

Phillips Erin

From: Savage Ross
Sent: Friday, 26 July 2013 10:54 AM
To: Pete Jones
Cc: Rhodes Monika; Reed Annette; DAFF_EIS Unit
Subject: DAFF EIS - Springsure Creek EIS discussion

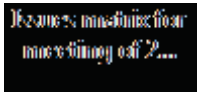
Follow Up Flag: Follow up
Flag Status: Flagged

Good morning

Hi Pete

Thank you for taking time to met with Annette and myself this morning.
Please find attached the topics worksheet, could you populate and return with your comments/undertakings...
Again, please do not hesitate to contact me if you have any questions concerning this or related matters (e.g. DAFF response to Final EIS etc) .
We look forward to working with you to finalise this.

Kind regards



Ross Savage
DAFF EIS Coordination
Agricultural Resources & Planning
Department of Agriculture, Fisheries and Forestry

tel +61 7 3405 6535 (ext 56535)
post GPO Box 46 Brisbane QLD 4001
visit Level 6, 80 Ann Street, Brisbane Queensland 4000

ross.savage@daff.qld.gov.au

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topic	concern	response/way forward
Agricultural productivity – Critical <ul style="list-style-type: none"> Baseline data on production – productivity, costing, modellings etc Baseline is need to measure outcomes Consider economic returns to affected properties 	<ul style="list-style-type: none"> clearly articulate this in EIS detail if information has been requested from landholders, and the results of this engagement if using comparative studies, state what, where and why – show why appropriate concerns that ACRC is seen as an attempt to push this issue at arms length away from the mine and any impacts from it. 	
Coexistence - Critical <ul style="list-style-type: none"> agricultural land use protection reduce uncertainty to affected landholders impacts - avoid, mitigate, compensate strategies 	<ul style="list-style-type: none"> clearly define and state your intentions? Is it going to be mutually beneficial or go you expect give way? provide timelines on when impacts expected is it 5 or 9 years? commit to use DenLo Park to prove up your strategies on subsidence and related impacts to farming systems and financial modelling before impacting the other five properties what will you do if results do not meet expectations? <ul style="list-style-type: none"> If material impacts are realised by landholders, what do you commit to do? how do you intend protect landholders from legacy issues after the mine operations cease e.g. rehabilitation strategies Provide a templates of <ul style="list-style-type: none"> CCA and details on how costs and impacts will be captured and review mechanisms will work Agricultural Management Plans for the management of productivity, cropping practices and farming systems. Do you commit to provide updated subsidence modelling to all potentially affected properties, both inside and outside MLA? 	
Cumulative impacts – are asking DEHP to consider	<ul style="list-style-type: none"> impacts from the whole project on agriculture including transport corridor and associated issues – see above 	
Biosecurity cooperate with landholders and local government	<ul style="list-style-type: none"> provide a list of plant species declared under local law best practice management for control and disposal of weeds and pest animals prevent entry and spread of weeds and pest animals recognise the need to control locusts align to local government priorities 	
Fisheries	<ul style="list-style-type: none"> do you commit to consulting DAFF during the detailed design stages for waterway barrier works, irrespective of location? 	

Phillips Erin

From: Bleakley Ashley
Sent: Friday, 10 May 2013 4:53 PM
To: Pete Jones
Cc: Smith Wedeena; Rhodes Monika
Subject: Existing licences to Take Groundwater in the area
Attachments: 1305.BASAL Auth Search for Ashley.pdf; Basalt auths.pdf

Pete,

Attached are the electronic versions of the information provided today which relates to the licences to take groundwater in the immediate area of the mine area.

Whilst we have carried out a fairly thorough check, it is possible that there may be others in the area that we have missed in our search, although unlikely.

Should you come across a user who is not on our list and you think they should be, we can run a check for you if you provide us with the details.

Regards

Ashley Bleakley

Principal Project Officer (Hydrology)

Water Services

South

Department of Natural Resources and Mines

sch4p4(16) Personal 54337714

ashley.bleakley@dnrm.qld.gov.au

From: Bleakley Ashley
Sent: Friday, 10 May 2013 3:20 PM
To: 'Pete Jones'
Cc: Smith Wedeena; Rhodes Monika
Subject: Mitigation example

Pete

I have taken the attached document from the Hancock Galilee website.

It relates to the Kevins Corner SEIS.

If you have a look at section T.3.4.6 Control Strategies, Groundwater you will see some useful words in regard to mitigation/ make good for groundwater.

Ashley Bleakley

Principal Project Officer (Hydrology)

Water Services

South

Department of Natural Resources and Mines

sch4p4(16) Personal 54337714

ashley.bleakley@dnrm.qld.gov.au

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Water Source	1305.BASAL
Management Group	(All)
Client Id	

Authorisation Status	(All)
Region	Central West Region (CWR)
Purpose	(All)

Auth Rows returned	17 rows - (Auths: 17 / Accts: 16)
--------------------	-----------------------------------

Lot / Plan / Description
Management Subgroups
Client Name

Authorisation Type
Office
Is Auth Active?

Office	Water Account	Client Id	Client Name	Authorisation Type	Authorisation Reference	Authorisation Status	Authorisation Status Set Date	Auth Expire Date	File Ref	Allocation Megalitres
Emerald	s.73 irrelevant information									
Emerald										
Emerald	54362	227756	CENTRAL HIGHLANDS REGIONAL COUNCIL	Licence to take water	89117F	Issued	06-Feb-2009	31-Jan-2014	EME-2083	50.0
Emerald	s.73 irrelevant information									
Emerald										
Emerald										
Emerald										
Emerald										
Emerald	405643	150501	THE STATE OF QUEENSLAND - REPRESENTED BY DEPARTMENT OF EDUCATION AND TRAINING	Licence to take water	30694F	Issued	01-Feb-2011	28-Feb-2021	EME-1337	5.0
Emerald	s.73 irrelevant information									
Emerald										
Emerald										



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No lot and/or Plan
(All)

(All)
(All)

Allocation Hectares	Purpose	Management Group	Management Subgroup	Attached Land	Source Land	Water Source Code	Water Source Name	Water Source AMTD
	s.73 irrelevant information							
	Town Water Supply	Not Assigned	Eme Not Assigned		1/RP612949, 72/SP151671, 73/SP151671	1305.BASAL	Basalt	
	s.73 irrelevant information							
	Educational Facility	Not Assigned	Eme Not Assigned	57/DSN394	57/DSN394	1305.BASAL	Basalt	
	s.73 irrelevant information							

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Works on Water Account	Meters on Water Account
s.73. irrelevant information	
03123/1F,570785,84115F,89115F,89117F	
s.73. irrelevant information	
47398F	
s.73. irrelevant information	

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Emerald	409517	237300	XSTRATA COAL QUEENSLAND PTY LTD AS TRUSTEE	Licence to take water	604037	Issued	24-Oct-2011	31-Jan-2021	EME515/001(0271)6	50.0
Emerald	412013	238184	MCC RURAL PROPERTY PTY LTD AS TRUSTEE	Licence to take water	62366F	Issued	20-Apr-2012	31-Aug-2020	EME/515/001(1225)	75.0
Emerald	s.73 irrelevant information									
Emerald	36105	203228	XSTRATA COAL QUEENSLAND PTY LTD	Licence to take water	181775	Issued	18-Dec-2012	31-Dec-2017	EME-2085	80.0

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	Stock Intensive	Not Assigned	Eme Not Assigned	12/RP616044, 2/RP616045, 4/RP617701, 1/SP164068	1/SP164068	1305.BASAL	Basalt	
	Irrigation, Stock	Not Assigned	Eme Not Assigned	5/SP185536	5/SP185536	1305.BASAL	Basalt	
	s.73 irrelevant information						Basalt	
	Amenities, Industrial	Not Assigned	Eme Not Assigned		Mining Lease 70307	1305.BASAL	Basalt	

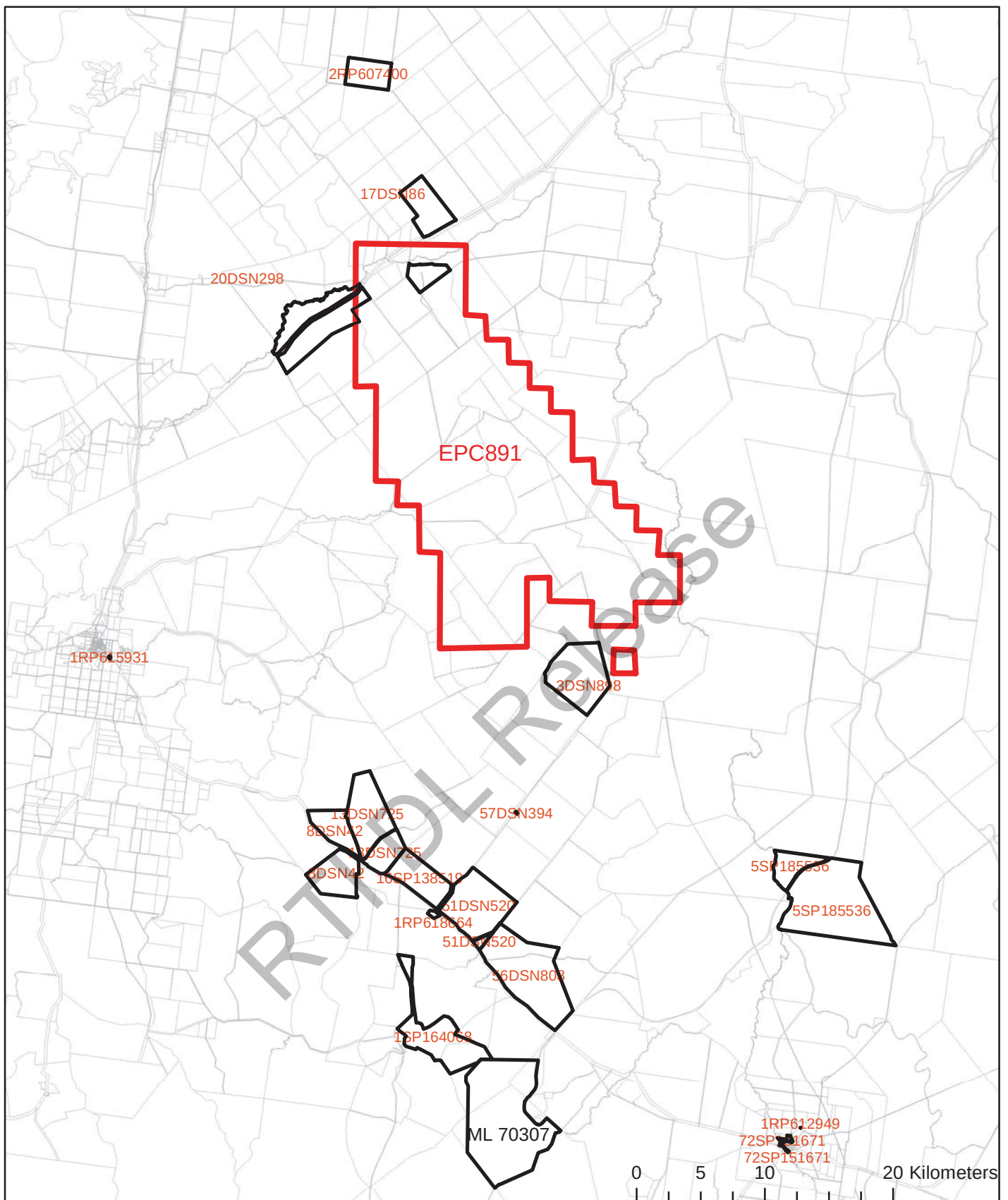
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33447F	
62366F	
s. 73, irrelevant information	
15292,15293	

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Location parcels on authorisations for the taking of water from the Basalt Formation



Legend

- Activity parcels on the entitlements which authorise the taking of water from the Basalt Formation
- Qld DCDB

Phillips Erin

From: Bleakley Ashley
Sent: Friday, 10 May 2013 3:32 PM
To: Rhodes Monika; Smith Wedeena
Subject: Additional point following todays meeting - peer review?

After you left today I raised an issue with 'Rakita', groundwater modeller at todays meeting (I will have spelt this wrong).

I reminded him of one of my comments on the EIS that the groundwater model once updated should be peer reviewed.

I advised that given the time frames I assumed that this was not going to happen.

I said that at the very least someone should be independently looking at the assumptions that will have most effect.

These are the depth of fracturing and location of fracturing in the zone above the goafing in the long wall mine and the modelled change in permeability that will occur as a result of fracturing.

These issues will determine where and how well the basalt aquifers become connected to the coal measures and therefore what impacts to water levels in the basalt aquifers will result.

This really does need peer reviewing and unfortunately we are running out of time.

As a general point we need to be aware that there appears to be a very productive basalt aquifer sitting on top of this proposed mine and we need to be confident that all that can be done has been done to understand the likely impacts, prior to the EA being approved.

Just another question - will this go to IESC?

Ashley Bleakley

Principal Project Officer (Hydrology)

Water Services

South

Department of Natural Resources and Mines

54337714

ashley.bleakley@dnrm.qld.gov.au

Phillips Erin

Subject: FW: Springsure Creek Coal Mine Project - SEIS
Location: 400 George Street - change of rooms and extension of time

Start: Wed 17/07/2013 8:50 AM
End: Wed 17/07/2013 10:50 AM
Show Time As: Tentative

Recurrence: (none)

Meeting Status: Not yet responded

Organizer: Rhodes Monika

When: Wednesday, 17 July 2013 8:50 AM-10:50 AM (GMT+10:00) Brisbane.
Where: 400 George Street - change of rooms and extension of time

Note: The GMT offset above does not reflect daylight saving time adjustments.

~~*~*~*~*~*~*~*

[Dial in details below](#)

From: Rhodes, Monika
Sent: Wednesday, 10 July 2013 2:02 PM
To: Rhodes, Monika; Curley, Peter; Dunlop, Kylie; Pete Jones; Smith, Wedeena; Krosch Neil; Savage, Ross; Rowland, Philip; David, Antoine
Cc: Baker, Tony; Herring, Michael; Hambleton, Alison
Subject: Springsure Creek Coal Mine Project - SEIS
When: Wednesday, 17 July 2013 8:50 AM-10:50 AM (GMT+10:00) Brisbane.
Where: 400 George Street - change of rooms and extension of time

Dear All

I have changed rooms as I think that one hour may be not enough and the other room was booked from 10 am onwards.

This meeting will now be held on level 25 (other side of the building); 400 George Street (for EHP colleagues attending from here).

For those coming from outside 400 George Street, please **meet me on level 3 at 8. 50 am sharp** - and I will lead you to level 25.

Neil/Ross, we will start with DAFF and DNRM issues first so you can leave once discussed. Antoine, you may want to come 30 minutes later.

Teleconference details as previously outlined (below).

Regards

Monika

This is to confirm a meeting between the proponent (Springsure Creek Pty Ltd), EHP, DNRM and DAFF to discuss comments on the SEIS for the Springsure Creek Coal Mine Project.

I will provide an agenda by Tuesday afternoon, once I have all comments received.

For the attendees coming from outside EHP, please meet me on Wednesday 17 July 2013 on level 3, 400 George Street at 8.50 am so that we can start sharp on time (the room is only booked for one hour and we have probably a few comments to discuss).

For the attendees ringing in: Please ring 1300 300 1092; code: 836 498 8713 for the teleconference.

The broad issues to be discussed are:

Noise, EM Plan, subsidence modelling and management, impacts on agricultural land uses and management and potentially water management. However, the full agenda will be confirmed once I have received all signed-off comments.

Pete, please invite your specialists for noise.

Regards

Monika

Dr Monika Rhodes
Principal Environmental Officer
Statewide Environmental Assessments
Telephone 07 3330 6293 **Facsimile** 3330 5875
Email: monika.rhodes@ehp.qld.gov.au
www.ehp.qld.gov.au
Department of Environment and Heritage Protection
Level 9, 400 George Street, Brisbane Q 4000
GPO Box 2454, Brisbane Q 4001

Phillips Erin

From: Policy Coordination <Policy.Coordination@dsdip.qld.gov.au>
Sent: Wednesday, 17 July 2013 9:11 AM
To: Rhodes Monika
Cc: Jennifer Boulton
Subject: FW: CBD/111013 Proposed Springsure Creek Coal Mine Project - Final Environmental Impact Statement
Attachments: DEPC13_854 Springsure Creek Coal Pty Ltd.pdf

Monika, in relation your below email to Jennifer, our comments can be provided directly to the proponent.

Graham

Graham Jones
Senior Policy Advisor
Policy and Legislation Programming
Strategy and Governance
Department of State Development, Infrastructure and Planning
tel: 07 3224 5875
post: GPO Box 15009 City East Queensland 4002
visit: Level 11/100 George Street, Brisbane
email: graham.jones@dsdip.qld.gov.au
web: www.dsdip.qld.gov.au

Great state. Great opportunity.

From: Jennifer Boulton
Sent: Tuesday, 16 July 2013 12:09 PM
To: Policy Coordination
Subject: CBD/111013 Proposed Springsure Creek Coal Mine Project - Final Environmental Impact Statement

For your consideration & response.

Thanks
Jen.

Jennifer Boulton
A/Executive Assistant
Strategic Policy
Department of State Development, Infrastructure and Planning
Queensland Government

tel +61 7 3405 8595 (ext 27595)
post PO Box 15009 City East Qld 4002
visit Level 11 Executive Building 100 George Street Brisbane
jennifer.boulton@dsdip.qld.gov.au

www.dsdip.qld.gov.au

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Great state. Great opportunity.

From: Rhodes Monika [<mailto:Monika.Rhodes@ehp.qld.gov.au>]

Sent: Tuesday, 16 July 2013 11:10 AM

To: Jennifer Boulton

Subject: CBD/111013 Proposed Springsure Creek Coal Mine Project - Final Environmental Impact Statement

Dear Jennifer

EHP is considering further information request from the proponent as part of the EIS assessment process; including issues raised in DSITIA's review of the amended EIS.

Would your comments (i.e. Attachment 1) provided to EHP be suitable to provide directly to the proponent (i.e. forward it as is)?

Kind regards

Dr Monika Rhodes
Principal Environmental Officer
Statewide Environmental Assessments
Telephone 07 3330 6293 **Facsimile** 3330 5875
Email: monika.rhodes@ehp.qld.gov.au
www.ehp.qld.gov.au

Department of Environment and Heritage Protection
Level 9, 400 George Street, Brisbane Q 4000
GPO Box 2454, Brisbane Q 4001

From: Jennifer Boulton [<mailto:Jennifer.Boulton@dsdip.qld.gov.au>]

Sent: Friday, 12 July 2013 9:11 AM

To: EIS External Submissions

Cc: Policy Coordination

Subject: CBD/111013 Proposed Springsure Creek Coal Mine Project - Final Environmental Impact Statement

Good morning:

Please find **attached** Department of State Development, Infrastructure and Planning response. The original has been mailed.

<<DEPC13_854 Springsure Creek Coal Pty Ltd.pdf>>

Kind regards,

Jennifer Boulton
A/Executive Assistant
Strategic Policy
Department of State Development, Infrastructure and Planning
Queensland Government

tel +61 7 3405 8595 (ext 27595)
post PO Box 15009 City East Qld 4002
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Great state. Great opportunity.

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Our ref: DEPC13/854

Your ref: CBD/111013

11 July 2013

The EIS Coordinator – Springsure Creek Coal Mine Project
Department of Environment and Heritage Protection
GPO Box 2454
BRISBANE QLD 4001

Dear EIS Coordinator

Thank you for your letter of 21 June 2013 inviting the Department of State Development, Infrastructure and Planning (DSDIP) to provide comment on the proponents' (Springsure Creek Coal Pty Ltd) response to DSDIP submissions for the proposed Springsure Creek Coal Mine Project.

DSDIP has reviewed the responses provided by the proponent and comments are provided at **Attachment 1**.

If you require any additional information regarding the comments provided, please do not hesitate to contact me on 3033 0659, or by email at alex.ackfun@dsdip.qld.gov.au

Yours sincerely

signed (6) Personal info

Alex Ackfun
Executive Director
Strategic Policy

DEPARTMENT OF STATE DEVELOPMENT INFRASTRUCTURE AND PLANNING

Submission on the Supplementary EIS for Springsure Creek Coal Mine

Section	Describe the issue	Suggested Solution
5.2.4 Strategic Cropping Land Act 2011(SCL Act) 5.3.5 Strategic Cropping Land Assessment	The Springsure Creek Coal Mine (SCCM) area is located within the Priority Agricultural Area (PAA) identified in the draft Central Queensland Regional Plan (CQRP).	<p>Note the Queensland Government's intention to protect priority agricultural land uses within PAAs in Central Queensland and introduce PAA co-existence criteria for resource activities on these areas – refer to the policy intent and maps, which are available on-line at www.dsdip.qld.gov.au/central-queensland.</p> <p>It is anticipated that the PAA policy position in the draft CQRP will be implemented through measures including amendments to the SCL Act and mirrored through approval processes such as environmental authorities. These regulatory measures are expected to be given effect at the same time as the final CQRP is released.</p>
5.7 Mitigation measures 19.5.2 Springsure Creek Agricultural Plan	The EIS refers to the project resulting in the direct disturbance of 60 ha of SCL located within the proposed mine infrastructure area (5.7.7) and various mitigation measures proposed to be taken. This area aligns with priority agricultural land uses within a PAA in the draft CQRP.	Note the Queensland Government's intention to protect priority agricultural land uses within PAAs in Central Queensland and introduce PAA co-existence criteria for resource activities on these areas – refer to the policy intent and maps, which are available on-line at www.dsdip.qld.gov.au/central-queensland
16.4.2 Queensland Government Objectives and Strategies Table 16-2 Summary of relevant Queensland government objectives and strategies	Local Industry Policy – A Fair Go for Local Industry.	Delete reference to Local Industry Policy - <i>A fair go for local industry</i> .
19.5.5 Local Industry Participation	Reference to Local Industry Policy. Dot point referring to Draft local content strategy.	<p>In the paragraph beginning “By securing goods and services to support the project locally,” delete the reference to the Queensland Government's Local Industry Policy – <i>A fair go for Local Industry</i>.</p> <p>Dot point should begin with “Continue to progress the development</p>

Phillips Erin

From: Rhodes Monika
Sent: Wednesday, 17 July 2013 2:06 PM
To: Curley Peter; Rowland Philip; Dunlop Kylie; Baker Tony; michael.a.nelles@tmr.qld.gov.au; Savage Ross; Grimes John; KROSCH Neil; Smith Wedeena; Hambleton Alison; Pete Jones; David Antoine
Subject: Meeting_Springsure_20130718

Dear All

Thank you for making time to discuss the best way forward for the Springsure Creek Coal Mine Project EIS process.

The list below identifies the parties at today's meeting.

Bandanna Energy will inform EHP by email by noon Friday 19 July 2013 a suitable extension period for submitting further supplementary materials and updated EIS.

As agreed during the meeting, Bandanna Energy will consult with the agencies (TMR, DAFF, DNRM and EHP) to address outstanding key issues to allow the project to proceed to the next stage (EIS assessment report). The proponent's response would include an amendment to the current (amended) EIS (dated 21 June 2013) and a response to each of the issues outlined in the agencies' responses provided to the proponent. The aim is to resolve the key issues before the SEIS is finalised and to give EHP adequate information for developing the EIS assessment report. EHP will need to ensure that all agencies' issues have been dealt with adequately.

The point of contact for DAFF is Ross Savage (phone: 3405 6535). John Grimes would be involved as well.

The point of contact for DNRM is Weedena Smith (phone: 4999 6914).

TMR agreed that most TMR issues can be dealt with post EIS process. However, it was made clear by TMR that road safety and key commitments will need to be addressed by the proponent in the EIS. Michael Nelles will also check if the RUMP has been provided to TMR and whether further comments from TMR need to be made. Michael Nelles can be contacted on 3066 1812.

To this end please provide EHP (via Monika Rhodes) with progressive updates on relevant discussion outcomes. If Bandanna Energy requires further consultation with EHP please contact Monika Rhodes to facilitate meetings with Kylie (water) and or Antoine (noise).

Regards

Monika

List of attendees:

Philip Rowland	A/Director	EHP
Peter Curley	A/Manager	EHP
Monika Rhodes	Principal Environmental Officer	EHP
Dr Antoine David	Noise specialist	EHP

Kylie Dunlop	Senior Environmental Officer	EHP, Rockhampton
Tony Baker	Principal Environmental Officer	EHP, Rockhampton
Michael Nelles	A/Principal Advisor (Development Outcomes)	TMR
Ross Savage	DAFF EIS Coordination	DAFF
John Grimes	Manager	DAFF, Rockhampton
Neil Krosch	Case Manager, Mining and Petroleum Operations	DNRM
Weedena Smith	Senior Natural Resource Officer	DNRM, Mackay
Alison Hambleton	Principal Natural Resources Officer	DNRM, Mackay
Stuart Clark	Chief Development Officer	Bandanna Energy
Pete Jones	Environmental Approvals Coordinator	Bandanna Energy
Peter Brisbane	General Manager Technical Services	Bandanna Energy
Neil Dale	Site Manager	Bandanna Energy
Dave Elmoutie	Consultant	CDM Smith
Not attended: Chris Lunney	Consultant	Vipac (Noise)
Michelle Cliston	Consultant	Vipac (Noise)

Dr Monika Rhodes
Principal Environmental Officer
Statewide Environmental Assessments
Telephone 07 3330 6293 **Facsimile** 3330 5875
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www.ehp.qld.gov.au

Department of Environment and Heritage Protection
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GPO Box 2454, Brisbane Q 4001

Phillips Erin

From: Rhodes Monika
Sent: Monday, 15 July 2013 10:41 AM
To: Savage Ross
Cc: Rowland Philip; Curley Peter
Subject: RE: DAFF EIS response to the Final EIS for the Springsure Creek Coal Mine Project

Dear Ross

EHP is considering further information request from the proponent as part of the EIS assessment process; including issues raised in DAFF's review of the amended EIS.

Would your comments provided to EHP be suitable to provide directly to the proponent (i.e. forward it as is)?

Also, could you please provide us with a primary contact for the proponent to communicate/deal with outstanding DAFF matters?

Please note that as part of the ongoing assessment process I would like to be part of any proposed meetings.

Kind regards

Dr Monika Rhodes
Principal Environmental Officer
Statewide Environmental Assessments
Telephone 07 3330 6293 **Facsimile** 3330 5875
Email: monika.rhodes@ehp.qld.gov.au
www.ehp.qld.gov.au

Department of Environment and Heritage Protection
Level 9, 400 George Street, Brisbane Q 4000
GPO Box 2454, Brisbane Q 4001

From: Savage Ross
Sent: Wednesday, 10 July 2013 3:04 PM
To: Rhodes Monika; EIS External Submissions
Cc: DAFF_EIS Unit
Subject: FW: DAFF EIS response to the Final EIS for the Springsure Creek Coal Mine Project

Good afternoon

Attn: Dr Monika Rhodes
The EIS Coordinator – Springsure Creek Coal Mine Project

Dear Dr Rhodes

I refer to your email of 24 June 2013 to the Department of Agriculture, Fisheries and Forestry (DAFF) regarding the Final Environmental Impact Statement (Final EIS) for the Springsure Creek Coal Mine Project.

DAFF has reviewed the Final EIS and has provided comments. Please find attached DAFF's response letter with the whole-of-DAFF submission.

<< File: Copy of DAFF EIS submission and letter for SCCMP Final EIS.pdf >>

These items were also posted to you today.

Please do not hesitate to contact me if you have any questions.

Also attached is a word copy of the submission, and is provided for EHP purposes only.

King regards

<< File: DAFF EIS sub for the final EIS for SCCMp EHP.doc >>

Ross Savage

DAFF EIS Coordination

Agricultural Resources & Planning

Department of Agriculture, Fisheries and Forestry

tel +61 7 3405 6535 (ext 56535)

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RTI DL Release

Phillips Erin

From: Hambleton Alison
Sent: Monday, 15 July 2013 12:36 PM
To: Rhodes Monika
Cc: Smith Wedeena
Subject: RE: DNRM Submission on the supplementary EIS for Springsure

Hi Monika

Yes those comments can go directly to EHP.

The first point of contact should be Wedeena Smith on 4999 6914. Given that Wedeena is only in Wed-Fri, I will be the point of contact in her absence.

Regards, Alison

Alison Hambleton
Principal Natural Resource Officer, Regional Planning and Coordination
Department of Natural Resources and Mines
Telephone: 07 4999 6813 **Fax:** 07 4999 6903
Mobile: scho44(6) Personal info
Email: alison.hambleton@dnrm.qld.gov.au

From: Rhodes Monika
Sent: Monday, 15 July 2013 10:38 AM
To: DACoordinationMackay; Smith Wedeena; Hambleton Alison
Cc: Rowland Philip; Curley Peter
Subject: RE: DNRM Submission on the supplementary EIS for Springsure

Dear Alison (in lieu of Weedena)

EHP is considering further information request from the proponent as part of the EIS assessment process; including issues raised in DNRM's review of the amended EIS.

Would your comments provided to EHP be suitable to provide directly to the proponent (i.e. forward it as is)?

Also, could you please provide us with a primary contact for the proponent to communicate/deal with outstanding DNRM matters?

Please note that as part of the ongoing assessment process I would like to be part of any proposed meetings.

Kind regards

Dr Monika Rhodes
Principal Environmental Officer
Statewide Environmental Assessments
Telephone 07 3330 6293 **Facsimile** 3330 5875
Email: monika.rhodes@ehp.qld.gov.au
www.ehp.qld.gov.au

From: Smith Wedeena **On Behalf Of** DACoordinationMackay
Sent: Friday, 12 July 2013 5:10 PM
To: Rhodes Monika; EIS External Submissions
Cc: DACoordinationMackay
Subject: DNRM Submission on the supplementary EIS for Springsure

Monika

Please find attached our submission on the project. As you are aware I am not back in the office until Wednesday so if you have any concerns in my absence please contact Alison Hambleton in my absence.

Regards

Wedeena Smith

senior natural resource officer | regional planning and coordination | department of natural resources and mines

t: 07 4999 6914 | f: 4999 6903 | m: Schedule Personal in | e: wedeena.smith@dnrm.qld.gov.au

Please note that I am at work part time – Wednesdays, Thursdays and Fridays

From: Rhodes Monika
Sent: Monday, 24 June 2013 7:50 AM
Subject: SEIS_Email-Out_submission of supplementary EIS_Springsure_20130624

Dear All

Your organisation lodged a submission on the environmental impact statement (EIS) for the proposed Springsure Creek Coal Mine Project, located 47 kilometres south-east of Emerald in central Queensland.

The proponent, Springsure Creek Coal Pty Ltd, has prepared a supplementary EIS and response to submissions that were received during the public notification period for the EIS. In the interests of facilitating the assessment of submissions provided by your department, please consider the response to your submissions and advise the Department of Environment and Heritage Protection (EHP) of any comments or recommended conditions that should apply to the project by **close of business Friday, 12 July 2013** (note that EHP will have to make a decision under section 56A of the *Environmental Protection Act 1994* if the EIS can proceed within 20 bd, so any comments should be received by 12/07/13; the Act does not allow for any extensions).

Your advice should be forwarded to:

The EIS Coordinator – Springsure Creek Coal Mine Project
Department of Environment and Heritage Protection
GPO Box 2454 BRISBANE QLD 4001
Level 9, 400 George Street BRISBANE QLD 4000
or by email.

Should you have not received a copy of the SEIS and a response to your submission by COB today, please contact Mr Pete Jones, Springsure Creek Pty Ltd (Bandanna Energy), on 3041 4434.

I will be the EIS Coordinator and primary contact for this project.

Kind regards

Dr Monika Rhodes
Principal Environmental Officer
Statewide Environmental Assessments
Telephone 07 3330 6293 **Facsimile** 3330 5875
Email: monika.rhodes@ehp.qld.gov.au
www.ehp.qld.gov.au

Department of Environment and Heritage Protection
Level 9, 400 George Street, Brisbane Q 4000
GPO Box 2454, Brisbane Q 4001

RTI DL Release

Phillips Erin

From: Pete Jones <PeteJones@bandannaenergy.com.au>
Sent: Tuesday, 13 August 2013 2:12 PM
To: Rhodes Monika
Subject: RE: EIS

Hi Monika,

Confirming we have amended title of the EIS as requested.

Thanks

Pete Jones

Environmental Approvals Coordinator

BANDANNA ENERGY LIMITED

Telephone No: 07 3041 4400

Direct No: 07 3041 4434

Fax No: 07 3041 4444

Email: petejones@bandannaenergy.com.au

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From: Rhodes Monika [<mailto:Monika.Rhodes@ehp.qld.gov.au>]
Sent: Wednesday, 31 July 2013 11:44 AM
To: Pete Jones
Subject: EIS

Pete

I always forget to mention that you may want to change the title 'final EIS' to just 'EIS'. Under the EP Act there is no such thing as a draft or final EIS – it only talks about an EIS and any amendments made to an EIS. (Unfortunately, the EP Act does have a draft TOR and a final TOR). A bit confusing, I know.

Regards

Dr Monika Rhodes
Principal Environmental Officer
Statewide Environmental Assessments
Telephone 07 3330 6293 **Facsimile** 3330 5875
Email: monika.rhodes@ehp.qld.gov.au
www.ehp.qld.gov.au

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RTI DL Release

Phillips Erin

From: Rhodes Monika
Sent: Tuesday, 16 July 2013 4:55 PM
To: Curley Peter; Rowland Philip; Dunlop Kylie; Baker Tony; michael.a.nelles@tmr.qld.gov.au; Savage Ross; Grimes John; KROSCH Neil; Smith Wedeena; Hambleton Alison; Pete Jones; David Antoine
Subject: RE: Meeting agenda-Springsure Creek 17 July 2013, 400 George Street & update on teleconference number
Attachments: ehp-meeting-agenda-Springsure_20130716.pdf

Apologies

I forgot to include EHP's noise specialist, Dr Antoine David, in the list.

Updated agenda attached.

Regards

Dr Monika Rhodes
Principal Environmental Officer
Statewide Environmental Assessments
Telephone 07 3330 6293 **Facsimile** 3330 5875
Email: monika.rhodes@ehp.qld.gov.au
www.ehp.qld.gov.au

Department of Environment and Heritage Protection
Level 9, 400 George Street, Brisbane Q 4000
GPO Box 2454, Brisbane Q 4001

From: Rhodes Monika
Sent: Tuesday, 16 July 2013 4:00 PM
To: Curley Peter; Rowland Philip; Dunlop Kylie; Baker Tony; michael.a.nelles@tmr.qld.gov.au; Savage Ross; Grimes John; KROSCH Neil; Smith Wedeena; Hambleton Alison; Pete Jones
Subject: Meeting agenda-Springsure Creek 17 July 2013, 400 George Street & update on teleconference number

Dear All

Please find attached the meeting agenda for tomorrow's meeting.

Bandanna Energy, TMR, DAFF, DNRM and EHP will be attending (list of attendees below).

For those who will be attending in person, please meet me on level 3, 400 George Street, Brisbane at 8.50 am sharp.

For those who ring in: Please dial please ring **1300 300 805**; code: 836 498 8713 – from 9 am. Please note that I gave you an incorrect number last time, please update!

We will start with TMR, then followed by DAFF, DNRM and EHP at the end. I am conscious of the time restraints, so tomorrow we will be only discussing the key issues to be addressed in the SEIS. Any detailed technical advice should be sought afterwards through the relevant officers in each department. This allows that the relevant officers only have to attend for a short time, rather than the full meeting.

Agency advisors: Please bring along your advice you sent to EHP. I will have some spare copies (just in case).

EHP issues will be discussed at the end.

Regards

Monika

Philip Rowland	A/Director	EHP
Peter Curley	A/Manager	EHP
Monika Rhodes	Principal Environmental Officer	EHP
Kylie Dunlop	Senior Environmental Officer	EHP, Rockhampton
Tony Baker	Principal Environmental Officer	EHP, Rockhampton
Michael Nelles	A/Principal Advisor (Development Outcomes)	TMR
Ross Savage	DAFF EIS Coordination	DAFF
John Grimes	Manager	DAFF, Rockhampton
Neil Krosch	Case Manager, Mining and Petroleum Operations	DNRM
Weedena Smith	Senior Natural Resource Officer	DNRM, Mackay
Alison Hambleton	Principal Natural Resources Officer	DNRM, Mackay
Stuart Clark	Chief Development Officer	Bandanna Energy
Pete Jones	Environmental Approvals Coordinator	Bandanna Energy
Peter Brisbane	General Manager Technical Services	Bandanna Energy
Neil Dale	Site Manager	Bandanna Energy
Dave Elmoutie	Consultant	CDM Smith
Chris Lunney	Consultant	Vipac (Noise)
Michelle Cliston	Consultant	Vipac (Noise)

Dr Monika Rhodes
Principal Environmental Officer
Statewide Environmental Assessments
Telephone 07 3330 6293 **Facsimile** 3330 5875
Email: monika.rhodes@ehp.qld.gov.au
www.ehp.qld.gov.au

Department of Environment and Heritage Protection
Level 9, 400 George Street, Brisbane Q 4000
GPO Box 2454, Brisbane Q 4001

Meeting agenda

Subject	Springsure Creek Coal Mine Project – Review of SEIS
Chair	Philip Rowland
Meeting Type	Meeting with teleconference from Rockhampton and Mackay
Date and location	Wednesday 17 July 2013 400 George Street Teleconference number: 1300 300 805 ; code: 836 498 8713
Timing	9 – 11 a.m.

