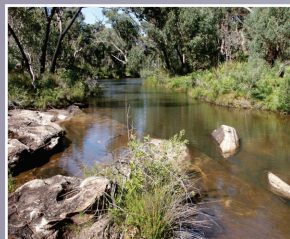


METROPOLITAN COAL

SURFACE FACILITIES WATER MANAGEMENT PLAN



METROPOLITAN COAL

SURFACE FACILITIES WATER MANAGEMENT PLAN

Revision Status Register

Section/Page/ Annexure	Revision Number	Amendment/Addition	Distribution	DP&E Approval Date
All	SFWMP-R01-A	Original	DECCW, NSW Office of Water and DoP	-
All	SFWMP-R01-B	Minor amendments and formatting	DoP	-
All	SFWMP-R01-C	Minor amendments and formatting	DoP	14 April 2011
All	SFWMP-R01-D	Amendments and formatting following submission of the 2014 Annual Review and AEMR/Rehabilitation Report	DP&E	25 August 2015

June 2015

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1 INTRODUCTION

Metropolitan Coal is a wholly owned subsidiary of Peabody Energy Australia Pty Ltd (Peabody). Metropolitan Coal was granted approval for the Metropolitan Coal Project (the Project) under Section 75J of the New South Wales (NSW) *Environmental Planning and Assessment Act, 1979* (EP&A Act) on 22 June 2009 (the Approval). A copy of the Project Approval is available on the Peabody website (<http://www.peabodyenergy.com.au>).

The Project comprises continuation, upgrade and extension of underground coal mining operations and surface facilities at Metropolitan Coal. The Approved underground mining Project layout is shown on Figure 1. The extent of the mine's Major Surface Facilities Area is shown on Figure 2.

1.1 PURPOSE AND SCOPE

This Surface Facilities Water Management Plan (SFWMP) has been prepared for the Project in accordance with Condition 15, Schedule 4 of the Project Approval.

The relationship of this SFWMP to the Metropolitan Coal Environmental Management Structure is shown on Figure 3.

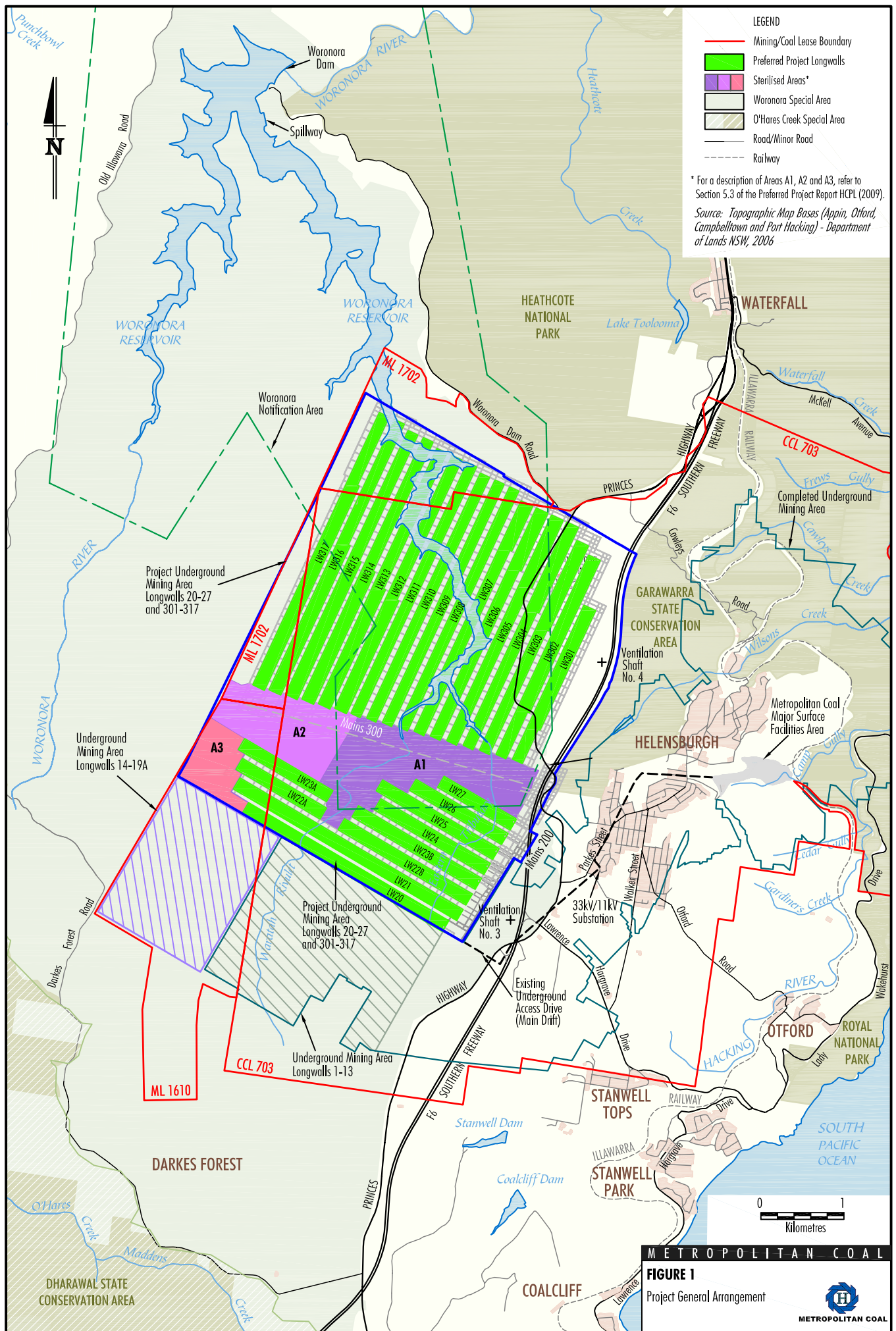
This SFWMP has been prepared by Gilbert & Associates Pty Ltd and Metropolitan Coal.

