



Mr Jon Degotardi
Manager – Technical Services
Metropolitan Coal
Po Box 402
HELENSBURGH NSW 2508

Dear Mr Degotardi

**Metropolitan Mine
Longwall 304 Extraction Plan**

I refer to your email dated 5 April 2019 providing a proposed Extraction Plan for Longwall 304. I also refer to your responses to the Department and other relevant agencies dated 16 May, 12 June, 14 June and 26 June 2019.

Planning and Assessment (P&A) has undertaken a comprehensive assessment of the Extraction Plan and associated response documents, in consultation with WaterNSW, the Dams Safety Committee, the Department's Division of Resources and Geoscience and Biodiversity Conservation Division and the Resources Regulator. The Department also sought advice from the Independent Expert Panel for Mining in the Catchment (the Panel).

P&A notes that the then Planning Assessment Commission's recommendations for the Metropolitan Coal Project in 2009 focused on limiting subsidence on natural features, particularly the Woronora Reservoir, the Waratah Rivulet and the Eastern Tributary.

It is generally acknowledged and accepted by Metropolitan Coal, P&A, the relevant agencies and the Panel that impacts beyond those predicted have been experienced along Eastern Tributary. Furthermore, these impacts have occurred at valley closure levels substantially less than 200 mm.

It is noted that Metropolitan Coal is proposing to extract Longwall 304 based on a setback of approximately 394 metres from the Eastern Tributary and is aiming to protect that stream's remaining unaffected pools by implementing a similar adaptive management approach to that used for the final stages of Longwall 303. This proposal is generally consistent with P&A's approval to extract Longwall 303 to a similar setback distance from the stream, subject to detailed monitoring supporting adaptive management and early cessation of the longwall should certain triggers be exceeded.

It is also noted that the Extraction Plan's Trigger Action Response Plan (TARP) proposed to be used for Longwall 304 (see the Plan's Table 25, as varied in your response of 26 June 2019) has been designed and refined to identify the onset of valley closure, rather than to meet a particular predicted or observed magnitude of closure that would result in an impact.

P&A notes that the TARP has been further refined (compared to the one implemented for Longwall 303) to include higher frequency monitoring at a greater distance from the finishing line, as requested by P&A and other relevant agencies.

It is proposed by Metropolitan Coal that the Eastern Tributary Technical Committee (ETTC) would continue to meet and review monitoring data within 24 hours of each monitoring event, from 1,230 metres to the finishing end of Longwall 304. Reports outlining the key outcomes would then be submitted to P&A and WaterNSW within 24 hours.

WaterNSW has recommended that all Level 2 and 3 TARP triggers after 900 metres of extraction of Longwall 304 should be reviewed by the ETTC and reported to Government agencies within 24 hours.

However, P&A considers that an appropriately conservative implementation point would be from 1,030 metres as this is the point at which Metropolitan Coal commences high-resolution surveys at no greater than 3-day intervals. It is logical that the ETTC would begin to meet at the point in time at which more regular surveys are considered warranted by Metropolitan Coal (ie 1,030 metres).

Based on P&A's assessment and advice from agencies and the Panel, the Secretary grants approval for the extraction of Longwall 304 subject to the Extraction Plan and the following condition.

The Applicant must implement the Extraction Plan's Eastern Tributary Valley Closure Trigger Action Response Plan (version provided to the Department on 26 June 2019) effective from 1,030 metres of extraction of Longwall 304, including regular review of all monitoring results by the Eastern Tributary Technical Committee in accordance with the frequency of monitoring set out in the Trigger Action Response Plan.

This Extraction Plan approval reflects a precautionary approach and requires the implementation of an adaptive management regime, as was implemented for Longwall 303. Please update the Extraction Plan to reflect the necessary revisions to Table 25 and place a correct version on the mine's website at your earliest convenience.

P&A has prepared a Record of Decision, which summarises its consideration of the Extraction Plan and updated Trigger Action Response Plan (see **Attachment A**).

If you have any further questions, please call Jessie Evans on 9274 6419.


Mike Young
A/Executive Director
Energy and Resources
as nominee of the Secretary

16/7/19.