Invited

Name	Job Title	Representation
Philip Rowland	A/Director	EHP
Peter Curley	A/Manager	EHP
Monika Rhodes	Principal Environmental Officer	EHP
Dr Antoine David	Noise specialist	EHP
Kylie Dunlop	Senior Environmental Officer	EHP, Rockhampton
Tony Baker	Principal Environmental Officer	EHP, Rockhampton
Michael Nelles	A/Principal Advisor (Development Outcomes)	TMR
Ross Savage	DAFF EIS Coordination	DAFF
John Grimes	Manager	DAFF, Rockhampton
Neil Krosch	Case Manager, Mining and Petroleum Operations	DNRM
Weedena Smith	Senior Natural Resource Officer	DNRM, Mackay
Alison Hambleton	Principal Natural Resources Officer	DNRM, Mackay
Stuart Clark	Chief Development Officer	Bandanna Energy
Pete Jones	Environmental Approvals Coordinator	Bandanna Energy
Peter Brisbane	General Manager Technical Services	Bandanna Energy
Neil Dale	Site Manager	Bandanna Energy
Dave Elmoutie	Consultant	CDM Smith

Chris Lunney	Consultant	Vipac (Noise)
Michelle Cliston	Consultant	Vipac (Noise)

Agenda

Item #	Topic	Timing (mins)
1.	TMR advice on SEIS	10 min
2.	DAFF advice on SEIS	10 min
3.	DNRM advice on SEIS	15 min
4.	EHP advice on SEIS	20 minutes

RTI DL Release

Phillips Erin

From: Rhodes Monika
Sent: Tuesday, 16 July 2013 11:29 AM
To: Pete Jones
Subject: RE: Response TMR attached
Attachments: SEIS_DTMR comments (Attachment A)_Springsure_20130712.doc; SEIS_DTMR comments (Attachment B)_Springsure_20130712.doc; SEIS_DTMR comments (guideline)_Springsure_20130712.doc; SEIS_DTMR comments_Springsure_20130712.pdf

Pete

Please find attached TMR's response again. There were some problems with the word attachments; which I have fixed now. Here it is again.

Regards

Dr Monika Rhodes
Principal Environmental Officer
Statewide Environmental Assessments
Telephone 07 3330 6293 **Facsimile** 3330 5875
Email: monika.rhodes@ehp.qld.gov.au
www.ehp.qld.gov.au

Department of Environment and Heritage Protection
Level 9, 400 George Street, Brisbane Q 4000
GPO Box 2454, Brisbane Q 4001

From: Rhodes Monika
Sent: Tuesday, 16 July 2013 7:49 AM
To: Curley Peter; Pete Jones
Cc: Rowland Philip
Subject: Response from DNRM and TMR attached

Dear Pete

Please find the response from DNRM and TMR attached. I have not heard back from DAFF. I will provide their response as soon as I have clearance.

I am currently working on the EHP response.

Any questions, please ring.

Regards

Dr Monika Rhodes
Principal Environmental Officer
Statewide Environmental Assessments
Telephone 07 3330 6293 **Facsimile** 3330 5875
Email: monika.rhodes@ehp.qld.gov.au
www.ehp.qld.gov.au

RTI DL Release

Attachment A

Queensland Department of Transport and Main Roads response to Dept Environment & Heritage Protections as EIS Coordinating Agency: Supplementary Environmental Impact Statement (S-EIS) – Springsure Creek Coal Mine Project

Program Delivery & Operations Division			
Name:	Mr Rex Cowan (Corridor Management & Operations), Program Delivery & Operations Division		
Address:	PO Box 5096, Central Queensland Mail Centre 4702	Contact:	Mr Jason Hoolihan, Senior Designer, (07) 4983 8736

General

DTMR has reviewed the proponent's response regarding the issues raised in the department's EIS submissions and is satisfied with some of the proponents proposed intentions to provide suitable mitigation measures. However, further consultation is required regarding a number of issues not adequately addressed in the Supplementary EIS (SEIS).

- Safety and efficiency of the State Controlled Road Network due to the increased traffic from the development;
- Mitigation of impacts on the State Controlled Network due to increased traffic volumes from the development.

The Department is not in a position to fund the safety improvements that may be required, nor would it be likely that this funding could be made available to undertake the immediate works necessary to ensure the ongoing safety and efficiency of the SCR network for the proposal to proceed with the construction phase. Therefore, once further information is available on the final design of the project, the proponent is required to undertake a review of the RIA and provide an updated assessment which clearly identifies any necessary safety improvements works, rehabilitation and maintenance costs to mitigate the impacts of project traffic prior to undertaking any project construction works. It is strongly recommended that the proponent and their consultants continue to liaise with Mr Jason Hoolihan (contact details noted above) to discuss and resolve these issues in a timely manner.

Recommendation for “Requirements” (generally these will not be conditions attached to the mining lease).

1. Post-Assessment Contact with the Department of Transport and Main Roads

Once the proponent has received final approval to proceed with the Springsure Creek Coal Mine Project, the proponent shall contact the Manager of the DTMR Emerald Office, Mr Rex Cowan no later than nine (9) months prior to the commencement of any project construction works to discuss the preparation of the finalised road impact assessment (RIA), road-use management plan (RMP) and traffic management plan (TMP).

2. Proposed Infrastructure Agreement condition

The proponent shall enter into an Infrastructure Agreement with DTMR for:

- a. contribution or upgrade to any intersections with the State-controlled Road network that are significantly impacted upon, as determined and agreed upon with TMR Emerald Office, following completion of a comprehensive Road Impact Assessment (RIA), which is carried out in accordance with the departments “Guidelines for Assessment of Road Impacts of Development” (GARID);
- b. contribution to minimising impacts on road links associated with project traffic as calculated and agreed upon with TMR Emerald Office, following completion of a comprehensive RIA which is carried out in accordance with the departments GARID;
- c. rehabilitation and maintenance contributions associated with project traffic as calculated and agreed upon with TMR Emerald Office, following completion of a comprehensive RIA which is carried out in accordance with the departments’ GARID.

This infrastructure agreement between the proponent and TMR should be concluded prior to commencement of any construction works on site.

TMR is the agency responsible for monitoring compliance with this condition.

3. Road Impact Assessment and Road Use Management Plan

When additional information regarding the final design and traffic generation of the project is available, the proponent shall undertake the following no later than six months prior to the commencement of any project construction works;

- a. review and finalise the road impact assessment (RIA) to include details of the latest project traffic generation and all project transport impacts on the safety and efficiency of state controlled roads in accordance with *Guidelines for Assessment of Road impacts of Development (2006)* in consultation with the Manager of DTMR Emerald Office;
- b. submit the RIA to the Manager of the DTMR Emerald Office for review and approval;
- c. prepare a road-use management plan (RMP) for all use of state-controlled roads for each phase of the project, in accordance with DTMR’s *Guide to Preparing a Road Use Management Plan* (attached). The RMP must receive DTMR’s approval prior to its implementation and must include:
 - o Latest traffic generation (vehicle numbers/types/routes etc.);
 - o Summary of finalised assessment of impacts on safety and efficiency at intersections, on road links and on network condition for example, pavements etc.; and
 - o Updated impact mitigation strategies, both road-use management strategies, such as bussing workers to minimise road-based trips and “infrastructure” strategies such as any road maintenance or any necessary improvements.

4. Traffic Management Plan

Three months prior to the commencement of any project construction works, the proponent shall prepare detailed drawings and traffic management plans (TMP) for all construction and other activities in state-controlled road corridors to demonstrate how these road works will be safely undertaken.

The proponent shall implement the traffic management plan during construction and commissioning of the project and construction of all access road intersection/s and other works to be undertaken within a SCR corridor.

The TMP shall incorporate a provision that, prior to commencing any program of oversize/over-mass transport movements that may be required for the construction of the project, the proponent will consult with DTMR, the Queensland Police Service and the Central Highlands Regional Council.

The proponent shall obtain the necessary permits for any excess mass or over-dimensional loads associated with the project as required under *the Transport Operations (Road Use Management) Act (Qld) 1995*.

5. Undertaking road impact mitigation strategies

The proponent shall present detailed drawings of any required roadworks and traffic management plans for review and approval by DTMR and take account of the reviews. The proponent shall undertake any required roadworks and road-use management strategies detailed in the RMP and TMP.

Attachment B**Queensland Department of Transport and Main Roads response to Dept Environment & Heritage Protections as EIS Coordinating Agency:
Supplementary Environmental Impact Statement (S-EIS) – Springsure Creek Coal Mine Project**

Policy & Planning Branch, Department of Transport & Main Roads			
Name:	Mr Tom Orr, A/Director (Development Outcomes)		
Address:	GPO Box 213, Brisbane 4001	Contact:	Mr Michael Nelles, A/ Principal Advisor (Development Outcomes) Ph 3066 1812

Section	Describe the issue [Omission/lack of clarity/incorrectness]	Additional information/ clarification/correction required	Reason for requirement/ other related sections or level of detail required
Final EIS (Suppl.) Chapter 6 Traffic & Transport			
1) Section 6.1.1.1, pg 6-2	This section again states the EIS/ road impact assessment (RIA) do not include providing traffic estimates and assessing the impacts of traffic generated by constructing and operating the transport and infrastructure corridor and the train loadout facility, given they will be dealt with under other approvals. TMR simply wishes to ensure all significant road impacts of the entire project are identified and dealt with and is not sure whether other approvals will be referred to TMR.	In keeping with comments made about the RIA, TMR requires all aspects of traffic generation for the project to be assessed and addressed.	
2) Section 6.6, pg 6-35 and Table 6-14	The issue of the identifying the increased risk of traffic incidents resulting from project traffic was previously commented on in the EIS. Assessing the level of risk seems largely based on current crash rates rather than further road safety assessment, for example, field inspections of the likely high-use routes and whether project traffic may result in road safety hotspots". While road safety audits are proposed at Glenorina Rd/ Gregory Hwy intersection and accommodation village access which will be upgraded to accommodate project traffic (see s6.7.1.2), some further road safety assessment may be warranted.	The proponent should consider undertaking road safety field inspections of most highly used routes to ensure project traffic does not create any road safety "hotspots", including at level crossings.	

3) Section 6.7.1.1, pg 6-39	Previous TMR comments on the EIS about focussing the objectives of the Road-use Management Plan stand.	Given the RIA calculations are re-run prior to project construction, using latest traffic figures but are generally not documented (that is, the RIA report is often not properly updated or published), TMR sees the RMP's purpose as 3 fold: 1) to document finalised impact mitigation strategies, primarily road-use management strategies e.g using buses to limit vehicle trips, managing heavy vehicle and oversize/mass vehicles and so on, but also funded (works or contributions if appropriate, 2) to summarise final traffic generation, and 3) summarise revised impact assessment, in accordance with TMR's guidelines (provided with EIS comments).	
4) Section 6.7.1.3, pg 6-40	This section discusses how the proponent will undertake works in road/rail reserves, but makes no reference to preparing Traffic Management Plans (TMPs) to document how works will be safely undertaken.	The proponent must prepare TMPs to document how works will be safely undertaken, in accordance with TMR's guidelines (attached).	
5) Section 6.7.1.6, pg 6-42	This section states fatigue management will be addressed in the SIMP. TMR believes fatigue management and other road safety issues are road-use management issues best documented in the RMP.	If these strategies are dealt with in the SIMP, they should also be summarised or cross-referenced in the RMP.	
Section 20.5, pg 20-3; Key Commitments	As previously commented on in the EIS, this table lists only 3 commitments with a number of diverse sub-elements. The list should be expanded to more clearly canvass commitments that need to be made.	Commitments should include: <ol style="list-style-type: none"> 1. upgrading local roads; 2. upgrading the state-controlled road (SCR) access at the accommodation village and intersection of Gregory Hwy with Glenorina Rd; 3. develop traffic management plans (TMPs) for those 2 SCR works (above); 4. finalise the RMP; 5. ensure oversize/ over-dimension issues are managed: impacts and permits, not just near schools; 6. revise the RIA with pre-construction traffic numbers if changed significantly; 7. ensure any increased road safety risk from project traffic including at level crossings is dealt with. 	

Traffic Management Plan

REVISED General Guidelines

Version 1: June 2013

As part of their development application or under an environmental impact assessment (EIS) process, proponents of large development projects are generally required to undertake a road impact assessment (RIA). RIAs should be undertaken in accordance with the Department of Transport & Main Roads' "Guidelines for Assessment of Road Impacts of Development". The RIA identifies and deals with the road impacts of traffic generated by the proposal. This helps manage increased road safety risk, impacts on structures and pavement condition, congestion and intersection performance, maintain community access and amenity and so on.

A Road-use Management Plan (RMP) is then required to demonstrate how road impacts of project traffic, particularly from heavy vehicle use, will be managed during the construction and operational phases of the development project.

Before construction of major development projects, proponents and their consultants must contact the relevant TMR regional office/s before preparing a Traffic Management Plan (TMP).

The **purpose** of the TMP is to document how any required works in or near a State-controlled road will be undertaken in a safe and efficient manner, providing for the needs of other road users, including pedestrians and cyclists. Regional contact officer names will generally have been provided as part of the EIS consultation process.

The TMP should include the following elements:

For the Department of Transport and Main Roads (TMR) a **Traffic Management Plan (TMP)** is a separate document to the Road-use Management Plan (described in its RMP - Revised General Guidelines) and shall be prepared in accordance with the latest edition of the "Manual of Uniform Traffic Control Devices: Part 3 - Works on Roads" (MUTCD) and the TMR Specification: "MRTS02- Provision for traffic".

The Traffic Management Plan shall apply to all works and activities in or near a state-controlled road corridor for each stage of the project, namely planning/ pre-construction, construction, operation, decommissioning (establishment, implementation, commissioning and decommissioning). The TMP is required as part of gaining an approval for such works under the *Transport Infrastructure Act 1994* from the TMR regional office.

In the "*Manual of Uniform Traffic Control Devices: Part 3- Works on Roads*" (MUTCD), the Traffic Management Plan (TMP) is an element in a Traffic Guidance Scheme which should provide for the following:

- Planning, via a traffic guidance scheme
- Traffic management plan, which provides for the following:
 - safety of workers and safety/convenience for road-users;
 - traffic through, past & around the work area (including side-tracks/detours)
 - night conditions
 - pedestrians & cyclists
 - temporary footpaths & pedestrian crossings
 - signage/barrier fences
 - speed zone matters
 - traffic controllers and so on.
- Risk management.

Please refer to the MUTCD and *TMR Specification: "MRTS02- Provision for traffic"* for full details and prepare the TMP in close consultation with TMR's Program Delivery & Operations Division

regional officers. (for contact details visit the departmental website:
<http://www.tmr.qld.gov.au/About-us/Contact-us.aspx>)

For an electronic copy of the *MUTCD* visit the departmental weblink:

<http://www.tmr.qld.gov.au/Business-and-industry/Technical-standards-and-publications/Manual-of-uniform-traffic-control-devices.aspx>

Any necessary approvals/permits for undertaking any works in or near State-controlled road reserves or for access to state-controlled roads should also be applied for and approved while preparing the TMP.

Please contact your regional TMR office for further details.

For further general information on Traffic Management Plans, please contact the Development Outcomes team, Planning Management Branch, Policy, Planning & Investment Division, Brisbane; email: MDP@tmr.qld.gov.au

Before preparing a TMP for TMR, please contact TMR's regional Program Delivery & Operations Division contacts which are provided during the EIS process. Alternatively, for regional contact details, visit the departmental website: <http://www.tmr.qld.gov.au/About-us/Contact-us.aspx>)

(Please note: TMR has developed a Traffic Management Company Registration Scheme which requires proponents using traffic controllers to only use registered companies when implementing Traffic Management Plans.)

RTI DL Release

Our ref 455/00617
Your ref Proponent letter dated 24/6/13
Enquiries Michael Nelles

Department of Transport and Main Roads
Policy, Planning and Investment Division
Planning Management Branch
Floor 12 Brisbane - Terrica Place
140 Creek Street Brisbane Queensland 4000
GPO Box 213 Brisbane Queensland 4001

10 July 2013

Telephone +61 7 3066 1812
Facsimile +61 7 3146 2008
Website www.tmr.qld.gov.au
Email michael.a.nelles@tmr.qld.gov.au

The EIS Coordinator – Springsure Creek Coal Mine Project
Statewide Environmental Assessments
Department of Environment and Heritage Protection
GPO Box 2454
Brisbane Qld 4001
Attention: Dr Monika Rhodes

Dear Monika,

Thank you for providing the Department of Transport and Main Roads (TMR) the opportunity to comment on the Finalised (supplementary) EIS for the **Springsure Creek coal mine project**.

TMR has reviewed the transport-related information provided in the Finalised EIS and again acknowledges its useful traffic information and also consultation with TMR undertaken to this stage. The attachments summarise a few key issues that need to be highlighted and lists TMR requirements, should the project proceed. Key issues include:

- ensuring road impacts of the overall project, including the traffic from the rail loadout facility (and the worker accommodation village if the proponent constructs it) are dealt with, irrespective of whether separate approvals for these will be sought later
- more detailed analysis of the potential increase in road safety risk from project traffic, on all key routes, including at level crossings
- further clarity about what the road-use management plan (RMP) should contain and how proposed impact mitigation strategies such as fatigue management will be implemented and documented
- a more detailed list of commitments, to comprehensively summarise proposed impact mitigation strategies, including a commitment to mitigate coal loss and coal dust generation during rail-haul of coal.

The attachments provide further information on these issues.

If you have any queries regarding these comments, please contact Michael Nelles on (07) 3066 1812.

Yours sincerely

sch404(6) Personal information
[Redacted signature]

Tom Orr
A/Director (Development Outcomes)

Attachments (3)

- A** Program Delivery & Operations Div. – Central Qld Region (Emerald office) submission
- B** Planning Mgt Branch submission
- C** Guideline for preparing a traffic management plan.

Cc (Via email only)

File Number: 455/00617

- | | |
|--|--|
| 1. Mr Damian Colclough
Executive Director
Freight, Ports and Governance
Roads, Rail and Ports System
Management
Attn: Andrew Armstrong | 2. Mgr (Project Planning & Corridor Mgt)
Central Queensland Region
– Emerald office
Program Delivery and Operations
Division
Attn: Mr Jason Hoolihan |
|--|--|

For your information.

Attachment A

Queensland Department of Transport and Main Roads response to Dept Environment & Heritage Protection as EIS Coordinating Agency: Finalised Environmental Impact Statement – Springsure Creek Coal Mine Project

Program Delivery & Operations Division			
Name:	Mr Rex Cowan (Corridor Management & Operations), Program Delivery & Operations Division		
Address:	PO Box 5096, Central Queensland Mail Centre 4702	Contact:	Mr Jason Hoolihan, Senior Designer, (07) 4983 8736

General

The Department of Transport & Main Roads' (TMR) Central Queensland Region has reviewed the proponent's response regarding the issues raised in TMR's EIS submission and is satisfied with some of the proponents proposed intentions to provide suitable mitigation measures. However, further consultation is required regarding a number of issues not adequately addressed in the Finalised EIS.

- Safety and efficiency of the State Controlled Road Network due to the increased traffic from the development
- Mitigation of damage to the State Controlled Network due to increased traffic volumes from the development

TMR is not in a position to fund the safety improvements that may be required, nor would it be likely that this funding could be made available to undertake the immediate works necessary to ensure the ongoing safety and efficiency of the SCR network for the proposal to proceed with the construction phase. Therefore, once further information is available on the final design of the project, the proponent is required to undertake a review of the RIA and provide an updated assessment which clearly identifies any necessary safety improvements works, rehabilitation and maintenance costs to mitigate the impacts of project traffic prior to undertaking any construction works. It is strongly recommended that the proponent and their consultants continue to liaise with Mr Jason Hoolihan (contact details noted above) to discuss and resolve these issues in a timely manner.

TMR Requirements

1. Post-Assessment contact with TMR

Once the proponent has received final approval to proceed with the Springsure Creek Coal Mine Project, the proponent shall contact the Manager of the TMR Emerald Office, Mr Rex Cowan no later than nine (9) months prior to the commencement of any project construction works to discuss the preparation of the finalised road impact assessment (RIA), road-use management plan (RMP) and traffic management plan (TMP).

2. Infrastructure Agreement

The proponent shall enter into an Infrastructure Agreement with TMR for:

- a. contribution or upgrade to all intersections with the State-controlled Road network that are adversely impacted upon, as determined and agreed upon with the TMR Emerald Office, following completion of a comprehensive Road Impact Assessment (RIA), which is carried out in accordance with TMRs "Guidelines for Assessment of Road Impacts of Development" (GARID);

- b. roadway link contribution associated with project traffic as calculated and agreed upon with the TMR Emerald Office, following completion of a comprehensive RIA which is carried out in accordance with TMRs GARID;
- c. rehabilitation and maintenance contributions associated with project traffic as calculated and agreed upon with the TMR Emerald Office, following completion of a comprehensive RIA which is carried out in accordance with TMRs' GARID.

This infrastructure agreement between the proponent and TMR shall be concluded prior to commencement of any construction works on site.

TMR is the agency responsible for monitoring compliance with this condition.

3. Road Impact Assessment and Road-use Management Plan

When additional information regarding the final design of the project is available, the proponent shall undertake the following no later than six months prior to the commencement of any project construction works;

- a. review and finalise the road impact assessment (RIA) to include details of the latest project traffic generation and all project transport impacts on the safety and efficiency of state controlled roads in accordance with *Guidelines for Assessment of Road impacts of Development (2006)* in consultation with the Manager of the TMR Emerald Office;
- b. submit the RIA to the Manager of the TMR Emerald Office for review and approval;
- c. prepare a road-use management plan (RMP) for all use of state-controlled roads for each phase of the project, in accordance with TMR's *Guide to Preparing a Road Use Management Plan* (attached). The RMP must receive TMR's approval prior to its implementation and must include:
 - o Latest traffic generation (vehicle numbers etc.);
 - o Finalised assessment of impacts on safety and efficiency at intersections, on road links and on pavements etc.; and
 - o Updated impact mitigation strategies such as any road maintenance or any necessary improvements.

4. Traffic Management Plan

Three months prior to the commencement of any project construction works, the proponent shall prepare detailed drawings and traffic management plans (TMP) for all construction and other activities in state-controlled road corridors to demonstrate how these road works will be safely undertaken.

The proponent shall implement the traffic management plan during construction and commissioning of the project and construction of all access road intersection/s and other works to be undertaken within a SCR corridor.

Attachment A

Queensland Department of Transport and Main Roads response to Dept Environment & Heritage Protection as EIS Coordinating Agency: Finalised Environmental Impact Statement — Springsure Creek Coal Mine Project

The TMP shall incorporate a provision that, prior to commencing any program of oversize/over-mass transport movements that may be required for the construction of the project, the proponent will consult with TMR, the Queensland Police Service and the Central Highlands Regional Council.

The proponent shall obtain the necessary permits for any excess mass or over-dimensional loads associated with the project as required under *the Transport Operations (Road Use Management) Act (Qld) 1995*.

5. Undertaking road impact mitigation strategies

The proponent shall present detailed drawings of any required roadworks and traffic management plans for review and approval by TMR and take account of the reviews. The proponent shall undertake any required roadworks and road-use management strategies detailed in the RMP and TMP.

RTI DL Release

Attachment B
Queensland Department of Transport and Main Roads response to Dept Environment & Heritage Protections as EIS Coordinating Agency:
Supplementary Environmental Impact Statement (S-EIS) – Springsure Creek Coal Mine Project

Policy & Planning Branch, Department of Transport & Main Roads			
Name:	Mr Tom Orr, A/Director (Development Outcomes)		
Address:	GPO Box 213, Brisbane 4001	Contact:	Mr Michael Nelles, A/ Principal Advisor (Development Outcomes) Ph 3066 1812

Section	Describe the issue [Omission/lack of clarity/incorrectness]	Additional information/ clarification/correction required	Reason for requirement/ other related sections or level of detail required
Final EIS (Suppl.) Chapter 6 Traffic & Transport			
1) Section 6.1.1.1, pg 6-2	This section again states the EIS/ road impact assessment (RIA) do not include providing traffic estimates and assessing the impacts of traffic generated by constructing and operating the transport and infrastructure corridor and the train loadout facility, given they will be dealt with under other approvals. TMR simply wishes to ensure all significant road impacts of the entire project are identified and dealt with and is not sure whether other approvals will be referred to TMR.	In keeping with comments made about the RIA, TMR requires all aspects of traffic generation for the project to be assessed and addressed.	
2) Section 6.6, pg 6-35 and Table 6-14	The issue of the identifying the increased risk of traffic incidents resulting from project traffic was previously commented on in the EIS. Assessing the level of risk seems largely based on current crash rates rather than further road safety assessment, for example, field inspections of the likely high-use routes and whether project traffic may result in road safety hotspots". While road safety audits are proposed at Glenorina Rd/ Gregory Hwy intersection and accommodation village access which will be upgraded to accommodate project traffic (see s6.7.1.2), some further road safety assessment may be warranted.	The proponent should consider undertaking road safety field inspections of most highly used routes to ensure project traffic does not create any road safety "hotspots", including at level crossings.	

3) Section 6.7.1.1, pg 6-39	Previous TMR comments on the EIS about focussing the objectives of the Road-use Management Plan stand.	Given the RIA calculations are re-run prior to project construction, using latest traffic figures but are generally not documented (that is, the RIA report is often not properly updated or published), TMR sees the RMP's purpose as 3 fold: 1) to document finalised impact mitigation strategies, primarily road-use management strategies e.g using buses to limit vehicle trips, managing heavy vehicle and oversize/mass vehicles and so on, but also funded (works or contributions if appropriate, 2) to summarise final traffic generation, and 3) summarise revised impact assessment, in accordance with TMR's guidelines (provided with EIS comments).	
4) Section 6.7.1.3, pg 6-40	This section discusses how the proponent will undertake works in road/rail reserves, but makes no reference to preparing Traffic Management Plans (TMPs) to document how works will be safely undertaken.	The proponent must prepare TMPs to document how works will be safely undertaken, in accordance with TMR's guidelines (attached).	
5) Section 6.7.1.6, pg 6-42	This section states fatigue management will be addressed in the SIMP. TMR believes fatigue management and other road safety issues are road-use management issues best documented in the RMP.	If these strategies are dealt with in the SIMP, they should also be summarised or cross-referenced in the RMP.	
Section 20.5, pg 20-3; Key Commitments	As previously commented on in the EIS, this table lists only 3 commitments with a number of diverse sub-elements. The list should be expanded to more clearly canvass commitments that need to be made.	<p>Commitments should include:</p> <ol style="list-style-type: none"> 1. upgrading local roads; 2. upgrading the state-controlled road (SCR) access at the accommodation village and intersection of Gregory Hwy with Glenorina Rd; 3. develop traffic management plans (TMPs) for those 2 SCR works (above); 4. finalise the RMP; 5. ensure oversize/ over-dimension issues are managed: impacts and permits, not just near schools; 6. revise the RIA with pre-construction traffic numbers if changed significantly; 7. ensure any increased road safety risk from project traffic including at level crossings is dealt with. 	

Traffic Management PlanREVISED General GuidelinesVersion 1: June 2013

As part of their development application or under an environmental impact assessment (EIS) process, proponents of large development projects are generally required to undertake a road impact assessment (RIA). RIAs should be undertaken in accordance with the Department of Transport & Main Roads' "Guidelines for Assessment of Road Impacts of Development". The RIA identifies and deals with the road impacts of traffic generated by the proposal. This helps manage increased road safety risk, impacts on structures and pavement condition, congestion and intersection performance, maintain community access and amenity and so on.

A Road-use Management Plan (RMP) is then required to demonstrate how road impacts of project traffic, particularly from heavy vehicle use, will be managed during the construction and operational phases of the development project.

Before construction of major development projects, proponents and their consultants must contact the relevant TMR regional office/s before preparing a Traffic Management Plan (TMP).

The **purpose** of the TMP is to document how any required works in or near a State-controlled road will be undertaken in a safe and efficient manner, providing for the needs of other road users, including pedestrians and cyclists. Regional contact officer names will generally have been provided as part of the EIS consultation process.

The TMP should include the following elements:

For the Department of Transport and Main Roads (TMR) a **Traffic Management Plan (TMP)** is a separate document to the Road-use Management Plan (described in its RMP - Revised General Guidelines) and shall be prepared in accordance with the latest edition of the "Manual of Uniform Traffic Control Devices: Part 3 - Works on Roads" (MUTCD) and the TMR Specification: "MRTS02- Provision for traffic".

The Traffic Management Plan shall apply to all works and activities in or near a state-controlled road corridor for each stage of the project, namely planning/ pre-construction, construction, operation, decommissioning (establishment, implementation, commissioning and decommissioning). The TMP is required as part of gaining an approval for such works under the *Transport Infrastructure Act 1994* from the TMR regional office.

In the "Manual of Uniform Traffic Control Devices: Part 3- Works on Roads" (MUTCD), the Traffic Management Plan (TMP) is an element in a Traffic Guidance Scheme which should provide for the following:

- Planning, via a traffic guidance scheme
- Traffic management plan, which provides for the following:
 - safety of workers and safety/convenience for road-users;
 - traffic through, past & around the work area (including side-tracks/detours)
 - night conditions
 - pedestrians & cyclists
 - temporary footpaths & pedestrian crossings
 - signage/barrier fences
 - speed zone matters
 - traffic controllers and so on.
- Risk management.

Please refer to the MUTCD and *TMR Specification: "MRTS02- Provision for traffic"* for full details and prepare the TMP in close consultation with TMR's Program Delivery & Operations Division regional officers. (for contact details visit the departmental website: <http://www.tmr.qld.gov.au/About-us/Contact-us.aspx>)

For an electronic copy of the *MUTCD* visit the departmental weblink:

<http://www.tmr.qld.gov.au/Business-and-industry/Technical-standards-and-publications/Manual-of-uniform-traffic-control-devices.aspx>

Any necessary approvals/permits for undertaking any works in or near State-controlled road reserves or for access to state-controlled roads should also be applied for and approved while preparing the TMP.

Please contact your regional TMR office for further details.

For further general information on Traffic Management Plans, please contact the Development Outcomes team, Planning Management Branch, Policy, Planning & Investment Division, Brisbane; email: MDP@tmr.qld.gov.au

Before preparing a TMP for TMR, please contact TMR's regional Program Delivery & Operations Division contacts which are provided during the EIS process. Alternatively, for regional contact details, visit the departmental website: <http://www.tmr.qld.gov.au/About-us/Contact-us.aspx>)

(Please note: TMR has developed a Traffic Management Company Registration Scheme which requires proponents using traffic controllers to only use registered companies when implementing Traffic Management Plans.)

From: Rowland Philip
Sent: Wednesday, 12 June 2013 9:10 AM
To: Pete Jones (PeteJones@bandannaenergy.com.au)
Cc: Rhodes Monika
Subject: RE: SCC Mine Project SEIS - information

Peter

Following are comments on the matters you raised in your email of 30 May 2013.

Regarding point 1. Response to submissions

Springsure Creek will need to meet the requirements of s.56(2) EP Act by providing to EHP a summary of submissions, statement of Springsure Creek's response to the submissions and any amendments to the EIS because of the submissions. Note that an amendment notice (s.66) would be needed regarding changes to the submitted EIS.

EHP would encourage Springsure Creek to make the response to submissions available to submitters and supports Springsure Creeks' plan to provide responses to all submitters.

Please note that under s.63 EPAct, EHP is required to provide to anyone any information submitted to EHP during the EIS process, this would include submissions and Springsure Creeks response to submissions.

Regarding point 2. SCL

In dealing with SCL, while it is clear that a Protection Decision is needed before the EA can be issued, it should be noted that according to s.40 (e) & (f) EPAct and s.290 SCL Act, determination of an acceptable final land use (that is conditioned in the EA) is a necessary outcome from the EIS process.

DNRM have previously required that the assessment of SCL should occur in parallel with the EIS process.

The final ToR for the project stated a number of requirements with regard to final land use. Hence, EHP has requested that DNRM provide advice on the acceptability or otherwise of the final proposed land use for the project site once the response to submissions and changes to the EIS have been received. It is expected that this advice would be consistent with the consideration of SCL requirements. To do this will require the information requested in the ToR and in submissions on the EIS concerning final land use to be adequately addressed in your response to submissions and any amendments to the EIS. Without this information, it is unlikely EHP could complete the assessment of the project.

While a description of the process that Springsure Creek will be following to meet the requirements of the SCL Act should be provided in the Supplementary EIS, sufficient information to allow DNRM to advise on the acceptability of the final land use (and the likelihood of meeting SCL conditions) is also required.

FYI relevant parts of the SCL Act and ToR are;

SCL Act :

– **290 SCL protection conditions imposed**

- (1) *This section applies for any environmental authority or mining lease granted because of an application mentioned in section 289(1).*

- (2) *It is a condition of the lease that no open cut mining can be carried out under the lease.*
- (3) *It is a condition of the environmental authority that its holder must use all reasonable endeavours to rehabilitate all impacts on the land from underground coal mining carried out under the lease.*

Final TOR - Springsure Creek:

1.6.1 Relevant legislation and policy requirements

Explain the legislation and policies controlling the approvals process. Make reference to the Queensland *Environmental Protection Act 1994*, *Sustainable Planning Act 2009* and other potentially relevant Queensland laws.

Describe local government planning controls, local laws and policies applying to the development, and provide a list of the approvals required for the project and the expected program for approval of applications. The description should include any requirements for workers' camps or villages as well as any approval or agreement process for the connection of the proposed rail spur with the Rolleston Branch rail line.

This information is required to assess how the legislation applies to the proposal, which agencies have jurisdiction, and whether the proposed impact assessment process is appropriate.

1.6.2 Planning processes and standards

Discuss the project's consistency with existing land uses or long-term policy framework for the area (for instance, as reflected in local and regional plans), and with legislation, standards, codes or guidelines available to monitor and control operations on site. Refer to all relevant state and regional planning policies. This information is required to demonstrate how the proposal conforms to state, regional and local plans for the area.

4.2.2.2 Land use and suitability

If the development adjoins or potentially impacts on good quality agricultural land, assess the potential for land use conflict. Investigations will follow the procedures set out in the planning guideline *The Identification of Good Quality Agricultural Land* (DPI & DHLGP, 1993), which supports State Planning Policy 1/92: Development and the Conservation of Agricultural Land. Assess any impacts due to the loss of good quality agricultural land on the long-term economic viability of agricultural industries and dependent businesses.

3.7 Rehabilitation and decommissioning

Describe in detail a closure plan to achieve best practice mine decommissioning. Outline what provisions will be made during operations to achieve the standards and completion criteria for mine decommissioning consistent with the Strategic Framework for Mine Closure (ANZMEC/MCA 2000), Technical Guidelines for the Environmental Management of Exploration and Mining in Queensland series (DME, 1995) series and other guidelines. This includes assessing project viability so that adequate provisions can be made to ensure that closure is environmentally, economically and socially feasible. Prepare a schedule of when detailed plans will be prepared for progressive rehabilitation back to its pre-mining level of agricultural activity. Provide evidence that would show a practical and achievable outcome

Please call if you would like to discuss any of the matters raised.

Philip Rowland

Phone: 07 3330 5602

From: Pete Jones [<mailto:PeteJones@bandannaenergy.com.au>]
Sent: Thursday, 30 May 2013 10:39 AM
To: Rhodes Monika; Rowland Philip
Cc: Stuart Clarke
Subject: SCC Mine Project SEIS

Hi Monika / Phil,

Thank you for your time yesterday and also for responding quickly to our concerns about the mine EIS.

I summarise my understanding of our telephone conversation below. Please could you confirm whether this is your understanding too.

1. **EIS submissions and responses:** SCC is responsible for providing responses on EIS submissions to each individual submitter with a copy of the SEIS. EHP will receive the entire spreadsheet with responses to all submissions and the SEIS.

SCC intend to publish the SEIS on its website on receipt of EHP's EIS Assessment Report. The SEIS will summarise the submissions made but not make publically available the entirety of all submissions or responses. EHP do not intend to publish submissions or responses on the EIS independently of SCC.

2. **Strategic Cropping Land:** the SEIS will be amended to better describe the project's requirements under SCL Act and SCC's legal requirement to apply for an SCL Protection Decision before the EA can be granted. The SEIS will also set out that SCC is undertaking detailed SCL and land capability studies on site to inform management practices and is consulting with DNRM and landholders as part of the management design process (amongst other issues of course).

The assessment of the project under the SCL Act will be determined by DNRM at the next stage of the approval process, following completion of the EIS process. Our discussions with DNRM have confirmed this timing as acceptable (meeting minutes to be forwarded to EHP). EHP support this approach as part of the Project's approval process.

Many thanks,
Pete

Pete Jones
Environmental Approvals Coordinator
BANDANNA ENERGY LIMITED

Telephone No: 07 3041 4400
Direct No: 07 3041 4434
Fax No: 07 3041 4444
Email: petejones@bandannaenergy.com.au

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RTI DL Release

Phillips Erin

From: Rhodes Monika
Sent: Tuesday, 25 June 2013 12:24 PM
Subject: RE: SEIS_Email-Out_submission of supplementary EIS_Springsure_20130624

Dear All

Please note that the proponent will not send out hard copies, but electronic copies of the amended EIS (as sticks), including the response to your submissions. I have heard that the proponent has sent them only yesterday (Monday).