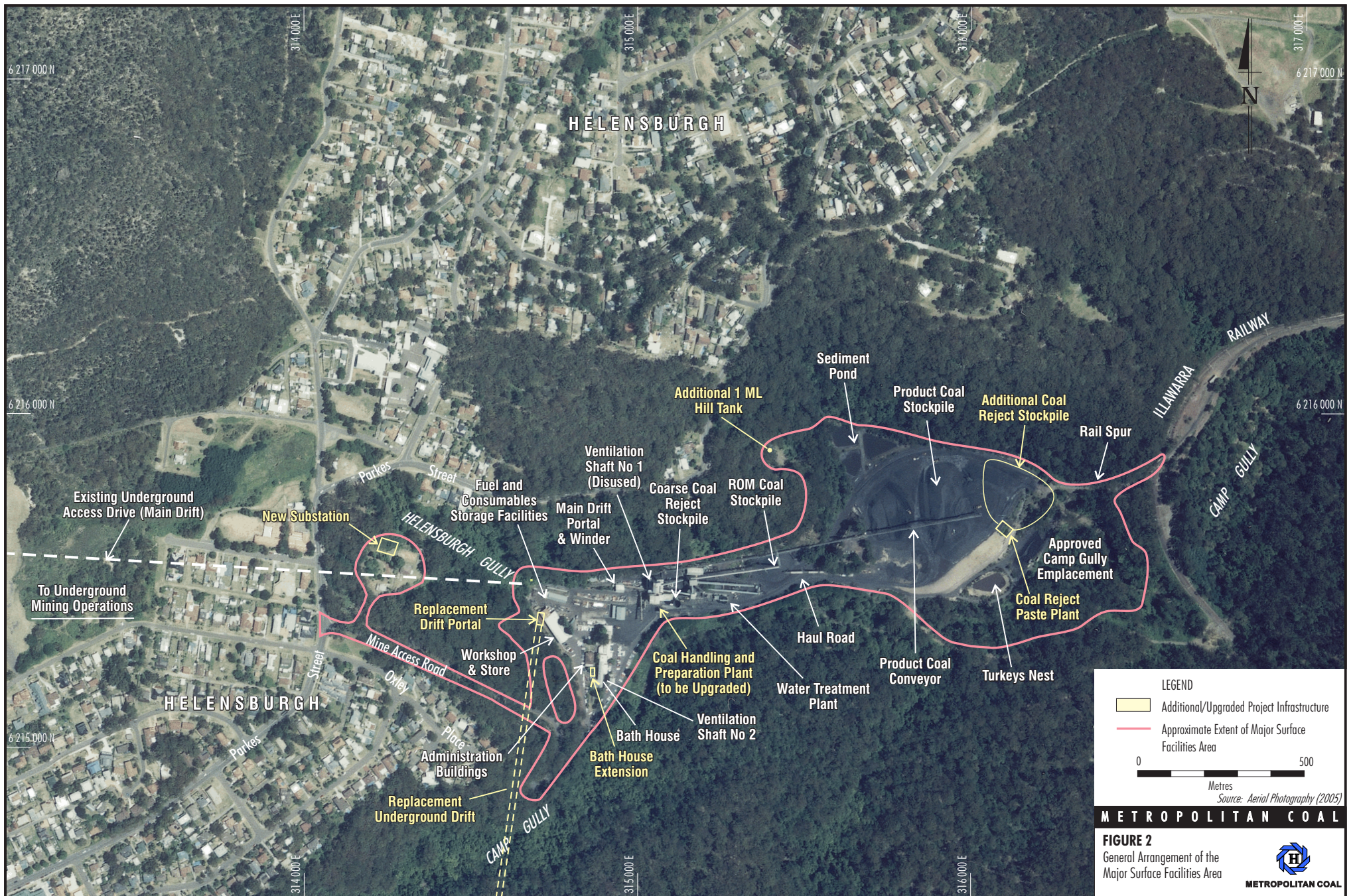
1.2 STRUCTURE OF THE SFWMP

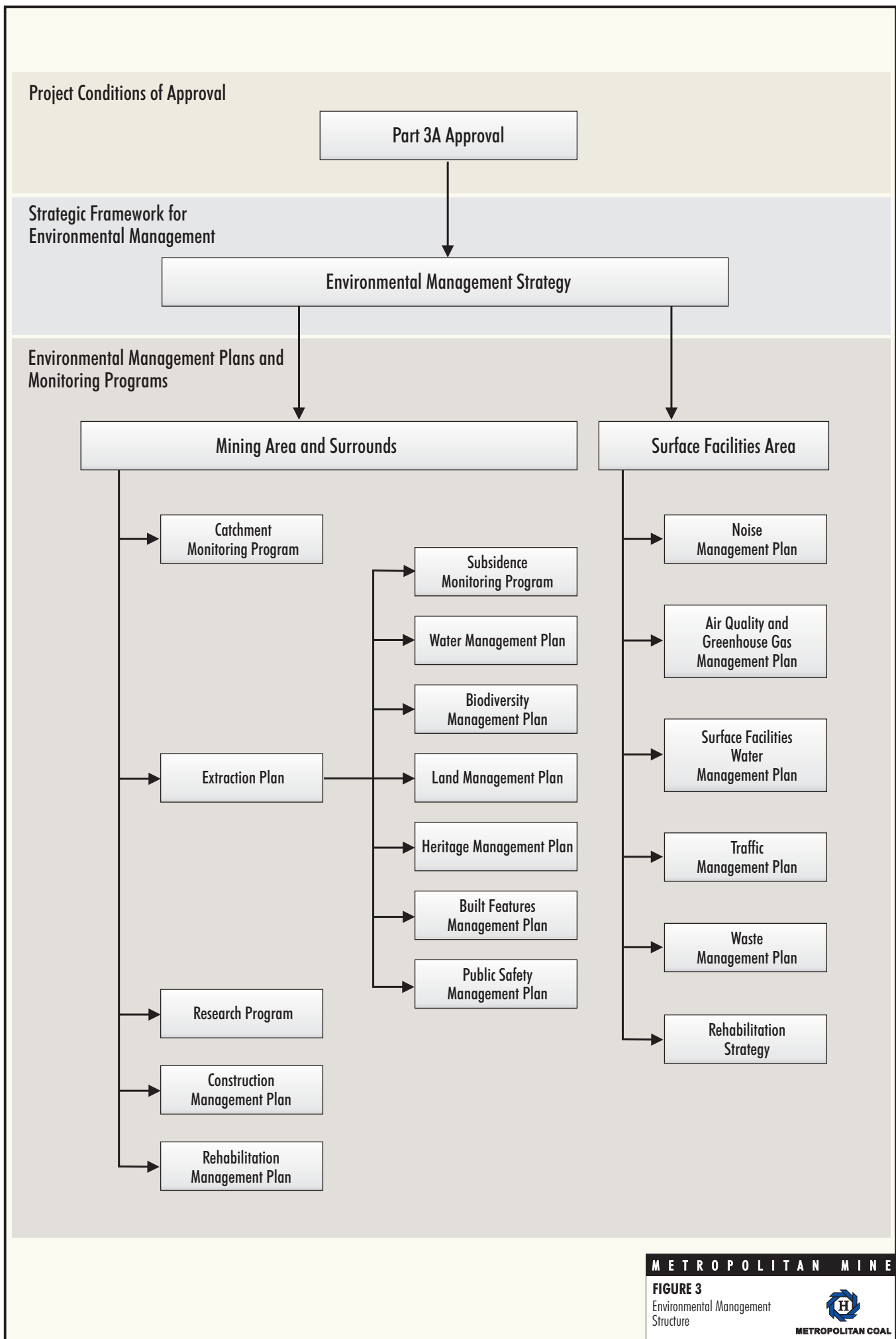
The remainder of the SFWMP is structured as follows:

- Section 2: Describes the review and update of the SFWMP.
- Section 3: Outlines the statutory requirements applicable to the SFWMP.
- Section 4: Provides a description of the water management system (major surface facilities area and ventilation shaft sites), including a description of the water balance model of the major surface facilities area water management system and the predicted water balance.
- Section 5: Provides the detailed baseline data.
- Section 6: Details the performance indicators that will be used to assess the Project.
- Section 7: Describes the monitoring program.
- Section 8: Describes the water management measures.
- Section 9: Provides a Contingency Plan to manage any unpredicted impacts and their consequences.
- Section 10: Describes the annual review and improvement of environmental performance process.
- Section 11: Describes the management and reporting of incidents, complaints and non-compliances.
- Section 12: Lists the references cited.

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FIGURE 3
Environmental Management
Structure



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2 SFWMP REVIEW AND UPDATE

In accordance with Condition 4, Schedule 7 of the Project Approval, this SFWMP will be reviewed within three months of the submission of:

- an audit under Condition 8 of Schedule 7;
- an incident report under Condition 6 of Schedule 7;
- an annual review under Condition 3 of Schedule 7; and

if necessary, revised to the satisfaction of the Director-General (now Secretary) of the Department of Planning and Environment (DP&E), to ensure the SFWMP is updated on a regular basis and to incorporate any recommended measures to improve environmental performance.

As described in the Metropolitan Coal Project Environmental Assessment (Helensburgh Coal Pty Ltd [HCPL], 2008), upgrade and/or extensions to the existing supporting infrastructure systems at the major surface facilities area, including the water management system have been required. Improvements to the water management system will be reported in each Annual Review and the SFWMP will be revised to reflect upgrades in accordance with the Annual Review process.

The SFWMP will also be reviewed within three months of approval of any Project modification and if necessary, revised to the satisfaction of the DP&E. The SFWMP will also be revised to the satisfaction of the DP&E in association with any future construction of the Camp Gully Emplacement.

The revision status of this SFWMP is indicated on the title page of each copy. The distribution register for controlled copies of the SFWMP is described in Section 2.1.

2.1 DISTRIBUTION REGISTER

In accordance with Condition 10, Schedule 7 'Access to Information', Metropolitan Coal will make the SFWMP publicly available on the Peabody website. A hard copy of the SFWMP will also be maintained at the mine site.

Metropolitan Coal recognises that various regulators have different distribution requirements, both in relation to whom documents should be sent and in what format. An Environmental Management Plan and Monitoring Program Distribution Register will be established in consultation with the relevant agencies and infrastructure owners that indicates:

- to whom the Metropolitan Coal plans and programs, such as the SFWMP, will be distributed;
- the format (i.e. electronic or hard copy) of distribution; and
- the format of revision notification.

Metropolitan Coal will make the Distribution Register publicly available on the Peabody website.

Metropolitan Coal is responsible for maintaining the Distribution Register and for ensuring that the notification of revisions is sent by email or post as appropriate.

In addition, Metropolitan Coal employees with local computer network access will be able to view the controlled electronic version of this SFWMP on the Metropolitan Coal local area network. Metropolitan Coal will not be responsible for maintaining uncontrolled copies beyond ensuring the most recent version is maintained on Metropolitan Coal's computer system and the Peabody website.

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3 STATUTORY REQUIREMENTS

Metropolitan Coal's statutory obligations are contained in:

- (i) the conditions of the Project Approval;
- (ii) relevant licences and permits, including conditions attached to mining leases; and
- (iii) other relevant legislation.

These are described below.

