

The Hon Paul Scully
Minister for Planning and Public Spaces
Parliament House
Macquarie St Sydney NSW 2000
office@scully.minister.nsw.gov.au

Thursday 21 September 2023

Dear Minister

Response to Submissions: Ulan Coal Mine Modification 6 (SSD MP08_0184-Mod-6)

Mudgee District Environment Group (MDEG), based in the Mid-Western Region local government area in NSW, is working for the conservation of our natural heritage and a sustainable future for our children.

We wish to draw your attention to a number of issues raised in submissions to the Ulan Coal Mine Modification 6 proposal (Mod 6), including submissions from Government agencies, that have not been addressed in the proponent's response report.

There are significant impacts on water sources that need to be addressed prior to determination of Mod 6.

These issues include:

1. A shortfall in water licences to mitigate drawdown in the Macquarie-Oxley Management Zone of the Murray-Darling Porous Rock Groundwater Source.
2. A recommendation by the Department of Environment – Water Division that updated monitoring data and model calibration be provided prior to determination.
3. There are 11 monitoring bores that show mining impacts greater than predicted in the calibrated model. There is no discussion about what groundwater source these bores are monitoring in regard to licence requirements for water interception.
4. There is need for an integrated assessment of the cumulative impacts of subsidence and dewatering over time on mine-influenced interception of surface water and changes in groundwater levels.
5. Further consideration of climate-change impacts and modelling of the extent and timing of maximum drawdown and predicted mounding. This is necessary to improve confidence in the mines predicted potential changes to ecologically

- important flows to both the Goulburn River and Mona Creek/Talbragar catchments.
6. Unexplained inconsistencies in Ulan Coal Mine and adjacent Moolarben Coal Mine groundwater modelling of the predicted subsidence impacts and interception, direct and indirect, of the Triassic formations regional groundwater flow that contribute baseflows to streams.
 7. The Response to Submissions report assumes minimal interaction between the Moolarben Coal Mine and Mod 6. Modelling of the regional groundwater impacts is inconsistent with the adjacent Moolarben Coal Mine model.
 8. The Response to Submissions report minimises the contribution from the regional groundwater system base flows to the upper Goulburn River, above and below the Drip gorge.
 9. There has been no response to date to the Independent Expert Scientific Committee on Coal Seam Gas and Large Coal Mining Development (IESC) assessment of water impacts of Mod 6. There were significant issues raised with the groundwater model.

We would appreciate a meeting to discuss these urgent issues as soon as possible prior to any determination on this project.

To arrange a suitable meeting date please contact us at:

E: rosemary.hadaway@gmail.com

Mob: 0411 755 682

Yours sincerely

A handwritten signature in black ink that reads "R. Hadaway". The signature is written in a cursive style and is placed on a light-colored, textured rectangular background.

Rosemary Hadaway
Chair
Mudgee District Environment Group