Alternatively, the amended EIS can be accessed through the proponent's web page:
<http://www.springsurecreekproject.com.au/project-development-and-approvals/springsure-creek-coal-mine-eis>

Please note that there was some confusion regarding the term 'final EIS' – as labelled on the documents; however, this EIS is the amended EIS (or supplementary EIS) based on submissions.

If you have any questions, please don't hesitate to contact me.

Regards

Dr Monika Rhodes
Principal Environmental Officer
Statewide Environmental Assessments
Telephone 07 3330 6293 **Facsimile** 3330 5875
Email: monika.rhodes@ehp.qld.gov.au
www.ehp.qld.gov.au

Department of Environment and Heritage Protection
Level 9, 400 George Street, Brisbane Q 4000
GPO Box 2454, Brisbane Q 4001

From: Rhodes Monika
Sent: Monday, 24 June 2013 7:50 AM
Subject: SEIS_Email-Out_submission of supplementary EIS_Springsure_20130624

Dear All

Your organisation lodged a submission on the environmental impact statement (EIS) for the proposed Springsure Creek Coal Mine Project, located 47 kilometres south-east of Emerald in central Queensland.

The proponent, Springsure Creek Coal Pty Ltd, has prepared a supplementary EIS and response to submissions that were received during the public notification period for the EIS. In the interests of facilitating the assessment of submissions provided by your department, please consider the response to your submissions and advise the Department of Environment and Heritage Protection (EHP) of any comments or recommended conditions that should apply to the project by **close of business Friday, 12 July 2013** (note that EHP will have to make a decision under section 56A of the *Environmental Protection Act 1994* if the EIS can proceed within 20 bd, so any comments should be received by 12/07/13; the Act does not allow for any extensions).

Your advice should be forwarded to:

The EIS Coordinator – Springsure Creek Coal Mine Project

Department of Environment and Heritage Protection
GPO Box 2454 BRISBANE QLD 4001
Level 9, 400 George Street BRISBANE QLD 4000
or by email to eis@ehp.qld.gov.au.

Should you have not received a copy of the SEIS and a response to your submission by COB today, please contact Mr Pete Jones, Springsure Creek Pty Ltd (Bandanna Energy), on 3041 4434.

I will be the EIS Coordinator and primary contact for this project.

Kind regards

Dr Monika Rhodes
Principal Environmental Officer
Statewide Environmental Assessments
Telephone 07 3330 6293 **Facsimile** 3330 5875
Email: monika.rhodes@ehp.qld.gov.au
www.ehp.qld.gov.au

Department of Environment and Heritage Protection
Level 9, 400 George Street, Brisbane Q 4000
GPO Box 2454, Brisbane Q 4001

RTI DL Release

Phillips Erin

From: David Antoine
Sent: Tuesday, 16 July 2013 9:57 AM
To: Rhodes Monika
Subject: RE: Springsure Creek - Noise query

Hi Monika,

I have checked Vipac Report and it is correct that they haven't modelled any noise for the Mine Ventilation Fan construction.

I have just been talking to Vipac and they are saying that this activity should not be heard beyond 200m. The construction will be restricted to day time. The construction of the ventilation Fan will be a tunnel at 30 degrees angle a small building with a fan of 6m by 6m then a shaft at 30 degree angle. The soil is loose so no blasting. basically a small boring machine and conveyor plus lorry traffic.

Vipac is sending an Email to confirm their statement and will forward.

Regards

Dr. Antoine David Ph.D. M.Eng. M.A.A.S.
Principal Environmental Officer
Project Support, Statewide Environmental Assessments
Environmental Services and Regulation
Department of Environment and Heritage Protection

Telephone 07 3330 5574
Email antoine.david@ehp.qld.gov.au
<http://www.ehp.qld.gov.au>

From: Rhodes Monika
Sent: Tuesday, 16 July 2013 7:59 AM
To: David Antoine
Subject: Springsure Creek - Noise query

Dear Antoine

Could you please look at point 6 on page 3 of the attached response from the Golden Triangle regarding noise from the ventilation shaft and get back to me with an answer?

If there is outstanding noise issues, I will need to outline these by today in a letter and tomorrow in the meeting.

Thanks heaps

Moni

Dr Monika Rhodes
Principal Environmental Officer
Statewide Environmental Assessments
Telephone 07 3330 6293 **Facsimile** 3330 5875
Email: monika.rhodes@ehp.qld.gov.au
www.ehp.qld.gov.au

RTI DL Release

Phillips Erin

From: Rhodes Monika
Sent: Wednesday, 26 June 2013 1:02 PM
To: Savage Ross
Subject: RE: Springsure Creek SEIS

Ross

Further to our discussion, please find attached the submission from the Golden Triangle via a consultant, Landholder Services. This submission went also to the Premier's office.

Issues raised in this submissions are repeated throughout all the other public submissions.

Kind regards

Monika

Dr Monika Rhodes
Principal Environmental Officer
Statewide Environmental Assessments
Telephone 07 3330 6293 **Facsimile** 3330 5875
Email: monika.rhodes@ehp.qld.gov.au
www.ehp.qld.gov.au

Department of Environment and Heritage Protection
Level 9, 400 George Street, Brisbane Q 4000
GPO Box 2454, Brisbane Q 4001

From: Savage Ross
Sent: Tuesday, 25 June 2013 8:38 AM
To: Pete Jones; Enquiries
Cc: Rhodes Monika
Subject: Springsure Creek SEIS

Good morning

Please note that DAFF has not received its copy of the SEIS.
I have not been able to find it on the project's website.
Please advise when it will be made available as the timeframe to respond has begun.

Regards

Ross Savage
DAFF EIS Coordination
Agricultural Resources & Planning
Department of Agriculture, Fisheries and Forestry

tel +61 7 3405 6535 (ext 56535)
post GPO Box 46 Brisbane QLD 4001
visit Level 6, 80 Ann Street, Brisbane Queensland 4000

ross.savage@daff.qld.gov.au

www.daff.qld.gov.au

 Please consider the environment before printing this email

RTI DL Release

Phillips Erin

From: michael.a.nelles@tmr.qld.gov.au
Sent: Monday, 15 July 2013 11:41 AM
To: Rhodes Monika
Cc: tom.k.orr@tmr.qld.gov.au; patrick.d.aprile@tmr.qld.gov.au;
john.z.pfingst@tmr.qld.gov.au; mdp@tmr.qld.gov.au
Subject: RE: TMR comments on SEIS for Springsure Creek coal project

Hi Monika

we always presume TMR comments on EIS documents will be made available to the proponent, unless our comments are advice about whether an EIS should Not proceed & we clearly recommended Against proceeding..we'd make that clear in the comments and contact your agency to discuss.

We in Brisbane met the Springsure people before & this worked out well..if their queries are not too engineering-specific, they can contact Tom Orr & myself. If its to haggle over engineering impact mitigation, they should chat with the regional contacts or the railway contacts. Their details are on the regional comment sheets.

Happy for you to attend any Brisbane meetings..

regards

Michael Nelles
A/Principal Advisor (Development Outcomes) | Policy & Planning Branch
Policy, Planning & Investment Division | Department of Transport and Main Roads

Floor 12 | Brisbane - Terrica Place | 140 Creek Street | Brisbane Qld 4000
GPO Box 213 | Brisbane Qld 4001
P: (07) 3066 1812 | F: (07) 3146 2008
E: michael.a.nelles@tmr.qld.gov.au
W: www.tmr.qld.gov.au

From: "Rhodes Monika" <Monika.Rhodes@ehp.qld.gov.au>
To: <michael.a.nelles@tmr.qld.gov.au>
Date: 15/07/2013 10:38 AM
Subject: RE: TMR comments on SEIS for Springsure Creek coal project

Dear Michael

EHP is considering further information request from the proponent as part of the EIS assessment process; including issues raised in TMR's review of the amended EIS.

Would your comments provided to EHP be suitable to provide directly to the proponent (i.e. forward it as is)?

Also, could you please provide us with a primary contact for the proponent to communicate/deal with outstanding TMR matters?

Please note that as part of the ongoing assessment process I would like to be part of any proposed meetings.

Kind regards

Dr Monika Rhodes
Principal Environmental Officer
Statewide Environmental Assessments
Telephone 07 3330 6293 **Facsimile** 3330 5875
Email: monika.rhodes@ehp.qld.gov.au
www.ehp.qld.gov.au
Department of Environment and Heritage Protection
Level 9, 400 George Street, Brisbane Q 4000
GPO Box 2454, Brisbane Q 4001

From: michael.a.nelles@tmr.qld.gov.au [<mailto:michael.a.nelles@tmr.qld.gov.au>]
Sent: Friday, 12 July 2013 12:19 PM
To: Rhodes Monika
Cc: EIS External Submissions; Jason.O.Hoolihan@tmr.qld.gov.au; cmo.rockhampton@tmr.qld.gov.au;
Andrew.E.Armstrong@tmr.qld.gov.au; mdp@tmr.qld.gov.au; tom.k.orr@tmr.qld.gov.au;
warwick.z.williams@tmr.qld.gov.au
Subject: TMR comments on SEIS for Springsure Creek coal project

Hi Monika

thank you for inviting TMR to comment on the SEIS for Springsure Ck mine project.

An e-copy of the departmental submission and Word files are attached.

Pls call me if you have any queries.

regards

Michael Nelles
A/Principal Advisor (Development Outcomes) | Policy & Planning Branch
Policy, Planning & Investment Division | Department of Transport and Main Roads

Floor 12 | Brisbane - Terrica Place | 140 Creek Street | Brisbane Qld 4000
GPO Box 213 | Brisbane Qld 4001
P: (07) 3066 1812 | F: (07) 3146 2008
E: michael.a.nelles@tmr.qld.gov.au
W: www.tmr.qld.gov.au

From: "Rhodes Monika" <Monika.Rhodes@ehp.qld.gov.au>
To: undisclosed-recipients;;
Date: 10/07/2013 07:15 AM
Subject: Reminder - comments on SEIS for Springsure Creek due this Friday

Dear All

Please keep in mind that the comments on any outstanding issues on the SEIS for the Springsure Creek Coal Mine Project are due this Friday, 12 July 2013 COB.

Your advice should be forwarded to:

The EIS Coordinator – Springsure Creek Coal Mine Project
Department of Environment and Heritage Protection
GPO Box 2454 BRISBANE QLD 4001
Level 9, 400 George Street BRISBANE QLD 4000
or by email to eis@ehp.qld.gov.au.

Note that EHP has only 20 bd to make a decision.

Kind regards

Dr Monika Rhodes
Principal Environmental Officer
Statewide Environmental Assessments
Telephone 07 3330 6293 **Facsimile** 3330 5875
Email: monika.rhodes@ehp.qld.gov.au
www.ehp.qld.gov.au
Department of Environment and Heritage Protection
Level 9, 400 George Street, Brisbane Q 4000
GPO Box 2454, Brisbane Q 4001

From: Rhodes Monika
Sent: Tuesday, 25 June 2013 12:24 PM
Subject: RE: SEIS_Email-Out_submission of supplementary EIS_Springsure_20130624

Dear All

Please note that the proponent will not send out hard copies, but electronic copies of the amended EIS (as sticks), including the response to your submissions. I have heard that the proponent has sent them only yesterday (Monday).

Alternatively, the amended EIS can be accessed through the proponent's web page:
<http://www.springsurecreekproject.com.au/project-development-and-approvals/springsure-creek-coal-mine-eis>

Please note that there was some confusion regarding the term 'final EIS' – as labelled on the documents; however, this EIS is the amended EIS (or supplementary EIS) based on submissions.

If you have any questions, please don't hesitate to contact me.

Regards

Dr Monika Rhodes
Principal Environmental Officer
Statewide Environmental Assessments
Telephone 07 3330 6293 **Facsimile** 3330 5875
Email: monika.rhodes@ehp.qld.gov.au
www.ehp.qld.gov.au
Department of Environment and Heritage Protection
Level 9, 400 George Street, Brisbane Q 4000
GPO Box 2454, Brisbane Q 4001

From: Rhodes Monika
Sent: Monday, 24 June 2013 7:50 AM
Subject: SEIS_Email-Out_submission of supplementary EIS_Springsure_20130624

Dear All

Your organisation lodged a submission on the environmental impact statement (EIS) for the proposed Springsure Creek Coal Mine Project, located 47 kilometres south-east of Emerald in central Queensland.

The proponent, Springsure Creek Coal Pty Ltd, has prepared a supplementary EIS and response to submissions that were received during the public notification period for the EIS. In the interests of facilitating the assessment of submissions provided by your department, please consider the response to your submissions and advise the Department of Environment and Heritage Protection (EHP) of any comments or recommended conditions that should apply to the project by **close of business Friday, 12 July 2013** (note that EHP will have to make a decision under section 56A of the *Environmental Protection Act 1994* if the EIS can proceed within 20 bd, so any comments should be received by 12/07/13; the Act does not allow for any extensions).

Your advice should be forwarded to:

The EIS Coordinator – Springsure Creek Coal Mine Project
Department of Environment and Heritage Protection
GPO Box 2454 BRISBANE QLD 4001
Level 9, 400 George Street BRISBANE QLD 4000
or by email to eis@ehp.qld.gov.au.

Should you have not received a copy of the SEIS and a response to your submission by COB today, please contact Mr Pete Jones, Springsure Creek Pty Ltd (Bandanna Energy), on 3041 4434.

I will be the EIS Coordinator and primary contact for this project.

Kind regards

Dr Monika Rhodes
Principal Environmental Officer
Statewide Environmental Assessments
Telephone 07 3330 6293 **Facsimile** 3330 5875
Email: monika.rhodes@ehp.qld.gov.au
www.ehp.qld.gov.au
Department of Environment and Heritage Protection
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or endorsed organisations utilising the same infrastructure.

RTI DL Release

Phillips Erin

From: michael.a.nelles@tmr.qld.gov.au
Sent: Wednesday, 17 July 2013 3:56 PM
To: Rhodes Monika
Cc: KROSCH Neil; Pete Jones; Curley Peter; Rowland Philip; Rex.Z.Cowan@tmr.qld.gov.au
Subject: Re: transport issues at Springsure Ck coal project meeting today
Attachments: sample RMP commitments table- July 13.xls

Hi Monika

thanks for summarising the discussion at this morning's Springsure Ck coal project meeting.

With regard to the draft Road-use Mgt Plan (RMP) in the TTM Traffic Report, I'd just like to confirm TMR is very happy with it in its draft form and does not require more at this stage. (In fact, we'd like Bandanna permission to remove any identifying logos/information and use it as an example of a good draft RMP). So, in terms of road issues, you may proceed with the Assessment Report.

We're confident Bandanna will 1) revise the road impact assessment if there are any material changes in estimated project traffic, 2) finalise the RMP including any further investigations of potential road safety hot-spots on the network from project traffic, 3) apply for necessary permits for over-dimension loads and Road Corridor Permits (approval for the access/driveway for the accommodation village and any improvements to the Gregory Hwy/ Glenorina Rd intersection) etc.

Pete Jones from Bandanna called before offering to meet again about road-related issues but I assured him we're comfortable at the moment and we have a clear understanding about future requirements.

I mentioned TMR has prepared a simple way of summarising road-use management plan commitments in a spreadsheet which I've attached. The entries are as examples only and should be replaced with company commitments. This makes it easy for the company to document progress with fulfillment of RMP requirements.

Thanks for your assistance with resolving transport matters for this project.

regards

Michael Nelles
A/Principal Advisor (Development Outcomes) | Policy & Planning Branch
Policy, Planning & Investment Division | Department of Transport and Main Roads

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GPO Box 213 | Brisbane Qld 4001
P: (07) 3066 1812 | **F:** (07) 3146 2008
E: michael.a.nelles@tmr.qld.gov.au
W: www.tmr.qld.gov.au

From: "Rhodes Monika" <Monika.Rhodes@ehp.qld.gov.au>
To: "Curley Peter" <Peter.Curley@ehp.qld.gov.au>, "Rowland Philip" <Philip.Rowland@ehp.qld.gov.au>, "Dunlop Kylie" <Kylie.Dunlop@ehp.qld.gov.au>, "Baker Tony" <Tony.Baker@ehp.qld.gov.au>, <michael.a.nelles@tmr.qld.gov.au>, "Savage Ross" <Ross.Savage@daff.qld.gov.au>, "Grimes John" <John.Grimes@daff.qld.gov.au>, "KROSCH Neil" <Neil.Krosch@dnrm.qld.gov.au>, "Smith Wedeena" <Wedeena.Smith@dnrm.qld.gov.au>, "Hambleton Alison" <Alison.Hambleton@dnrm.qld.gov.au>, "Pete Jones" <PeteJones@bandannaenergy.com.au>, "David Antoine" <Antoine.David@ehp.qld.gov.au>
Date: 17/07/2013 02:06 PM
Subject: Meeting_Springsure_20130718

Dear All

Thank you for making time to discuss the best way forward for the Springsure Creek Coal Mine Project EIS process.

The list below identifies the parties at today's meeting.

Bandanna Energy will inform EHP by email by noon Friday 19 July 2013 a suitable extension period for submitting further supplementary materials and updated EIS.

As agreed during the meeting, Bandanna Energy will consult with the agencies (TMR, DAFF, DNRM and EHP) to address outstanding key issues to allow the project to proceed to the next stage (EIS assessment report). The proponent's response would include an amendment to the current (amended) EIS (dated 21 June 2013) and a response to each of the issues outlined in the agencies' responses provided to the proponent. The aim is to resolve the key issues before the SEIS is finalised and to give EHP adequate information for developing the EIS assessment report. EHP will need to ensure that all agencies' issues have been dealt with adequately.

The point of contact for DAFF is Ross Savage (phone: 3405 6535). John Grimes would be involved as well.

The point of contact for DNRM is Weedena Smith (phone: 4999 6914).

TMR agreed that most TMR issues can be dealt with post EIS process. However, it was made clear by TMR that road safety and key commitments will need to be addressed by the proponent in the EIS. Michael Nelles will also check if the RUMP has been provided to TMR and whether further comments from TMR need to be made. Michael Nelles can be contacted on 3066 1812.

To this end please provide EHP (via Monika Rhodes) with progressive updates on relevant discussion outcomes. If Bandanna Energy requires further consultation with EHP please contact Monika Rhodes to facilitate meetings with Kylie (water) and or Antoine (noise).

Regards

Monika

List of attendees:

Philip Rowland	A/Director	EHP
Peter Curley	A/Manager	EHP
Monika Rhodes	Principal Environmental Officer	EHP
Dr Antoine David	Noise specialist	EHP
Kylie Dunlop	Senior Environmental Officer	EHP, Rockhampton
Tony Baker	Principal Environmental Officer	EHP, Rockhampton
Michael Nelles	A/Principal Advisor (Development Outcomes)	TMR
Ross Savage	DAFF EIS Coordination	DAFF
John Grimes	Manager	DAFF, Rockhampton
Neil Krosch	Case Manager, Mining and Petroleum Operations	DNRM
Weedena Smith	Senior Natural Resource Officer	DNRM, Mackay
Alison Hambleton	Principal Natural Resources Officer	DNRM, Mackay
Stuart Clark	Chief Development Officer	Bandanna Energy
Pete Jones	Environmental Approvals Coordinator	Bandanna Energy
Peter Brisbane	General Manager Technical Services	Bandanna Energy
Neil Dale	Site Manager	Bandanna Energy
Dave Elmoutie	Consultant	CDM Smith

Not attended: Chris Lunney	Consultant	Vipac (Noise)
Michelle Cliston	Consultant	Vipac (Noise)

Dr Monika Rhodes
Principal Environmental Officer
Statewide Environmental Assessments
Telephone 07 3330 6293 **Facsimile** 3330 5875
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Commitment Number	Proponent draft RMP section, page	Commitment	Issue category	Relative importance to TMR; A=high	Proponent evidence and commentary on progress with action/ implementation of this commitment	TMR comment on proponent evidence/commentary	TMR: Satisfactory/ needs more (what?)	Proponent Close-out Response
		Note: this draft table is provided as a guide only, for proponents to expand and update.			EXAMPLE ONLY	<small>(If clarity Acronyms: 1) for TMR, a Road-use Mgt Plan (RUMP) lists non- infrastructure or "soft" impact mitigation strategies, 2) the Infrastructure Agreement (IA) lists "hard" infrastructure strategies for example, works, 3) for TMR, a Traffic Mgt Plan (TMP) documents how any required roadworks will be safety undertaken.</small>		
1		General commitments: Scope						
2	Section xx, pg yy	The RMP applies to all operations during construction & operational phase;		A				
3	Section xx, pg yy	Includes all permanent and temporary worksites;		B				
4	Section xx, pg yy	Applies to all proponent staff, subcontractors & visitors.		B				
5	Section xx, pg yy	Key responsibility for its implementation lies with: Health & Safety Mgr, Construction Mgr, Logistics Mgr, Infrastructure Plans & Equipment Supervisors, overall Tpt Mgr & Environmental Mgr. (in applicable)		B				
6	Section xx, pg yy	Specific commitments:						
7	Section xx, pg yy	During construction,proponent will manage worker parking to minimise congestion around xxxxxxxx and use buses to transport workers from carpark to port. (define more specifically to allow measurement).		B				
8	Section xx, pg yy	The RMP will be updated to reflect the road-use management findings of the xxxxx Cumulative Impact Study		B				
9	Section xx, pg yy	The proponent will update the RMP as required by the Performance Criteria.		B				
10	Section xx, pg yy	The RMP will deal with issues such as road safety, transport scheduling, dust control strategies and ensure effective management of the movement of freight, materials & workforce.		A				
11	Section xx, pg yy	The proponent will prepare Traffic Mgt Plans for any works in public road reserves, and ensure approvals of excess mass/ dimension vehicles is obtained well in advance of use.		A				
12	Section xx, pg yy	The proponent will work closely with QPS, regional councils & TMR in developing Traffic (road-use) management plans.		B				
13	Section xx, pg yy	The proponent will advise TMR of any significant material changes to the project timeline and impacts on traffic generation which may change potential impacts & mitigation requirements.		A				
14	Section xx, pg yy	The proponent will limit road accesses from State-controlled road to those project locations indicated or advise and seek further approval for new or changed accesses.		A				
15	Section xx, pg yy	SCRs used in future phases of the project will be defined in subsequent versions of the RMP once further operations are more clearly defined. In section xx, it states Exploration road-use was not covered in the RIA or RMP. The proponent commits to documenting traffic generation of this activity with affected regions and addressing key issues and impacts.		B				
16	Section xx, pg yy	Any changes to use of roads for pipe gathering and drilling activities (originally forecast to be similar to Table 3.2) will be advised in revisions of the RMP.		B				
17	Section xx, pg yy	Any changes to use of roads for the construction and use of current and future facilities will be advised in revisions of the RMP.		B				
18	Section xx, pg yy	Bridge load limits on all SCR bridges, both TMR system-identified and others will be observed and any damage through use will be rectified by the proponent.		A				
19	Section xx, pg yy	Any significant changes to traffic generation/use of roads for the construction and operational phase to those forecast in this version of the RMP will be advised to TMR regions and impact assessment/ mitigations revised as per the Performance Criteria.		B				
20	Section xx, pg yy	The project's Health, Safety & Environmental inductions for staff and contractors will cover a number of topics including transport to & from site, defensive driving and key elements of this RMP.		B				
21	Section xx, pg yy	The proponent's transport directive sets out requirements for the safe operations of vehicles, with all vehicles and drivers needing to comply. The proponent will provide TMR with a copy of the Directive to confirm key road safety requirements are adequately covered. This section also commits proponent to only used approved routes for the transport of equipment, materials & plant.		A				
22	Section xx, pg yy	A Journey Mgt Plan will be prepared for all journeys over 2 hrs unless otherwise authorised: proponent should clarify their purpose in ensuring safe road-use if achieved.		C				
23	Section xx, pg yy	As part of the RIA, safety assessments of roads were undertaken to identify notable deficiencies, with a view to rectifying any that would be made higher-risk through project traffic use. The proponent will report on progress/completion of these undertakings, including joint inspections on areas of concern.		A				
24	Section xx, pg yy	Proponent vehicles, if fitted with RVMS will warn a central supervisor if safety measures are exceeded. The proponent will provide TMR with exception reports and discuss any need for improved practices.		B				
25	Section xx, pg yy	In the draft RMP, the section listed a number of fatigue mgt training and strategies, e.g regular breaks for general and professional drivers. This table should summarise strategies and report on the number and nature of fatigue-related incidents.		B				
26	Section xx, pg yy	This section lists a number of personnel transport and other strategies, e.g busing of workers, regular breaks for general and professional drivers, car-pooling, scheduling worker shifts to off peak shifts etc. Please report on the level of implementation of these strategies and performance indicators.		B				
27	Section xx, pg yy	Incident management mgt/reporting: Please report on the number and nature of transport-related incidents, including contractors.		B				
28	Section xx, pg yy	The proponent undertakes to limit night time operations and deliveries to minimise disturbance to residents and other sensitive receptors.		C				
29	Section xx, pg yy	Traffic Mgt Plans/Traffic Guidance Schemes: provide a list of individual traffic mgt. plans submitted/approved to TMR.		B				
30	Section xx, pg yy	Regulating driving speeds esp in higher risk situations: document strategies to report on and manage proponent traffic compliance with speed regulations, for example, via exception reporting.		B				
31	Section xx, pg yy	The proponent will employ an Over-size/Over-mass Logistics specialist: how will s/he help manage road-use? Summarise road-use mgt strategies for OSD/M.		A				
32	Section xx, pg yy	Platooning of proponent vehicles will be managed as follows: adequate distance between vehicles, pull over if holding up traffic etc.		A				
33	Section xx, pg yy	Multi-combination vehicles will only use routes approved for that type of vehicle.		A				
34	Section xx, pg yy	proponent will consult with school bus companies to identify strategies to minimise impacts on bus routes for example, reduce speeds, avoid routes/rechedule tpt and so on.		B				
35	Section xx, pg yy	The proponent will minimise impacts of company vehicles parking on public roads by.....		C				
36	Section xx, pg yy	The proponent will minimise impacts of company vehicles using /crossing stock routes, esp. in times of high seasonal activities by.....		C				
37	Section xx, pg yy	Management strategies when constructing pipeline crossings across roads: all endeavours made to not block existing traffic, manage traffic in accordance with approved traffic Mgt Plan, proponent will inform communities of proposed works, provide diversions where necessary, provide signposting etc.		B				
38	Section xx, pg yy	Management strategies when constructing pipeline crossings parallel to roads: all endeavours made to not block existing traffic, manage traffic in accordance with approved traffic Mgt Plan, proponent will inform communities of proposed works, provide diversions where necessary, provide signposting etc, ensure access/egress to public roads are safe/adequate, ensure any movement of heavy equipment across roads is safely undertaken etc.		B				
39	Section xx, pg yy	The proponent will communicate any necessary road-use management actions with stakeholders for example, road authorities, the community, other agencies and so on in a timely fashion.		C				
40	Section xx, pg yy	This section list a number of traffic & transport communication protocols, regarding moving rigs, permits for works in road reserves, publishing a monthly information bulletin to inform stakeholders. Summarise these.		B				
41	Section xx, pg yy	Grievance & dispute resolution policy: summarise how this applies to reports on proponent road-use/ company and contractor vehicles.		C				
42	Section xx, pg yy	Roles and responsibilities: summarise key road-use mgt. responsibilities of Tpt Mgr, Tpt Liaison Officer, Construction Mgr, Operations Mgr Tpt operators/haulers, Traffic Officer		C				
43	Section xx, pg yy	Audit and review of RMP, including traffic reports: The draft RMP proposes the following: the first comprehensive review of this document will take place X months from implementation, followed by xxxxxx reviews and a complete update & re-issue after the 5 year Project Assessment period. This version has abbreviated update/change commitments. Summarise the latest commitments, in line with Performance Criteria Sch 5.		A				
44	Section xx, pg yy	The proponent is committed to implementing an "environmentally friendly" transport mgt system that fully complies with statutory requirements, community needs & achieves environmental practices. This will manage: dust emissions, vehicle noise & emissions, transport of hazardous materials, fuel & oil spills, weed & pest spread.		C				
45	Section xx, pg yy	Traffic during extreme weather incidents: traffic mgt plans will suspend tpt operations deemed unsafe during or following extreme weather events, regularly review road condition reports. Also discussed in 4.6. Summarise strategies.		B				
46	Section xx, pg yy	The proponent Disaster Mgt Plan will address response/measures applicable to the project's transport operations.		C				

Priority	
A	Road safety management (environmental) requirements on public roads
A	Over-size/over-mass loads, vehicle management & approvals
B	Other key project vehicle/ traffic management commitments
B	Notification & engagement: TMR/ LG and road users/ the community
C	Less critical project vehicle/ traffic management commitments
C	Environmental commitments/ requirements on public roads

Phillips Erin

From: Rhodes Monika
Sent: Friday, 19 July 2013 8:46 AM
To: 'Pete Jones'
Cc: Rowland Philip; Curley Peter
Subject: RE: transport issues at Springsure Ck coal project meeting today

Pete

Yes, DTMR does not require any further work on the SEIS.

Regards

Dr Monika Rhodes
Principal Environmental Officer
Statewide Environmental Assessments
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From: Pete Jones [<mailto:PeteJones@bandannaenergy.com.au>]
Sent: Thursday, 18 July 2013 9:57 AM
To: Rhodes Monika
Cc: Rowland Philip; Curley Peter
Subject: RE: transport issues at Springsure Ck coal project meeting today

Hi Monika,

Based on Michael's email below, please can you confirm that no further work is required by Bandanna in relation to traffic and transport at the present time?

Many thanks for your assistance
Pete

Pete Jones

Environmental Approvals Coordinator
BANDANNA ENERGY LIMITED

Telephone No: 07 3041 4400
Direct No: 07 3041 4434
Fax No: 07 3041 4444
Email: petejones@bandannaenergy.com.au

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From: Rhodes Monika [<mailto:Monika.Rhodes@ehp.qld.gov.au>]
Sent: Wednesday, 17 July 2013 3:59 PM

To: michael.a.nelles@tmr.qld.gov.au

Cc: KROSCH Neil; Pete Jones; Curley Peter; Rowland Philip; Rex.Z.Cowan@tmr.qld.gov.au

Subject: RE: transport issues at Springsure Ck coal project meeting today

Many thanks, Michael.

Dr Monika Rhodes
Principal Environmental Officer
Statewide Environmental Assessments
Telephone 07 3330 6293 **Facsimile** 3330 5875
Email: monika.rhodes@ehp.qld.gov.au
www.ehp.qld.gov.au

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Level 9, 400 George Street, Brisbane Q 4000
GPO Box 2454, Brisbane Q 4001

From: michael.a.nelles@tmr.qld.gov.au [<mailto:michael.a.nelles@tmr.qld.gov.au>]

Sent: Wednesday, 17 July 2013 3:56 PM

To: Rhodes Monika

Cc: KROSCH Neil; Pete Jones; Curley Peter; Rowland Philip; Rex.Z.Cowan@tmr.qld.gov.au

Subject: Re: transport issues at Springsure Ck coal project meeting today

Hi Monika

thanks for summarising the discussion at this morning's Springsure Ck coal project meeting.

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We're confident Bandanna will 1) revise the road impact assessment if there are any material changes in estimated project traffic, 2) finalise the RMP including any further investigations of potential road safety hot-spots on the network from project traffic, 3) apply for necessary permits for over-dimension loads and Road Corridor Permits (approval for the access/driveway for the accommodation village and any improvements to the Gregory Hwy/ Glenorina Rd intersection) etc.

Pete Jones from Bandanna called before offering to meet again about road-related issues but I assured him we're comfortable at the moment and we have a clear understanding about future requirements.

I mentioned TMR has prepared a simple way of summarising road-use management plan commitments in a spreadsheet which I've attached. The entries are as examples only and should be replaced with company commitments. This makes it easy for the company to document progress with fulfillment of RMP requirements.

Thanks for your assistance with resolving transport matters for this project.

regards

Michael Nelles
A/Principal Advisor (Development Outcomes) | Policy & Planning Branch
Policy, Planning & Investment Division | Department of Transport and Main Roads

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E: michael.a.nelles@tmr.qld.gov.au

Phillips Erin

From: Rhodes Monika
Sent: Tuesday, 16 July 2013 7:49 AM
To: Curley Peter; Pete Jones
Cc: Rowland Philip
Subject: Response from DNRM and TMR attached
Attachments: SEIS_DNRM comments_Springsure_20130712.pdf; SEIS_DTMR comments (1)_Springsure_20130712.doc; SEIS_DTMR comments (2)_Springsure_20130712.doc; SEIS_DTMR comments (guideline)_Springsure_20130712.doc; SEIS_DTMR comments_Springsure_20130712.pdf; SEIS_DNRM comments_Springsure_20130712.doc.docx

Dear Pete

Please find the response from DNRM and TMR attached. I have not heard back from DAFF. I will provide their response as soon as I have clearance.

I am currently working on the EHP response.

Any questions, please ring.

Regards

Dr Monika Rhodes
Principal Environmental Officer
Statewide Environmental Assessments
Telephone 07 3330 6293 **Facsimile** 3330 5875
Email: monika.rhodes@ehp.qld.gov.au
www.ehp.qld.gov.au

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Level 9, 400 George Street, Brisbane Q 4000
GPO Box 2454, Brisbane Q 4001

Springsure Creek Coal Project Supplementary EIS

Submission prepared by
Department of Natural Resources and Mines
July 2013

Water Management and Use – Groundwater

General Comment

Firstly it should be noted that in the document provided by Bandanna Energy, 'Response to Submissions to EIS' the responses provided in relation to comments made by DNRM on groundwater related issues were in places poor and at times did not address the comment. However a review of the updated groundwater report often resulted in answers to the original comments being obtained.

It is noted that Water Resource Australia Pty Ltd have reviewed the updated groundwater model and provided comment. Water Resource Australia have generally supported the quality of the modelling work carried out, with some qualifications. It is a positive step that Bandanna have arranged for this peer review of the groundwater model. The comments of Water Resource Australia, the updated model report and draft EMP have been reviewed by DNRM along with the proponent's responses referred to above. The more significant outstanding issues are noted below.

Monitoring Bores

Issue

It should be noted that in the course of the groundwater investigation work carried out as part of this EIS, nine monitoring or production bores were drilled. Of these bores strata details are supplied for two (SPR107C and SPR138) and construction details supplied for four bores in the original EIS. In the SEIS documents, basic construction details are supplied for the nine bores, but no additional strata details are provided.

Recommendation

Strata details are required to be provided for the remaining seven bores.

Section 9.5.4.3 – Calibrated Model (Page-9-77)

Issue

In table 9-20 a vertical hydraulic conductivity (permeability) for the Rewan Formation of 1×10^{-6} m/day has been adopted. In determining this figure, references are provided for work carried out by AGE on the Ensham mine in 2006 and by Ausenco – Norwest (2012) in work carried out on a groundwater model for the northern Bowen Basin for Arrow Energy.

However recent work carried out by AGE in 2013 for Minyango (Blackwater) suggest a vertical hydraulic conductivity for the Rewan of 5.4×10^{-5} m/day. Additionally recent work carried out in the southern Galilee Basin in the Alpha area has seen URS (2012) adopt a vertical hydraulic conductivity for the Rewan of 9×10^{-5} m/day for the Alpha/ Kevins Corner model and Heritage Computing (2013) adopt 9.3×10^{-5} m/day for the Galilee Coal Project model. These figures all relate to a formation not yet fractured by the effects of goafing.

In the Springsure Creek model, in the lower fractured zone, an adjusted vertical

hydraulic conductivity of 1×10^{-5} m/day is adopted, which is still considerably lower than the unfractured figures quoted above.

In section 9.5.6.1 it is noted that the vertical hydraulic conductivity is one of a number of parameters to which drawdown predictions are sensitive. This is to be expected as the connection of the basalt aquifer to the dewatered coal measures is directly linked to the vertical hydraulic conductivity of the Rewan Formation which separate them.

In a sensitivity analysis carried out for Springsure Creek the unfractured Rewan vertical conductivity is increased to 1×10^{-5} m/day which is meant to represent a worst case scenario. This approach of sensitivity/ uncertainty testing is supported but again this figure is significantly lower than those quoted above from other mines in Central Queensland so it does not qualify as a worst case scenario.

In the peer review carried by Water Resource Australia it was noted that *while literature references and comparisons are required, it does not completely overcome the need for more site specific data and investigations*. It was further noted that *No packer tests or core permeability test results at site are provided in the report*.

The vertical hydraulic conductivity of the Rewan is probably the most important groundwater issue at this time as it directly dictates the predicted impact on the overlying basalt aquifer and its users.

Recommendation

It is recommended that a further model run/ sensitivity/ uncertainty analysis be carried out using an unfractured vertical hydraulic conductivity figure of 1×10^{-4} m/day which would then be increased in fractured zones. This will then provide a more appropriate upper limit of potential impacts.

Section 9.5 – Groundwater Impact Assessment (Page- 9-60)

Issue

The groundwater model has been developed with no flow boundaries on most boundaries of the model. This means that with the exception of the north east corner of the model, groundwater cannot flow into or out of the model area.

The peer review by Water Resource Australia identified the no flow model boundaries on much of the model as atypical of most modelling projects. Furthermore, they noted that the conceptualisation of the how the system operates, in justifying the no flow boundaries was *based upon data primarily sourced from local water table aquifers with very little data from the deeper geologic units, in particular the coal seams*. The concerns about the lack of data in the deeper formations mirror those expressed by DNRm in response to the EIS.