3.1 EP&A ACT APPROVAL

Condition 15, Schedule 4 of the Project Approval requires the preparation of a SFWMP for the Project. Approval Condition 15 states:

Surface Facilities Water Management Plan

15. *The Proponent shall prepare and implement a Water Management Plan for the surface facilities area and two ventilation shaft sites to the satisfaction of the Director-General. This plan must be prepared in consultation with NOW and OEH by a suitably qualified expert/ whose appointment has been endorsed by the Director-General, and submitted to the Director-General for approval by the end of June 2010. In addition to the standard requirements for management plans (see condition 2 of schedule 7), this plan must:*

- (a) include a comprehensive water balance for the project; and*
- (b) ensure that suitable measures are implemented to minimise water use, control erosion, prevent groundwater contamination, and comply with any surface water discharge limits.*

Note: The water balance in this plan must be suitably integrated with both the Catchment Monitoring Program and the Water Management Plans that form part of the Extraction Plan.

In addition, Condition 2, Schedule 7 of the Project Approval outlines management plan requirements that are applicable to the preparation of the SFWMP. Table 1 indicates where each component of this condition is addressed within this SFWMP.

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Table 1
Management Plan Requirements

Project Approval Condition	SFWMP Section
Condition 2, Schedule 7	
2. The Proponent shall ensure that the management plans required under this approval are prepared in accordance with any relevant guidelines, and include:	
a) detailed baseline data;	Section 5
b) a description of:	
• the relevant statutory requirements (including any relevant approval, licence or lease conditions);	Section 3
• any relevant limits or performance measures/criteria;	Not applicable
• the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the project or any management measures;	Section 6
c) a description of the measures that would be implemented to comply with the relevant statutory requirements, limits, or performance measures/criteria;	Sections 7, 8 and 9
d) a program to monitor and report on the:	Sections 7, 8 and 9
• impacts and environmental performance of the project;	
• effectiveness of any management measures (see c above);	
e) a contingency plan to manage any unpredicted impacts and their consequences;	Section 9
f) a program to investigate and implement ways to improve the environmental performance of the project over time;	Section 10
g) a protocol for managing and reporting any;	
• incidents;	Section 11
• complaints;	Section 11
• non-compliances with statutory requirements; and	Section 11
• exceedances of the impact assessment criteria and/or performance criteria; and	Not applicable
h) a protocol for periodic review of the plan.	Section 2

3.2 LICENCES, PERMITS AND LEASES

In addition to the Project Approval, all activities at or in association with Metropolitan Coal will be undertaken in accordance with the following licences, permits and leases which have been issued or are pending issue.

- The conditions of mining leases issued by the Division of Resources and Energy (DRE), within the NSW Department of Trade and Investment, Resources and Energy (NSW T&I), under the NSW *Mining Act, 1992* (e.g. Consolidated Coal Lease [CCL] 703, Mining Lease [ML] 1610, ML 1702, Coal Lease 379, Mining Purpose Lease 320 and Authorisation 200).
- The *Metropolitan Coal Mining Operations Plan 1 October 2012 to 30 September 2019* approved by NSW T&I.

- The conditions of Environment Protection Licence (EPL) No. 767 issued by the NSW Environment Protection Authority (EPA) under the *NSW Protection of the Environment Operations Act, 1997*. Revision of the EPL will be required prior to the commencement of Metropolitan Coal activities that differ from those currently licensed.
- The prescribed conditions of specific surface access leases within CCL 703 for the installation of surface facilities as required.
- Water extraction licences issued by the *NSW Office of Water* under the *Water Act, 1912*, were converted to licences under the *Water Management Act, 2000*. The existing licences were converted to licences under the *Water Sharing Plan for the Greater Metropolitan Region Groundwater Sources, 2011* (i.e. WAL36475 was converted on 1 May 2014) and the *Water Sharing Plan for the Greater Metropolitan Region Unregulated River Water Sources, 2011* (i.e. WAL25410 was converted on 28 November 2012).
- Mining and occupational health and safety related approvals granted by NSW T&I and WorkCover NSW.
- Supplementary approvals obtained from WaterNSW (previously the Sydney Catchment Authority [SCA]) for surface activities within the Woronora Special Area (e.g. fire road maintenance activities).

3.3 OTHER LEGISLATION

Metropolitan Coal will conduct the Project consistent with the Project Approval and any other legislation that is applicable to an approved Part 3A Project under the EP&A Act.

The following Acts may be applicable to the conduct of the Project (HCPL, 2008):

- *Contaminated Land Management Act, 1997;*
- *Dangerous Goods (Road and Rail Transport) Act, 2008;*
- *Mining Act, 1992;*
- *Noxious Weeds Act, 1993;*
- *Rail Safety (Adoption of National Law) Act, 2012;*
- *Roads Act, 1993;*
- *Protection of the Environment Operations Act, 1997;*
- *Threatened Species Conservation Act, 1995;*
- *Sydney Water Catchment Management Act, 1998;*
- *Coal Mine Health and Safety Act, 2002;*
- *Crown Lands Act, 1989;*
- *Dams Safety Act, 1978;*
- *Energy and Utilities Administration Act, 1987;*
- *Fisheries Management Act, 1994;*
- *Water Act, 1912;* and
- *Water Management Act, 2000.*

Relevant licences or approvals required under these Acts will be obtained as required.

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4 DESCRIPTION OF SURFACE FACILITIES WATER MANAGEMENT SYSTEM

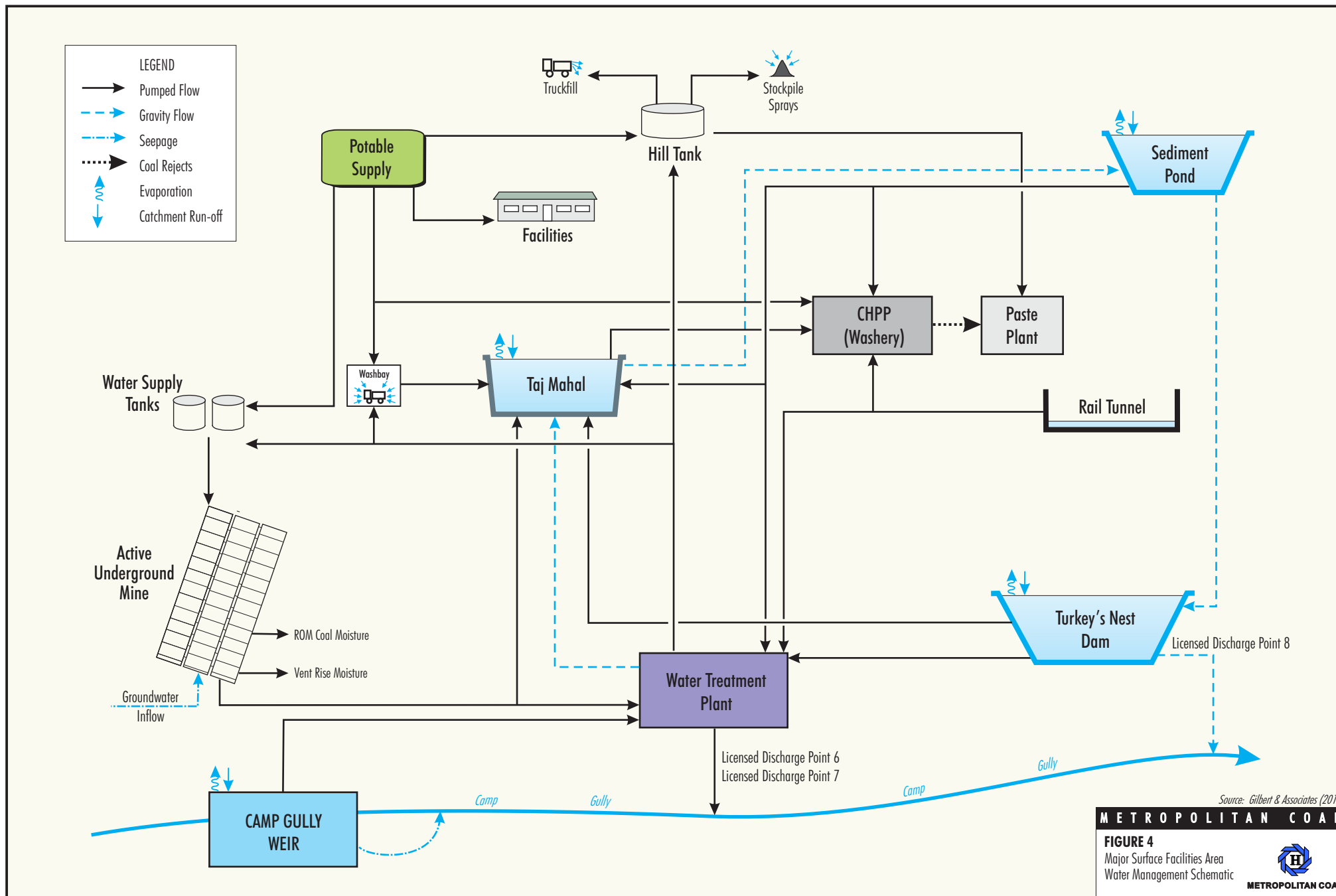
4.1 MAJOR SURFACE FACILITIES AREA

The major surface facilities area, including the coal washery and load out facilities, is located in a steep-sided valley adjacent to the town of Helensburgh and next to Camp Gully (Figures 2 and 6). Helensburgh Gully, to which some of the town drains, passes beneath the site via a tunnel and drains into Camp Gully. Runoff from the vast majority of the catchment upslope of the washery, workshop and stockpile areas is diverted around the north of the site and either into Helensburgh Gully or Camp Gully. Runoff from the administration/bathhouse area (from roofs and paved or grassed areas) drains directly to Camp Gully, while runoff from the washery, workshop and stockpile areas is collected in the site water management system.

