted for the project.”

Table 1 (attached) presents the Independent Environmental Audit’s recommendations and Metropolitan Coal’s response to these recommendations.

Please do not hesitate to contact me on (02) 4294 7222 should you have any queries.

Yours faithfully



Ryan Pascoe  
Manager – Environment and Community

**Table 1  
Independent Environmental Audit Recommendations and Responses**

<b>Audit Recommendation</b>	<b>Metropolitan Coal Response</b>
<p><b>Biodiversity</b></p> <ul style="list-style-type: none"> <li>▪ Current water quality monitoring data of the area near to the downstream control sites should be compared with the water quality data from existing, truly independent streams to determine if there is any likelihood of minor water quality impacts reaching the controls sites.</li> <li>▪ Identify and include in the monitoring program several truly independent riparian monitoring sites.</li> <li>▪ Littlejohn's Tree-frog is primarily a winter calling species and it is recommended that ongoing winter surveys for this species are conducted as it has been recorded recently within the Lake Avon, Lake Cataract and Lake Cordeaux Catchments.</li> </ul>	<ul style="list-style-type: none"> <li>▪ These recommendations will be addressed in subsequent iterations of the Biodiversity Management Plan.</li> </ul>
<p><b>Blasting</b></p> <ul style="list-style-type: none"> <li>▪ No blasting activities have occurred on the surface operational areas of Metropolitan Coal leases. The audit concludes that Metropolitan Coal is currently meeting its obligations under the Department of Planning Approval conditions for Schedule 4 "Specific Environmental Conditions — General" Condition 7, however for completeness, a section be included in the either the Environmental Management Strategy or Noise Management Plan to document blasting at the surface facility and its restriction and process to conduct blasting in the unlikely occasion it would be required.</li> </ul>	<ul style="list-style-type: none"> <li>▪ This recommendation will be addressed in the next iteration of the Noise Management Plan.</li> </ul>
<p><b>Catchment Management</b></p> <ul style="list-style-type: none"> <li>▪ Although the baseline groundwater data reported in the Catchment Monitoring Program is considered to satisfy the Project Approval, improvement could be made by inclusion of the following information in the monitoring program: <ul style="list-style-type: none"> <li>○ Groundwater flow contours for the different aquifers;</li> <li>○ Data on aquifer properties such as hydraulic transmissivity and storativity;</li> <li>○ A more comprehensive review of water quality trends and characteristics;</li> <li>○ Rainfall data on hydrographs.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>▪ Metropolitan Coal will seek to implement these recommendations, where possible, in subsequent iterations of the Catchment Monitoring Program.</li> </ul>
<p><b>Rehabilitation Management</b></p> <ul style="list-style-type: none"> <li>▪ It is suggested that the condition be reworded or the Rehabilitation Management Plan procedure be modified to include provision for the revegetation of disturbed areas using appropriate local source native seed/plant material and the instigation of a longer term monitoring program that focusses on monitoring self-sustaining biological processes (e.g. flowering, seed set, seed viability, germination and establishment, and generational succession) to determine if they are occurring. If these processes are not seen to be evident in the rehabilitated areas, further investigation into the ecosystem function should be considered.</li> </ul>	<ul style="list-style-type: none"> <li>▪ This recommendation will be addressed in the next iteration of the Rehabilitation Management Plan.</li> </ul>
<p><b>Subsidence</b></p> <ul style="list-style-type: none"> <li>▪ The installation of deep borehole extensometers above the centre of future long-wall panels at Metropolitan to provide strata dilation profiles would complement the piezometric data and increase our understanding of the mechanism's impacting upon the groundwater regime.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Metropolitan Coal will investigate the feasibility of installing deep borehole extensometers above the centre of future long-wall panels.</li> </ul>

**Water Management Plan**

- The Water Management Plan mentions additional deep groundwater sites are to be constructed for future Extraction Plans. A timeframe from which sufficient baseline data can be collected from these bores prior to mining of additional long-walls should be developed as it is noted that instruments in existing deep sites have taken considerable time to stabilise.
- Metropolitan Coal has sought and been granted construction approval for the installation of additional deep groundwater monitoring sites to obtain Longwall 23 – 27 baseline data. Construction of these deep groundwater monitoring sites is being progressed to ensure adequate baseline data is captured prior to extraction of these longwall panels.