Water Resource Australia also raise concern about evapotranspiration being the primary source of outflow from the model.

It would appear from the plots provided in Figure 9-37 using the limited historical data available that a combination of the model boundaries and application of recharge and evapotranspiration has resulted in the models inability to match the observed water level declines and rises caused by drought and high rainfall events.

It is considered that more work will be required in relation to these issues in the future to refine the model but for now they are not considered critical.

Recommendation

In future updates of the model the suitability of existing model boundary conditions and application of recharge and evapotranspiration should be addressed to more accurately simulate local hydrogeological conditions.

Section 9.3.3.3 – Title Geologic Structures (Page- 9-15)

Issue

The following description of the Albinia Fault is provided:

A northwest to southeast trending fault called the Albinia Fault traverses along the east of EPC891 (Xenith 2011, Resolve Geo 2011). No significant vertical displacement from one side of the fault to the other has been identified, although a sudden change in the thickness of the Aries 2 seam across the fault is observed. The location of Albinia Fault, as presented in Resolve Geo (2011), is shown in Figure 9-6. Other faults identified in the Project area shown in Figure 9-6 are interpreted to terminate in the basement and do not extend up into the Bandanna Formation (Xenith 2011). The Bandanna Formation and the sedimentary sequence above the Mantuan Formation, occurring approximately 300m below the Aries 2 seam, are interpreted to be notably free of faulting (Resolve Geo 2011).

Figure 9-8 in the groundwater report appears to indicate that there is significant displacement in the Bandanna formation and the Triassic sediments with the fault extending up to ground level. It would appear that the figure contradicts the text.

In section 9.3.6.3 it is stated:

The northwest to southeast trending Albinia Fault traverses along the east of EPC891. With the exception of a sudden change in the thickness of the Aries 2 seam, no displacement of strata has been identified on either side of this fault (Xenith 2011). Therefore the fault is considered unlikely to act as a barrier to horizontal flow along the coal seams although the fault surface, if altered to clay, may locally restrict groundwater flow. Other faults in the Project area are interpreted to terminate within the bedrock at some depth below the Bandanna Formation. The regional groundwater flow along the coal seams would be expected to be most sensitive to the lateral continuity, thickness and associated transmissivity of the coal seams.

Given that the existence of a significant fault in the Rewan could compromise its integrity as an aquitard, there needs to be consistency on how this issue is reported. Is the Rewan Formation faulted or likely to be faulted or not?

Recommendation

Clarification should be provided on the extent of faulting in regard to the Rewan Formation and its potential to effect existing modelled impact predictions.

Section 18.5.4.9 – Environmental Management Plan, Control Strategies (Page- 18-103)

Issue

In this section it is stated:

As drawdown depends on a range of factors, its impacts are best managed adaptively. Adaptive management involves monitoring groundwater impacts and, based on the severity of impacts, modify the mine plan as mining takes place such that impacts could be limited to within designated ranges. In the event impacts are detected, potential adaptation strategies include modifying the dimension of panels, the order of mining of panels or the installation of bulkheads to allow some mined areas (goafs) to refill with groundwater, without water draining from those areas contributing to subsequent dewatering requirements.

This information constitutes a discussion rather than a commitment. There is no discussion about what will trigger the adaptive management. How will trigger levels be developed? There is a commitment in section 18.5.4.11 to develop a groundwater management plan but it is not clear what will be in this plan. Will it include information relevant to adaptive management as discussed above?

Recommendation

The proponent must clearly articulate how the proposal of adaptive management will be developed and function.

Section 18.5.4.9 – Environmental Management Plan, Control Strategies (Page-18-103)

Issue

The following is provided;

Any landholder bores located in areas of significant drawdown which result in an inability or reduction in access to groundwater volumes may need to be deepened or replaced. This is in addition to any structural damage to bores occurring due to subsidence. In most cases, the Basalt aquifer will have sufficient saturated thickness to enable deepening of wells. Four registered bores (RN57358, 57359, 57360 and 57361), are located in where the modelled initial saturated thickness of the basalt aquifer is less than 40 m. Deepening of these bores may not be possible and these bores may need to be re-located. In the event that groundwater bores are damaged due to mining activities, SCC will maintain supply of groundwater as agreed with the landholder.

There appears to be no clear cut commitment about what agreements will be entered into with the landowners and when this will occur. In fact, there appears to be little change in the words provided at EIS stage where it was pointed out that a stronger clearer commitment was required.

Recommendation

The proponent must commit to enter into agreements, prior to mining commencing, with those landowners predicted to be impacted and with others as additional information indicating impacts or potential impacts, becomes available. There must also be a commitment to replace diminished groundwater with the same quantity and quality or better.

Section 3.4.3 – Ongoing Evaluation and Exploration Activities (Page 3-27 to 3-29)

Issue

Thank you for providing the local project area cross-sections. However they require greater vertical exaggeration in order to be interpreted correctly.

Recommendation

Please increase the vertical exaggeration in the project cross-sections.

Water Management and Use – Groundwater Dependant Ecosystems

Section 18.5.4.6 – Environmental values including GDEs (Page 18-97) and parallel section in Chapter 9.

Issue

The mapping in Figure 9-22 is not from EHP but is from the National Atlas of Groundwater Dependent Ecosystems, and indicates that a high potential for GW interaction exists in a significant portion of the project area.

It is an assumption to state that the predicted maximum drawdown of 0.5m, which would be permanent, is comparable to natural system variability. No evidence to prove this assumption is provided. It is hoped that the fractures do not propagate into the basalt, but if they do, there may be significant effects on the deeply rooted components of GDEs. There is no evidence to suggest that these potential GDEs can survive a drought coincident with a permanent drawdown of 0.5m.

Recommendation

Replace:

Although current EHP mapping indicates no GDEs or springs occur within approximately 100 km of the Project area, there is a potential for these to occur along Springsure and Station Creek. The predicted maximum drawdown along these creek systems is approximately 0.5 m. Potential GDEs include deep rooted plants that are drought tolerant and may adjust to declines in groundwater levels without adverse health effects, however in periods of low rainfall, the dependence of GDEs on groundwater is higher.

The predicted reduction in the evapotranspiration rate is likely to be comparable to the systems natural variability, although this is based on a conservative assumption that the fractures above the goaf extends into the Basalt by several 10s of metres in parts of the mine area and that the vertical hydraulic conductivities of key aquitards are an order of magnitude greater than the current best estimates. A model scenario based on local experience indicates that there will be no drawdown related impacts to GDEs as fractures are not assumed to extend into the Basalt.

On this basis, the risk to GDEs is estimated to be medium assuming that some of the deep rooted plants in the riparian zone have high dependence on groundwater particularly during low rainfall periods. It is therefore expected that there will not be any significant impacts to riparian vegetation.

With:

The National Atlas of Groundwater Dependent Ecosystems indicates that there are areas with a high potential for GDEs in the Project area. In periods of low rainfall, the dependence of GDEs on groundwater is higher. As the predicted maximum

drawdown along some creek systems is approximately 0.5 m, in periods of low rainfall, there may be impacts on GDEs.

The risk to GDEs is considered to be medium, based on conservative assumptions that:

- the fractures above the goaf extend into the basalt by several 10s of metres in parts of the mine area*
- some of the deep rooted plants in the riparian zone have high dependence on groundwater particularly during low rainfall periods.*

However, a model scenario based on local experience indicates that there will be no drawdown related impacts to GDEs as fractures are not assumed to extend into the basalt. It is therefore assumed that there will not be any significant impacts to riparian vegetation.

Section 18.5.4.9 – Control Strategies (groundwater – environmental values) (Page 18-101)

Issue

The statement about a water level decline not affecting GDE health is immediately followed by a statement to the effect that, as GW becomes less available, fringing vegetation will transpire less. This is actually a statement about declining health.

Enhanced recharge through increased ponding (a major system change) is generally not considered desirable for the ecosystems or groundwater systems already present.

Recommendation

Please remove the paragraph:

Although a decline in water levels is predicted to occur, there are several ways in which the regional water balance could adjust without adverse effects on the health of GDEs. One possibility is that as the water table declines, fringing vegetation takes less water by evapotranspiration such that withdrawal of groundwater is balanced by a slight decrease in evapotranspiration from vegetation throughout the region. Another possibility is that re-directed flow during episodic flood events continues to supply recharge to the Alluvium that allows water table elevations to recover. Recharge may locally be enhanced as a result of cracking of stream bed and increased ponding depth above subsided panels.

Section 18.5.4.9 – Control Strategies (groundwater - management of drawdown) (Page 18-103)

Issue

Fracturing may impact on both GW levels (drawdown) and surface topography (subsidence). This in turn may impact on environmental values associated with GDEs, water bore function and agricultural practices.

Drawdown: The discussion about drawdown impact mitigation strategies is good overall, but this section is not clear about how fracturing extents will be monitored – is it through monitoring GW levels alone? What would be the triggers for the implementation of mitigation measures? Have there been other projects where bulkheads or grout injection were successfully implemented as mitigation measures?

Subsidence: There is no indication in the SEIS of what the control strategies,

remediation is, or the mitigation measures are, for impacts to GDEs from subsidence.

Recommendation

The discussion about adaptive fracture-related drawdown management needs to be strengthened with commitments about the drawdown impact mitigation strategies. Cite instances where mitigation measures for fracture-related drawdown impacts have been successfully implemented. State what the trigger levels would be for the measures to be implemented.

Add a discussion that includes monitoring methods, triggers and commitments about mitigation and remediation for subsidence-related impacts on GDEs. If possible it should be related to the mitigation measures and commitments about fracture-related drawdown impacts.

Chapter 12 Section 12.5.8.2 – Stygofauna Assessment – Field assessment

Issue

Inadequate sampling for stygofauna and inconsistency between the Ecology and Groundwater chapters regarding the presence of alluvial aquifers.

The Ecology report states that the majority of stygofauna that have been collected to date have been in alluvial aquifers, but that alluvial aquifers do not occur in the study area (Section 12.5.8.2). It also states that stygofaunal sampling may have been inadequate (p. 12-88).

In comments on the EIS, DNRM pointed out that although the Ecology report (Chapter 12) stated that there were no alluvial aquifers in the study area, alluvium was referred to in the Groundwater Report. DNRM requested that chapter 12 be amended to make it consistent with the Groundwater Report. This has not been done. There are a number of references to alluvial aquifers in the revised Groundwater Report (chapter 9) e.g. pp. 9-18, 9-27, 9-31, 9-39, 9-56, 9-64 and the revised EM Plan (Chapter 18) e.g. pp 18-92, 18-93, 18-97, 18-103 and 18-104. Page 18-104 refers to monitoring bores to be installed in the alluvium.

Further, the original EIS stated that bores were purged prior to sampling. DNRM pointed out that this was inconsistent with WA Guidance No.54 and 54a. In response the proponent has simply stated that bores were not purged prior to sampling. It appears that the stygofaunal sampling was carried out during groundwater quality assessment. It is standard procedure to purge bores before sampling for water quality. This then raises the question of whether bores were sampled adequately for water quality, if they were not purged. The best way of establishing how sampling was carried out is through reference to the consultant's report, which was not provided as a technical appendix to the EIS

Recommendation

The EM Plan should include a commitment that monitoring bores to be established in the alluvium will be sampled for stygofauna in a manner consistent with the WA Guidance No.54 and 54a.

The Ecology report should be modified to be consistent with the Groundwater report regarding the presence of alluvium in the study area, as requested in the previous comments on the EIS.

The original consultant's report on the stygofaunal and water quality sampling should

be provided.

Water Management and Use – Surface Water

General Comment

We have noticed that the Appendix document was not updated for subsidence, however we acknowledge that the proponent has noted the comments that we made on that section

Resource Planning – Subsidence Modelling

Subsidence Modelling

Issue

The modelling of subsidence over the mine area as presented in the EIS was based on a mine plan designed to fit within the boundaries of the then ML application. Since that time, the original ML application was rejected and a new ML application has been lodged, with boundaries that are marginally different and over a marginally smaller area than the original. Although the longwall panel layout has been amended (essentially by shortening panels to fit within the new ML boundary), there has been no matching subsidence model presented in the SEIS to show how subsidence at the periphery of the mine plan will relate to the new ML boundary. This is important as DNRM will not permit any subsidence to be caused to any area outside the boundary of the company's ML and the surface area held under same.

Recommendation

It is recommended that a new subsidence model/plan be presented showing the most up to date ML boundary and mine plan (longwall layout) and the surface expression of subsidence that is predicted relative to those.

Issue

The SEIS also includes a modelled subsidence plan showing predicted pondage areas on the surface caused by the layout of the subsurface longwall panels and pillars. This plan overlays the "ponding" areas over existing surface drainage, but does not show any interpretation of changes to surface drainage patterns that may occur "naturally" as a result of subsidence, or of surface engineering works that may need to be done to realign surface drainages to minimise the effects of ponding.

Recommendation

It is recommended that another plan be provided to show an interpretation of the surface drainage pattern that is expected to exist post-subsidence.

Strategic Cropping Land – General Comments

Determining SCL and Non-SCL

The information provided in the SEIS regarding the SCL status of the land does not adequately address Schedule 1 of the *Strategic Cropping Land Act 2011* (SCL Act) or the *Guidelines for applying the proposed strategic cropping land criteria* (criteria guidelines). Without adhering to the SCL Act and criteria guidelines the SEIS could have incorrectly identified areas of SCL and non-SCL, and consequently could have misrepresented the area of SCL impacted by the project. Should a validation application be lodged with DNR based on the information in the SEIS, it would be unacceptable.

Examples include, but are not limited to:

1. The spatial density of soil assessment sites do not satisfy the requirements set out in the criteria guidelines; and
2. The SCL act and criteria guidelines specify two methods for determining the soil water storage, the SEIS (Appendix A4 – 01, pg 25 and section 3.8 pg257) states that 5 locations are within the 15% margin of the look up table and therefore require further assessment. The SCL Act and criteria guidelines state the other acceptable method of determining soil water storage; the PAWC method used in the SEIS is unacceptable.

Future SCL Protection Decision Application for the Mine Area

As the EIS process does not provide any means of approval relating to SCL, a SCL protection decision will be required before any EA or ML can be issued. The SCL protection decision application for the mine area will be assessed in line with the requirements of the SCL Act. The application will be required to demonstrate:

- the nature of the impacts as a result of the project;
- that SCL has been avoided to the greatest extent practicable;
- impacts have been minimised where they cannot be avoided;
- whether the impacts are temporary or permanent (as per section 14 of the SCL Act) ;
- for temporary impacts, how the SCL will be restored to its pre-development condition, and not impeded from cropping (legally or physically) for more than 50 years: and
- for permanent impacts, mitigation measures in accordance with the SCL Act.

Whether the subsidence from underground mining constitutes a temporary or permanent impact, will be determined by whether the application can demonstrate the land affected by subsidence can be restored to pre-development condition, and is not impeded from being cropped for at least 50 years. Restoration to pre-development condition is more than just maintaining the pre-development land use; it also includes, but is not limited to, the soil profile and soil properties, landform, and productive capacity of the land.

The supplementary SEIS states the predicted subsidence is in the order of 1.2m to 2.3m over the longwall panels and 0.2m to 1m over the pillars. The SEIS also focuses on managing the impacts of subsidence by remediating the subsided areas (i.e. re-contouring, ripping to remove surface cracks etc.), and in the long term does not expect any permanent change in land use will occur. However the SCL Act, in seeking to preserve a strategic resource, applies a more rigorous test than "stable landform and re-vegetated" when determining whether an impact is of a temporary or permanent nature. The SCL Act requires not simply that the land be rehabilitated sufficient to allow a comparable agricultural land use, but requires that land be restored its pre-development condition and all impediments to cropping to be removed (within 50 years) – irrespective of what the predevelopment land use was or the post-development use of adjoining land happens to be.

Based on the information within the SEIS, DNRM has serious concerns whether restoration to pre-development condition (as defined by the SCL Act) is possible. Mining Lease Application 70486 meets the requirements of section 289 of the SCL Act for transitional status, and is therefore exempt from the permanent impact restriction. As a result, the ultimate determination of whether the impact is temporary or permanent does not pose as a show stopper for the mine area.

Transport corridor and Rail load out facility

DNRM notes that the Terms of Reference for the EIS includes the requirements for the construction, upgrading or relocation of any-transport-related infrastructure. This includes road and rail transportation and exportation of products during the construction and operational phases of the project. DNRM notes the previous decision that the transport corridor and rail load out facility should not be included in the EIS, however it would be remiss of DNRM to not raise the issues relating to the SCL approvals required for those components of the overall project, given the successful undertaking of the development is contingent on access to a transport corridor.

The rail load out facility in its current location, being Mining Lease Application 70501, will not require any SCL application as there is no potential SCL on the SCL trigger map in that area.

The transport corridor, being Mining Lease Application 70502, does contain potential SCL and will require a SCL protection decision. The transport corridor is within a SCL protection area and does not have an exemption from the permanent impact restriction. The requirements for the protection decision application for the transport corridor, will need to address the same requirements previously outlined for the mine area.

As no information has been provided regarding the construction, operation, and decommissioning of the haul road, DNRM is unable to provide an indication of the likelihood of it being a temporary or permanent impact (as defined by the SCL Act). If the land is unable to be restored to pre-development condition and all impediments to cropping are not removed within 50 years, the haul road will be a permanent impact. For a permanent impact to proceed, an Exceptional Circumstances application would need to be lodged, and the development would need to be granted Exceptional Circumstances. The process and criteria for making the exceptional circumstance decision are provided for by chapter 4 of the SCL Act. The Minister for Natural Resources and Mines would currently be the decider of the application.

The overall project is dependent on being able to transport the coal from the mine to a rail load out facility via the transport corridor. If any permanent impact is to occur to SCL within that corridor, the ability of the project to proceed could be reliant on obtaining a favourable SCL Exceptional Circumstance decision.

RTI DL Release

Attachment B
Queensland Department of Transport and Main Roads response to Dept Environment & Heritage Protections as EIS Coordinating Agency:
Supplementary Environmental Impact Statement (S-EIS) – Springsure Creek Coal Mine Project

Policy & Planning Branch, Department of Transport & Main Roads			
Name:	Mr Tom Orr, A/Director (Development Outcomes)		
Address:	GPO Box 213, Brisbane 4001	Contact:	Mr Michael Nelles, A/ Principal Advisor (Development Outcomes) Ph 3066 1812

Section	Describe the issue [Omission/lack of clarity/incorrectness]	Additional information/ clarification/correction required	Reason for requirement/ other related sections or level of detail required
Final EIS (Suppl.) Chapter 6 Traffic & Transport			
1) Section 6.1.1.1, pg 6-2	This section again states the EIS/ road impact assessment (RIA) do not include providing traffic estimates and assessing the impacts of traffic generated by constructing and operating the transport and infrastructure corridor and the train loadout facility, given they will be dealt with under other approvals. TMR simply wishes to ensure all significant road impacts of the entire project are identified and dealt with and is not sure whether other approvals will be referred to TMR.	In keeping with comments made about the RIA, TMR requires all aspects of traffic generation for the project to be assessed and addressed.	
2) Section 6.6, pg 6-35 and Table 6-14	The issue of the identifying the increased risk of traffic incidents resulting from project traffic was previously commented on in the EIS. Assessing the level of risk seems largely based on current crash rates rather than further road safety assessment, for example, field inspections of the likely high-use routes and whether project traffic may result in road safety hotspots". While road safety audits are proposed at Glenorina Rd/ Gregory Hwy intersection and accommodation village access which will be upgraded to accommodate project traffic (see s6.7.1.2), some further road safety assessment may be warranted.	The proponent should consider undertaking road safety field inspections of most highly used routes to ensure project traffic does not create any road safety "hotspots", including at level crossings.	

3) Section 6.7.1.1, pg 6-39	Previous TMR comments on the EIS about focussing the objectives of the Road-use Management Plan stand.	Given the RIA calculations are re-run prior to project construction, using latest traffic figures but are generally not documented (that is, the RIA report is often not properly updated or published), TMR sees the RMP's purpose as 3 fold: 1) to document finalised impact mitigation strategies, primarily road-use management strategies e.g using buses to limit vehicle trips, managing heavy vehicle and oversize/mass vehicles and so on, but also funded (works or contributions if appropriate, 2) to summarise final traffic generation, and 3) summarise revised impact assessment, in accordance with TMR's guidelines (provided with EIS comments).	
4) Section 6.7.1.3, pg 6-40	This section discusses how the proponent will undertake works in road/rail reserves, but makes no reference to preparing Traffic Management Plans (TMPs) to document how works will be safely undertaken.	The proponent must prepare TMPs to document how works will be safely undertaken, in accordance with TMR's guidelines (attached).	
5) Section 6.7.1.6, pg 6-42	This section states fatigue management will be addressed in the SIMP. TMR believes fatigue management and other road safety issues are road-use management issues best documented in the RMP.	If these strategies are dealt with in the SIMP, they should also be summarised or cross-referenced in the RMP.	
Section 20.5, pg 20-3; Key Commitments	As previously commented on in the EIS, this table lists only 3 commitments with a number of diverse sub-elements. The list should be expanded to more clearly canvass commitments that need to be made.	Commitments should include: <ol style="list-style-type: none"> 1. upgrading local roads; 2. upgrading the state-controlled road (SCR) access at the accommodation village and intersection of Gregory Hwy with Glenorina Rd; 3. develop traffic management plans (TMPs) for those 2 SCR works (above); 4. finalise the RMP; 5. ensure oversize/ over-dimension issues are managed: impacts and permits, not just near schools; 6. revise the RIA with pre-construction traffic numbers if changed significantly; 7. ensure any increased road safety risk from project traffic including at level crossings is dealt with. 	

Attachment B**Queensland Department of Transport and Main Roads response to Dept Environment & Heritage Protections as EIS Coordinating Agency:
Supplementary Environmental Impact Statement (S-EIS) – Springsure Creek Coal Mine Project**

Policy & Planning Branch, Department of Transport & Main Roads			
Name:	Mr Tom Orr, A/Director (Development Outcomes)		
Address:	GPO Box 213, Brisbane 4001	Contact:	Mr Michael Nelles, A/ Principal Advisor (Development Outcomes) Ph 3066 1812

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2) Section 6.6, pg 6-35 and Table 6-14	The issue of the identifying the increased risk of traffic incidents resulting from project traffic was previously commented on in the EIS. Assessing the level of risk seems largely based on current crash rates rather than further road safety assessment, for example, field inspections of the likely high-use routes and whether project traffic may result in road safety hotspots". While road safety audits are proposed at Glenorina Rd/ Gregory Hwy intersection and accommodation village access which will be upgraded to accommodate project traffic (see s6.7.1.2), some further road safety assessment may be warranted.	The proponent should consider undertaking road safety field inspections of most highly used routes to ensure project traffic does not create any road safety "hotspots", including at level crossings.	

3) Section 6.7.1.1, pg 6-39	Previous TMR comments on the EIS about focussing the objectives of the Road-use Management Plan stand.	Given the RIA calculations are re-run prior to project construction, using latest traffic figures but are generally not documented (that is, the RIA report is often not properly updated or published), TMR sees the RMP's purpose as 3 fold: 1) to document finalised impact mitigation strategies, primarily road-use management strategies e.g using buses to limit vehicle trips, managing heavy vehicle and oversize/mass vehicles and so on, but also funded (works or contributions if appropriate, 2) to summarise final traffic generation, and 3) summarise revised impact assessment, in accordance with TMR's guidelines (provided with EIS comments).	
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Section 20.5, pg 20-3; Key Commitments	As previously commented on in the EIS, this table lists only 3 commitments with a number of diverse sub-elements. The list should be expanded to more clearly canvass commitments that need to be made.	<p>Commitments should include:</p> <ol style="list-style-type: none"> 1. upgrading local roads; 2. upgrading the state-controlled road (SCR) access at the accommodation village and intersection of Gregory Hwy with Glenorina Rd; 3. develop traffic management plans (TMPs) for those 2 SCR works (above); 4. finalise the RMP; 5. ensure oversize/ over-dimension issues are managed: impacts and permits, not just near schools; 6. revise the RIA with pre-construction traffic numbers if changed significantly; 7. ensure any increased road safety risk from project traffic including at level crossings is dealt with. 	

Traffic Management Plan

REVISED General Guidelines

Version 1: June 2013

As part of their development application or under an environmental impact assessment (EIS) process, proponents of large development projects are generally required to undertake a road impact assessment (RIA). RIAs should be undertaken in accordance with the Department of Transport & Main Roads' "Guidelines for Assessment of Road Impacts of Development". The RIA identifies and deals with the road impacts of traffic generated by the proposal. This helps manage increased road safety risk, impacts on structures and pavement condition, congestion and intersection performance, maintain community access and amenity and so on.

A Road-use Management Plan (RMP) is then required to demonstrate how road impacts of project traffic, particularly from heavy vehicle use, will be managed during the construction and operational phases of the development project.

Before construction of major development projects, proponents and their consultants must contact the relevant TMR regional office/s before preparing a Traffic Management Plan (TMP).

The **purpose** of the TMP is to document how any required works in or near a State-controlled road will be undertaken in a safe and efficient manner, providing for the needs of other road users, including pedestrians and cyclists. Regional contact officer names will generally have been provided as part of the EIS consultation process.

The TMP should include the following elements:

For the Department of Transport and Main Roads (TMR) a **Traffic Management Plan (TMP)** is a separate document to the Road-use Management Plan (described in its RMP - Revised General Guidelines) and shall be prepared in accordance with the latest edition of the "Manual of Uniform Traffic Control Devices: Part 3 - Works on Roads" (MUTCD) and the TMR Specification: "MRTS02- Provision for traffic".

The Traffic Management Plan shall apply to all works and activities in or near a state-controlled road corridor for each stage of the project, namely planning/ pre-construction, construction, operation, decommissioning (establishment, implementation, commissioning and decommissioning). The TMP is required as part of gaining an approval for such works under the *Transport Infrastructure Act 1994* from the TMR regional office.

In the "*Manual of Uniform Traffic Control Devices: Part 3- Works on Roads*" (MUTCD), the Traffic Management Plan (TMP) is an element in a Traffic Guidance Scheme which should provide for the following:

- Planning, via a traffic guidance scheme
- Traffic management plan, which provides for the following:
 - safety of workers and safety/convenience for road-users;
 - traffic through, past & around the work area (including side-tracks/detours)
 - night conditions
 - pedestrians & cyclists
 - temporary footpaths & pedestrian crossings
 - signage/barrier fences
 - speed zone matters
 - traffic controllers and so on.
- Risk management.

Please refer to the MUTCD and *TMR Specification: "MRTS02- Provision for traffic"* for full details and prepare the TMP in close consultation with TMR's Program Delivery & Operations Division

regional officers. (for contact details visit the departmental website:
<http://www.tmr.qld.gov.au/About-us/Contact-us.aspx>)

For an electronic copy of the *MUTCD* visit the departmental weblink:

<http://www.tmr.qld.gov.au/Business-and-industry/Technical-standards-and-publications/Manual-of-uniform-traffic-control-devices.aspx>

Any necessary approvals/permits for undertaking any works in or near State-controlled road reserves or for access to state-controlled roads should also be applied for and approved while preparing the TMP.

Please contact your regional TMR office for further details.

For further general information on Traffic Management Plans, please contact the Development Outcomes team, Planning Management Branch, Policy, Planning & Investment Division, Brisbane; email: MDP@tmr.qld.gov.au

Before preparing a TMP for TMR, please contact TMR's regional Program Delivery & Operations Division contacts which are provided during the EIS process. Alternatively, for regional contact details, visit the departmental website: <http://www.tmr.qld.gov.au/About-us/Contact-us.aspx>

(Please note: TMR has developed a Traffic Management Company Registration Scheme which requires proponents using traffic controllers to only use registered companies when implementing Traffic Management Plans.)

RTI DL Released

Phillips Erin

From: Pete Jones <PeteJones@bandannaenergy.com.au>
Sent: Thursday, 27 June 2013 11:50 AM
To: Rhodes Monika
Subject: Responses to #17 and #28
Attachments: 17 - s73 irrelevant Confidential - updated.pdf; 28 - s73 irrelevant Confidential - updated.pdf

Hi Monika,

Thank you for alerting us to the responses on two submissions (#17 and #28). Please find complete responses attached.

We are telephoning both submitters and re-sending our responses to them for completeness.

Thanks again,

Pete

Pete Jones

Environmental Approvals Coordinator

BANDANNA ENERGY LIMITED

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Springsure Creek Coal Mine Project

Response to Submission to EIS



13-081

Submission number	Topic	Comment	Recommendation / Suggestion	Response
17.01	Chapter 9 - Groundwater	I have great concerns that the SCC mining could and will affect my ground water supplies, both quantity and quality. Ground waters supply our houses and buildings, as well as nearly all stock water for our property. We normally run over 300 head of cattle and we are concerned about how they would get water if the bores were to drop in capacity and quality, and especially if they went dry overnight. We believe measures should be in place before mining commences in case such events do arise. No-one in the mining company has approached us about our bores, as requested.	We believe our bores should be tested and monitored by sec before, during and after mining. This could be done by drilling several monitoring bores for this purpose. Possibly we could be given guaranteed access to the proposed water pipeline passing our property, or guaranteed supply by other means. Disruption to our ground water supply would have a serious impact on our business.	Subsequent to the EIS being prepared, additional groundwater monitoring has been undertaken, including some at your property. s.73 irrelevant The groundwater assessment completed for the project indicates there is unlikely to be an impact on the groundwater resource in terms of quality or quantity. SCC will install long-term groundwater monitors at a number of locations around the site to monitor impacts on the groundwater system as a result of mining activities. Any impacts will develop over time enabling SCC will work with landholders to relocate or deepen affected bores along with any other water infrastructure (such as pipes and pumps) to ensure ongoing water supply. Section 9.6 outlines mitigation measures that can be undertaken to manage any potential impacts on groundwater.
17.02	Chapter 8 - Surface Water	Overland Flow - I am concerned that the proposed road improvements will cause significant problems during rain and flood events. Elevated road improvements will inevitably cause water to back up and pond, potentially drowning grass and crops. When the water finally breaks through, the fast flowing water will cause serious erosion to land and crops downstream. One only needs to look at the severe damage to land and infrastructure where the Rolleston rail line crosses the Comet River. Not enough thought is put into the effect these changes will have on roads and properties, and the significant damage resulting could greatly impact our ability to continue operating our farming business.		Detailed flood modelling and hydraulic design will be undertaken for proposed local road upgrades. Minor and major flood events will be modelled and design of flow conveyance structures (culverts/bridges etc) will be undertaken to minimise upstream and downstream flooding of properties. Road upgrade designs will also be designed taking into account the flood model developed for the area as part of this project. CHRC, the Department of Transport and Main Roads, the local school bus committee and representatives of the local agricultural committee will be engaged during the design phase to ensure upgrades take into account the needs of all road users.
17.03	Chapter 10 - Air Quality	Dust - s.73 irrelevant information Our winds are predominately from the east to the south. We are very concerned about dust that may blow over our property. We are also seriously concerned that coal dust will have an adverse effect on our health as we have members of our family who suffer from asthma. Any increase in the number of times and severity of asthma attack could be life threatening. We are also extremely concerned about coal dust contaminating our rain water supplies which are our source of drinking water and for chemical application. Loss of our rain water would have a big effect on our daily lives.	Dust monitoring should be a must for those who live down wind of the proposed mine.	SCC understands the impact that dust can have on agriculture, properties and water. Subsequent to the EIS being completed, additional baseline dust monitoring has been undertaken. Air quality modelling undertaken has concluded that no sensitive receptors will experience an adverse impact in air quality as a direct result of the mining operations. Long term air quality monitors will be installed at a number of locations around the site. These monitors will be 'real time' meaning data from the monitors will be communicated to the mine site as it is collected enabling an immediate response to any issues raised.
17.04	Chapter 11 - Noise and Vibration	Noise, vibration and visual amenities - Prevailing winds not only bring dust, but also noise. s.73 irrelevant information we will suffer more noise impact from the increased traffic on the road, as well as probably from mining operations to our south east. Vibration from blasting will be evident, as well as	Due to our close proximity we would want notification of any blasting activities as a common courtesy to surrounding land and homeowners.	A communications plan will be developed which will include protocols for notifying nearby landholders of any activities such as blasting. This plan will be developed in consultation with the landholders to ensure the methods of communication are suitable.

Springsure Creek Coal Mine Project

Response to Submission to EIS



Submission number	Topic	Comment	Recommendation / Suggestion	Response
		increased lighting at night.		
17.05	Chapter 6 - Traffic and Transportation	Over dimensional vehicle management - s.73 irrelevant information s.73 irrelevant information We frequently move oversized farm machinery along many roads in the vicinity of the mining area. With greatly increased traffic flows, shifting oversized machinery will be more difficult, and we are concerned about our ability to continue to do so in a timely and safe manner. The big problem will be the proposed road upgrades that will be needed. Road designs are commonly well above ground level with steep verges. These steep verges make it almost impossible to pull over or off the road with oversized machinery when there is oncoming or following traffic. It may be several kilometres before a suitable site can be found to safely pull over.	This problem could be greatly alleviated with gentle slopes on the road verges and bays to pull off regularly along the roads, say every one to two kilometres.	The local agricultural community is a key stakeholder in the design of local road upgrades. SCC will engage with representatives with the local community, along with CHRC, the Department of Transport and Main Roads and the local School Bus Committee in developing the design of upgrades. As mentioned at the Gindie Public Information Session localised widening features such as pull-off bays can be incorporated into the design to provide safe area for large vehicles to pass each other.
17.06	Chapter 12 - Ecology	We are concerned about the wellbeing and safety of native animals in this area. Currently on s.73 irrelevant information we have a thriving, breeding colony of koalas on land we own s.73 irrelevant information . We have commonly sighted koalas crossing Wyntoon Road, and ourselves and local people recognise and watch out for them. With increased traffic on the road, we believe the koalas existence will be in jeopardy and it will only need a few deaths to decimate the population. We also often see echidnas crossing s.73 irrelevant information and we are concerned about their fate as well. There are also numerous other native animals that use Nine Mile Creek as a nature strip s.73 irrelevant information .	Statement only - no recommendation given	In addition to the mitigation measures to reduce the risk of fauna mortality outlined in Section 12.8.3, SCC will be developing policies and procedures for all staff using local roads. This will include awareness of the presence of local fauna and what to do in the event of an incident.
17.07	Chapter 16 - Economics	We are concerned that the viability of our farming business will be significantly altered and, quite likely, seriously jeopardized by the proposed sec mine. s.73 irrelevant information s.73 irrelevant information s.73 irrelevant information If we are unable to farm that land it will mean 22% loss in our farming area, which will have a huge negative economic impact on our business. s.73 irrelevant information s.73 irrelevant information The loss of this contracting business would represent a further loss of approximately 20% of income of our business. A total loss of some 40% of our business activity would be economically devastating for us, and would quite likely make us unviable.		SCC is committed to maintaining or increasing agricultural productivity on properties directly affected by the mine and as such is not proposing to cease farming activities or cause impacts that result in landholders not being able to farm. Any disruptions to active agricultural activity on areas impacted by mining would be limited to the actual area currently being subsided and the area immediately adjacent. On Cowley, based on the current mine plan, the first subsidence is not scheduled to occur until 2023.
17.08	Chapter 14 - Social Impacts	During the mining boom over the last ten or fifteen years, there has been undoubted growth and gains in housing and businesses in our local towns of Emerald and Springsure. However, such gains in these towns have actually had a negative impact on our business.		Noted.