The site water management system comprises a series of collection dams, sumps and treatment systems. The system is operated to avoid mixing of clean water runoff and mine water, minimise off site release of site runoff and to provide water supply requirements on site. Figure 4 shows a schematic of the major surface facilities water management system, the key features of which are described below.

- An excavated **“Turkey’s Nest” dam** at the most downhill (easterly) point of the site. This collects runoff from the product coal stockpile area. Any overflow from the sediment pond (refer below) also reports to the Turkey’s Nest dam. Water is pumped from the Turkey’s Nest dam to the water treatment plant for subsequent re-use on site and to the Taj Mahal sump (refer below). Overflow from the Turkey’s Nest dam (i.e. during wet periods) flows to Camp Gully. The catchment area of the Turkey’s Nest dam is estimated at 5.7 hectares (ha), with a storage capacity of 6.9 megalitres (ML).
- A **sediment pond** is located on the northern side of the site. This collects runoff from the run-of-mine (ROM) coal stockpile and truck wash areas. Water is pumped from the sediment pond to the water treatment plant and to the Taj Mahal sump (refer below). Any overflow from the sediment pond reports to the Turkey’s Nest dam. The catchment area of the sediment pond is estimated at 2.6 ha, with a storage capacity of 8.7 ML.
- A concrete-lined sump, known as the **“Taj Mahal”** captures runoff and incidental spills from the majority of the washery and workshop areas. The catchment area reporting to the Taj Mahal is estimated to be 2.7 ha, while the sump has a storage capacity of 0.52 ML. The Taj Mahal also receives pumped inflow from the underground mine and drainage from the truckwash facility. Water from the Turkey’s Nest dam and sediment pond can also be pumped to the Taj Mahal. Water from the Taj Mahal is used to supply make-up water to the washery tailings thickener. Any overflow from the Taj Mahal flows to the sediment pond.
- A number of **underground storage** areas are used for temporary storage of water accumulating in underground operations prior to pumping to the surface. The volume of these storages is relatively small.
- The **water treatment plant** processes water pumped from the underground storages, the sediment pond, the Turkey’s Nest dam and other sources. The plant comprises a flocculant-dosed thickener, a sand filtration plant and a discharge tank. Water from the discharge tank is either pumped as make-up to the two Water Supply Tanks, the existing Hill Tank or released under a discharge licence (EPL No. 767) to Camp Gully.
- A **concrete weir** exists on **Camp Gully**. Licensed extraction of water is possible via a pump which supplies water to the water treatment plant, only when there is water in the weir (i.e. when Camp Gully is flowing). The catchment area of the weir is estimated at 150 ha.

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Source: Gilbert & Associates (2015)

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FIGURE 4
Major Surface Facilities Area
Water Management Schematic

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- A disused **rail tunnel** north of the sediment pond contains runoff and groundwater seepage. Water pumped from the rail tunnel is also used as feed to the water treatment plant and as make-up to the washery tailings thickener.
- The **washery** requires water to make-up losses to water exported with product coal, coarse and fine rejects (tailings), as well as for flocculant dosing and general wash-down. Water is recovered internally within the washery from tailings via a thickener and a belt filter press.
- The **Hill Tank** provides water for truck fill (road dust suppression), stockpile sprays and to the paste plant which is used to generate tailings paste for underground disposal. The Hill Tank receives supply from the water treatment plant and make-up from town water.
- Two **Water Supply Tanks** supply water to underground mining operations (for underground mining plant cooling and dust suppression). These also receive supply from the water treatment plant and make-up from town water. A third tank also exists and is kept filled to provide emergency water supply for fire fighting.
- Supply from local **Town Water** which, apart from providing make-up to the tanks and washery, provides direct supply to the bath house/potable water and for truck wash.

The main uses of water on site are to supply underground mining operations and for the coal washery. Water is recycled from underground operations to the Taj Mahal, with some water lost through ventilation. Minimal make-up is produced by mine groundwater inflow as the underground mine is essentially dry.

4.1.1 Simulated Performance of Water Management System

In accordance with Condition 15 (a), Schedule 4 of the Project Approval, a sub-daily time step water balance model of the major surface facilities area water management system has been developed. The model is based on the water management system described in Section 4.1 and shown on Figure 4. The water balance model (for a range of climatic scenarios):

- predicts the water balance for the future life of the Project;
- predicts system controlled release/overflow rates; and
- predicts make-up requirements for predicted future production rates.

The model operates on a less than daily time-step and has been developed to run over a large number of different daily climate “realizations¹” compiled from the 126 year record of available data. Each realization comprised an 18 year period (2015-2032 inclusive). The realizations were formed by moving along the historical record one year at a time with the first realization comprising the first 18 years in the record. The second realization comprised years 2 to 19 in the record while the third realization comprised years 3 to 20 and so on. At the end of the record, 17 years of data from the start of the record was added from the beginning, so that data at the beginning and end of the record were used in as many realizations as data from the rest of the record. Using this methodology, 126 mine life realizations were simulated and used to generate statistics relating to mine water supply and overflow/controlled release events. This method effectively includes all historical climatic events in the water balance model, including extreme high and low rainfall periods and all the recorded rainfall in between these periods.

¹ ‘Realization’ is a term used in the water balance model for different climatic periods.

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Key data and assumptions used in the model were as follows:

- The groundwater inflow rate to the underground commencing at 0.15 ML/d (consistent with estimates for late 2015, Metropolitan Coal [2015]) and increasing to the final (2032) upper bound value of 1.3 ML/d predicted in Heritage Computing (2009).
- 126 years of rainfall data (1889-2014 inclusive) was obtained for the Bureau of Meteorology (BoM) rain gauge at Helensburgh (Station Number 68028) from the Queensland Department of Science, Information Technology and Innovation's SILO Patched Point Data Set (refer <http://www.longpaddock.qld.gov.au/silo/>)². A 126 year evaporation data set for the site was also obtained from this source.
- The Australian Water Balance Model (AWBM)³ was used to simulate runoff from rainfall on the various sub-catchments across the major surface facilities area, with four different sub-catchment types modelled and catchment areas as outlined in Section 4.1.
- Evaporative losses from water storages were estimated on the basis of the above pan evaporation rates multiplied by a pan factor and storage surface areas derived from storage area-volume relationships.
- The following pump rates for pumping of water from given storages:
 - Turkey's Nest : 40 Litres per second (L/s);
 - Sediment Pond: 12 L/s;
 - Camp Gully Weir⁴: 16 L/s;
 - Water Treatment Plant: 45 L/s under typical operating conditions;
 - Rail Tunnel: 7 L/s;
 - Underground Storages: 16 L/s; and
 - Maximum Town Water supply rate: 54 L/s.
- The following system demands:
 - Washery make-up: 30 L/ROM tonne;
 - Underground demand: 1.0 to 1.2 Megalitres per day (ML/day);
 - Coal stockpile dust suppression demand: 10 L/ROM tonne washed;
 - Truck fill (dust suppression) demand: 144 kL/day;
 - Truck wash: 24 kL/day;
 - Bath house: 27 kL/day; and
 - Paste Plant: 222 L/tonne of reject.

Table 2 summarises model results in terms of system inflows and outflows. Results are expressed as averages over the 18 year simulated period: averaged over all realizations, the 10th percentile highest values in any 18 year realization and the 10th percentile lowest values in any 18 year realization.

² The Patched Point Dataset uses original Bureau of Meteorology measurements for a particular meteorological station, but with interpolated data from surrounding stations used to fill ("patch") any gaps in the observation record.