Springsure Creek Coal Mine Project

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Submission number	Topic	Comment	Recommendation / Suggestion	Response
		<p>All the businesses and services we require to operate our farming business (which include suppliers of seed, chemicals and fuel; and machinery sellers and dealers, tradesmen and so on) all struggle against the high cost of housing and wages and lack of staff, as a result of the booming mining business. This has greatly affected services to our business. For example, it is very difficult to get tradesmen on a timely basis compared to what it was before the mining boom. We believe SCC will be just compounding these difficulties and will therefore have a negative effect on our business.</p> <p>Increased mining activity has also made it extremely difficult for us to freight our produce to markets. Our grain has very limited access to rail transport due to competition from coal, and road transport is difficult to access and expensive as a result of demands from the mining industry and the high freight rates they can afford to pay. SCC will not improve this situation and only add to the problems for our business.</p>		
17.09	Chapter 16 - Economics	<p>Impact on local property values - The EIS only refers to housing property values and ignores the impacts on local rural property values.</p> <p>Farm businesses, like all businesses rely on their equity to fund operation, development and expansion in their business. Farming businesses situated close to the SCC mine now find themselves in a difficult position as the properties are considered to be unsaleable, by both banks and the market. No-one wants to buy a property next to a proposed coal mine. Such property owners are therefore unable to realise their equity if needed. Farmers are concerned about extreme losses in equity because of the property being unsaleable in the event that the banks foreclose. I believe that properties in close proximity to the SCC mine will be devalued if the mine proceeds, which could seriously affect our ability to borrow necessary operating funds for our business in future.</p>		<p>The Economic Report included as Appendix A4-16 to the EIS states in Section 5.11.2.2:</p> <p><i>"The construction and operation of the Project is likely to negatively impact on the demand for rural land in the immediate vicinity of the Project",</i> according to consultation with rural agents in the Study Area. However despite this negative impact on demand, real estate agents in the Study Area reported minimal negative impact on actual sales values as a result of previous mining developments in the region. As a result, the impact of the Project on rural property values due to co-existing land uses is expected to be minimal and restricted to those landholders directly affected by mine site infrastructure."</p> <p>Compensation agreements will be negotiated with those landholders that are proposed to be directly affected by the project and any land valuation issues will be addressed as part of negotiating these agreements.</p>
17.10	Chapter 6 – Traffic and Transport	<p>6.3.9 Movement of Stock</p> <p>This has been by far our greatest concern to date, as we frequently walk cattle § 73 irrelevant information to our yards. The extra traffic will make this almost impossible. To date, two near misses have already occurred involving SCC drilling personnel travelling § 73 irrelevant information</p>	<p>The only way that this can be safely managed will be for SCC to build us new cattle yards and required fencing on our grazing land west of the § 90 irrelevant information</p>	<p>SCC understands the road is a shared community asset and will endeavour to work with stakeholders, including landholders to manage any impacts.</p> <p>Local roads to be used for mine site access are to be upgraded to provide all weather access and a higher level of flood immunity than provided at present. This means roads will be sealed and drainage improved.</p> <p>SCC will work with stakeholders including the Central Highlands Regional Council, the school bus committee and representatives from the local community to discuss the design of local road improvements to cater for all road users, including the movement of stock. Along with local road upgrades, a Road Use Management Plan will be developed. This will include,</p>

Springsure Creek Coal Mine Project

Response to Submission to EIS



Submission number	Topic	Comment	Recommendation / Suggestion	Response
				<p>among other things, initiatives to best manage any potential conflicts between stock movement and mine related traffic. This plan will be reviewed regularly throughout the project to ensure it remains current. This will be reviewed regularly throughout the project to ensure it remains current. SCC is committed to working with stakeholders to develop road user strategies that maximise safety for all road users.</p> <p>SCC will engage further with you in the design of local road upgrades and the development of the Road Use Management Plan to better understand stock movements and how they can be accommodated safely.</p>

Springsure Creek Coal Mine Project

Response to Submission to EIS



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Submission number	Topic	Comment	Recommendation / Suggestion	Response
28.1	Chapter 10 - Air Quality	10.2.3.2 Sensitive Community Receptors "Sixteen sensitive receptors (homesteads) were identified, using aerial imagery and on ground assessment, as having potential to be impacted by the Project activities"		Relevant tables and figures showing sensitive receptors have been updated, including residences on Shalimar.
28.2	Chapter 11 - Noise and Vibration	11.3.2 Sensitive Community Receptors "Sensitive receptors were identified according to schedule 1 of the EP Noise. Based on this, sixteen sensitive receptors (all homesteads) were identified, using aerial imagery and on ground assessment_ as having potential to be impacted by the Project"		As noted above, relevant tables and figures showing sensitive receptors have been updated, including residences on Shalimar.
28.4	Chapter 17 - Hazard and Risk	17.4.1-Sensitive Community Receptors "Fifteen homesteads occur within 16km of the main mine infrastructure area..."		As noted above, relevant tables and figures showing sensitive receptors have been updated, including residences on Shalimar.
28.5	Chapter 18 - Draft EM Plan	18.5.2.2- Sensitive Community Receptors Table 18-10 Sensitive receptor locations within wider Project area 18.5.3.3- Potential/Impacts on the environmental Value Table 18-17 Predicted construction phase noise levels at sensitive receptors Table 18-18 18.5.6.2- Landscape Character and Visual Amenity Figure 18-19 Homestead locations and features of the landscape	In relation to all of the above sections, the property s.73.irrelevant informa Springsure, is not included on any of the sensitive receptor maps or tables within the EIS. s.73.irrelevant information therefore I believe we would be a sensitive community receptor located within the Project area	As noted above, relevant tables and figures showing sensitive receptors have been updated, including residences on Shalimar.
28.6	Chapter 6 – Traffic and Transportation	6.3.1.5 Milroy Downs Road s.73B(2) disclosure log s.73B(2) disclosure log We use Milroy Downs Road on a daily basis to travel to work and to transport our children to the school bus stop and no part of the road is partially sealed. The quality of the gravel on Milroy Downs Road is poor, and the road requires fresh gravel to be laid regularly to make it drivable after rain events. In the Executive Summary E4.3 Traffic and Transport, Milroy Downs Road is not listed as an access route. This is contradicted in Table 6-1 Anticipated Transport routes during construction and operation of the Project, as Milroy Downs Road is included as a route that will be used by mine vehicles.		Milroy Downs Road is not proposed to be used as an access road. As noted in E4.3 and Chapter 6, Section 6.3.1 the proposed site access route will include the Gregory Highway, Glenorina Road, Wyntoon Road and Kilmore Access Road. Section 6.3.1.5 provides an explanation of Milroy Downs Road as part of the surrounding local road network. Local roads to be used for mine site access are to be upgraded to provide all weather access and a higher level of flood immunity than provided at present. This means roads will be sealed and drainage improved. It should be noted this does not mean roads will be flood-proofed. It is expected that some roads will become inundated and impassable in some storm events as currently occurs. SCC will work with stakeholders including the Central Highlands Regional Council and the school bus committee to discuss the design of local road improvements to cater for all road users.

s.73B(2) disclosure log

Springsure Creek Coal Mine Project

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		<p>The ability to maintain Milroy Downs Road as an all-weather road will have to be addressed if mine vehicles are to use Milroy Downs Road as an access route.</p>		
28.7	Chapter 9 - Groundwater	<p>9.6 Mitigation and Management Measures</p> <p><i>9.6.1-Aquifer Cross Contamination</i> <i>Cross contamination of aquifers during construction of the drift can be effectively mitigated by installing groundwater control systems during construction that will limit groundwater entering excavations and hence, cross contamination of aquifers.</i></p> <p>This section does not clarify if there are any methods' they can use to ensure that groundwater is prevented from cross contaminating aquifers. Prevention of cross contamination is of high importance as groundwater is our sole source of drinking water.</p> <p><i>9.6.5 Landholder Bores</i> <i>Any registered landholder bores located in areas of significant drawdown may need to be deepened or replaced.</i></p> <p>If a landholder external to an "area of significant drawdown" experiences a drop in the level of their bore, an avenue of recourse should be made available to them. As bore water is vital both domestically and agriculturally in this community, any significant drop in the level or quality of water within the aquifer will have an adverse effect. Assistance should be provided to all homesteads disadvantaged by changes in water supply.</p>		<p>There is a potential for cross contamination of aquifers during construction of the cut and cover and drift. This has the potential to decrease water quality within the Basalt which is currently used by landholders for domestic, irrigation and stock watering supplies. Without any mitigation, the risk of this occurring has been assessed as 'medium'.</p> <p>Mitigation measures that can be implemented to reduce the risk are outlined in Section 9.6.1.1 which notes: <i>Cross contamination of aquifers during construction of the drift can be effectively mitigated by installing groundwater control systems during construction that will limit groundwater entering excavations and hence, cross contamination of aquifers. These could include:</i> <ul style="list-style-type: none"> • Impermeable cut off structures; and • Groundwater depressurisation systems </p> <p><i>Where any penetration (shaft, drift etc.) intersects multiple geological units it should be engineered such that it does not act as a pathway for migration of water between units.</i></p> <p>SCC will install long-term groundwater monitors at a number of locations around the site to monitor impacts on the groundwater system as a result of mining activities. Any impacts will develop over time enabling SCC will work with landholders to relocate or deepen affected bores along with any other water infrastructure (such as pipes and pumps) to ensure ongoing water supply. We will manage impacts on all landholder bores, whether registered or not.</p>
28.8	Chapter 18 – EM Plan	<p>18.5.4.11 Commitments</p> <p><i>The Proponent will commit to the following:</i></p> <ul style="list-style-type: none"> • <i>The relevant responsible staff member will investigate all substantiated surface water related complaints;</i> <p><i>Community members need to be informed of what constitutes a "substantiated surface water related complaint" and should be informed of any guidelines that need to be met to ensure that health and safety issues are addressed in a timely manner.</i></p> <ul style="list-style-type: none"> • <i>The Project will implement corrective actions resulting from validated complaint investigations as required;</i> <p><i>Community members need to be informed of what constitutes a</i></p>		<p>Information relating to enquiries and complaints is included in Chapter 19 – Draft SIMP.</p> <p>An enquiry and complaints register is being maintained within the stakeholder management database for the Project. This register documents the subject of the enquiry or complaint; record the actions undertaken to respond and close-out issue within specified timeframes. The target time of 24 hours (excluding weekends and public holidays) to acknowledge and respond to a query is being consistently met to date.</p> <p>A central point of contact for all enquiries and complaints is being maintained during the Project to enable the content and distribution</p>

Springsure Creek Coal Mine Project

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		<p><i>"validated" complaint so that any health and safety issues are addressed in a timely manner.</i></p> <p>To date, we have not been contacted by Bandanna regarding the proposed Springsure Creek Coal Mine Project. If the Project proceeds, each community member located within the Sensitive Receptor boundaries should be provided with written instructions on how to proceed with complaints and the contact details for relevant personnel.</p>		<p>of information to the community to be effectively managed and monitored. This central point comprises a 1800 number, project email and online registration form.</p> <p>As the project progresses, and prior to any construction commencing, there will be further engagement with the local community regarding project activities and communication channels.</p>
28.9	Chapter 15 – Health and Safety	<p>Chapter 15.2.4 Surface Water</p> <p><i>"As the project area is located in a predominantly rural location it can be assumed that all homesteads use rainwater tanks for potable water supply."</i></p> <p>It is a gross assumption that all homesteads use rainwater tanks. Our homestead relies solely on bore water for human consumption and all domestic use. We do not have any rainwater connected to the homestead. Therefore we are deeply concerned that the quality of bore water will be reduced if the Project proceeds.</p>		<p>The statement was made in the context of undertaking the air quality assessment and risk to health and safety of residents due to dust deposition potentially affecting drinking water supplies. By assuming that all homesteads use rainwater tanks we are taking a very conservative approach and assessing a 'worst case' scenario.</p> <p>Subsequent to the EIS being completed, additional baseline dust monitoring has been undertaken. Air quality modelling undertaken has concluded that no sensitive receptors will experience an adverse impact in air quality as a direct result of the mining operations.</p> <p>Sources of supply in water in the project area have been reviewed as part of updating the groundwater impact assessment (Chapter 9).</p>
28.10	Chapter 4 - Climate	<p>Table 4.5 Impacts and mitigation measures associated with Climate</p> <p><i>"Excessive rainfall- flooding is not expected to restrict access to the project area as local access roads will be upgraded to a higher level of flood immunity than currently exists."</i></p> <p>there have been a number of excessive rainfall events which have produced flooding that has restricted access to the project area. It is not uncommon for Glenorina Road to be cut off at Sandhurst Creek and Minerva Creek bridges, as well as two other smaller waterways that cross Glenorina Road. On 28th January 2012 a total of 178mm fell in 2 hours as a result of a localized storm cell. A total of 304mm of rain fell in January 2012, which resulted in local roads being impassable on a number of days.</p>		<p>Local roads to be used for mine site access are to be upgraded to provide all weather access and a higher level of flood immunity than provided at present. This means roads will be sealed and drainage improved. It should be noted this does not mean roads will be flood-proofed. It is expected that some roads will become inundated and impassable in some storm events as currently occurs.</p> <p>Flood modelling was undertaken using 86 years of historic data from Bureau of Meteorology (BoM) weather stations, assessing multiple flooding scenarios. BoM data is used as it provides the most accurate data over a historic period of 80 years or more, with known consistent collection methods allowing for direct comparison between multiple stations.</p> <p>Assessment of storms and flooding for the climate change assessment has been based on CSIRO predictions for the area and how this may impact staff and the mining operations. The climate models used provide estimates based on simulated data from baseline sources which assess the probability of weather affecting the site based on historical weather patterns and predicted changes to the site.</p>

Phillips Erin

From: s73 irrelevant information
Sent: Sunday, 14 July 2013 10:57 PM
To: EIS External Submissions; Carlos Reuben; Wells Melissa; Rhodes Monika
Subject: Springsure Creek EIS Response
Attachments: scan0009.pdf; scan0010.pdf

Hi,
Please find attached our cover letter and comments on Bandanna Energies' Response to our submission on the Springsure Creek EIS.

Regards,

s73 irrelevant information

RTI DL Release

Reuben Carlos - Executive Director Central Region
Melissa Wells - Regional Manager Mining
Philip Rowland - Chief Executive Officer &
Monica Rhodes - Principal Environmental Officer
Department of Environment and Heritage Protection
Attention: The EIS Coordinator (Springsure Creek Coal Mine Project)
G.P.O. Box 2454
Brisbane QLD 4001
Email: eis@ehp.qld.gov.au reuben.carlos@ehp.qld.gov.au melissa.wells@ehp.qld.gov.au &
Monika.Rhodes@ehp.qld.gov.au

12th July 2013

Dear Reuben, Melissa, Philip & Monica

Thank you for the opportunity to comment on Bandanna Energies responses to our original submission to the Springsure Creek Coal Mine EIS.

I would like to point out to you that there is no public support for Bandanna Energy's plans to build a mine in the Golden Triangle. I think it timely to point out to you that Bandanna Energy has a very poor reputation in the community, and more so, they have not been doing the right thing by citizens of Queensland. This goes beyond the recent issues of their EIS.

- Bandanna Energy has been drilling throughout the area for many years now, but their track record of rehabilitation is appalling. Landholders had to take Bandanna to the mining warden force them to do rehabilitation. Even after that Audit, there are still drill sites, unsealed bores and drilling sumps left abandoned on SCL land. Some of this work is 4 years old. I point out that rehab should be done within 6 months of drilling and Bandanna Energy has been in breach of their Environmental Authority to explore- this still continues to date. What really burns me, is that this company is out in the public, saying what a great corporate citizen they are, and how they are going to show the world how they can rehab the mined land after they have finished; yet they are absolutely in breach of even the most basic of rehab activities. If there was ever a question as to whether this company could be entrusted to conduct experiment rehabilitation of Strategic Cropping Land after mining, their actions speak louder than words.
- Bandanna Energy were taken to a Judicial Review by Golden Triangle farmers because they "photoshopped" the aerial photos used for their application for a

mining license. They had conveniently replaced grain farming paddocks and irrigation fields and infrastructure with trees. Bandanna conceded defeat, but for some reason their application was never thrown out. I believe that their special exemption relies on the currency of this application.

- Farmers (including myself) who have spoken out about Bandannas behaviour have been threatened to be sued by this company. This has happened on 2 separate occasions and both instances were fully valid situations. Bandanna are using stand over tactics to keep farmers from commenting on their actions. This is disgraceful behaviour by a mining company.
- Bandanna is only an exploration company; they do not yet have approvals to mine. They are now claiming that because that own a farm in Golden Triangle that they have the right to trial unproven rehabilitation methods on it. This isn't a land ownership issue; this is a land use and planning issue. I also notice that Bandanna energy have just put out a media release (attached) stating that ***"sought to clarify its approvals process with the Qld government.....that confirmed that there had been no change to the current approvals process, and that there were no additional approvals that would be required for the Springsure Creek Coal Project."*** This is in direct conflict with Deputy Premier, Jeff Seeney's recent statement that Bandana Energy would have to comply with the Statutory Regional Plans.

Kind regards

s.73 irrelevant information



Response to Bandanna Energy's response 24th June 2013

This information has been compiled in response to the Springsure Creek Coal Mine Project's Environmental Impact Statement (EIS), Bandanna Energy's response to us on the 24th June 2013.

The proponent for the Springsure Creek Coal Mine Project is Springsure Creek Coal (SCC) Pty Ltd, a wholly owned subsidiary of Bandanna Energy Limited (Bandanna). The mining operations and associated infrastructure would be located on mining lease application (MLA) 70486.

The responses tabled by Bandanna Energy is a complete "whitewash" of the entire EIS process and are by no means a satisfactory response to the issues we have tabled in our original EIS submission on the 27/03/2013.

41.01 – As per our original comments it is clear that Bandanna has not addressed the Terms of Reference. The Chief Executive should repeal his decision that the EIS was properly made.

41.02 – Just because Bandanna Energy owns Den-Lo Park it does not give them the right to start an experimental mine on it. This is an issue about land use planning, and rehabilitation and not land ownership. The effect of mining on cropping land may not be apparent for 5, 10, 30, or 70 years after mining has taken place. To claim that they demonstrate co-existence on Den-Lo Park before moving on to neighbouring land is not valid.

We contacted the chairman of the Agricultural Co-existence research committee 7 weeks after the EIS submission process had closed; he had not read the EIS and clearly stated that the committee had nothing to do with the EIS or the approvals process. The job of the committee was to conduct research only.

41.03 – There is a very high risk that cropping land will be permanently damaged as comments in 41.02 this damage may not be apparent until after the project is completed. This is unacceptable for future generations of Australians.

41.04 – Bandanna Energy's response is totally inappropriate. We have spoken to several Mining Engineers and consultants who believe that Bandanna Energy's mine plans, infrastructure and predicted production are completely unrealistic.

41.05 – Contrary to Bandanna Energy's opinion; it is not appropriate to ask for an Environmental approval without clear and detailed plans for rehabilitation of cropping land. Cropping Land is a finite resource that cannot be replaced once damage has occurred. It is beyond belief that a controversial project such as this could ask for approval without these plans.

41.06 - Bandanna Energy is an exploration company who as a company have no proven track record with mining and agricultural production. We have no confidence that the Co-existence Research Committee, who are paid direct by Bandanna Energy, will be able to operate at arms length and be

able to independently define and set the research that is to be conducted in the first place. There is no doubt that there will be restrictions or parameters set by Bandanna Energy, even under the best intentions by Bandanna Energy they will have budget restrictions that will define the scope of what research they can do. Many of the members may also have a perceived conflict of interest as they actively source funding for research for their own organisations or businesses.

I notice in Bandanna Energy's response they have put forward two projects investigating the effect of mining on cropping land. Both of these projects are very narrow in their scope of research and were not continued over an extended period of time. They certainly do not represent the operation and activities of a modern intensive farm. It is important to note that cropping land is a finite resource and will be required by every generation of future Australians. I urge you to view Cotton Australia report on "The risks and impacts of coal mine subsidence on irrigation areas" http://cottonaustralia.com.au/uploads/blog/Subsidence_paper_QLD.pdf This report covers a far wider perspective of the impact of mining on cropping land.

41.07 - Bandanna Energy are being deceptive if not mischievous in stating that our original comments are incorrect. It is widely known that farmers had to take an Environmental audit to DEERM who in turn forced Bandanna Energy to conduct their outstanding rehabilitation work. One particular drill site had a free flowing bore which required immediate intervention. Also of note Bandanna Energy had not completed their annual report or annual return required for their existing EA. A company that is asking the State of Queensland to approve an extremely controversial project on the States most precious farm land should have an impeccable track record when it comes to rehabilitation of existing works. This is an issue of integrity and Bandanna Energy does not deserve the trust of the people of Queensland to conduct mining experiments on protected cropping land.

41.08 - The flood modelling used cut off of the most recent years of data. This date was very important as it contained records showing a return to wet seasons. Prior to this we had a long stretch of droughts. Their general assertion that floods are unlikely to impact the site is unrealistic.

41.09 - As pointed out in our original submission the Springsure Creek EIS should never have been released due to being incomplete as stated in 41.01 it should not rest on us as farm business operators to audit Bandanna Energy incompetent submissions. We have business to run this imposes cost and time burdens on us.

41.10 - As per our original EIS submission the EIS has not identified existing overland flow patterns and it has not explained the impacts of the subsidence on the overland flow.

41.11 - Bandanna Energy cite ACARP research reports C1808 and C15013 to claim that productivity can be maintained on subsided land. As per 41.06 above Cotton Australia's report is at odds with this claim. Once again claiming that the Agriculture Co-existence Committee can prove co-existence in 5 years before continuing mining beyond Den-Lo Park is not possible. As stated earlier problems are likely to arise years after the initial rehab is finished and Bandanna Energy are long gone.

41.12 - Once again due to incompetent work put forward by Bandanna Energy this EIS should never have been released for public comment. In Bandanna Energy's response to us they say they will take

2

Response to the Springsure Creek EIS

s.73 irrelevant information

s.73 irrelevant information

into account the farming practices at the time. With modern farming practises changing all the time, subsidence impacts may jeopardise future farming practises. Subsidence impacts are unacceptable.

41.13 – Bandanna Energy has stated that they have not formulated a plan for subsidence and therefore have no ability to calculate the amount of top soil that they will require as this is an experimental project.

41.14 – Bandanna Energy claim to be committed to co-existence. Their tack record on rehabilitation as discussed earlier makes a mockery of this statement. As stated in 41.11 above Bandanna Energy's claims about maintaining agriculture productivity post mining or the co-existence research committee being able to prove this in 5 years is unrealistic.

41.15 – Evidence shows that coal mining activities have had a negative impact on the general road system of Queensland.

41.16 – no comment

41.17 – Bandanna Energy and the Springsure Creek Coal project lays claim to a 11 Mtpa mine this would be 18% on the Emerald areas 2010 production figures coming from only one mine. To claim that traffic impact would be relatively low is ridiculous.

41.18 - This is a KEY THREATNING PROCESS. It needs to be specifically addressed.

41.19- Once again due to incompetent work put forward by Bandanna Energy this EIS should never have been released for public comment. In Bandanna Energy's response to us they say the will take into account the farming practices at the time. With modern farming practises changing all the time, subsidence impacts may jeopardise future farming practises. Subsidence impacts are unacceptable. As per 41.13 future assessment may require significant amounts of top soil that may not be available.

41.20 – As per 41.19 please note that flood modelling was completed using an old mine plan.

41.21 – As per 41.19 please note that flood modelling was completed using an old mine plan.

41.22- Comments noted. Bandanna Energy has a poor track record of complying with rehab and monitoring requirements as per 41.07

41.23- Baseline Data is not sufficient. This EIS should never have been released. The proposed model, report, mitigation and monitoring strategy is not sufficient. We do not have the option of surface dams for alternative supplies due to soil type, and bore relocation and deepening may not be effective.

41.24- As pre 41.23 above

41.25- Aditonal monitoring claimed by Bandanna Energy could not be sufficient, due to the short time involved.

41.26- Noted

41.27 - We do not have the option of surface dams for alternative supplies due to soil type, and bore relocation and deepening may not be effective.

41.28- As per 41.13

41.29- As pointed out in our original submission the Springsure Creek EIS should never have been released due to being incomplete as stated in 41.01. It should not rest on us as farm business operators to audit Bandanna Energy incompetent submissions. We have business to run this imposes cost and time burdens on us.

41.30- As per 41.29

41.31 - As per 41.29

41.32- As per 41.29

41.33 – Noted.

41.34 – Noted

41.35 – Noted

41.36- Noted

41.37 – On the contrary, Bandanna Energy have demonstrated a complete lack of commitment or responsibility to complete rehabilitation on their existing EA. Paying wages to the Agricultural Coexistence Research Committee members does not demonstrate commitment.

Bandanna has not been compliant on existing annual reports or annual returns required for their existing EA. In fact they may still be in breach. Their track record annual compliance reporting speaks louder than words. This is an issue of integrity and Bandanna Energy does not deserve the trust of the people of Queensland to conduct mining experiments on protected cropping land.

Refer to 41.06 Cotton Australia report "The risks and impacts of coal mine subsidence on irrigation areas"

41.38 – The 3 identified mitigation strategies will not address the problem

41.39 – Once again, we only had 18 days in which to respond to this latest submission. It was not advertised publically that we could even make another submission, so most affected parties have missed out on a chance to reply.

We had asked for an extension on our original EIS submission and were rejected. Since then, Bandanna Energy has been granted 2 separate extensions to respond to us. I ask if the EIS process fair and equitable.

4

Response to the Springsure Creek EIS

s:73 irrelevant information 1

s:73 irrelevant information

41.40 – Noted that Bandanna Energy are not interested in this issue.

41.41 – Noted

41.42 - As pointed out in 41.29

41.43 – Noted

41.44 - As pointed out in 41.29

41.45- This is a major risk to Bandanna Energy's ability to conduct their rehab and commitments to maintaining farmland productivity. It needs to be addressed on such a controversial and risky proposal.

RTI DL Release

Phillips Erin

From: Stephanie Mills <SMills@chrc.qld.gov.au>
Sent: Thursday, 11 July 2013 8:56 AM
To: EIS External Submissions
Subject: SEIS Springsure Creek Coal Mine Project - CHRC Submission
Attachments: Supplementary Environmental Impact Statement.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Springsure Creek Project

Attention – The EIS Coordinator (Springsure Creek Coal Mine Project)

Dear Sir/Madam,

Please find attached Central Highland Regional Council's submission to the Supplementary Environmental Impact Statement.

Please note a hard copy has been mailed to you.

Please contact the nominated officer, David N Brown on (07) 4988 7248 if you require any further information.

Kind Regards,

Stephanie Mills | Admin Assistant - Strategic Planning
Central Highlands Regional Council
Address | PO Box 21 | EMERALD QLD 4720
P 1300 242 686 **D** 07 4982 8327 **F** 1300 242 687
E SMills@chrc.qld.gov.au **W** www.centralhighlands.qld.gov.au
Follow Us facebook.com/centralhighlandsregionalcouncil

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10 July 2013

The Chief Executive
Department of Environment and Heritage Protection
GPO Box 2454
Level 9, 400 George Street
Brisbane QLD 4001

Attention: The EIS Coordinator (Springsure Creek Coal Mine Project)

Dear Sir / Madam,

Re: Comment on Supplementary Environmental Impact Statement

In response to your call for comment on the Supplementary EIS for the Springsure Creek Coal Mine Project, I advise that council officers have reviewed the proponent responses and are generally satisfied with the material supplied. The additional material in the Supplementary EIS and responses to Council's comments addresses the issues raised and we look forward to working with the proponent as the project progresses.

Thank you for the opportunity to provide additional comment on a very extensive Environmental Impact Statement. Council looks forward to working with your department and Springsure Creek Coal Pty Ltd to implement the mitigation strategies outlined, in particular the voluntary Social Impact Management Plan.

Please contact the nominated officer, David N Brown, on 4988 7248 if you require any further information.

Yours faithfully

Section 4(6) Personal Information

Bryan Ottone
Chief Executive Officer

Phillips Erin

From: David N. Brown <miningliaison@chrc.qld.gov.au>
Sent: Wednesday, 10 July 2013 3:52 PM
To: Rhodes Monika
Cc: EIS External Submissions
Subject: Springsure Creek SEIS

Follow Up Flag: Follow up
Flag Status: Flagged

Good afternoon Monika

I am drafting a letter for CEO Bryan Ottone signature advising that Central Highlands Regional Council has no further comments to make on the Springsure Creek SEIS.

As I will be out of office tomorrow and Friday I wanted to be sure you were aware of this in case there were any delays.

Regards

David N. Brown | Mining Liaison

Central Highlands Regional Council

Address | PO Box 21 | EMERALD QLD 4720

P 1300 242 686 **D** 07 4988 7248 **F** 1300 242 687 **M** sct4p4(6) Personal

E miningliaison@chrc.qld.gov.au **W** www.centralhighlands.qld.gov.au

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Phillips Erin

From: Wendy Perberdy <Wendy@brennanmayneag.com.au>
Sent: Friday, 12 July 2013 11:32 AM
To: EIS External Submissions
Cc: s73 Irrelev@bigpond.com
Subject: Response to Springsure Creek Coal Mine Project - Ref CBD/111013 - DR & JK Bate
Attachments: 130712 Response to SCCP.pdf; 130712 Ltr to Springsure Creek Coal.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Attn: Philip Rowland, Project Manager, Statewide Environmental Assessments

Dear Sir

Attached is our covering letter and response to Springsure Creek Coal Mine Project letter dated 21st June 2013 Ref CBD/111013.

Please confirm that you have received this response to e-mail: s73 Irrelev@bigpond.com

Regards

s73 Irrelevant information

This email and its attached document/s (if any) may contain information which is confidential and/or legally privileged. This information is intended only for the use of the individual or entity to which it is addressed. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution or taking of any action in reliance on the contents of this email is strictly prohibited. Please delete the information and notify the sender by return email.

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12th July 2013

**Response to Springsure Creek Coal Mine Project letter dated 21st June 2013
Ref CBD/111013.**

Submission No 10.1

Chapter 9

Groundwater

The issue of groundwater monitoring still has not been addressed fully.

The information you have supplied still indicates that only 15 of the 16 bores have been monitored.

All bores within the local water aquifer must be regularly monitored and checked. We need independently verified monitoring.

We are not prepared to accept the findings and reports of Springsure Creek Coal Mine Project alone.

Submission No 10.2

Chapter 9

Groundwater

The proponents response has not satisfied our concerns.

A medium risk of cross contamination cannot be tolerated. The unmitigated risk is stated as "medium". This is not acceptable. This is a "medium" chance that there will be significant effects on our business.

Submission No 10.3

Chapter 9

Groundwater

The proponent's response to such a serious matter of - "Should impacts occur, SCC will consult with landholders about relocating or deepening affected bores along with any other water infrastructure (such as pipes and pumps) to ensure ongoing water supply."

If bores had to be deepened because of the mining impacts affecting our aquifer levels and cross contaminations, there is absolutely no guarantee that the water quality and flow on rates would be suitable for human consumption and agricultural and stock water use.

An increase in costs to the landholder would be associated with the pumping and monitoring of deeper bores, notwithstanding the problem that the quality of the deeper bore water may not be suitable for agricultural, stock and human consumption.

The country and soil types do not lend themselves to dams. That would not be an option.

We strongly object to such a vague response from the proponents regarding such a potentially serious long term impact.

Submission No 10.4

Chapter 14

Social Impacts

The proponents have only responded to social impacts in a very general and vague manner.

There are absolutely no indications of any formal commitments by Springsure Creek Coal Mine Project to any of the risks and problems associated with this project – just promises.

Submission No 10.5

Chapter 20

Key Commitments

The response from Springsure Creek Coal Mine Project that the ground water assessment indicates - “there is unlikely to be an impact on ground water resources in terms of quality and quantity” is not acceptable.

The consequences and facts are – the underground bore water is used extensively and exclusively for human consumption and all herbicide and insecticide spraying for our cropping enterprises, stock water and feedlot purposes.

Interference with the lowering of the water table in this aquifer would have catastrophic effects to our enterprises. The quality of the deeper bore water could have serious consequences to our operations.

This country and soil types do not lend themselves to dams. They are not successful in our soil types.

So, the potential problem is not “just now” but “***for ever***”.

There are absolutely no concrete assurances by the proponents in their responses - just vague promises.

s.73 irrelevant information

12th July 2013

The Chief Executive
Department of Environment & Heritage Protection
GPO Box 2454
BRISBANE QLD 4001

Attn: Philip Rowland, Project Manager, Statewide Environmental Assessments
EIS Co-ordinator (Springsure Creek Coal Mine Project)

Dear Sir

Please find attached our response to the Springsure Creek Coal Mine Project letter dated 21st June 2013 Ref CBD/111013.

Should you require any further information please do not hesitate to contact us at any time.

Can you please send an e-mail as confirmation you have received our response to

s.73 irrelevant information @bigpond.com

Yours faithfully

s.73 irrelevant information

Phillips Erin

From: Savage Ross
Sent: Wednesday, 10 July 2013 3:04 PM
To: Rhodes Monika; EIS External Submissions
Cc: DAFF_EIS Unit
Subject: FW: DAFF EIS response to the Final EIS for the Springsure Creek Coal Mine Project

Follow Up Flag: Follow up
Flag Status: Flagged

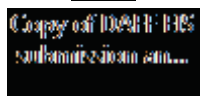
Good afternoon

Attn: Dr Monika Rhodes
The EIS Coordinator – Springsure Creek Coal Mine Project

Dear Dr Rhodes

I refer to your email of 24 June 2013 to the Department of Agriculture, Fisheries and Forestry (DAFF) regarding the Final Environmental Impact Statement (Final EIS) for the Springsure Creek Coal Mine Project.

DAFF has reviewed the Final EIS and has provided comments. Please find attached DAFF's response letter with the whole-of-DAFF submission.

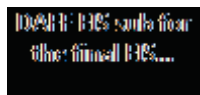


These items were also posted to you today.

Please do not hesitate to contact me if you have any questions.

Also attached is a word copy of the submission, and is provided for EHP purposes only.

King regards



Ross Savage
DAFF EIS Coordination
Agricultural Resources & Planning
Department of Agriculture, Fisheries and Forestry

tel +61 7 3405 6535 (ext 56535)
post GPO Box 46 Brisbane QLD 4001
visit Level 6, 80 Ann Street, Brisbane Queensland 4000

ross.savage@daff.qld.gov.au

www.daff.qld.gov.au

 Please consider the environment before printing this email

Reference: SCCMP Final EIS

Department of
**Agriculture, Fisheries
and Forestry**

10 July 2013

Dr Monika Rhodes
The EIS Coordinator – Springsure Creek Coal Mine Project
Department of Environment and Heritage Protection
GPO Box 2454
BRISBANE QLD 4001

Dear Dr Rhodes

I refer to your email of 24 June 2013 to the Department of Agriculture, Fisheries and Forestry (DAFF) regarding the Final Environmental Impact Statement (Final EIS) for the Springsure Creek Coal Mine Project.

Thank you for providing DAFF with the opportunity to review this project's Final EIS. The respective business areas across DAFF have taken the opportunity to review the project documents and have, where appropriate, provided comments. These comments have been edited and collated in to a whole-of-DAFF submission. Please find enclosed this submission. Could you please forward any future correspondence on this matter, including requests for further information on the technical matters raised in this submission, to the DAFF EIS Coordinator, Mr Ross Savage and also to the daff_eis_unit@daff.qld.gov.au mailbox.

Mr Savage's contact details are: DAFF EIS Coordinator
Attention: Ross Savage
Department of Agriculture, Fisheries and Forestry
Primary Industries Building
Level 6, 80 Ann Street
Brisbane Qld 4000
T: 07 3405 6535, F: 07 3239 3074
E: ross.savage@daff.qld.gov.au

Yours sincerely

Section 4(6) Personal information

for.
Elton Miller
General Manager
Strategic Policy and Planning

Level 6
80 Ann Street, Brisbane
GPO Box 46, Brisbane
Queensland 4001 Australia
Telephone + 61 7 34056535
Facsimile + 61 7 32393074
Website www.daff.qld.gov.au
ABN 66 954341188 276

DEPARTMENT OF AGRICULTURE, FISHERIES AND FORESTRY

Submission on the Final EIS for the Springsure Creek Coal Mine Project (Springsure Creek Coal Pty Ltd).

Section	DAFF Division	Describe the issue	Suggested Solution
Final EIS Chapter 5	Regional Services & Biosecurity Queensland	<p>Issues:</p> <ol style="list-style-type: none"> (s5.4.7, p5-52) In response to DAFF's EIS submission no. 18.16, the information in this section contains generalised descriptions of farm practices in the Central Highlands, but does not provide specific data on the Project area. (RS) (s5.7.5, p5.76) The application of appropriate legislation where chemical control is the proposed mitigation measure for weeds. Herbicides such as flupropanate used to control invasive grasses like tussock, Parramatta, Giant rats tail, Chilean needle and African lovegrass, have long withholding periods and put obligations on landholders to move livestock to clean feed prior to slaughter. (BQ) 	<p>Comments:</p> <ol style="list-style-type: none"> As previously requested, the EIS should address the full requirements of the TOR in particular the existing land uses, any productivity loss due to mine development and how the mine will be designed to minimise the extent of disturbance to existing agricultural activities. The EIS should ensure that the Project is compliant with both the <i>Chemical Usage (Agricultural and Veterinary) Control Act 1988</i> (use controls) and <i>Agricultural Chemicals Distribution Controls Act 1966</i> (licensing controls) to ensure that use of agricultural chemicals or other industrial chemicals does not have an adverse impact on human health, trade or the environment through contamination of agricultural produce. Note: It is essential that landholders are involved in consultation on uses of herbicides to ensure that appropriate risk management actions can be implemented where stock could be exposed.
Final EIS Chapter 7	Biosecurity Queensland	(Table7-2, p7-10) With reference to the management methods for mulching of green waste, this section does not mention plant species that are declared under the <i>Land Protection (Pest and Stock Route Management) Act 2002</i> or declared species under local government laws.	Species that are declared under the <i>Land Protection (Pest and Stock Route Management) Act 2002</i> or declared under local government laws need to be identified in the survey to guide best practice management and disposal of weeds.
Final EIS Chapter 8	Fisheries Queensland	(s8.3.2, p8-6) Further to the response to DAFF's EIS submission no. 18.04 and 18.05, the EIS does not satisfy DAFF's recommendation that consultation between the Proponent and DAFF occur for all waterway works that might affect fish movement.	The EIS should commit the Project to consult DAFF on all matters concerning potential impacts to fish movements including waterway barrier works, irrespective of their location with respect to the MLA.

DEPARTMENT OF AGRICULTURE, FISHERIES AND FORESTRY

Final EIS Chapter 12	Biosecurity Queensland	<p>Issues:</p> <ol style="list-style-type: none"> (s12.6, p12-91) The Project area may be subject to aerial spraying for the management of migratory and spur-throated locusts. (s12.7.7, p12-105 & s14.6.4, p14-39) The EIS does not refer to the possible application of the <i>Plant Protection Act 1989</i>. For example, the whole of QLD is a pest quarantine area for grape phylloxera and the Project site is located in a grape growing area. The Project also transverses the Special Control Zone (which is designated as a phylloxera exclusion zone). For further information refer to - http://www.daff.qld.gov.au/4790_20983.htm#Grape. 	<p>Comments:</p> <ol style="list-style-type: none"> The EIS should acknowledge that the Project area might be subject to the control of locusts, which could include aerial spraying. Any process should be developed in collaboration with state and local authorities. No immediate issues are foreseen, however, there is the possibility that machinery contaminated with plant pests (e.g. insects) or disease (e.g. fungi) could move to, or from, sensitive zones. While it is unlikely that plant and machinery has been in contact with grape vines, general biosecurity awareness of plant risks amongst the workforce can reduce the risk of introducing pests of concern into QLD. The EIS should describe the compliance strategy for the requirements of the <i>Plant Protection Act 1989</i> (e.g. s73 of the subordinate legislation <i>Plant Protection Regulation 2002</i>). For specific movement conditions refer to Inspector's Approval 4.6 - http://www.daff.qld.gov.au/documents/Biosecurity_MovingPlantsAndPlantProducts/IA_4.6.pdf
Final EIS Chapter 16	Regional Services & Plant Industries and Food	<p>Issues:</p> <ol style="list-style-type: none"> (c16) In response to DAFF's EIS submission no. 18.22, the EIS is relying on the Agricultural Research Co-existence Committee to gather and provide relevant information about impacts on agricultural production. The delivery of this work should occur prior to Project's impacts occurring. (RS & PIF) (s16.7.7.1, p16-34) The cumulative impacts that the broader project (that is, the mine and the train load out facility and transport and infrastructure corridor) needs to be examined with regard to the totality of potential impacts on existing agricultural land uses and business enterprises (i.e. productivity and yields, farming systems, cost structures and economic returns). (RS & PIF) 	<p>Comments:</p> <ol style="list-style-type: none"> As previously requested, the Project should determine or provide for an estimate of the costs and value of agricultural production that has been and continues to be generated annually from the Project area. This should be done for a period of years so that seasonal variations can be averaged out. As a demonstration of the Proponent's commitment to coexistence between agriculture and mining, the cumulative impacts should be considered on a whole of project basis, not on separate project components basis, as is the current approach. Without this undertaking, the EIS assessment and mitigation of impacts to potential affected agricultural land uses and business enterprises will remain incomplete. Note: This should be cross referenced with an updated Chapter 20 – <i>Key Commitments</i>.

DEPARTMENT OF AGRICULTURE, FISHERIES AND FORESTRY

		<p>3. (s16.7.7.1, p16-34) The EIS references co-existence between agriculture and mining activities but is silent on how this will be formally managed and delivered for benefit of affected landholders. The Proponent is providing a process via the Agricultural Research Co-existence Committee by which rehabilitation and productivity enhancement measures could be developed, however greater commitment to actions in this regard is sought. (RS)</p>	<p>3.1 The EIS should recognise the important role of Agricultural Management Plans and should commit to finalising these quickly with all affected landholders.</p> <p>3.2 The EIS should commit to detailed planning for the rehabilitation of affected land, including addressing subsidence (including all earthworks and soil renovation procedures), the infrastructure to control runoff on dryland area and distribute water to irrigated areas and the agronomic approaches that will be adopted to improve agricultural productivity. The Agricultural Management Plans should also contain measures to ensure that productivity and economic returns are maintained over the long term. These Plans would also contain alternative strategies should the measures proposed to restore land and maintain productivity are not successful.</p> <p>Notes:</p> <p>A. This should be crossed referenced with an updated Chapter 20 – Key Commitments.</p> <p>B. To support the development of Agricultural Management Plans, the EIS should provide updated subsidence modelling for all affected areas, including modelling of all affected agricultural areas outside of the MLA.</p>
Final EIS Chapter 18	Biosecurity Queensland	<p>(s18.5.8, p18-214) With reference to the statement <i>"This Plan will be developed and implemented prior to commencement of construction through consultation with the Department of Agriculture, Fisheries and Forestry (DAFF), and managed in accordance with the requirements of the LP Act."</i></p>	<p>Comments:</p> <p>1.1 The EIS should ensure that a weed and pest animal management plan be developed consistent with state and local pest and weed priorities.</p> <p>1.2 In addition to state and regional priorities, this plan should align with local government weed and pest animal priorities.</p>

ENDORSED / NOT ENDORSED

Comments

Chapter 6 (6) Personal Information

Date: 10/7/13.

for
Elton Miller
General Manager
Strategic Policy and Planning
Department of Agriculture, Fisheries and Forestry

DEPARTMENT OF AGRICULTURE, FISHERIES AND FORESTRY

Submission on the Final EIS for the Springsure Creek Coal Mine Project (Springsure Creek Coal Pty Ltd).

Section	DAFF Division	Describe the issue	Suggested Solution
Final EIS Chapter 5	Regional Services & Biosecurity Queensland	<p>Issues:</p> <ol style="list-style-type: none"> (s5.4.7, p5-52) In response to DAFF's EIS submission no. 18.16, the information in this section contains generalised descriptions of farm practices in the Central Highlands, but does not provide specific data on the Project area. (RS) (s5.7.5, p5.76) The application of appropriate legislation where chemical control is the proposed mitigation measure for weeds. Herbicides such as flupropanate used to control invasive grasses like tussock, Parramatta, Giant rats tail, Chilean needle and African lovegrass, have long withholding periods and put obligations on landholders to move livestock to clean feed prior to slaughter. (BQ) 	<p>Comments:</p> <ol style="list-style-type: none"> As previously requested, the EIS should address the full requirements of the TOR in particular the existing land uses, any productivity loss due to mine development and how the mine will be designed to minimise the extent of disturbance to existing agricultural activities. The EIS should ensure that the Project is compliant with both the <i>Chemical Usage (Agricultural and Veterinary) Control Act 1988</i> (use controls) and <i>Agricultural Chemicals Distribution Controls Act 1966</i> (licensing controls) to ensure that use of agricultural chemicals or other industrial chemicals does not have an adverse impact on human health, trade or the environment through contamination of agricultural produce. Note: It is essential that landholders are involved in consultation on uses of herbicides to ensure that appropriate risk management actions can be implemented where stock could be exposed.
Final EIS Chapter 7	Biosecurity Queensland	(Table7-2, p7-10) With reference to the management methods for mulching of green waste, this section does not mention plant species that are declared under the <i>Land Protection (Pest and Stock Route Management) Act 2002</i> or declared species under local government laws.	Species that are declared under the <i>Land Protection (Pest and Stock Route Management) Act 2002</i> or declared under local government laws need to be identified in the survey to guide best practice management and disposal of weeds.
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DEPARTMENT OF AGRICULTURE, FISHERIES AND FORESTRY

Final EIS Chapter 12	Biosecurity Queensland	<p>Issues:</p> <ol style="list-style-type: none"> 1. (s12.6, p12-91) The Project area may be subject to aerial spraying for the management of migratory and spur-throated locusts. 2. (s12.7.7, p12-105 & s14.6.4, p14-39) The EIS does not refer to the possible application of the <i>Plant Protection Act 1989</i>. For example, the whole of QLD is a pest quarantine area for grape phylloxera and the Project site is located in a grape growing area. The Project also transverse the Special Control Zone (which is designated as a phylloxera exclusion zone). For further information refer to - http://www.daff.qld.gov.au/4790_20983.htm#Grape. 	<p>Comments:</p> <ol style="list-style-type: none"> 1. The EIS should acknowledge that the Project area might be subject to the control of locusts, which could include aerial spraying. Any process should be developed in collaboration with state and local authorities. 2. No immediate issues are foreseen, however, there is the possibility that machinery contaminated with plant pests (e.g. insects) or disease (e.g. fungi) could move to, or from, sensitive zones. While it is unlikely that plant and machinery has been in contact with grape vines, general biosecurity awareness of plant risks amongst the workforce can reduce the risk of introducing pests of concern into QLD. The EIS should describe the compliance strategy for the requirements of the <i>Plant Protection Act 1989</i> (e.g. s73 of the subordinate legislation Plant Protection Regulation 2002). For specific movement conditions refer to Inspector's Approval 4.6 - http://www.daff.qld.gov.au/documents/Biosecurity_MovingPlantsAndPlantProducts/IA_4.6.pdf
Final EIS Chapter 16	Regional Services & Plant Industries and Food	<p>Issues:</p> <ol style="list-style-type: none"> 1. (c16) In response to DAFF's EIS submission no. 18.22, the EIS is relying on the Agricultural Research Co-existence Committee to gather and provide relevant information about impacts on agricultural production. The delivery of this work should occur prior to Project's impacts occurring. (RS & PIF) 2. (s16.7.7.1, p16-34) The cumulative impacts that the broader project (that is, the mine and the train load out facility and transport and infrastructure corridor) needs to be examined with regard to the totality of potential impacts on existing agricultural land uses and business enterprises (i.e. productivity and yields, farming systems, cost structures and economic returns). (RS & PIF) 	<p>Comments:</p> <ol style="list-style-type: none"> 1. As previously requested, the Project should determine or provide for an estimate of the costs and value of agricultural production that has been and continues to be generated annually from the Project area. This should be done for a period of years so that seasonal variations can be averaged out. 2. As a demonstration of the Proponent's commitment to coexistence between agriculture and mining, the cumulative impacts should be considered on a whole of project basis, not on separate project components basis, as is the current approach. Without this undertaking, the EIS assessment and mitigation of impacts to potential affected agricultural land uses and business enterprises will remain incomplete. Note: This should be cross referenced with an updated Chapter 20 – <i>Key Commitments</i>.

DEPARTMENT OF AGRICULTURE, FISHERIES AND FORESTRY

		<p>3. (s16.7.7.1, p16-34) The EIS references co-existence between agriculture and mining activities but is silent on how this will be formally managed and delivered for benefit of affected landholders. The Proponent is providing a process via the Agricultural Research Co-existence Committee by which rehabilitation and productivity enhancement measures could be developed, however greater commitment to actions in this regard is sought. (RS)</p>	<p>3.1 The EIS should recognise the important role of Agricultural Management Plans and should commit to finalising these quickly with all affected landholders.</p> <p>3.2 The EIS should commit to detailed planning for the rehabilitation of affected land, including addressing subsidence (including all earthworks and soil renovation procedures), the infrastructure to control runoff on dryland area and distribute water to irrigated areas and the agronomic approaches that will be adopted to improve agricultural productivity. The Agricultural Management Plans should also contain measures to ensure that productivity and economic returns are maintained over the long term. These Plans would also contain alternative strategies should the measures proposed to restore land and maintain productivity are not successful.</p> <p>Notes:</p> <p>A. This should be cross referenced with an updated Chapter 20 – Key Commitments.</p> <p>B. To support the development of Agricultural Management Plans, the EIS should provide updated subsidence modelling for all affected areas, including modelling of all affected agricultural areas outside of the MLA.</p>
Final EIS Chapter 18	Biosecurity Queensland	<p>(s18.5.8, p18-214) With reference to the statement <i>“This Plan will be developed and implemented prior to commencement of construction through consultation with the Department of Agriculture, Fisheries and Forestry (DAFF), and managed in accordance with the requirements of the LP Act.”</i></p>	<p>Comments:</p> <p>1.1 The EIS should ensure that a weed and pest animal management plan be developed consistent with state and local pest and weed priorities.</p> <p>1.2 In addition to state and regional priorities, this plan should align with local government weed and pest animal priorities.</p>

ENDORSED / NOT ENDORSED

Comments

Date: / /

Elton Miller
General Manager
Strategic Policy and Planning
Department of Agriculture, Fisheries and Forestry

DEPARTMENT OF AGRICULTURE, FISHERIES AND FORESTRY

RTI DL Release

Phillips Erin

From: GRAINGER, Catherine <Catherine.GRAINGER@dete.qld.gov.au>
Sent: Wednesday, 10 July 2013 2:12 PM
To: EIS External Submissions
Cc: Rhodes Monika
Subject: FW: Reminder - comments on SEIS for Springsure Creek due this Friday

Hello Monika

Skills and Employment in the Department of Education Training and Employment (DETE) have no comment to make on the Supplementary EIS for Springsure Creek. The proponent has noted our request to meet with them at/ or after FID when they are developing the detail of their skilling and employment strategies.

However the SEIS makes reference to meeting with Skills Queensland on these strategies as well. Please be advised that the functions of Skills Queensland are transitioning back to DETE. The final structure for future industry consultative arrangements is still under review. When these arrangements are complete we will provide you with the appropriate contact details to share with the proponents.

Regards
Cathie

Catherine Grainger

Principal Program Officer | Skills and Employment | 07 3237 0650

From: Rhodes Monika [[mailto:](mailto:monika.rhodes@ehp.qld.gov.au)]
Sent: Wednesday, 10 July 2013 7:15 AM
Subject: Reminder - comments on SEIS for Springsure Creek due this Friday

Dear All

Please keep in mind that the comments on any outstanding issues on the SEIS for the Springsure Creek Coal Mine Project are due this Friday, 12 July 2013 COB.

Your advice should be forwarded to:

The EIS Coordinator – Springsure Creek Coal Mine Project
Department of Environment and Heritage Protection
GPO Box 2454 BRISBANE QLD 4001
Level 9, 400 George Street BRISBANE QLD 4000
or by email to eis@ehp.qld.gov.au.

Note that EHP has only 20 bd to make a decision.

Kind regards

Dr Monika Rhodes
Principal Environmental Officer
Statewide Environmental Assessments
Telephone 07 3330 6293 **Facsimile** 3330 5875
Email: monika.rhodes@ehp.qld.gov.au
www.ehp.qld.gov.au

From: Rhodes Monika
Sent: Tuesday, 25 June 2013 12:24 PM
Subject: RE: SEIS_Email-Out_submission of supplementary EIS_Springsure_20130624

Dear All

Please note that the proponent will not send out hard copies, but electronic copies of the amended EIS (as sticks), including the response to your submissions. I have heard that the proponent has sent them only yesterday (Monday).

Alternatively, the amended EIS can be accessed through the proponent's web page:
<http://www.springsurecreekproject.com.au/project-development-and-approvals/springsure-creek-coal-mine-eis>

Please note that there was some confusion regarding the term 'final EIS' – as labelled on the documents; however, this EIS is the amended EIS (or supplementary EIS) based on submissions.

If you have any questions, please don't hesitate to contact me.

Regards

Dr Monika Rhodes
Principal Environmental Officer
Statewide Environmental Assessments
Telephone 07 3330 6293 **Facsimile** 3330 5875
Email: monika.rhodes@ehp.qld.gov.au
www.ehp.qld.gov.au
Department of Environment and Heritage Protection
Level 9, 400 George Street, Brisbane Q 4000
GPO Box 2454, Brisbane Q 4001

From: Rhodes Monika
Sent: Monday, 24 June 2013 7:50 AM
Subject: SEIS_Email-Out_submission of supplementary EIS_Springsure_20130624

Dear All

Your organisation lodged a submission on the environmental impact statement (EIS) for the proposed Springsure Creek Coal Mine Project, located 47 kilometres south-east of Emerald in central Queensland.

The proponent, Springsure Creek Coal Pty Ltd, has prepared a supplementary EIS and response to submissions that were received during the public notification period for the EIS. In the interests of facilitating the assessment of submissions provided by your department, please consider the response to your submissions and advise the Department of Environment and Heritage Protection (EHP) of any comments or recommended conditions that should apply to the project by **close of business Friday, 12 July 2013** (note that EHP will have to make a decision under section 56A of the *Environmental Protection Act 1994* if the EIS can proceed within 20 bd, so any comments should be received by 12/07/13; the Act does not allow for any extensions).

Your advice should be forwarded to:

The EIS Coordinator – Springsure Creek Coal Mine Project
Department of Environment and Heritage Protection
GPO Box 2454 BRISBANE QLD 4001
Level 9, 400 George Street BRISBANE QLD 4000
or by email to eis@ehp.qld.gov.au.

Should you have not received a copy of the SEIS and a response to your submission by COB today, please contact Mr Pete Jones, Springsure Creek Pty Ltd (Bandanna Energy), on 3041 4434.

I will be the EIS Coordinator and primary contact for this project.

Kind regards

Dr Monika Rhodes
Principal Environmental Officer
Statewide Environmental Assessments
Telephone 07 3330 6293 **Facsimile** 3330 5875
Email: monika.rhodes@ehp.qld.gov.au
www.ehp.qld.gov.au
Department of Environment and Heritage Protection
Level 9, 400 George Street, Brisbane Q 4000
GPO Box 2454, Brisbane Q 4001

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Phillips Erin

From: Mark Allen <Mark.ALLEN@communities.qld.gov.au>
Sent: Friday, 12 July 2013 9:49 AM
To: EIS External Submissions
Subject: Springsure Creek SEIS

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Monika

The Department of Housing and Public Works has reviewed the SEIS for Springsure Creek and considers that issues of concern have been adequately addressed and does not wish to raise any further comment.

Regards

Mark Allen

Senior Housing Analyst | Planning Supply & NRAS

Housing Programs | Department of Housing & Public Works

Level 9, 61 Mary Street, Brisbane Qld 4000

T: 07 3238 3973 | **F:** 07 3227 8094 | **E:** mark.allen@communities.qld.gov.au

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Phillips Erin

From: KROSCH Neil
Sent: Wednesday, 10 July 2013 11:11 AM
To: Wirth Jacqueline; IRWIN Malcolm; Smith Wedeena
Cc: Rhodes Monika
Subject: Comments on Springsure Creek SEIS

Follow Up Flag: Follow up
Flag Status: Flagged

Jackie, Mal, Wedeena

Following a couple of conversations with people at DEHP (Monika Rhodes and Greg Tkai), I have been encouraged to put some comments together on a couple of aspects of the Springsure Creek SEIS, as follows, for incorporation in the consolidated response from DNRM. Please take these in the context of any other comments provided on the same topics. If already covered by other contributions, then you can ignore, if in conflict with any other comments, then use your judgement.

Subsidence modelling

The modelling of subsidence over the mine area as presented in the EIS was based on a mine plan designed to fit within the boundaries of the then ML application. Since that time, the original ML application was rejected and a new ML application has been lodged, with boundaries that are marginally different and over a marginally smaller area than the original. Although the longwall panel layout has been amended (essentially by shortening panels to fit within the new ML boundary), there has been no matching subsidence model presented in the SEIS to show how subsidence at the periphery of the mine plan will relate to the new ML boundary. This is important as DNRM will not permit any subsidence to be caused to any area outside the boundary of the company's ML and the surface area held under same. It is recommended that a new subsidence model/plan be presented showing the most up to date ML boundary and mine plan (longwall layout) and the surface expression of subsidence that is predicted relative to those.

The SEIS also includes a modelled subsidence plan showing predicted pondage areas on the surface caused by the layout of the subsurface longwall panels and pillars. This plan overlays the "ponding" areas over existing surface drainage but does not show any interpretation of changes to surface drainage patterns that may occur "naturally" as a result of subsidence, or of surface engineering works that may need to be done to realign surface drainages to minimise the effects of ponding. It is recommended that another plan be provided to show an interpretation of the surface drainage pattern that is expected to exist post-subsidence.

Hope this helps.

Neil

Neil Krosch
Case Manager
Mining and Petroleum Operations
Service Delivery
Department of Natural Resources and Mines
Level 16, 61 Mary Street
Brisbane QLD 4000
PO Box 15216 City East QLD 4002
Telephone 3199 8081* Facsimile 3238 3188
Mobile (b) (6) Personal info
Email neil.krosch@dnrm.qld.gov.au
Website www.dnrm.qld.gov.au

* Please note new telephone number

Phillips Erin

From: Smith Wedeena on behalf of DACoordinationMackay
Sent: Friday, 12 July 2013 5:10 PM
To: Rhodes Monika; EIS External Submissions
Cc: DACoordinationMackay
Subject: DNRM Submission on the supplementary EIS for Springsure
Attachments: Springsure Creek SEIS Attachment 1.pdf; Springsure Creek SEIS.pdf

Monika

Please find attached our submission on the project. As you are aware I am not back in the office until Wednesday so if you have any concerns in my absence please contact Alison Hambleton in my absence.

Regards

Wedeena Smith

senior natural resource officer | regional planning and coordination | department of natural resources and mines
t: 07 4999 6914 | f: 4999 6903 | m: sch4p4(6) Personal inf | e: wedeena.smith@dnrm.qld.gov.au

Please note that I am at work part time – Wednesdays, Thursdays and Fridays

From: Rhodes Monika
Sent: Monday, 24 June 2013 7:50 AM
Subject: SEIS_Email-Out_submission of supplementary EIS_Springsure_20130624

Dear All

Your organisation lodged a submission on the environmental impact statement (EIS) for the proposed Springsure Creek Coal Mine Project, located 47 kilometres south-east of Emerald in central Queensland.

The proponent, Springsure Creek Coal Pty Ltd, has prepared a supplementary EIS and response to submissions that were received during the public notification period for the EIS. In the interests of facilitating the assessment of submissions provided by your department, please consider the response to your submissions and advise the Department of Environment and Heritage Protection (EHP) of any comments or recommended conditions that should apply to the project by **close of business Friday, 12 July 2013** (note that EHP will have to make a decision under section 56A of the *Environmental Protection Act 1994* if the EIS can proceed within 20 bd, so any comments should be received by 12/07/13; the Act does not allow for any extensions).

Your advice should be forwarded to:

The EIS Coordinator – Springsure Creek Coal Mine Project
Department of Environment and Heritage Protection
GPO Box 2454 BRISBANE QLD 4001
Level 9, 400 George Street BRISBANE QLD 4000
or by email.

Should you have not received a copy of the SEIS and a response to your submission by COB today, please contact Mr Pete Jones, Springsure Creek Pty Ltd (Bandanna Energy), on 3041 4434.

I will be the EIS Coordinator and primary contact for this project.

Kind regards

Dr Monika Rhodes
Principal Environmental Officer

Statewide Environmental Assessments
Telephone 07 3330 6293 **Facsimile** 3330 5875
Email: monika.rhodes@ehp.qld.gov.au
www.ehp.qld.gov.au

Department of Environment and Heritage Protection
Level 9, 400 George Street, Brisbane Q 4000
GPO Box 2454, Brisbane Q 4001

RTI DL Release

Springsure Creek Coal Project Supplementary EIS

Submission prepared by
Department of Natural Resources and Mines
July 2013

Water Management and Use – Groundwater

General Comment

Firstly it should be noted that in the document provided by Bandanna Energy, 'Response to Submissions to EIS' the responses provided in relation to comments made by DNRM on groundwater related issues were in places poor and at times did not address the comment. However a review of the updated groundwater report often resulted in answers to the original comments being obtained.

It is noted that Water Resource Australia Pty Ltd have reviewed the updated groundwater model and provided comment. Water Resource Australia have generally supported the quality of the modelling work carried out, with some qualifications. It is a positive step that Bandanna have arranged for this peer review of the groundwater model. The comments of Water Resource Australia, the updated model report and draft EMP have been reviewed by DNRM along with the proponent's responses referred to above. The more significant outstanding issues are noted below.

Monitoring Bores

Issue

It should be noted that in the course of the groundwater investigation work carried out as part of this EIS, nine monitoring or production bores were drilled. Of these bores strata details are supplied for two (SPR107C and SPR138) and construction details supplied for four bores in the original EIS. In the SEIS documents, basic construction details are supplied for the nine bores, but no additional strata details are provided.

Recommendation

Strata details are required to be provided for the remaining seven bores.

Section 9.5.4.3 – Calibrated Model (Page-9-77)

Issue

In table 9-20 a vertical hydraulic conductivity (permeability) for the Rewan Formation of 1×10^{-6} m/day has been adopted. In determining this figure, references are provided for work carried out by AGE on the Ensham mine in 2006 and by Ausenco – Norwest (2012) in work carried out on a groundwater model for the northern Bowen Basin for Arrow Energy.

However recent work carried out by AGE in 2013 for Minyango (Blackwater) suggest a vertical hydraulic conductivity for the Rewan of 5.4×10^{-5} m/day. Additionally recent work carried out in the southern Galilee Basin in the Alpha area has seen URS (2012) adopt a vertical hydraulic conductivity for the Rewan of 9×10^{-5} m/day for the Alpha/ Kevins Corner model and Heritage Computing (2013) adopt 9.3×10^{-5} m/day for the Galilee Coal Project model. These figures all relate to a formation not yet fractured by the effects of goafing.

In the Springsure Creek model, in the lower fractured zone, an adjusted vertical

hydraulic conductivity of 1×10^{-5} m/day is adopted, which is still considerably lower than the unfractured figures quoted above.

In section 9.5.6.1 it is noted that the vertical hydraulic conductivity is one of a number of parameters to which drawdown predictions are sensitive. This is to be expected as the connection of the basalt aquifer to the dewatered coal measures is directly linked to the vertical hydraulic conductivity of the Rewan Formation which separate them.

In a sensitivity analysis carried out for Springsure Creek the unfractured Rewan vertical conductivity is increased to 1×10^{-5} m/day which is meant to represent a worst case scenario. This approach of sensitivity/ uncertainty testing is supported but again this figure is significantly lower than those quoted above from other mines in Central Queensland so it does not qualify as a worst case scenario.

In the peer review carried by Water Resource Australia it was noted that *while literature references and comparisons are required, it does not completely overcome the need for more site specific data and investigations*. It was further noted that *No packer tests or core permeability test results at site are provided in the report*.

The vertical hydraulic conductivity of the Rewan is probably the most important groundwater issue at this time as it directly dictates the predicted impact on the overlying basalt aquifer and its users.

Recommendation

It is recommended that a further model run/ sensitivity/ uncertainty analysis be carried out using an unfractured vertical hydraulic conductivity figure of 1×10^{-4} m/day which would then be increased in fractured zones. This will then provide a more appropriate upper limit of potential impacts.

Section 9.5 – Groundwater Impact Assessment (Page- 9-60)

Issue

The groundwater model has been developed with no flow boundaries on most boundaries of the model. This means that with the exception of the north east corner of the model, groundwater cannot flow into or out of the model area.

The peer review by Water Resource Australia identified the no flow model boundaries on much of the model as atypical of most modelling projects. Furthermore, they noted that the conceptualisation of the how the system operates, in justifying the no flow boundaries was *based upon data primarily sourced from local water table aquifers with very little data from the deeper geologic units, in particular the coal seams*. The concerns about the lack of data in the deeper formations mirror those expressed by DNRm in response to the EIS.

Water Resource Australia also raise concern about evapotranspiration being the primary source of outflow from the model.

It would appear from the plots provided in Figure 9-37 using the limited historical data available that a combination of the model boundaries and application of recharge and evapotranspiration has resulted in the models inability to match the observed water level declines and rises caused by drought and high rainfall events.

It is considered that more work will be required in relation to these issues in the future to refine the model but for now they are not considered critical.

Recommendation

In future updates of the model the suitability of existing model boundary conditions and application of recharge and evapotranspiration should be addressed to more accurately simulate local hydrogeological conditions.

Section 9.3.3.3 – Title Geologic Structures (Page- 9-15)

Issue

The following description of the Albinia Fault is provided:

A northwest to southeast trending fault called the Albinia Fault traverses along the east of EPC891 (Xenith 2011, Resolve Geo 2011). No significant vertical displacement from one side of the fault to the other has been identified, although a sudden change in the thickness of the Aries 2 seam across the fault is observed. The location of Albinia Fault, as presented in Resolve Geo (2011), is shown in Figure 9-6. Other faults identified in the Project area shown in Figure 9-6 are interpreted to terminate in the basement and do not extend up into the Bandanna Formation (Xenith 2011). The Bandanna Formation and the sedimentary sequence above the Mantuan Formation, occurring approximately 300m below the Aries 2 seam, are interpreted to be notably free of faulting (Resolve Geo 2011).

Figure 9-8 in the groundwater report appears to indicate that there is significant displacement in the Bandanna formation and the Triassic sediments with the fault extending up to ground level. It would appear that the figure contradicts the text.

In section 9.3.6.3 it is stated:

The northwest to southeast trending Albinia Fault traverses along the east of EPC891. With the exception of a sudden change in the thickness of the Aries 2 seam, no displacement of strata has been identified on either side of this fault (Xenith 2011). Therefore the fault is considered unlikely to act as a barrier to horizontal flow along the coal seams although the fault surface, if altered to clay, may locally restrict groundwater flow. Other faults in the Project area are interpreted to terminate within the bedrock at some depth below the Bandanna Formation. The regional groundwater flow along the coal seams would be expected to be most sensitive to the lateral continuity, thickness and associated transmissivity of the coal seams.

Given that the existence of a significant fault in the Rewan could compromise its integrity as an aquitard, there needs to be consistency on how this issue is reported. Is the Rewan Formation faulted or likely to be faulted or not?

Recommendation

Clarification should be provided on the extent of faulting in regard to the Rewan Formation and its potential to effect existing modelled impact predictions.

Section 18.5.4.9 – Environmental Management Plan, Control Strategies (Page- 18-103)

Issue

In this section it is stated:

As drawdown depends on a range of factors, its impacts are best managed adaptively. Adaptive management involves monitoring groundwater impacts and, based on the severity of impacts, modify the mine plan as mining takes place such that impacts could be limited to within designated ranges. In the event impacts are detected, potential adaptation strategies include modifying the dimension of panels, the order of mining of panels or the installation of bulkheads to allow some mined areas (goafs) to refill with groundwater, without water draining from those areas contributing to subsequent dewatering requirements.

This information constitutes a discussion rather than a commitment. There is no discussion about what will trigger the adaptive management. How will trigger levels be developed? There is a commitment in section 18.5.4.11 to develop a groundwater management plan but it is not clear what will be in this plan. Will it include information relevant to adaptive management as discussed above?

Recommendation

The proponent must clearly articulate how the proposal of adaptive management will be developed and function.

Section 18.5.4.9 – Environmental Management Plan, Control Strategies (Page-18-103)

Issue

The following is provided;

Any landholder bores located in areas of significant drawdown which result in an inability or reduction in access to groundwater volumes may need to be deepened or replaced. This is in addition to any structural damage to bores occurring due to subsidence. In most cases, the Basalt aquifer will have sufficient saturated thickness to enable deepening of wells. Four registered bores (RN57358, 57359, 57360 and 57361), are located in where the modelled initial saturated thickness of the basalt aquifer is less than 40 m. Deepening of these bores may not be possible and these bores may need to be re-located. In the event that groundwater bores are damaged due to mining activities, SCC will maintain supply of groundwater as agreed with the landholder.

There appears to be no clear cut commitment about what agreements will be entered into with the landowners and when this will occur. In fact, there appears to be little change in the words provided at EIS stage where it was pointed out that a stronger clearer commitment was required.

Recommendation

The proponent must commit to enter into agreements, prior to mining commencing, with those landowners predicted to be impacted and with others as additional information indicating impacts or potential impacts, becomes available. There must also be a commitment to replace diminished groundwater with the same quantity and quality or better.

Section 3.4.3 – Ongoing Evaluation and Exploration Activities (Page 3-27 to 3-29)

Issue

Thank you for providing the local project area cross-sections. However they require greater vertical exaggeration in order to be interpreted correctly.

Recommendation

Please increase the vertical exaggeration in the project cross-sections.

Water Management and Use – Groundwater Dependant Ecosystems

Section 18.5.4.6 – Environmental values including GDEs (Page 18-97) and parallel section in Chapter 9.

Issue

The mapping in Figure 9-22 is not from EHP but is from the National Atlas of Groundwater Dependent Ecosystems, and indicates that a high potential for GW interaction exists in a significant portion of the project area.

It is an assumption to state that the predicted maximum drawdown of 0.5m, which would be permanent, is comparable to natural system variability. No evidence to prove this assumption is provided. It is hoped that the fractures do not propagate into the basalt, but if they do, there may be significant effects on the deeply rooted components of GDEs. There is no evidence to suggest that these potential GDEs can survive a drought coincident with a permanent drawdown of 0.5m.

Recommendation

Replace:

Although current EHP mapping indicates no GDEs or springs occur within approximately 100 km of the Project area, there is a potential for these to occur along Springsure and Station Creek. The predicted maximum drawdown along these creek systems is approximately 0.5 m. Potential GDEs include deep rooted plants that are drought tolerant and may adjust to declines in groundwater levels without adverse health effects, however in periods of low rainfall, the dependence of GDEs on groundwater is higher.

The predicted reduction in the evapotranspiration rate is likely to be comparable to the systems natural variability, although this is based on a conservative assumption that the fractures above the goaf extends into the Basalt by several 10s of metres in parts of the mine area and that the vertical hydraulic conductivities of key aquitards are an order of magnitude greater than the current best estimates. A model scenario based on local experience indicates that there will be no drawdown related impacts to GDEs as fractures are not assumed to extend into the Basalt.

On this basis, the risk to GDEs is estimated to be medium assuming that some of the deep rooted plants in the riparian zone have high dependence on groundwater particularly during low rainfall periods. It is therefore expected that there will not be any significant impacts to riparian vegetation.

With:

The National Atlas of Groundwater Dependent Ecosystems indicates that there are areas with a high potential for GDEs in the Project area. In periods of low rainfall, the dependence of GDEs on groundwater is higher. As the predicted maximum

drawdown along some creek systems is approximately 0.5 m, in periods of low rainfall, there may be impacts on GDEs.

The risk to GDEs is considered to be medium, based on conservative assumptions that:

- the fractures above the goaf extend into the basalt by several 10s of metres in parts of the mine area*
- some of the deep rooted plants in the riparian zone have high dependence on groundwater particularly during low rainfall periods.*

However, a model scenario based on local experience indicates that there will be no drawdown related impacts to GDEs as fractures are not assumed to extend into the basalt. It is therefore assumed that there will not be any significant impacts to riparian vegetation.

Section 18.5.4.9 – Control Strategies (groundwater – environmental values) (Page 18-101)

Issue

The statement about a water level decline not affecting GDE health is immediately followed by a statement to the effect that, as GW becomes less available, fringing vegetation will transpire less. This is actually a statement about declining health.

Enhanced recharge through increased ponding (a major system change) is generally not considered desirable for the ecosystems or groundwater systems already present.

Recommendation

Please remove the paragraph:

Although a decline in water levels is predicted to occur, there are several ways in which the regional water balance could adjust without adverse effects on the health of GDEs. One possibility is that as the water table declines, fringing vegetation takes less water by evapotranspiration such that withdrawal of groundwater is balanced by a slight decrease in evapotranspiration from vegetation throughout the region. Another possibility is that re-directed flow during episodic flood events continues to supply recharge to the Alluvium that allows water table elevations to recover. Recharge may locally be enhanced as a result of cracking of stream bed and increased ponding depth above subsided panels.

Section 18.5.4.9 – Control Strategies (groundwater - management of drawdown) (Page 18-103)

Issue

Fracturing may impact on both GW levels (drawdown) and surface topography (subsidence). This in turn may impact on environmental values associated with GDEs, water bore function and agricultural practices.

Drawdown: The discussion about drawdown impact mitigation strategies is good overall, but this section is not clear about how fracturing extents will be monitored – is it through monitoring GW levels alone? What would be the triggers for the implementation of mitigation measures? Have there been other projects where bulkheads or grout injection were successfully implemented as mitigation measures?

Subsidence: There is no indication in the SEIS of what the control strategies,

remediation is, or the mitigation measures are, for impacts to GDEs from subsidence.

Recommendation

The discussion about adaptive fracture-related drawdown management needs to be strengthened with commitments about the drawdown impact mitigation strategies. Cite instances where mitigation measures for fracture-related drawdown impacts have been successfully implemented. State what the trigger levels would be for the measures to be implemented.

Add a discussion that includes monitoring methods, triggers and commitments about mitigation and remediation for subsidence-related impacts on GDEs. If possible it should be related to the mitigation measures and commitments about fracture-related drawdown impacts.

Chapter 12 Section 12.5.8.2 – Stygofauna Assessment – Field assessment

Issue

Inadequate sampling for stygofauna and inconsistency between the Ecology and Groundwater chapters regarding the presence of alluvial aquifers.

The Ecology report states that the majority of stygofauna that have been collected to date have been in alluvial aquifers, but that alluvial aquifers do not occur in the study area (Section 12.5.8.2). It also states that stygofaunal sampling may have been inadequate (p. 12-88).

In comments on the EIS, DNRM pointed out that although the Ecology report (Chapter 12) stated that there were no alluvial aquifers in the study area, alluvium was referred to in the Groundwater Report. DNRM requested that chapter 12 be amended to make it consistent with the Groundwater Report. This has not been done. There are a number of references to alluvial aquifers in the revised Groundwater Report (chapter 9) e.g. pp. 9-18, 9-27, 9-31, 9-39, 9-56, 9-64 and the revised EM Plan (Chapter 18) e.g. pp 18-92, 18-93, 18-97, 18-103 and 18-104. Page 18-104 refers to monitoring bores to be installed in the alluvium.

Further, the original EIS stated that bores were purged prior to sampling. DNRM pointed out that this was inconsistent with WA Guidance No.54 and 54a. In response the proponent has simply stated that bores were not purged prior to sampling. It appears that the stygofaunal sampling was carried out during groundwater quality assessment. It is standard procedure to purge bores before sampling for water quality. This then raises the question of whether bores were sampled adequately for water quality, if they were not purged. The best way of establishing how sampling was carried out is through reference to the consultant's report, which was not provided as a technical appendix to the EIS

Recommendation

The EM Plan should include a commitment that monitoring bores to be established in the alluvium will be sampled for stygofauna in a manner consistent with the WA Guidance No.54 and 54a.

The Ecology report should be modified to be consistent with the Groundwater report regarding the presence of alluvium in the study area, as requested in the previous comments on the EIS.