³ Boughton W.C. (2004) *The Australian Water Balance Model*. Environmental Modelling & Software, Vol. 19, pp 943-956.

⁴ Camp Gully Weir has an annual licensed extraction limit of 130 ML (Licence No. 10SL049311).

Table 2
Water Balance Predicted System Inflows and Outflows

	10%ile Lowest Values (ML/yr)	Average Values (ML/yr)	10%ile Highest Values (ML/yr)
<i>Inflows</i>			
Rainfall Capture	85	97	110
From Camp Gully Weir	72	78	85
From Rail Tunnel	106	115	123
From Underground	292	292	292
Town Water Supply	105	111	118
<i>Outflows*</i>			
Turkey's Nest Overflow	0.0	0.8	1.6
Water Treatment Plant Controlled Release	31	37	48
Washery Make-up	87	87	87
Underground Supply	394	394	394
Stockpile Dust Suppression	23.0	23.5	23.7
Road Watering	42.9	43.7	44.2
Paste Plant	92.4	93	93.7
Bath House	9.8	9.8	9.8
Evaporation	4.4	4.6	4.9

* Differences in total outflows when compared to total inflows are due to changes in stored volume in the model.

A copy of the water balance model will be held by Metropolitan Coal personnel and used as a forward planning tool. The water balance model will be upgraded in accordance with planned and actual water management changes and upgrades. It will also be used to assess the effectiveness of planned water management upgrades.

4.2 VENTILATION SHAFT SITES

A ventilation shaft (known as Ventilation Shaft No. 3) exists outside the major surface facilities area, located near the Old Princes Highway south-west of Helensburgh (Figure 1). The area drains north to the Eastern Tributary of the Woronora Reservoir. Surface facilities include the ventilation rise itself (enclosed in a building) along with fans, power transformers, two small sheds and a small rainwater tank collecting roof runoff. The area around the fans is paved and the areas around the power transformers are paved with concrete bunds. The remaining area is either grassed (majority) or sheeted with gravel. The area is located near the head of the catchment on a ridge line. Upslope runoff has been substantially diverted around infrastructure using concrete-lined drains.

As the Project underground mining operations extend further to the north, extension of the existing ventilation system will be required to maintain a safe working environment within the underground mine. Development will include the installation of a new upcast shaft and associated fan installation (Ventilation Shaft No. 4) adjacent to the main roadways to the west of the F6 Southern Freeway (Figure 1). The SFWMP will be revised to address water management at Ventilation Shaft No. 4 prior to its construction. It is anticipated that surface water management at Ventilation Shaft No. 4 will be similar to the measures currently in place at Ventilation Shaft No. 3.

5 BASELINE DATA

Sections 5.1 to 5.3 describe the baseline data available of relevance to surface facilities water management.

5.1 METEOROLOGY

Regional and local meteorological data is available from the BoM weather stations at Lucas Heights (Station Number 66078), Helensburgh (Station Number 68028), Darkes Forest (Station Number 68024), and 'Reverces' (Station Number 568069) (Table 3). Rainfall data is also available from Metropolitan Coal pluviometers situated in the Waratah Rivulet catchment (site PV1) and Woronora River catchment (site PV2) (Figure 5). Evaporation data is available from the discontinued SCA station at the Woronora Dam (Table 3 and Figure 5).

Table 3
Existing Meteorological Monitoring Station Locations and Recording Periods

Station Number	Data Type	Period of Record
Lucas Heights (BoM Station Number 66078)	Evaporation, ground minimum temperature, air maximum temperature, air temperature, dew point, mean sea level pressure, total cloud amount, wind speed, maximum wind gust speed, rainfall and rainfall intensity	1958 to present
Darkes Forest (BoM Station Number 68024)	Rainfall (BoM daily read converted to pluviometer)	1894 to present
Helensburgh (BoM Station Number 68028)	Rainfall (BoM daily read converted to pluviometer)	1889 to 2005
'Reverces' (BoM Station Number 568069)	Rainfall (pluviometer)	2000 to present
Waratah Rivulet (site PV1)	Rainfall (Metropolitan Coal pluviometer)	2006 to present
Woronora River (site PV2)	Rainfall (Metropolitan Coal pluviometer)	2007 to present
Woronora Reservoir (566052)	Evaporation data (SCA station)	from 1976 (discontinued)t

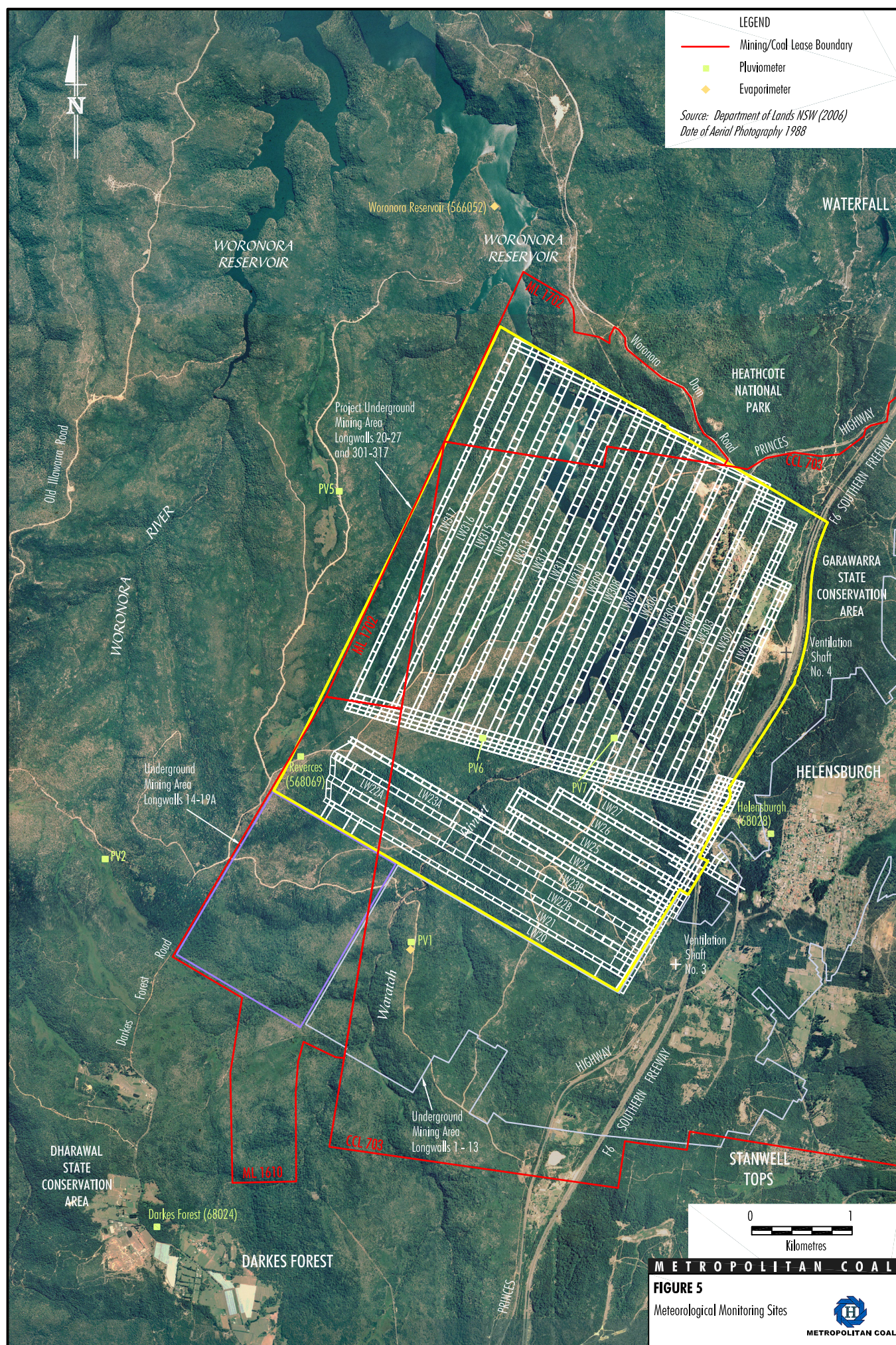
A meteorological station has been installed at Robertson Street in Helensburgh, approximately 500 metres west of the major surface facilities area. This station will also provide rainfall data for use in future updates of the water balance model.

Additional pluviometers have been installed within the Honeysuckle Creek catchment (site PV5), Waratah Rivulet catchment (site PV6) and Eastern Tributary catchment (site PV7) (Figure 5).