The original consultant's report on the stygofaunal and water quality sampling should

be provided.

Water Management and Use – Surface Water

General Comment

We have noticed that the Appendix document was not updated for subsidence, however we acknowledge that the proponent has noted the comments that we made on that section

Resource Planning – Subsidence Modelling

Subsidence Modelling

Issue

The modelling of subsidence over the mine area as presented in the EIS was based on a mine plan designed to fit within the boundaries of the then ML application. Since that time, the original ML application was rejected and a new ML application has been lodged, with boundaries that are marginally different and over a marginally smaller area than the original. Although the longwall panel layout has been amended (essentially by shortening panels to fit within the new ML boundary), there has been no matching subsidence model presented in the SEIS to show how subsidence at the periphery of the mine plan will relate to the new ML boundary. This is important as DNRM will not permit any subsidence to be caused to any area outside the boundary of the company's ML and the surface area held under same.

Recommendation

It is recommended that a new subsidence model/plan be presented showing the most up to date ML boundary and mine plan (longwall layout) and the surface expression of subsidence that is predicted relative to those.

Issue

The SEIS also includes a modelled subsidence plan showing predicted pondage areas on the surface caused by the layout of the subsurface longwall panels and pillars. This plan overlays the "ponding" areas over existing surface drainage, but does not show any interpretation of changes to surface drainage patterns that may occur "naturally" as a result of subsidence, or of surface engineering works that may need to be done to realign surface drainages to minimise the effects of ponding.

Recommendation

It is recommended that another plan be provided to show an interpretation of the surface drainage pattern that is expected to exist post-subsidence.

Strategic Cropping Land – General Comments

Determining SCL and Non-SCL

The information provided in the SEIS regarding the SCL status of the land does not adequately address Schedule 1 of the *Strategic Cropping Land Act 2011* (SCL Act) or the *Guidelines for applying the proposed strategic cropping land criteria* (criteria guidelines). Without adhering to the SCL Act and criteria guidelines the SEIS could have incorrectly identified areas of SCL and non-SCL, and consequently could have misrepresented the area of SCL impacted by the project. Should a validation application be lodged with DNRM based on the information in the SEIS, it would be unacceptable.

Examples include, but are not limited to:

1. The spatial density of soil assessment sites do not satisfy the requirements set out in the criteria guidelines; and
2. The SCL act and criteria guidelines specify two methods for determining the soil water storage, the SEIS (Appendix A4 – 01, pg 25 and section 3.8 pg257) states that 5 locations are within the 15% margin of the look up table and therefore require further assessment. The SCL Act and criteria guidelines state the other acceptable method of determining soil water storage; the PAWC method used in the SEIS is unacceptable.

Future SCL Protection Decision Application for the Mine Area

As the EIS process does not provide any means of approval relating to SCL, a SCL protection decision will be required before any EA or ML can be issued. The SCL protection decision application for the mine area will be assessed in line with the requirements of the SCL Act. The application will be required to demonstrate:

- the nature of the impacts as a result of the project;
- that SCL has been avoided to the greatest extent practicable;
- impacts have been minimised where they cannot be avoided;
- whether the impacts are temporary or permanent (as per section 14 of the SCL Act) ;
- for temporary impacts, how the SCL will be restored to its pre-development condition, and not impeded from cropping (legally or physically) for more than 50 years: and
- for permanent impacts, mitigation measures in accordance with the SCL Act.

Whether the subsidence from underground mining constitutes a temporary or permanent impact, will be determined by whether the application can demonstrate the land affected by subsidence can be restored to pre-development condition, and is not impeded from being cropped for at least 50 years. Restoration to pre-development condition is more than just maintaining the pre-development land use; it also includes, but is not limited to, the soil profile and soil properties, landform, and productive capacity of the land.

The supplementary SEIS states the predicted subsidence is in the order of 1.2m to 2.3m over the longwall panels and 0.2m to 1m over the pillars. The SEIS also focuses on managing the impacts of subsidence by remediating the subsided areas (i.e. re-contouring, ripping to remove surface cracks etc.), and in the long term does not expect any permanent change in land use will occur. However the SCL Act, in seeking to preserve a strategic resource, applies a more rigorous test than "stable landform and re-vegetated" when determining whether an impact is of a temporary or permanent nature. The SCL Act requires not simply that the land be rehabilitated sufficient to allow a comparable agricultural land use, but requires that land be restored its pre-development condition and all impediments to cropping to be removed (within 50 years) – irrespective of what the predevelopment land use was or the post-development use of adjoining land happens to be.

Based on the information within the SEIS, DNRM has serious concerns whether restoration to pre-development condition (as defined by the SCL Act) is possible. Mining Lease Application 70486 meets the requirements of section 289 of the SCL Act for transitional status, and is therefore exempt from the permanent impact restriction. As a result, the ultimate determination of whether the impact is temporary or permanent does not pose as a show stopper for the mine area.

Transport corridor and Rail load out facility

DNRM notes that the Terms of Reference for the EIS includes the requirements for the construction, upgrading or relocation of any-transport-related infrastructure. This includes road and rail transportation and exportation of products during the construction and operational phases of the project. DNRM notes the previous decision that the transport corridor and rail load out facility should not be included in the EIS, however it would be remiss of DNRM to not raise the issues relating to the SCL approvals required for those components of the overall project, given the successful undertaking of the development is contingent on access to a transport corridor.

The rail load out facility in its current location, being Mining Lease Application 70501, will not require any SCL application as there is no potential SCL on the SCL trigger map in that area.

The transport corridor, being Mining Lease Application 70502, does contain potential SCL and will require a SCL protection decision. The transport corridor is within a SCL protection area and does not have an exemption from the permanent impact restriction. The requirements for the protection decision application for the transport corridor, will need to address the same requirements previously outlined for the mine area.

As no information has been provided regarding the construction, operation, and decommissioning of the haul road, DNRM is unable to provide an indication of the likelihood of it being a temporary or permanent impact (as defined by the SCL Act). If the land is unable to be restored to pre-development condition and all impediments to cropping are not removed within 50 years, the haul road will be a permanent impact. For a permanent impact to proceed, an Exceptional Circumstances application would need to be lodged, and the development would need to be granted Exceptional Circumstances. The process and criteria for making the exceptional circumstance decision are provided for by chapter 4 of the SCL Act. The Minister for Natural Resources and Mines would currently be the decider of the application.

The overall project is dependent on being able to transport the coal from the mine to a rail load out facility via the transport corridor. If any permanent impact is to occur to SCL within that corridor, the ability of the project to proceed could be reliant on obtaining a favourable SCL Exceptional Circumstance decision.

RTI DL Release

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Department of
Natural Resources and Mines

12 July 2013

The Chief Executive
Department of Environment and Heritage
PO Box 2454
BRISBANE QLD 4001

Email: eis@ehp.qld.gov.au

Attention: Dr Monika Rhodes

Dear Sir/Madam

Re: Supplementary Environmental Impact Statement – Springsure Creek Coal Project

I refer to your email dated 25 June 2013, inviting the Department of Natural Resources and Mines (DNRM) to comment on the additional information provided on the supplementary environmental impact statement (SEIS) for the Springsure Creek Coal Mine.

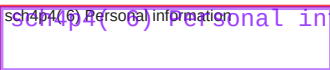
DNRM has reviewed the additional SEIS documents and detailed comments have been provided in Attachment 1.

The department has identified an outstanding issue in relation to Groundwater, Groundwater Dependent Ecosystems and Subsidence Modelling. Further information will be required from the proponent in order to assess project impacts and determine appropriate mitigation measures.

Comment and information has also been provided in relation to Strategic Cropping Land. Given the need to address this matter before the project could proceed it has been included for the proponent's consideration.

Should you have any queries, please contact Wedeena Smith on (07) 4999 6914.

Yours sincerely


Schedule 4(1) Personal information

Alison Hambleton
Principal Natural Resource Officer
Regional Planning and Coordination
Central Region
Department of Natural Resources and Mines

Attachment 1: Appendix 1 - DNRM submission on Amended EIS, Springsure Creek Coal Project

Springsure Creek Coal Project Supplementary EIS

Submission prepared by
Department of Natural Resources and Mines
July 2013

Water Management and Use – Groundwater

General Comment

Firstly it should be noted that in the document provided by Bandanna Energy, 'Response to Submissions to EIS' the responses provided in relation to comments made by DNRM on groundwater related issues were in places poor and at times did not address the comment. However a review of the updated groundwater report often resulted in answers to the original comments being obtained.

It is noted that Water Resource Australia Pty Ltd have reviewed the updated groundwater model and provided comment. Water Resource Australia have generally supported the quality of the modelling work carried out, with some qualifications. It is a positive step that Bandanna have arranged for this peer review of the groundwater model. The comments of Water Resource Australia, the updated model report and draft EMP have been reviewed by DNRM along with the proponent's responses referred to above. The more significant outstanding issues are noted below.

Monitoring Bores

Issue

It should be noted that in the course of the groundwater investigation work carried out as part of this EIS, nine monitoring or production bores were drilled. Of these bores strata details are supplied for two (SPR107C and SPR138) and construction details supplied for four bores in the original EIS. In the SEIS documents, basic construction details are supplied for the nine bores, but no additional strata details are provided.

Recommendation

Strata details are required to be provided for the remaining seven bores.

Section 9.5.4.3 – Calibrated Model (Page-9-77)

Issue

In table 9-20 a vertical hydraulic conductivity (permeability) for the Rewan Formation of 1×10^{-6} m/day has been adopted. In determining this figure, references are provided for work carried out by AGE on the Ensham mine in 2006 and by Ausenco – Norwest (2012) in work carried out on a groundwater model for the northern Bowen Basin for Arrow Energy.

However recent work carried out by AGE in 2013 for Minyango (Blackwater) suggest a vertical hydraulic conductivity for the Rewan of 5.4×10^{-5} m/day. Additionally recent work carried out in the southern Galilee Basin in the Alpha area has seen URS (2012) adopt a vertical hydraulic conductivity for the Rewan of 9×10^{-5} m/day for the Alpha/ Kevins Corner model and Heritage Computing (2013) adopt 9.3×10^{-5} m/day for the Galilee Coal Project model. These figures all relate to a formation not yet fractured by the effects of goafing.

In the Springsure Creek model, in the lower fractured zone, an adjusted vertical

hydraulic conductivity of 1×10^{-5} m/day is adopted, which is still considerably lower than the unfractured figures quoted above.

In section 9.5.6.1 it is noted that the vertical hydraulic conductivity is one of a number of parameters to which drawdown predictions are sensitive. This is to be expected as the connection of the basalt aquifer to the dewatered coal measures is directly linked to the vertical hydraulic conductivity of the Rewan Formation which separate them.

In a sensitivity analysis carried out for Springsure Creek the unfractured Rewan vertical conductivity is increased to 1×10^{-5} m/day which is meant to represent a worst case scenario. This approach of sensitivity/ uncertainty testing is supported but again this figure is significantly lower than those quoted above from other mines in Central Queensland so it does not qualify as a worst case scenario.

In the peer review carried by Water Resource Australia it was noted that *while literature references and comparisons are required, it does not completely overcome the need for more site specific data and investigations*. It was further noted that *No packer tests or core permeability test results at site are provided in the report*.

The vertical hydraulic conductivity of the Rewan is probably the most important groundwater issue at this time as it directly dictates the predicted impact on the overlying basalt aquifer and its users.

Recommendation

It is recommended that a further model run/ sensitivity/ uncertainty analysis be carried out using an unfractured vertical hydraulic conductivity figure of 1×10^{-4} m/day which would then be increased in fractured zones. This will then provide a more appropriate upper limit of potential impacts.

Section 9.5 – Groundwater Impact Assessment (Page- 9-60)

Issue

The groundwater model has been developed with no flow boundaries on most boundaries of the model. This means that with the exception of the north east corner of the model, groundwater cannot flow into or out of the model area.

The peer review by Water Resource Australia identified the no flow model boundaries on much of the model as atypical of most modelling projects. Furthermore, they noted that the conceptualisation of the how the system operates, in justifying the no flow boundaries was *based upon data primarily sourced from local water table aquifers with very little data from the deeper geologic units, in particular the coal seams*. The concerns about the lack of data in the deeper formations mirror those expressed by DNRm in response to the EIS.

Water Resource Australia also raise concern about evapotranspiration being the primary source of outflow from the model.

It would appear from the plots provided in Figure 9-37 using the limited historical data available that a combination of the model boundaries and application of recharge and evapotranspiration has resulted in the models inability to match the observed water level declines and rises caused by drought and high rainfall events.

It is considered that more work will be required in relation to these issues in the future to refine the model but for now they are not considered critical.

Recommendation

In future updates of the model the suitability of existing model boundary conditions and application of recharge and evapotranspiration should be addressed to more accurately simulate local hydrogeological conditions.

Section 9.3.3.3 – Title Geologic Structures (Page- 9-15)

Issue

The following description of the Albinia Fault is provided:

A northwest to southeast trending fault called the Albinia Fault traverses along the east of EPC891 (Xenith 2011, Resolve Geo 2011). No significant vertical displacement from one side of the fault to the other has been identified, although a sudden change in the thickness of the Aries 2 seam across the fault is observed. The location of Albinia Fault, as presented in Resolve Geo (2011), is shown in Figure 9-6. Other faults identified in the Project area shown in Figure 9-6 are interpreted to terminate in the basement and do not extend up into the Bandanna Formation (Xenith 2011). The Bandanna Formation and the sedimentary sequence above the Mantuan Formation, occurring approximately 300m below the Aries 2 seam, are interpreted to be notably free of faulting (Resolve Geo 2011).

Figure 9-8 in the groundwater report appears to indicate that there is significant displacement in the Bandanna formation and the Triassic sediments with the fault extending up to ground level. It would appear that the figure contradicts the text.

In section 9.3.6.3 it is stated:

The northwest to southeast trending Albinia Fault traverses along the east of EPC891. With the exception of a sudden change in the thickness of the Aries 2 seam, no displacement of strata has been identified on either side of this fault (Xenith 2011). Therefore the fault is considered unlikely to act as a barrier to horizontal flow along the coal seams although the fault surface, if altered to clay, may locally restrict groundwater flow. Other faults in the Project area are interpreted to terminate within the bedrock at some depth below the Bandanna Formation. The regional groundwater flow along the coal seams would be expected to be most sensitive to the lateral continuity, thickness and associated transmissivity of the coal seams.

Given that the existence of a significant fault in the Rewan could compromise its integrity as an aquitard, there needs to be consistency on how this issue is reported. Is the Rewan Formation faulted or likely to be faulted or not?

Recommendation

Clarification should be provided on the extent of faulting in regard to the Rewan Formation and its potential to effect existing modelled impact predictions.

Section 18.5.4.9 – Environmental Management Plan, Control Strategies (Page- 18-103)

Issue

In this section it is stated:

As drawdown depends on a range of factors, its impacts are best managed adaptively. Adaptive management involves monitoring groundwater impacts and, based on the severity of impacts, modify the mine plan as mining takes place such that impacts could be limited to within designated ranges. In the event impacts are detected, potential adaptation strategies include modifying the dimension of panels, the order of mining of panels or the installation of bulkheads to allow some mined areas (goafs) to refill with groundwater, without water draining from those areas contributing to subsequent dewatering requirements.

This information constitutes a discussion rather than a commitment. There is no discussion about what will trigger the adaptive management. How will trigger levels be developed? There is a commitment in section 18.5.4.11 to develop a groundwater management plan but it is not clear what will be in this plan. Will it include information relevant to adaptive management as discussed above?

Recommendation

The proponent must clearly articulate how the proposal of adaptive management will be developed and function.

Section 18.5.4.9 – Environmental Management Plan, Control Strategies (Page-18-103)

Issue

The following is provided;

Any landholder bores located in areas of significant drawdown which result in an inability or reduction in access to groundwater volumes may need to be deepened or replaced. This is in addition to any structural damage to bores occurring due to subsidence. In most cases, the Basalt aquifer will have sufficient saturated thickness to enable deepening of wells. Four registered bores (RN57358, 57359, 57360 and 57361), are located in where the modelled initial saturated thickness of the basalt aquifer is less than 40 m. Deepening of these bores may not be possible and these bores may need to be re-located. In the event that groundwater bores are damaged due to mining activities, SCC will maintain supply of groundwater as agreed with the landholder.

There appears to be no clear cut commitment about what agreements will be entered into with the landowners and when this will occur. In fact, there appears to be little change in the words provided at EIS stage where it was pointed out that a stronger clearer commitment was required.

Recommendation

The proponent must commit to enter into agreements, prior to mining commencing, with those landowners predicted to be impacted and with others as additional information indicating impacts or potential impacts, becomes available. There must also be a commitment to replace diminished groundwater with the same quantity and quality or better.

Section 3.4.3 – Ongoing Evaluation and Exploration Activities (Page 3-27 to 3-29)

Issue

Thank you for providing the local project area cross-sections. However they require greater vertical exaggeration in order to be interpreted correctly.

Recommendation

Please increase the vertical exaggeration in the project cross-sections.

Water Management and Use – Groundwater Dependant Ecosystems

Section 18.5.4.6 – Environmental values including GDEs (Page 18-97) and parallel section in Chapter 9.

Issue

The mapping in Figure 9-22 is not from EHP but is from the National Atlas of Groundwater Dependent Ecosystems, and indicates that a high potential for GW interaction exists in a significant portion of the project area.

It is an assumption to state that the predicted maximum drawdown of 0.5m, which would be permanent, is comparable to natural system variability. No evidence to prove this assumption is provided. It is hoped that the fractures do not propagate into the basalt, but if they do, there may be significant effects on the deeply rooted components of GDEs. There is no evidence to suggest that these potential GDEs can survive a drought coincident with a permanent drawdown of 0.5m.

Recommendation

Replace:

Although current EHP mapping indicates no GDEs or springs occur within approximately 100 km of the Project area, there is a potential for these to occur along Springsure and Station Creek. The predicted maximum drawdown along these creek systems is approximately 0.5 m. Potential GDEs include deep rooted plants that are drought tolerant and may adjust to declines in groundwater levels without adverse health effects, however in periods of low rainfall, the dependence of GDEs on groundwater is higher.

The predicted reduction in the evapotranspiration rate is likely to be comparable to the systems natural variability, although this is based on a conservative assumption that the fractures above the goaf extends into the Basalt by several 10s of metres in parts of the mine area and that the vertical hydraulic conductivities of key aquitards are an order of magnitude greater than the current best estimates. A model scenario based on local experience indicates that there will be no drawdown related impacts to GDEs as fractures are not assumed to extend into the Basalt.

On this basis, the risk to GDEs is estimated to be medium assuming that some of the deep rooted plants in the riparian zone have high dependence on groundwater particularly during low rainfall periods. It is therefore expected that there will not be any significant impacts to riparian vegetation.

With:

The National Atlas of Groundwater Dependent Ecosystems indicates that there are areas with a high potential for GDEs in the Project area. In periods of low rainfall, the dependence of GDEs on groundwater is higher. As the predicted maximum

drawdown along some creek systems is approximately 0.5 m, in periods of low rainfall, there may be impacts on GDEs.

The risk to GDEs is considered to be medium, based on conservative assumptions that:

- the fractures above the goaf extend into the basalt by several 10s of metres in parts of the mine area*
- some of the deep rooted plants in the riparian zone have high dependence on groundwater particularly during low rainfall periods.*

However, a model scenario based on local experience indicates that there will be no drawdown related impacts to GDEs as fractures are not assumed to extend into the basalt. It is therefore assumed that there will not be any significant impacts to riparian vegetation.

Section 18.5.4.9 – Control Strategies (groundwater – environmental values) (Page 18-101)

Issue

The statement about a water level decline not affecting GDE health is immediately followed by a statement to the effect that, as GW becomes less available, fringing vegetation will transpire less. This is actually a statement about declining health.

Enhanced recharge through increased ponding (a major system change) is generally not considered desirable for the ecosystems or groundwater systems already present.

Recommendation

Please remove the paragraph:

Although a decline in water levels is predicted to occur, there are several ways in which the regional water balance could adjust without adverse effects on the health of GDEs. One possibility is that as the water table declines, fringing vegetation takes less water by evapotranspiration such that withdrawal of groundwater is balanced by a slight decrease in evapotranspiration from vegetation throughout the region. Another possibility is that re-directed flow during episodic flood events continues to supply recharge to the Alluvium that allows water table elevations to recover. Recharge may locally be enhanced as a result of cracking of stream bed and increased ponding depth above subsided panels.

Section 18.5.4.9 – Control Strategies (groundwater - management of drawdown) (Page 18-103)

Issue

Fracturing may impact on both GW levels (drawdown) and surface topography (subsidence). This in turn may impact on environmental values associated with GDEs, water bore function and agricultural practices.

Drawdown: The discussion about drawdown impact mitigation strategies is good overall, but this section is not clear about how fracturing extents will be monitored – is it through monitoring GW levels alone? What would be the triggers for the implementation of mitigation measures? Have there been other projects where bulkheads or grout injection were successfully implemented as mitigation measures?

Subsidence: There is no indication in the SEIS of what the control strategies,

remediation is, or the mitigation measures are, for impacts to GDEs from subsidence.

Recommendation

The discussion about adaptive fracture-related drawdown management needs to be strengthened with commitments about the drawdown impact mitigation strategies. Cite instances where mitigation measures for fracture-related drawdown impacts have been successfully implemented. State what the trigger levels would be for the measures to be implemented.

Add a discussion that includes monitoring methods, triggers and commitments about mitigation and remediation for subsidence-related impacts on GDEs. If possible it should be related to the mitigation measures and commitments about fracture-related drawdown impacts.

Chapter 12 Section 12.5.8.2 – Stygofauna Assessment – Field assessment

Issue

Inadequate sampling for stygofauna and inconsistency between the Ecology and Groundwater chapters regarding the presence of alluvial aquifers.

The Ecology report states that the majority of stygofauna that have been collected to date have been in alluvial aquifers, but that alluvial aquifers do not occur in the study area (Section 12.5.8.2). It also states that stygofaunal sampling may have been inadequate (p. 12-88).

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Recommendation

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The Ecology report should be modified to be consistent with the Groundwater report regarding the presence of alluvium in the study area, as requested in the previous comments on the EIS.

The original consultant's report on the stygofaunal and water quality sampling should

be provided.

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General Comment

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Subsidence Modelling

Issue

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Recommendation

It is recommended that a new subsidence model/plan be presented showing the most up to date ML boundary and mine plan (longwall layout) and the surface expression of subsidence that is predicted relative to those.

Issue

The SEIS also includes a modelled subsidence plan showing predicted pondage areas on the surface caused by the layout of the subsurface longwall panels and pillars. This plan overlays the "ponding" areas over existing surface drainage, but does not show any interpretation of changes to surface drainage patterns that may occur "naturally" as a result of subsidence, or of surface engineering works that may need to be done to realign surface drainages to minimise the effects of ponding.

Recommendation

It is recommended that another plan be provided to show an interpretation of the surface drainage pattern that is expected to exist post-subsidence.

Strategic Cropping Land – General Comments

Determining SCL and Non-SCL

The information provided in the SEIS regarding the SCL status of the land does not adequately address Schedule 1 of the *Strategic Cropping Land Act 2011* (SCL Act) or the *Guidelines for applying the proposed strategic cropping land criteria* (criteria guidelines). Without adhering to the SCL Act and criteria guidelines the SEIS could have incorrectly identified areas of SCL and non-SCL, and consequently could have misrepresented the area of SCL impacted by the project. Should a validation application be lodged with DNRM based on the information in the SEIS, it would be unacceptable.

Examples include, but are not limited to:

1. The spatial density of soil assessment sites do not satisfy the requirements set out in the criteria guidelines; and
2. The SCL act and criteria guidelines specify two methods for determining the soil water storage, the SEIS (Appendix A4 – 01, pg 25 and section 3.8 pg257) states that 5 locations are within the 15% margin of the look up table and therefore require further assessment. The SCL Act and criteria guidelines state the other acceptable method of determining soil water storage; the PAWC method used in the SEIS is unacceptable.

Future SCL Protection Decision Application for the Mine Area

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- the nature of the impacts as a result of the project;
- that SCL has been avoided to the greatest extent practicable;
- impacts have been minimised where they cannot be avoided;
- whether the impacts are temporary or permanent (as per section 14 of the SCL Act) ;
- for temporary impacts, how the SCL will be restored to its pre-development condition, and not impeded from cropping (legally or physically) for more than 50 years: and
- for permanent impacts, mitigation measures in accordance with the SCL Act.

Whether the subsidence from underground mining constitutes a temporary or permanent impact, will be determined by whether the application can demonstrate the land affected by subsidence can be restored to pre-development condition, and is not impeded from being cropped for at least 50 years. Restoration to pre-development condition is more than just maintaining the pre-development land use; it also includes, but is not limited to, the soil profile and soil properties, landform, and productive capacity of the land.

The supplementary SEIS states the predicted subsidence is in the order of 1.2m to 2.3m over the longwall panels and 0.2m to 1m over the pillars. The SEIS also focuses on managing the impacts of subsidence by remediating the subsided areas (i.e. re-contouring, ripping to remove surface cracks etc.), and in the long term does not expect any permanent change in land use will occur. However the SCL Act, in seeking to preserve a strategic resource, applies a more rigorous test than "stable landform and re-vegetated" when determining whether an impact is of a temporary or permanent nature. The SCL Act requires not simply that the land be rehabilitated sufficient to allow a comparable agricultural land use, but requires that land be restored its pre-development condition and all impediments to cropping to be removed (within 50 years) – irrespective of what the predevelopment land use was or the post-development use of adjoining land happens to be.

Based on the information within the SEIS, DNRM has serious concerns whether restoration to pre-development condition (as defined by the SCL Act) is possible. Mining Lease Application 70486 meets the requirements of section 289 of the SCL Act for transitional status, and is therefore exempt from the permanent impact restriction. As a result, the ultimate determination of whether the impact is temporary or permanent does not pose as a show stopper for the mine area.

Transport corridor and Rail load out facility

DNRM notes that the Terms of Reference for the EIS includes the requirements for the construction, upgrading or relocation of any-transport-related infrastructure. This includes road and rail transportation and exportation of products during the construction and operational phases of the project. DNRM notes the previous decision that the transport corridor and rail load out facility should not be included in the EIS, however it would be remiss of DNRM to not raise the issues relating to the SCL approvals required for those components of the overall project, given the successful undertaking of the development is contingent on access to a transport corridor.

The rail load out facility in its current location, being Mining Lease Application 70501, will not require any SCL application as there is no potential SCL on the SCL trigger map in that area.

The transport corridor, being Mining Lease Application 70502, does contain potential SCL and will require a SCL protection decision. The transport corridor is within a SCL protection area and does not have an exemption from the permanent impact restriction. The requirements for the protection decision application for the transport corridor, will need to address the same requirements previously outlined for the mine area.

As no information has been provided regarding the construction, operation, and decommissioning of the haul road, DNRM is unable to provide an indication of the likelihood of it being a temporary or permanent impact (as defined by the SCL Act). If the land is unable to be restored to pre-development condition and all impediments to cropping are not removed within 50 years, the haul road will be a permanent impact. For a permanent impact to proceed, an Exceptional Circumstances application would need to be lodged, and the development would need to be granted Exceptional Circumstances. The process and criteria for making the exceptional circumstance decision are provided for by chapter 4 of the SCL Act. The Minister for Natural Resources and Mines would currently be the decider of the application.

The overall project is dependent on being able to transport the coal from the mine to a rail load out facility via the transport corridor. If any permanent impact is to occur to SCL within that corridor, the ability of the project to proceed could be reliant on obtaining a favourable SCL Exceptional Circumstance decision.

RTI DL Release

Phillips Erin

From: Christina Sinnemann <Christina.Sinnemann@dcs.qld.gov.au>
Sent: Wednesday, 10 July 2013 12:34 PM
To: EIS External Submissions
Cc: Rhodes Monika; Gary Mahon; Fiona Rafter; Graham Wiltshire; Peter Mason (SP&ES)
Subject: DCS comments SEIS - Springsure Creek Coal Mine Project

Follow Up Flag: Follow up
Flag Status: Flagged

Re: Springsure Creek Coal Mine Project – Supplementary Environmental Impact Statement (SEIS)

Hello Monika,

Thank you for providing the Department of Community Safety (DCS) with the opportunity to comment on the SEIS for the Springsure Creek Coal Mine Project. DCS has reviewed the response to previous DCS comments on the EIS and requires no further information at this stage.

If you have any further questions, please don't hesitate to contact Peter Mason, Policy Advisor on 3635 3482 or by email Peter.Mason2@dcs.qld.gov.au.

Regards
Christina Sinnemann
Principal Policy Advisor
Corporate Service
Department of Community Safety

On behalf of

Gary Mahon | A/Deputy Director-General | Corporate Service | Department of Community Safety | 3635 3792 | gary.mahon@dcs.qld.gov.au |

From: Rhodes Monika [<mailto:Monika.Rhodes@ehp.qld.gov.au>]
Sent: Wednesday, 10 July 2013 7:15 AM
To: undisclosed-recipients
Subject: Reminder - comments on SEIS for Springsure Creek due this Friday

Dear All

Please keep in mind that the comments on any outstanding issues on the SEIS for the Springsure Creek Coal Mine Project are due this Friday, 12 July 2013 COB.

Your advice should be forwarded to:

The EIS Coordinator – Springsure Creek Coal Mine Project
Department of Environment and Heritage Protection
GPO Box 2454 BRISBANE QLD 4001
Level 9, 400 George Street BRISBANE QLD 4000
or by email to eis@ehp.qld.gov.au.

Note that EHP has only 20 bd to make a decision.

Kind regards

Dr Monika Rhodes
Principal Environmental Officer
Statewide Environmental Assessments
Telephone 07 3330 6293 **Facsimile** 3330 5875
Email: monika.rhodes@ehp.qld.gov.au
www.ehp.qld.gov.au

Department of Environment and Heritage Protection
Level 9, 400 George Street, Brisbane Q 4000
GPO Box 2454, Brisbane Q 4001

From: Rhodes Monika
Sent: Tuesday, 25 June 2013 12:24 PM
Subject: RE: SEIS_Email-Out_submission of supplementary EIS_Springsure_20130624

Dear All

Please note that the proponent will not send out hard copies, but electronic copies of the amended EIS (as sticks), including the response to your submissions. I have heard that the proponent has sent them only yesterday (Monday).

Alternatively, the amended EIS can be accessed through the proponent's web page:
<http://www.springsurecreekproject.com.au/project-development-and-approvals/springsure-creek-coal-mine-eis>

Please note that there was some confusion regarding the term 'final EIS' – as labelled on the documents; however, this EIS is the amended EIS (or supplementary EIS) based on submissions.

If you have any questions, please don't hesitate to contact me.

Regards

Dr Monika Rhodes
Principal Environmental Officer
Statewide Environmental Assessments
Telephone 07 3330 6293 **Facsimile** 3330 5875
Email: monika.rhodes@ehp.qld.gov.au
www.ehp.qld.gov.au

Department of Environment and Heritage Protection
Level 9, 400 George Street, Brisbane Q 4000
GPO Box 2454, Brisbane Q 4001

From: Rhodes Monika
Sent: Monday, 24 June 2013 7:50 AM
Subject: SEIS_Email-Out_submission of supplementary EIS_Springsure_20130624

Dear All

Your organisation lodged a submission on the environmental impact statement (EIS) for the proposed Springsure Creek Coal Mine Project, located 47 kilometres south-east of Emerald in central Queensland.

The proponent, Springsure Creek Coal Pty Ltd, has prepared a supplementary EIS and response to submissions that were received during the public notification period for the EIS. In the interests of facilitating the assessment of submissions provided by your department, please consider the response to your submissions and advise the Department of Environment and Heritage Protection (EHP) of any comments or recommended conditions that should apply to the project by **close of business Friday, 12 July 2013** (note that EHP will have to make a decision under section 56A of the *Environmental Protection Act 1994* if the EIS can proceed within 20 bd, so any comments should be received by 12/07/13; the Act does not allow for any extensions).

Your advice should be forwarded to:

The EIS Coordinator – Springsure Creek Coal Mine Project
Department of Environment and Heritage Protection
GPO Box 2454 BRISBANE QLD 4001
Level 9, 400 George Street BRISBANE QLD 4000
or by email to eis@ehp.qld.gov.au.

Should you have not received a copy of the SEIS and a response to your submission by COB today, please contact Mr Pete Jones, Springsure Creek Pty Ltd (Bandanna Energy), on 3041 4434.

I will be the EIS Coordinator and primary contact for this project.

Kind regards

Dr Monika Rhodes
Principal Environmental Officer
Statewide Environmental Assessments
Telephone 07 3330 6293 **Facsimile** 3330 5875
Email: monika.rhodes@ehp.qld.gov.au
www.ehp.qld.gov.au

Department of Environment and Heritage Protection
Level 9, 400 George Street, Brisbane Q 4000
GPO Box 2454, Brisbane Q 4001

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RTI DL Release

Phillips Erin

From: Jennifer Boulton <Jennifer.Boulton@dsdip.qld.gov.au>
Sent: Friday, 12 July 2013 9:11 AM
To: EIS External Submissions
Cc: Policy Coordination
Subject: CBD/111013 Proposed Springsure Creek Coal Mine Project - Final Environmental Impact Statement
Attachments: DEPC13_854 Springsure Creek Coal Pty Ltd.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Good morning:

Please find **attached** Department of State Development, Infrastructure and Planning response. The original has been mailed.

<<DEPC13_854 Springsure Creek Coal Pty Ltd.pdf>>
Kind regards,

Jennifer Boulton
A/Executive Assistant
Strategic Policy
Department of State Development, Infrastructure and Planning
Queensland Government

tel +61 7 3405 8595 (ext 27595)
post PO Box 15009 City East Qld 4002
visit Level 11 Executive Building 100 George Street Brisbane
jennifer.boulton@dsdip.qld.gov.au

www.dsdip.qld.gov.au

 Please consider the environment before printing this email

Great state. Great opportunity.

Our ref: DEPC13/854

Your ref: CBD/111013

11 July 2013

The EIS Coordinator – Springsure Creek Coal Mine Project
Department of Environment and Heritage Protection
GPO Box 2454
BRISBANE QLD 4001

Dear EIS Coordinator

Thank you for your letter of 21 June 2013 inviting the Department of State Development, Infrastructure and Planning (DSDIP) to provide comment on the proponents' (Springsure Creek Coal Pty Ltd) response to DSDIP submissions for the proposed Springsure Creek Coal Mine Project.

DSDIP has reviewed the responses provided by the proponent and comments are provided at **Attachment 1**.

If you require any additional information regarding the comments provided, please do not hesitate to contact me on 3033 0659, or by email at alex.ackfun@dsdip.qld.gov.au

Yours sincerely

Section 4(6) Personal Information

Alex Ackfun
Executive Director
Strategic Policy

DEPARTMENT OF STATE DEVELOPMENT INFRASTRUCTURE AND PLANNING

Submission on the Supplementary EIS for Springsure Creek Coal Mine

Section	Describe the issue	Suggested Solution
5.2.4 Strategic Cropping Land Act 2011(SCL Act) 5.3.5 Strategic Cropping Land Assessment	The Springsure Creek Coal Mine (SCCM) area is located within the Priority Agricultural Area (PAA) identified in the draft Central Queensland Regional Plan (CQRP).	<p>Note the Queensland Government's intention to protect priority agricultural land uses within PAAs in Central Queensland and introduce PAA co-existence criteria for resource activities on these areas – refer to the policy intent and maps, which are available on-line at www.dsdip.qld.gov.au/central-queensland.</p> <p>It is anticipated that the PAA policy position in the draft CQRP will be implemented through measures including amendments to the SCL Act and mirrored through approval processes such as environmental authorities. These regulatory measures are expected to be given effect at the same time as the final CQRP is released.</p>
5.7 Mitigation measures 19.5.2 Springsure Creek Agricultural Plan	The EIS refers to the project resulting in the direct disturbance of 60 ha of SCL located within the proposed mine infrastructure area (5.7.7) and various mitigation measures proposed to be taken. This area aligns with priority agricultural land uses within a PAA in the draft CQRP.	Note the Queensland Government's intention to protect priority agricultural land uses within PAAs in Central Queensland and introduce PAA co-existence criteria for resource activities on these areas – refer to the policy intent and maps, which are available on-line at www.dsdip.qld.gov.au/central-queensland
16.4.2 Queensland Government Objectives and Strategies Table 16-2 Summary of relevant Queensland government objectives and strategies	Local Industry Policy – A Fair Go for Local Industry.	Delete reference to Local Industry Policy - <i>A fair go for local industry</i> .
19.5.5 Local Industry Participation	Reference to Local Industry Policy. Dot point referring to Draft local content strategy.	<p>In the paragraph beginning “By securing goods and services to support the project locally,” delete the reference to the Queensland Government's Local Industry Policy – <i>A fair go for Local Industry</i>.</p> <p>Dot point should begin with “Continue to progress the development</p>

Phillips Erin

From: Eva Holt <eva.holt@derm.qld.gov.au>
Sent: Wednesday, 10 July 2013 11:18 AM
To: Holt Eva; Rhodes Monika; Rowland Philip
Cc: Mann Reinier; WorkRequests Water
Subject: WRNB ID 776 - Work Request Response - Springsure Creek Coal Mine Project SEIS Review : SEIS Review - Springsure Creek Coal Pty Ltd - Springsure Creek Coal Mine Project
Attachments: WRNB response 776.docx; comet_plan_300811.pdf; fitzroy_comet_river_wqo_290911.pdf
Follow Up Flag: Follow up
Flag Status: Flagged

Request Task: SEIS Review
Proponent / Company: Springsure Creek Coal Pty Ltd
Facility Name: Springsure Creek Coal Mine Project
Facility Location: 47 km SE of Emerald
Project File Details: CBD/111013
Date of Request: 21/06/2013 12:00:00 AM
Due Date of Request: 12/07/2013 12:00:00 AM
Urgency: Normal
Client Region: Central Office
Category: Mining

Hello Monika,

Please find our response to your work request attached. Nothing major. Please call me if you have any questions (31705557).