5.2 WATER USE AND LICENSED DISCHARGE

A database of continuous water usage (monitored via flow meters) is maintained at the major surface facilities area using an electronic system. Water use is recorded hourly and backup manual readings of accumulating flow meters are taken weekly. Monitoring of water flows has been conducted at the following sites:

- water pumped from underground storages to surface;
- water pumped from surface tanks to underground operations;
- extraction from Camp Gully Weir;
- discharge from Water Treatment Plant to Camp Gully;



- water pumped from the Turkey's Nest dam;
- water pumped from the Sediment Pond; and
- town water supplied (weekly readings only).

5.3 WATER QUALITY

Water quality data has been collected in Camp Gully downstream of the major surface facilities area as part of a Landcare study conducted between 1997 and 2000. Metropolitan Coal has also monitored water quality at four sites on Camp Gully (sites A to D). Water quality is also monitored at the EPL No. 767 monitoring point (Point 9) – the clean water tank at the Water Treatment Plant. The site locations are summarised in Table 4 and are shown on Figure 6.

Table 4
Stream Water Quality Monitoring Sites - Camp Gully

Site Number	Sampling Period	Number of Observations
Landcare Site (LS)	Jan 1997 – Feb 2000	28
A	Dec 2008 – Jul 2009	24
B	Dec 2008 – Jul 2009	13
C	Dec 2008 – Jul 2009	21
D	Dec 2008 – Jul 2009	18
EPL No. 767 Point 9	Jan 2007 - ongoing	39

A statistical summary of the water quality parameters monitored at each of the above sites is provided in Tables 5 and 6.

Table 5
Statistical Summary of Water Quality Data – Camp Gully

Site	Number of Samples	pH (pH Units)				Electrical Conductivity (µS/cm)				Dissolved Oxygen (% Saturation)			
		Min	Max	Mean	Std. Dev	Min	Max	Mean	Std. Dev	Min	Max	Mean	Std. Dev
Landcare Site (LS)	33	6.2	8.3	7.5	0.5	90	360	235	59	75	110	92	8.3
A	24	6.1	8.4	7.8	0.4	29	341	260	79	5.5	106	69	23
B	13	6.6	8.2	7.8	0.4	33	1432	555	382	51	101	76	17
C	21	7.0	8.7	8.2	0.4	129	755	496	166	29	169	83	28
D	18	7.5	8.4	7.9	0.3	24	498	291	98	12	113	78	23

µS/cm = microSiemens per centimetre.

Table 6
Statistical Summary of Water Quality Data – EPL No. 767 Monitoring Point 9

Number of Samples	39			
Parameter	Minimum	Maximum ¹	Mean	Standard Deviation
pH (pH Units)	7.1	8.9	8.1	0.4
Total Suspended Solids (mg/L)	1	80	6.3	12.6
Oil and Grease (mg/L)	<0.1	7	0.4*	1.6

* For determination of mean value, results of "<0.1 mg/L" were taken as 0.1 mg/L.

¹ Note, when the quality of water is not within with the EPL discharge limits, water is not discharged to Camp Gully.

mg/L = milligrams per litre.

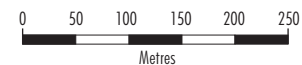
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LEGEND

- Water Pipeline
- Camp Gully Water Extraction Pipeline
- Water Quality Monitoring
- Volume Monitoring

Note: Site D is located approximately 2.3 km upstream of Site A



Source: Metropolitan Coal (2014)
Date of Aerial Photography October 2014

METROPOLITAN COAL

FIGURE 6

Metropolitan Coal's Water Sources
and Key Infrastructure



METROPOLITAN COAL

5.4 MINE WATER MAKE

Mine water make (i.e. groundwater that is captured in the underground mine workings) is calculated from the difference between total mine inflows (reticulated water into the mine, moisture in the downcast ventilation and the ROM coal *in situ* moisture content) and mine outflows (reticulated water out of the mine, moisture in the exhaust ventilation, and moisture in the ROM coal).

Since May 2006, Metropolitan Coal has had no available additional underground water storage capacity. Using a conservative estimate of 10% for the ROM coal moisture content (which maximises the inferred water inflow calculation), the average daily 'water make' is 0.2 megalitres per day (ML/day) (Figure 7). Using what is considered to be a more realistic estimate of ROM coal moisture content of 7%, the average daily 'water make' is 0.07 ML/day. A moisture scanning device has been installed on Main Drift Belt No. 1 near the mine's exit to measure the ROM coal moisture content.

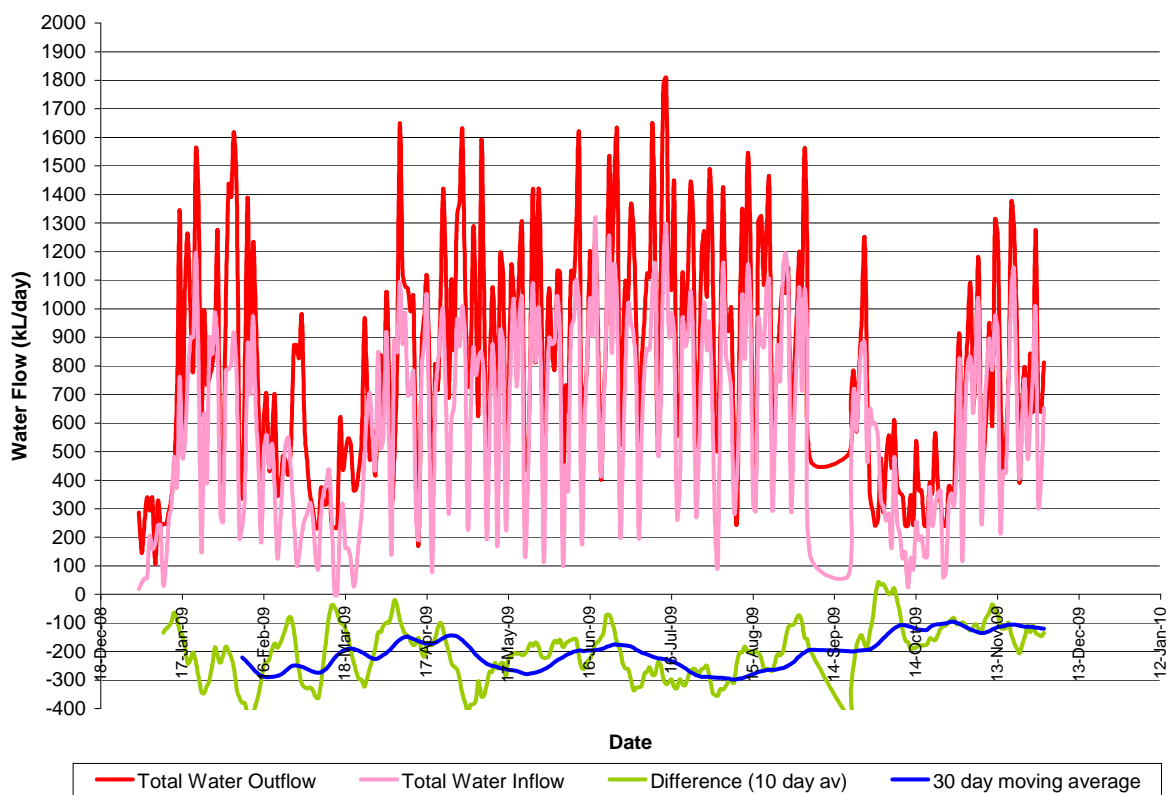


Figure 7 Mine Water Balance - January 2008 to November 2009

6 WATER MANAGEMENT PERFORMANCE INDICATORS

Consistent with Condition 2, Schedule 7 and Condition 15, Schedule 4 of the Project Approval, Table 7 outlines the performance indicators that will be used to assess the performance of the SFWMP, and in particular whether suitable measures are in place to:

- minimise water use at the major surface facilities area;
- control erosion;
- prevent groundwater contamination; and
- comply with licensed discharge limits (i.e. EPL No. 767).

Table 7
Summary of Surface Facilities Water Management Performance Indicators

Aspect	Objective	Performance Indicator
Water use.	To minimise the use of potable water (i.e. town water) and maximise the use of water recycled from underground and water captured on site.	The use of potable water (i.e. megalitres of town water used per tonne of coal produced) does not increase over time, after taking into consideration climatic conditions. Potable water has not been used in circumstances where there is a viable alternative.
Erosion control.	To implement measures to effectively control erosion.	Inspections of the major surface facilities area and ventilation shaft(s) indicate the measures implemented are effectively controlling erosion.
Containment of contaminants.	To implement effective isolation and containment systems to prevent contaminants from impacting on groundwater resources.	Effective containment and/or isolation measures are in place for potential contaminants on site.
Licensed discharge.	To comply with the licensed discharge limits for surface water discharges to Camp Gully.	Surface water discharges comply with the requirements of EPL No. 767.
System integrity.	To regularly check that key components of the water management system are operating effectively.	Inspections of system components indicate the integrity of the system is not at risk of being compromised.

Monitoring that will be conducted to assess the performance indicators is described in Section 7.

The monitoring program includes the monitoring of:

- rainfall (Section 7.1);
- water usage and licensed discharge (Section 7.2);
- water quality (Section 7.3);
- mine water make (Section 7.4); and
- overall system integrity (Section 7.5).

7 MONITORING PROGRAM

A monitoring program will be implemented to monitor the performance of the water management system. The monitoring program is described in Sections 7.1 to 7.5 below. Section 7.6 describes the assessment of the monitoring results against the performance indicators.

7.1 METEOROLOGY

Daily rainfall totals and rainfall intensity will be measured at the Metropolitan Coal meteorological station at Robertson Street in Helensburgh. This data will be supplemented by data from nearby Bureau of Meteorology stations or Metropolitan Coal monitoring equipment (Section 5.1) as required.

Collected rainfall data will be used as input to the water balance model.

7.2 WATER USE AND LICENSED DISCHARGE

Installed flow meters at key points in the water management system will monitor the flow rates listed in Section 5.2 via the electronic system and manual (weekly) readings.

Water discharged from the Water Treatment Plant to Camp Gully will be monitored at site 10 (flow meter on the pipeline discharging from the clean water tank in the water treatment plant) in accordance with EPL 767 (Figure 6).

The data will be maintained on a computer spreadsheet or database.

7.3 WATER QUALITY

Surface water quality monitoring will be conducted at the following sites (Figure 6):

- EPL No. 767 monitoring point 9 (clean water tank of the water treatment plant); and
- Sites A, B, C and D on Camp Gully.

Water quality sampling will be scheduled at monthly intervals at all sites, however this will be flow permitting for the sites on Camp Gully, and if discharge is occurring to Camp Gully from the water treatment plant for the EPL No. 767 monitoring point. More frequent (i.e. event-based) sampling will be conducted at the Camp Gully sites during larger rainfall events (i.e. greater than 25 mm/day).

Water quality parameters for EPL No. 767 monitoring point 9 will include: pH (pH units), oil and grease (mg/L) and total suspended solids (mg/L). Water quality parameters for the Camp Gully sites will include: pH (pH units), electrical conductivity ($\mu\text{S}/\text{cm}$), oil and grease (mg/L), total suspended solids (mg/L), dissolved oxygen (% Saturation and mg/L) and oxygen reduction potential (mV).

7.4 MINE WATER MAKE

Monitoring of mine water make will comprise:

- Metered water reticulated into the mine (recorded continuously and downloaded monthly).
- Metered water reticulated out of the mine (recorded continuously and downloaded monthly).
- Manual measurement of moisture content into and out of the mine through the mine ventilation system using a digital psychrometer. The frequency of readings will be as follows:

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- every hour over a 9 hour period on two occasions during a 12 month period;
- daily (week day) except public holidays or other circumstances (access, fan maintenance, etc.) that prevent readings to be taken); and
- once per week as a minimum.
- Measurement of the *in-situ* moisture content of the coal during channel sampling for coal quality.
- Measurement of the moisture content of ROM coal conveyed out of the mine at the drift portal using an automated moisture scanner. A fully automated data acquisition system records and stores the data.

The inferred mine water make (i.e. groundwater that has seeped into the mine through the strata) will be calculated from the difference between total mine inflows (reticulated water into the mine, moisture in the downcast ventilation, and the *in-situ* coal moisture content) and total mine outflows (reticulated water out of the mine, moisture in the exhaust ventilation, and moisture in the ROM coal).

Given the large fluctuations in daily water usage and the cycle period for water entering the mine, being used by machinery and draining to sumps for return pumping to the surface, a 20 day average will be used to provide a more reliable estimate of water make.

The mine water make water balance has been suitably integrated with the Metropolitan Coal Catchment Monitoring Program, Metropolitan Coal Longwalls 20-22 Water Management Plan and the Metropolitan Coal Longwalls 23-27 Water Management Plan.

7.5 OVERALL SYSTEM INTEGRITY

The following items will be visually inspected and reported in accordance with the mine's maintenance system.

- Integrity of all water management system pipelines and pumps for leaks and general serviceability (daily inspection).
- Integrity of all concrete bunded areas (hydrocarbon storages) for integrity and signs of leakage (daily inspection).
- Integrity of main water storages (i.e. Turkey's Nest, Sediment Pond and Taj Mahal) and status of sediment accumulation (daily inspection).
- Signs of discharge of site runoff to Camp Gully or Helensburgh Gully, other than via licensed discharge points (daily inspection).
- Integrity of upslope diversions at site perimeter (weekly inspection).
- Integrity and effectiveness of erosion control measures (weekly inspection).

The Manager - Safety & Environmental Services, or their delegate, will also inspect the site weekly. The Water Treatment Plant will also be checked daily by the site's maintenance personnel under the direction of the Manager - Safety & Environmental Services.

7.6 ASSESSMENT AGAINST PERFORMANCE INDICATORS

The monitoring results will be used to assess the Project against the performance indicators detailed in Table 8. If data analysis indicates a performance indicator has been exceeded or is likely to be exceeded, management measures will be implemented and Metropolitan Coal will continue to monitor.

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Table 8
Monitoring of Environmental Consequences against Performance Indicators

Aspect	Performance Indicator(s)	Monitoring of Environmental Consequences			Relevant Management and Contingency Measures
		Sites	Parameters	Frequency	
Water use.	The use of potable water (i.e. megalitres of town water used per tonne of coal produced) does not increase over time, after taking into consideration climatic conditions. Potable water has not been used in circumstances where there is a viable alternative.	Town water (i.e. potable water).	Monitored flows.	Daily monitoring. Six monthly analysis.	<ul style="list-style-type: none"> System water audit. Implementation of system modifications (e.g. pump sizes, storage capacities).
Erosion control.	Inspections of the major surface facilities area and ventilation shaft(s) indicate the measures implemented are effectively controlling erosion.	Major surface facilities area and ventilation shafts.	Visual inspection of the integrity and effectiveness of existing erosion control measures. Visual inspection for areas requiring the implementation of erosion control measures.	Weekly and opportunistic visual observations conducted during routine activities. Inspections following significant rainfall events (>25 mm/day).	<ul style="list-style-type: none"> Maintenance of existing erosion control measures to maintain integrity and effectiveness. Implementation of additional erosion control measures.
Containment of contaminants.	Effective containment and/or isolation measures are in place for potential contaminants on site.	Major surface facilities area.	Visual inspection of existing containment measures. Visual inspection for areas requiring containment measures.	Daily.	<ul style="list-style-type: none"> Maintenance of existing containment measures to maintain integrity and effectiveness. Implementation of additional containment measures.
Licensed discharge.	Surface water discharges comply with the requirements of EPL No. 767.	EPL No. 767 Point 9 (clean water tank of the water treatment plant).	<ul style="list-style-type: none"> pH. Oil and grease. Total suspended solids (TSS). 	Monthly.	<ul style="list-style-type: none"> System water audit. Review/revision of key infrastructure in the system (e.g. pump sizes, storage capacities). Implementation of system modifications.
System integrity.	Inspections of system components indicate the integrity of the system is not at risk of being compromised.	Visual check of pumps/pipelines, concrete bunded areas, main water storages for sediment build-up, upslope diversions and discharges off-site.	<ul style="list-style-type: none"> Integrity and effectiveness of key water management system components. 	As described in Section 7.5.	<ul style="list-style-type: none"> Maintenance of existing system components to maintain integrity and effectiveness. Implementation of additional system components to improve and/or maintain system integrity and effectiveness. Implementation of system modifications.

8 MANAGEMENT MEASURES

The Project comprises continuation, upgrade and extension of underground coal mining operations and surface facilities at Metropolitan Coal. The actual timing of the implementation of some of the water management measures will be dependent on the timing of mine upgrades and replacement/upgrade of existing water management infrastructure.

Follow-up inspections will be conducted to assess the effectiveness of implemented management measures and the requirement for any additional management measures. Management measures will be reported in the Annual Review (Section 10).

8.1 SYSTEM WATER AUDIT

In the event that the performance indicator for water use is exceeded, a system water audit will be conducted to identify the potential for additional improvements to the re-use of site water. The likely effectiveness of identified potential measures can be assessed by simulation using the water balance model. The implementation of any system modifications (e.g. pump sizes, storage capacities etc.) will continue to be monitored against the performance indicator.

8.2 EROSION CONTROL

Routine inspections will be conducted to check the integrity and effectiveness of erosion control measures at the Major Surface Facilities Area and at the Ventilation Shafts. Particular attention will be paid to perimeter areas and batters of the product coal stockpile area.

If erosion controls are found to be defective, or if there is visible erosion detected that threatens to progress and not self-stabilise, management measures will be implemented as soon as practicable. Erosion controls will be designed in accordance with DECCW (2008) *Managing Urban Stormwater: Soils and Construction Volume 2E Mines and Quarries*.

If areas of erosional instability were to develop on-site, an accredited geotechnical engineer would be engaged to investigate and design stabilisation measures sufficient to re-establish long term stability of the affected area. These works would be implemented by an earthworks contractor with the works being certified by the geotechnical engineer.

8.3 CONTAINMENT AND ISOLATION MEASURES

Routine inspections will be conducted to confirm the existence and suitability of physical control measures designed to contain and/or isolate potential contaminants on site. Where containment measures are identified as not being effective, upgrades or additional controls will be implemented. Examples of controls include improvements to bunding systems and clean-up methods.

8.4 LICENSED DISCHARGE TO CAMP GULLY

Metropolitan Coal will report any exceedances of the licensed discharges to Camp Gully in accordance with EPL No. 767. In the event of an exceedance, an investigation will be conducted to identify the factors contributing to the exceedance. Corrective measures would be identified to rectify the causal factors. Measures may include upgrades and/or operational changes to the water treatment system, increased capacity of containment systems or changes to operational water management procedures. The implementation of any system modifications will continue to be monitored against the performance indicator.

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8.5 SYSTEM INTEGRITY

In addition to the measures described in Sections 8.1 to 8.4, a number of additional measures may be implemented to maintain the effectiveness and integrity of the water management system. Examples include:

- equipment repair or replacement (e.g. pipelines and pumps);
- control of any leaks;
- servicing of equipment;
- equipment or storage upgrades;
- de-silting of water storages;
- removal of temporarily stockpiled refuse material (waste drums, scrap metal, etc) from site to avoid contamination of runoff off-site; and
- structural improvements to upslope diversions.

A water management infrastructure audit will be conducted annually to identify areas for system improvement and to replace critical infrastructure as required.

9 CONTINGENCY PLAN

In the event the management measures described in Section 8 are not considered to have been effective, Metropolitan Coal will conduct an investigation into the cause of the unpredicted impact and identify and assess potential rectification measures.

Potential rectification measures may include:

- audit of water management system, reviewing system performance in conjunction with water balance model predictions;
- identification of potential system improvements such as upgrade of key infrastructure (pumps, pipelines, storage capacities, diversions);
- implementation of upgrades/modifications to the water management system;
- conduct of review of erosion control measures focussing on causal factors, the reasons for the measures being ineffective and implementation of identified improved or expanded control measures;
- implementation of upgrades/modifications to the contaminant containment system;
- the conduct of additional monitoring (e.g. increase in monitoring frequency or additional sampling) to inform the proposed contingency measures; and
- review design of treatment system and investigate means of modifying treatment to improve water quality.

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10 ANNUAL REVIEW AND IMPROVEMENT OF ENVIRONMENTAL PERFORMANCE

In accordance with Condition 3, Schedule 7 of the Project Approval, Metropolitan Coal will conduct an Annual Review of the environmental performance of the Project by the end of March each year.

The Annual Review will specifically address the environmental performance of the SFWMP and will:

- describe the works carried out in the past year, and the works proposed to be carried out over the next year;
- include a comprehensive review of the monitoring results and complaints records of the Project over the past year, including a comparison of these results against the:
 - relevant statutory requirements, limits or performance measures/criteria;
 - monitoring results of previous years; and
 - relevant predictions in the EA, Preferred Project Report and Extraction Plan;
- identify any non-compliance over the last year, and describe what actions were (or are being) taken to ensure compliance;
- identify any trends in the monitoring data over the life of the Project;
- identify any discrepancies between the predicted and actual performance of the Project, and analyse the potential cause of any significant discrepancies; and
- describe what measures will be implemented over the next year to improve the system environmental performance of the Project.

As described in Section 2, this SFWMP will be reviewed within three months of the submission of an Annual Review, and revised where appropriate.

11 REPORTING

11.1 INCIDENTS

An incident is defined as a set of circumstances that causes or threatens to cause material harm to the environment, and/or breaches or exceeds the limits or performance measures/criteria in the Project Approval.

The reporting of incidents will be conducted in accordance with Condition 6, Schedule 7 of the Project Approval. Metropolitan Coal will notify the Director-General (now Secretary) of the DP&E and any other relevant agencies of any incident associated with the Project as soon as practicable after Metropolitan Coal becomes aware of the incident. Within seven days of the date of the incident, Metropolitan Coal will provide the Director-General (now Secretary) of the DP&E and any relevant agencies with a detailed report on the incident.

11.2 COMPLAINTS

A protocol for the managing and reporting of complaints has been developed as a component of Metropolitan Coal's Environmental Management Strategy and is described below.

The Manager – Safety & Environmental Services is responsible for maintaining a system for recording complaints.

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Metropolitan Coal will maintain public signage advertising the telephone number on which environmental complaints can be made. The Manager – Safety & Environmental Services is responsible for ensuring that the currency and effectiveness of the service is maintained. Notifications of complaints received are to be provided as quickly as practicable to the Manager – Safety & Environmental Services.

Complaints and enquiries do not have to be received via the telephone line and may be received in any other form. Any complaint or enquiry relating to environmental management or performance is to be relayed to the Manager – Safety & Environmental Services as soon as practicable. All employees are responsible for ensuring the prompt relaying of complaints. All complaints will be recorded in a complaints register.

For each complaint, the following information will be recorded in the complaints register:

- date and time of complaint;
- method by which the complaint was made;
- personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect;
- nature of the complaint;
- the action(s) taken by Metropolitan Coal in relation to the complaint, including any follow-up contact with the complainant; and
- if no action was taken by Metropolitan Coal, the reason why no action was taken.

The Manager - Safety & Environmental Services is responsible for ensuring that all complaints are appropriately investigated, actioned and that information is fed back to the complainant, unless requested to the contrary.

In accordance with Condition 10, Schedule 7 of the Project Approval, the complaints register will be made publicly available on the website and updated on a monthly basis. A summary of complaints received and actions taken will be presented to the Community Consultative Committee as part of the operational performance review.

11.3 NON-COMPLIANCES WITH STATUTORY REQUIREMENTS

A protocol for the managing and reporting of non-compliances with statutory requirements has been developed as a component of Metropolitan Coal's Environmental Management Strategy and is described below.

Compliance with all approvals, plans and procedures will be the responsibility of all personnel (staff and contractors) employed on or in association with Metropolitan Coal, and will be developed through promotion of Metropolitan Coal ownership under the direction of the General Manager.

The Technical Services Manager and/or Manager - Safety & Environmental Services will undertake regular inspections, internal audits and initiate directions identifying any remediation/rectification work required, and areas of actual or potential non-compliance.

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As described in Section 11.1, Metropolitan Coal will notify the Director-General (now Secretary) of the DP&E and any other relevant agencies of any incident associated with Metropolitan Coal as soon as practicable after Metropolitan Coal becomes aware of the incident. Within seven days of the date of the incident, Metropolitan Coal will provide the Director-General (now Secretary) of the DP&E and any relevant agencies with a detailed report on the incident.

A review of Metropolitan Coal's compliance with all conditions of the Project Approval, mining leases and all other approvals and licences will be conducted prior to (and included within) each Annual Review. The Annual Review will be made publicly available on the Peabody website.

Additionally, in accordance with Condition 8, Schedule 7 of the Project Approval, an independent environmental audit will be conducted by the end of December 2011, and a minimum of once every three years thereafter. A copy of the audit report will be submitted to the Director-General (now Secretary) of the DP&E and made publicly available on the Peabody website. The independent audits will be conducted by an appropriately qualified, experienced and independent team of experts whose appointment has been endorsed by the Director-General (now Secretary) of the DP&E.

12 REFERENCES

Helensburgh Coal Pty Ltd (2008) *Metropolitan Coal Project Environmental Assessment*.

Heritage Computing (2009) *Metropolitan Coal Project Groundwater Assessment: Recalibration of Metropolitan Colliery Groundwater Model Using MODFLOW-SURFACT*. Report HC 2009/6 for Helensburgh Coal Ltd, 22p.

Metropolitan Coal (2015) *Metropolitan Coal 2014 Annual Review and AEMR/Rehabilitation Report*.