Cheers Eva

--

Eva Holt
Email: eva.holt@derm.qld.gov.au

To view more information about this work request visit: [More Info](#)

Request Summary

Status	InProgress	Hours Worked	15
Request Task	SEIS Review	Proponent / Company	Springsure Creek Coal Pty Ltd
Facility Name	Springsure Creek Coal Mine Project	Facility Location	47 km SE of Emerald

Request Summary

Project File Details CBD/111013 Date of Request 21/06/2013 12:00:00 AM

Due Date of Request 12/07/2013 12:00:00 AM Urgency Normal

Client Region Central Office Category Mining

Requesting Officer

First Name Monika Last Name Rhodes

Phone 3330 6293 Office 400 George Street, Brisbane Qld 4000

Region Central Position Principal Environmental Officer

Email Monika.Rhodes@ehp.qld.gov.au

Manager

Manager First Name Philip Manager Last Name Rowland

Manager Phone 3330 5602 Manager Position Project Manager

Manager Email Philip.Rowland@ehp.qld.gov.au

Request Details

Your organisation lodged a submission on the environmental impact statement (EIS) for the proposed Springsure Creek Coal Mine Project, located 47 kilometres south-east of Emerald in central Queensland.

The proponent, Springsure Creek Coal Pty Ltd, has prepared a supplementary EIS (SEIS) and response to submissions that were received during the public notification period for the EIS. In the interests of facilitating the assessment of submissions provided by your department, please consider the response to your submissions and advise the Department of Environment and Heritage Protection (EHP) of any comments or recommended conditions that should apply to the project by close of business Friday, 12 July 2013.

Your advice should be forwarded to: The EIS Coordinator – Springsure Creek Coal Mine Project Department of Environment and Heritage Protection GPO Box 2454 BRISBANE QLD 4001 Level 9, 400 George Street BRISBANE QLD 4000 or by email to eis@ehp.qld.gov.au.

The EIS Coordinator and primary contact for this project is Dr Monika Rhodes, Principal Environmental Officer, who can be contacted on (07) 3330 6293 or email monika.rhodes@ehp.qld.gov.au.

Relevant Documents

The cover letter with the electronic copy of the SEIS and response to your submission will be mailed out to you by the proponent. I also have saved the documents on T drive_City_Springsure.

Justification

Review of SEIS in regards to your submission made regarding water quality and aquatic ecosystem health issues. No field investigation or monitoring involved.

Other

Budget Availability

Previous Contacts

Attachments

RTI DL Release

Memorandum

Enquiries Eva Holt
 Telephone (07) 3170 5557
 Your reference Springsure Creek Coal Mine Project
 Our reference WRNB ID 776
 11/09/2013



**Queensland
Government**

Department of
**Science, Information
 Technology, Innovation
 and the Arts**

To:	Monika Rhodes, Principal Environmental Officer Statewide Environmental Assessments Department of Environment and Heritage Protection
Through:	Dr Reinier Mann, Principal Environmental Officer
From:	Dr Eva Holt, Senior Environmental Officer Water Assessment & Systems, Environmental Monitoring and Assessment, Science Delivery, Department of Science, Information Technology, Innovation and the Arts

Subject: Springsure Creek Coal Mine Project SEIS Review

Further to your work request dated 21/06/2013, the Water Assessment & Systems (WAS) group has reviewed:

- “*Springsure Creek Coal Mine Project – Response to Submission to EIS*” prepared by Springsure Creek Coal Pty Ltd (File Reference: SCC's Response to all Submissions[1].pdf)

Additional information referred to:

- “*Springsure Creek Coal Mine Project Final Environmental Impact Statement June 2013 Chapter 8 – Surface Water*” prepared by Springsure Creek Coal Pty Ltd (File Reference: 08 SCC Surface Water - Final SEIS.pdf);
- “*Springsure Creek Coal Mine Project Final Environmental Impact Statement June 2013 Chapter 12 – Ecology*” prepared by Springsure Creek Coal Pty Ltd (File Reference: 12 SCC Ecology - Final SEIS.pdf);
- “Minutes of meeting 01/05/2013 - Discussion of key topics from DSITIA's submission, namely” prepared by Springsure Creek Coal Pty Ltd (File Reference: Springsure coal project _minutes of meeting 1May13.pdf)

General Comments:

In general the proponent has responded to and / or fulfilled the recommendations made by WAS. However, there are still some minor points that may need to be addressed in the SEIS and some considerations for proposed conditions in the Environmental Authority (if the project/activity is approved).

Please refer to specific comments below.

RTI DL Release

Specific Comments

Topic	Recommendation / Suggestion	Response	Comments	Recommendations
Chapter 8 – Surface Water	<p>Recommendation: It is recommended that baseline water quality assessments continue and be amended according to the issues identified above.</p> <p>[Issue: Section 8.4 and subsection relating to the Water Quality Assessment] <i>A preliminary baseline water quality assessment was undertaken for the Springsure Creek Coal Mine Investigation area, over two sampling events (with a total of 12 data points both upstream and downstream collected so far). From the mapping presented in Figure 8-5, it does not appear that a water quality and quantity monitoring site has been placed at a location downstream of the proposed mine dams. It is necessary to include a site downstream of the major source of contaminants to receiving waters, in the flowing section of the waterways. It will also be necessary to design monitoring for Dam 2 and Dam 4 which are listed as being downstream of the mine discharges in other sections of the EIS.</i></p> <p><i>Section 8.4.3.2 lists the indicators measured as part of the baseline water quality assessment for the Springsure project. This list is not comprehensive and should include all indicators listed in Tables 2 and 3 of the “Model water conditions for coal mines in the Fitzroy basin”.</i></p> <p><i>Section 8.4.4.2 Electrical Conductivity discusses the results obtained so far for</i></p>	<p>This submission was discussed between DSITIA, EHP and SCC on 1 May 2013 (as per minutes circulated between attendees).</p> <p>Additional surface water quality data has been collected at four locations (February 2013) and include the Springsure Creek Inflow to Den-Lo Park Dam, Upstream from the Project area on Springsure Creek, Upstream from the Project area on Station Creek and Upstream of the Project area on Unnamed Creek 4. Water quality data and parameters measured at these sites during this period include an extended suite of tested and measured parameters as outlined in the DNRM, Guideline Model Water Conditions for Coal Mines in the Fitzroy Basin. This additional data is presented in Chapter 8 of the EIS. Sampling at these sites is ongoing and data will be used to develop specific water Quality trigger values for the Project. This sampling program will be extended to include additional sites (potentially including locations used in initial sampling program) as</p>	<p>The proponent response has largely fulfilled the recommendation made by WAS, however there is some issue with the details, including:</p> <p>C1. The proponent should better incorporate any new data collected. For instance two of the four sites sampled in February coincide with sites already sampled in summer. How do these sampling events for the same site compare in water quality?</p> <p>C2. There are no surface water survey site descriptions for the new sites that have not been sampled before, namely (a) Springsure Creek Inflow to Den-Lo Park Dam and (b) Upstream of the Project area on Unnamed Creek 4</p> <p>[NB February survey sites:</p> <ul style="list-style-type: none"> – Springsure Creek Inflow to Den-Lo Park Dam (new site); – Upstream from the Project area on Springsure Creek (site 5); – Upstream from the Project area on Station Creek (site 2) and, – Upstream of the Project area on Unnamed Creek 4 (new 	<p>R1. Where any new data are collected it should be incorporated with data already collected, for example sites samples in February, 2013 have been sampled previously in summer and this data should be compared.</p> <p>R2. A description should be included in Section 8.4.3.1 (Site Conditions) of any new sites.</p>

	<p><i>EC. The conclusions made are not based on sufficient data or thorough investigation of the relationship between flow and EC for the relevant creeks. Far more data collected over a longer period of time and representative of various seasons and conditions will be required if the proponents wish to establish locally relevant water quality objectives for EC. Graphing EC vs. recorded stream flow at the time of sampling would be useful to inform this process.]</i></p>	<p>necessary, and will form the basis of the Projects Water Quality Sampling Program. Data from this sampling program will also be used to develop site specific trigger values for the Project.</p> <p>No discharges are proposed as part of the Project except during major flood events, in which case contaminants will be diluted within receiving waters.</p> <p>As noted above, additional surface water quality data has been collected at four locations (February 2013) and include the Springsure Creek Inflow to Den-Lo Park Dam, Upstream from the Project area on Springsure Creek, Upstream from the Project area on Station Creek and Upstream of the Project area on Unnamed Creek 4. Water quality data and parameters measured at these sites during this period include an extended suite of tested and measured parameters as outlined in the DNRM, Guideline Model Water Conditions for Coal Mines in the Fitzroy Basin.</p> <p>(As discussed at meeting, the DNRM Guidelines were not released at the time of preparing the draft EIS, hence they were not referenced at that time.) Chapter 8 of the EIS</p>	<p>site).]</p> <p>C3. While an extended suite of water quality parameters have been analysed for the February, 2013 survey (4 sites) the proponent does not provide a clear list of what these additional parameters are in Chapter 8.</p> <p>C4. Some water quality objectives are missing from Table 8-8 (pp8-32 – 8-33; Chapter 8; SEIS).</p>	<p>R3. Include a list of additional water quality parameters included in the February, 2013 survey in Section 8.4.3.2 (Water Quality and Sediment Sampling Method).</p> <p>R4. Update Table 8-8 (pp8-32 – 8-33; Chapter 8; SEIS) to include all WQOs)</p>
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		<p>has been updated accordingly.</p> <p>As noted above, additional surface water quality data has been collected at four locations (February 2013). Sampling at these sites is ongoing and data will be used to develop specific water Quality trigger values for the Project. This sampling program will be extended to include additional sites (potentially including locations used in initial sampling program) as necessary, and will form the basis of the Projects Water Quality Sampling Program. Data from this sampling program will also be used to develop site specific trigger values for the Project. Surface water monitoring criteria are thus to be announced as per Chapter 18 – EM Plan.</p>	<p>C5. The reference to the information on surface water monitoring criteria in Chapter 18 is not specific enough.</p>	<p>R5. The proponent should refer to specific section(s) of Chapter 18 mentioned in the following: "surface water monitoring criteria are thus to be announced as per Chapter 18"</p>
	<p>Recommendation: It is recommended that potential impacts to aquatic ecosystem from reduced stream flow volumes are adequately assessment [sic] and presented in the SEIS.</p> <p>[Issue: Section 8.5.6 Stream Flows] <i>The median predicted decrease in stream flow is predicted to be up to 42% for local waterways. Very little consideration has been given to the potential impacts this may have on aquatic ecosystems downstream, including wetlands or semi-permanent or permanent pools in the receiving waters.]</i></p>	<p>Information in relation to the aquatic ecosystems from reduced stream flows within and downstream of the Project area has been assessed in Chapter 12 - Ecology. This chapter identifies that it is not anticipated that the project will result in significant impacts to aquatic values.</p>	<p>The proponent does discuss the subsidence as potentially reducing connectivity and impacting stream flow within and downstream of the project area (including a wetland protection area) with potential impacts to aquatic flora and fauna (Table 12-19). The risk level is considered medium (Table 12-19). Subsidence management measures are also outlined (Section 12.7.10) and these should decrease the risk of impacts from the predicted</p>	<p>No further recommendations.</p>

			decrease in flow in Springsure Creek if carried out appropriately. The proponent has committed to ongoing monitoring of streams and wetlands downstream for subsidence related impacts (Section 12.7.11) throughout the construction; operational phases and decommissioning phases of the mine.	
	<p>Recommendation: It is strongly recommended that a clear and consistent proposal is submitted in the SEIS. It is impossible for the administering authority to assess the proposal when conflicting statements are observed throughout the documents. How exactly will water management be undertaken on-site? All sections of the EIS need to be updated to ensure that a consistent message is presented throughout, in the text, tables and diagrams.</p> <p>[Issue: Chapter 8 Surface Water Table 8-13] <i>Potential impacts to surface water, clearly states that a no controlled release policy will be in place during the operation of the mine. Again under section 8.6.1 Cumulative Impacts the proponent states "However, this Project will not be undertaking controlled releases and may only discharge water during extreme high flow or dangerous events"</i> <i>In other section of the EIS the proponents mention that a strategy to undertake controlled discharges is incorporated in the water management (e.g. Section 18.5.4.9 Control Strategies).</i></p>	The mine site water management strategy identified a water deficit, or shortage of water, for proposed operations. Water will therefore be piped to the site from a secured allocation. This plus rain water collected on site and groundwater removed from the mine working area will be recycled for operational uses. Using 86 years of historical rainfall data in a water balance model, dams have been sized to have no discharge during the 86 years of historical rainfall records to reduce the need for any potential uncontrolled discharges from the site. There are no proposed piped (controlled) releases from dams to the receiving environment. The "Manual for Assessing Hazard Categories and Hydraulic Performance of Dams" (DERM 2012) was used as a basis of design document. All mine water	<p>C6. There is still inconsistent information in the SEIS regarding whether there will be a controlled discharge from dams. For example, the proponent has not updated point 3 under the heading of "Mobilisation of contaminants" [p18-99; Chapter 17; SEIS]. If there will be not controlled discharges from dams then this point should be removed from the text.</p>	<p>R6. The proponent should remove point 3 under the heading of "Mobilisation of contaminants" [p18-99; Chapter 17; SEIS] because they have made it clear that there will be no controlled discharges from dams.</p>

	<p><i>Inconsistencies of this nature are repeatedly observed throughout the EIS. The proposal needs to be clarified, and consistently presented throughout the EIS. It is impossible to assess the environmental risks posed by the proposal if there has been no decision as to how the water management will be undertaken.]</i></p>	<p>infrastructure will comply with release limits and conditions contained in any Environmental Authority issued by DEHP. A Water Management Plan will be required to be prepared and approved as a condition of any Environmental Authority. This Plan will detail measures for: use and movement of water for operations, water quality and quantity monitoring, and stormwater management, etc.</p>		
	<p>Recommendation: It is strongly recommended that a clear and consistent proposal is submitted in the SEIS. It is impossible for the administering authority to assess the proposal when conflicting statements are continually encountered.</p> <p>[Issue: Chapter 8 <i>During the information session presented on 12th April, the proponents mentioned that;</i></p> <ul style="list-style-type: none"> <i>No coal processing is proposed within the mining lease area; hence no tailings will be generated within the mining lease area (which is the subject of the current EIS process).</i> <i>During construction, overburden is proposed to be re-used for the construction of roads and dams, where possible.</i> <i>During operation, 100% of mined material will be exported from the site; hence, no overburden stockpiles will be required on the surface within the MLA. In contrast to this Table 8-13 mentions</i> 	<p>Reference to a coal processing plant has been removed from the final EIS as this is not required. Overburden from the construction of a cut and cover and the drift will be recycled to provide construction material onsite. No overburden will be stored on site in a waste rock or tailings storage facility. As discussed during meeting, Table 8-13 and Table 8-14 present impacts and their mitigation during different stages of the Project i.e. construction phase versus operations phase.</p>	<p>The response provides sufficient information to understand that overburden will not be stockpiled on site, yet there will be coal stockpile during the mine operation. Erosion and stormwater runoff from the coal stockpile is listed as a potential cause of impacts to surface water (sedimentation and contamination) during the operation phase of the project.</p>	<p>No further recommendations.</p>

	that “Erosion and sedimentation during the operation phases is most likely to occur from stormwater runoff from the coal stockpile, MIA and ongoing minor earthworks...” Additionally Table 8-14 specifically identifies an environmental dam which is planned to receive run-off from the coal stockpile. What is the actual proposal?]			
General Water Management Strategy	<p>Recommendation: It is better to manage discharges in a controlled fashion rather than identifying that uncontrolled discharges will occur but should hopefully not impact on downstream environmental values. Discharging controlled volumes of water to minimum flow triggers in the receiving waters represents a better environmental management strategy as a level of dilution and flushing is then assured. Of course, rainfall event/s can be so extreme as to cause uncontrolled discharge but in terms of managing water on-site where discharge has been identified as being required, then this should be managed in a controlled fashion.</p> <p>[Issue: General Water Management Strategy] <i>There are major concerns regarding the plans for on-site water management for the Springsure Creek Coal Project. The repeated claim that discharges will only be of an uncontrolled nature presents a number of significant problems.</i> <i>The presented intent of the water management on site is to control excess water using uncontrolled discharges (which are modelled to be quite rare).</i></p>	Please refer to response above regarding water management. The proposal does not include any controlled discharges. The dams located on drainage lines are those that already exist in the Project area as used by landholders primarily for agricultural uses. Existing water practices within the Project area have been clarified within Chapter 8.	C7. The proponent has added information that there will be not controlled discharge of mine wastewater to surface water and that uncontrolled release will be rare and restricted to high rainfall events. The proponent needs to ensure that all references to controlled discharge in the SEIS are removed.	R7. Ensure all reference to controlled discharge is removed from the SEIS.

	<p>However, the proponent admits that quite a high uncertainty remains in relation to the volumes of groundwater which will be encountered during this long wall mining operation, which may mean the models are not representative. This means that when the one single dam designated to contain mine-affected water from the underground operations is approaching capacity, continued pumping of mine-affected water from underground operations (estimated 1.5-3.7 ML/DAY, and potentially more) to the surface may cause a discharge. By definition this would not be considered an "uncontrolled" discharge, since on-site pumping would be causing this discharge. However, we question whether the proponents will cease underground mining operations to avoid a discharge under these circumstances (and wait until space becomes available to store more mine-affected water in the mine water dam). Given that the sizing of the mine water dam has been based on several layers of modelling (and the associated assumptions and limitations) we have concerns regarding this strategy.</p> <p>The mine water dam could be gradually filling up over a particular wet season (with high rainfall). This may be due to water falling directly over the mine dam footprint itself (and surrounding catchment, is this planned as a Turkey's Nest Dam?) but also due to the fact that when high rainfall is experienced on the surface, the levels of groundwater will also be expected to increase in the underground operation. As the level of water in the mine water dams</p>			
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	<p><i>approaches the spillway level, it may in fact be a relatively small rainfall event, or series of small rainfall events that trigger uncontrolled discharge/s. The assumption made by the proponent that significant dilution with receiving waters will occur during an uncontrolled discharge is not necessarily the case.</i></p> <p><i>Is the mine water dam a dam without any outside catchment? At the information session it was mentioned that certain dams were located on drainage lines, which dams?]</i></p>			
EIS and Environmental Management Plan (Chapter 18)	<p>Recommendation: It is recommended the proponent clearly map all wetlands identified through Queensland wetland mapping both on-site and downstream. Identify potential impacts from anticipated water quality and quantity changes for each of these identified wetlands.</p> <p>[Issue: Section 12 Environmental Management Plan</p> <p><i>Figure 18-11 in the Draft EM Plan maps five wetlands identified through Queensland wetland mapping (which are also farm dams). From our mapping the lower reaches of Springsure Creek are mapped as Riverine RE (Regional Ecosystems) and there are additional wetlands relevant to the site. The proponents also mention a “wetland protection area 2.4 km to the east of the Project area along Springsure Ck”. This is not currently mapped in the EIS. Downstream wetlands are also important to identify and consider given the changes to flows anticipated due to subsidence.]</i></p>	This figure has been updated.	<p>C8. Figure 18-11 in Chapter 18 of the EIS is now Figure 18-12 in Chapter 18 of the SEIS. Figure does not appear to show any new information when compared to Figure 18-11. The proponent should indicate (what information has been added) how the figure has been updated apart from the numbering.</p>	<p>R8. The proponent should say what has been updated in Figure 18-12 (Chapter 18) of the SEIS.</p>
	Recommendation: It is recommended	This section has been	Wording in dot point 5; p12-106;	R9. Review the

	<p>that the proponent specifically outline the mitigation measures for each and/or all types of mine-affected waters in Section 12.8.8.</p> <p>[Issue: Section 12.8 Mitigation Measures] <i>The proponents state in Section 12.8 Mitigation Measures 12.8.8 Accidental Release of Pollutants that "the redirection of all infrastructure area runoff to environmental dams" will occur, however this should be altered to read "the redirection of all mine affected run-off and mine affected waters are made to appropriately managed dams". No mention is made in this section of the mitigation measures and destination for groundwater inflows (one of the major concerns in terms of water quality and volumes).]</i></p>	<p>reworded to clarify the meaning. Groundwater mitigation measures and inflows are addressed in Chapter 9 - Groundwater and Chapter 18 - EM Plan.</p>	<p>Section 12.7.8 (formerly 12.8.8) of Chapter 12 has been changed to <i>"The redirection of all mine affected runoff and mine affected waters are made to appropriately managed dams which have been designed to be above the 1:1000 year ARI level"</i></p> <p>It is also apparent from the EMP (Chapter 18) of the SEIS that mine dewatering water (from groundwater inflows) will be stored in dams with a potential for uncontrolled discharge or vertical infiltration of contaminants from dams to water table aquifer.</p> <p>C9. Not all of the performance criteria associated with potential groundwater impacts from groundwater inflow and disposal/removal (e.g. in italics below) are measurable and should be reconsidered. <i>"all valid groundwater complaints from down gradient users will be taken seriously and investigated in accordance with Project investigation procedures"</i> Without measureable performance criteria it will be difficult to assess impacts and / or efficacy of mitigation and management measures.</p>	<p>performance criteria for ground and surface water impacts and ensure all environmental protection commitments are measurable and auditable</p>
	<p>Recommendation: Scientific justification of the above statement is required and should be presented in Chapter 8 – Surface Water (and appropriate appendices) and Section 12.8. The</p>	<p>As noted above, a baseline water quality monitoring program is being prepared at present. This will be implemented and data</p>	<p>C10. The proponent not only need to ensure that they have a good characterisation of water in the receiving environment but will also need to characterise the</p>	<p>R10. More information would be required on the quality of mine affected water that may be released and under what scenarios or</p>

	<p>proponents should prepare and present an assessment of the anticipated water quality of all the various types of mine waters.</p> <p>[Issue: Section 12.8 Mitigation Measures <i>The proponents state in Section 12.8 Mitigation Measures 12.8.8 Accidental Release of Pollutants that “The discharge of wastewater and stormwater will be similar to water quality of receiving waters and in accordance with the water quality objectives for the Comet River sub-basin” however we have found no evidence in the EIS that an assessment of the anticipated water quality onsite has been undertaken. Without presentation of this estimated water quality it is unclear how this statement can be scientifically justified.]</i></p>	<p>gathered prior to construction. The findings of this additional monitoring will determine specific trigger values. Sizing of dams will ensure that any uncontrolled discharges resulted in highly diluted water being released that will not impact the system. This has been discussed in Chapter 8 - Surface Water.</p>	<p>quality of mine affected water that may be discharged and under what conditions (if there is natural stream discharge at the time of mine affected water release then potential contaminants will be diluted to some extent) to the environment before they can understand the potential impacts of mine affected water release (controlled or uncontrolled) to the receiving environment.</p>	<p>conditions this water would be released in order for the proponent to justify the statement <i>“The discharge of wastewater and stormwater will be similar to water quality of receiving waters and in accordance with the water quality objectives for the Comet River sub-basin”</i></p>
	<p>Recommendation: It is recommended that the proponents update Section 18.5.4.6 Potential Impacts on Environmental Values (Surface Water) and other relevant sections of the EIS to include impacts listed under “groundwater” but which actually pertain to “surface waters”. The proponents should also detail the potential impact to downstream environmental values in further detail, i.e. list the contaminants of greatest concern and assess potential impacts to identified EVs downstream outside of the mixing zone (quantitatively), from alterations to both water quality and quantity including for aquatic ecosystems e.g. farm dam wetlands, semi-permanent or permanent waterholes, Riverine regional ecosystems</p>	<p>Section 18.5.4.9 Control Strategies for the management of surface water impacts has been updated to include monitoring of downstream discharges. Monitoring will account for all existing uses and values of water and adopt a risk based approach to management as appropriate. As discussed at meeting, the Arcturus Coal Mine project is on hold and thus cumulative impacts for this project need not be assessed as part of this EIS.</p>	<p>The proponent has added more detail on potential impacts to surface and groundwater EVs, and proposed control strategies to Sections 18.5.4.6 and 18.5.4.9 of the SEIS, respectively. Included in Section 18.5.4.9 of the SEIS is some broad information on the monitoring program to be implemented to; (a) <i>“supplement the water management strategy to confirm that any potential uncontrolled discharges (overflows from the Environmental Dams) do not adversely impact on downstream water quality”,</i> and (b) <i>“serve as a continual</i></p>	<p>R11. Where possible measure local stream flow data rather than estimating it. R12. Provide greater detail within a Mine Affected Water Monitoring Plan or incorporate this information into the Water Quality Monitoring Plan.</p>

	<p>etc., irrigation and stock watering. Cumulative impact's also needed to be assessed. This is required under the EIS ToR and has not been adequately addressed in the EIS.</p> <p>[Issue: Environmental Management Plan : Section 18.5.4.6 Potential Impacts on Environmental Values (page 18-84)]</p> <p><i>The potential impacts to surface waters identified by the proponents during the operational phase are listed as:</i></p> <p><i>“ Altered catchment conditions and subsidence on the hydrology of waterways and drainage lines; and Stormwater runoff, erosion and contaminants from the CHP and MIA areas.”</i></p> <p><i>Yet in the groundwater section (page 18-85) a more descriptive assessment of potential impacts to <u>surface waters</u> is presented.</i></p> <p><i>“Mine dewatering water will be stored in a dewatering dam on the eastern side of the MIA. Due to the quality (“poor”) of mine water, potential impacts to above ground ecosystems could results from uncontrolled discharge into the surrounding waterways...”</i></p> <p><i>In general however, the descriptions and assessment presented in this section of the EIS is not considered adequate. The ToR clearly require;</i></p> <p><i>“ Describe any cumulative impacts on environmental values caused by the project, in isolation and in combination with the proposed Arcturus Coal Mine and other known existing or planned</i></p>		<p><i>improvement mechanism for the ongoing management of stormwater including operational calibration of the water balance model”</i></p> <p>C11. According to sub-point 3 p18-101; Chapter 18; SEIS (“Relevant water quality parameters, including physico-chemical and estimation of local stream flow;”) local stream flow data will be estimated rather than measured.</p> <p>C12. Very limited detail is provided in Section 18.5.4.9 (EMP section of the SEIS) on the intended monitoring of mine affected water in storages. This information is integral in determining the potential impacts should mine affected water be released. This information would also be used to set release limits and / or trigger values should the mine affected water ever be released to surface waters.</p>	
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	<p>development or sources of contamination.”</p> <p>and</p> <p>“Impact on environmental values: describe quantitatively the likely impact of the project on the identified environmental values of the area. The cumulative impacts of the project must be considered over time or in combination with other (all) impacts in the dimensions of scale, intensity, duration or frequency of the impacts. In particular, address any requirements and recommendations of relevant state planning policies, environmental protection policies, national environmental protection measures and integrated catchment management plans.”</p> <p>and</p> <p>“Cumulative impacts on the environmental values of land (including agricultural land), air and water and cumulative impacts on public health and the health of terrestrial and aquatic ecosystems must be discussed in the relevant sections. This assessment may include air and watersheds affected by the project and other proposals, such as the Arcturus Coal Mine, competing for use of the local air and water sheds.”</p> <p>and</p> <p>“Where impacts from the project will not be felt in isolation to other sources of impact, it is recommended that the proponent develop consultative arrangements with the Arcturus Coal Project and other industries in the project's area to undertake cooperative monitoring and/or management of environmental parameters. Describe such</p>			
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	<p><i>arrangements in the EIS”]</i></p> <p>Recommendation: It is recommended that a much greater emphasis is placed on site-specific assessment in regards to potential impacts and environmental protection objectives for surface waters.</p> <p>[Issue: Environmental Management Plan : Section 18.5.4.7 Environmental Protection Objectives (page 18-85)] <i>The environmental protection objectives listed for water resources are scarce and apart from protecting agricultural use the only objective listed is as follows: “Maintain chemical, physical and biological properties of existing water resources within acceptable parameters” There is no consideration of protecting water flow as a protection objective, and there is a wide leeway in how “acceptable parameters” could be interpreted. It would appear that very little time and consideration has been given to identify, and clearly assess that site-specific environmental values and environmental protection objectives for surface waters both on-site and downstream of the proposed site. This is a major concern in regards to this EIS. How can the objective be to maintain existing properties for surface waters when an inadequate assessment of local surface waters has been undertaken? If information is not currently available then the EPO’s should include to an objective to comprehensively assess the local surface waterways and aquatic ecosystems and detail the spatial location of all relevant EVs (mapping).]</i></p>	<p>As noted above, a baseline water quality monitoring program is being prepared at present. This will be implemented and data gathered prior to construction. The findings of this additional monitoring will determine specific trigger values appropriate to the context of the Project.</p>	<p>C13. The proponent has not fully addressed the recommendation. There is a combination of information that is used in the site specific assessment of potential impacts and to quantitatively assess the efficacy of impact mitigation and management measures. Initially, environmental values and objectives to protect or enhance these values should be identified. WAS wish to reiterate that while the baseline water quality monitoring information is important the Scheduled environmental values and water quality objectives for the region (attached) should also be considered in impact assessment.</p>	<p>R13. Scheduled environmental values and water quality objectives for the region (attached) where the project occurs are as important as baseline monitoring data and should also be considered in impact assessment. EVs and the objects used to protect or enhance these values should be detailed in the EIS and EMP. There are Scheduled EVs for surface and groundwater flow and Scheduled WQOs for flow objectives in high ecological value waters. Regional surface and groundwater flow objectives should also be taken into account (Queensland Government, 2011).</p>
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	<p>Recommendation: It is recommended that the proponent makes the suggested alteration listed above.</p> <p>[Issue: Environmental Management Plan: Section 18.5.4.8 Performance Criteria (page 18-85)] <i>The proponent lists the following Performance Criteria for surface waters: “ Compliance with the regulatory conditions outlined by the Project’s Environmental Activity (EA); Monitoring to be undertaken in accordance with outlined control strategies; Develop monitoring criteria including trigger values using site specific data ; Quantity of groundwater complaints from down gradient users”</i> <i>The terminology is incorrect for EA, as this should read “Environmental Authority” rather than “Environmental Activity”. Given that the main Performance Criteria is based on compliance with the EA, the EA will need to be designed in such a way to protect the receiving waters and associated environmental values environment. As it stands the current proposed EA does not achieve these aims.</i> <i>It is not a performance criteria to “ <u>develop</u> a monitoring program and trigger values” rather, it would be a performance criteria to “adequately monitor and <u>maintain</u> water quality within receiving waters in order to meet the Water Quality Objectives (WQOs) for identified environmental values”.</i></p>	Section 18.5.4.8 has been amended as recommended.	The proponent has fulfilled the recommendations made by WAS.	No further recommendations.
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	<p><i>It is unclear how a “quantity of complaints” it an adequate environmental performance criteria. By this criteria in the current EIS, if a small number of complaints are received regarding the projects impact on down-gradient groundwater users, then the site is “performing” adequately. We would suggest that any and all complaints should be considered seriously.]</i></p>			
	<p>Recommendation: It is recommended that the proponent clarify the water management strategies as there is a general lack of consistency throughout the EIS and Appendices. Follow the advice above to undertake the planning of a controlled discharge</p> <p>[Issue: Environmental Management Plan: Section 18.5.4.9 Control Strategies (page 18-87)]</p> <p><i>For the first time, the proponents mention anything about a controlled discharge. In all or most other sections of the EIS the proponents only refer to “uncontrolled” discharges.</i></p> <p><i>“Controlled discharges from dams (i.e. actively controlled discharges) will only be undertaken in the event water quality parameters are in accordance with the relevant guidelines”</i></p> <p><i>While we are not against the proposal of controlled discharges if designed in such a way that WQOs are adequately protected (i.e. with dilution specifically designed), this should not be the first and only mention of this water management option. There does not appear to be any EA conditions relating to controlled discharges, if controlled discharges are to</i></p>	<p>As confirmed during meeting, the Project is not proposing any controlled discharges. As such, no draft EA conditions are proposed to manage this. Conditions to manage the event of an uncontrolled release are proposed at Condition D15, which includes quality objectives for monitoring and reporting requirements.</p>	<p>C14. It is not usual to condition for an uncontrolled release, especially if the release will be rare or unlikely to occur at all during the lifetime of the project. In instances where an uncontrolled release is foreseeable the proponent may apply for a Temporary Emissions Licence (TEL). The information collected to characterise baseline surface water quality and the quality of mine affected water in storage dams monitoring would be useful in this application. There would also be some monitoring requirements under the TEL.</p>	<p>R14. Consider removing Condition D15, which conditions the uncontrolled release of mine affected water, to surface waters given that uncontrolled release of mine affected water is highly unlikely (only occurs in extreme weather events).</p>

	<p><i>be considered further then further information and site-specific assessment will need to be incorporated in Chapter 8 – Surface Water, Site Water Management Plans and Site Water Balance, and detailed conditions proposed in the EA water conditions (refer to Model Conditions for Coal Mine in the Fitzroy for more guidance on this). The Technical guideline “Wastewater release to Queensland waters” (2012) should also be followed.]</i></p>			
	<p>Recommendation: It is recommended that this statement is removed from the Mine Water Management System section of Section 18.5.4.9 Control Strategies. The mine water management should clearly aim to keep “clean” or “raw” water separate from “dirty” or mine affected waters. This should be updated in Section 18.5.4.9 and any other relevant sections of the EIS.</p> <p>[Issue: Issue: Environmental Management Plan : Section 18.5.4.9 Control Strategies (page 18-87)</p> <p><i>The proponents [sic]</i></p> <p><i>“Raw water will also be used to top up the mine dewatering dam to ensure there is enough water for underground mine use and stockpile sprays”</i></p> <p><i>This statement does not align with the stated aim to separate “clean” and “mine-affected water” on-site, where separation of these water types represents best-practice management. It is not best-practice to combine clean or raw water with contaminated waters (impacted by mining activities), as this in-effect</i></p>	<p>All water within the MIA is classes as ‘dirty’ or “mine affected” water. Clean water is either that from outside the site that will be diverted around the mine site, or bought into the site. Bandanna Energy has purchased an allocation of 1,000 mega litres of water per year from Sunwater’s Nogoia–McKenzie Water Supply Scheme for use at the mine site. Water from this scheme will be piped to the site. The purchase will ensure the mine is self-sufficient and does not draw upon existing local water supplies and or aquifers. In the event that the dam does not contain sufficient quantities of water to undertake underground mining activities, water from the pipeline will be utilised as a supplement.</p>	<p>The proponent has provided sufficient information on this issue.</p>	<p>WAS have no further recommendations on this issue.</p>

	<p><i>increases the volumes of contaminated water onsite.]</i></p> <p>Recommendation: It is recommended that the proponent state that the baseline water assessment and interpretation of water quality data will follow the appropriate guidelines including the DERM Monitoring and Sampling Manual, Queensland Water Quality Guidelines (QWQG, 2009), ANZECC guidelines, Model water conditions for coal mines in the Fitzroy Basin etc. As a minimum, but not limited to including;</p> <ul style="list-style-type: none"> • Measure for those all indicators listed in Tables 2 and 3 the Model water conditions for coal mines in the Fitzroy Basin (including both field filtered (dissolved) metals and totals metals). • When deriving local WQOs make sure included data is only collected from true reference sites (as per the definition in Section 4.4.3 of the QWQGs (2009)). It is not adequate to use data collected from locations downstream of discharging mines. • Include a measure or estimate of local stream flow at the time of each sampling event. The relationship between flow vs. EC should be investigated at local reference sites. • A minimum of 10 data points, but preferably 24 data points should be used and collected over a minimum of 12-18 months, and be representative of all seasons; 	<p>A detailed monitoring plan is currently being developed. Please refer to Chapter 18, Section 18.5.4.10</p>	<p>The proponent has provided sufficient information on this issue.</p>	<p>WAS have no further recommendations on this issue.</p>
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	<ul style="list-style-type: none"> All data used to determine locally-derived trigger values should be presented in electronic format for review by DEHP or DSITIA <p>IMPORTANT NOTE: Reference to these documents, and the minimum requirements listed above should also be added to other relevant sections of the EIS which refer to future plans to undertake water and aquatic ecosystem health monitoring and WQO derivation</p> <p>[Issue: Section Environmental Management Plan: Section 18.5.4.9 Control Strategies (page 18-88)] <i>The proponents commit to developing a Water Management Plan (Water MP) under the Construction Environmental Management Plan (CEMP), and as part of this program they plan to develop:</i> <i>"Criteria will be developed with trigger values set at the 20th and 80th percentiles identified through baseline investigations which will be further undertaken prior to construction"</i> <i>No clear plans are presented in regards to how these "baseline investigations" will be undertaken. There is no presentation of the monitoring program design, indicators to be measures, QA/QC, etc. There is also no reference to the appropriate guideline documents.]</i></p>			
	<p>Recommendation: The issues listed should be addressed in the relevant sections of the EIS</p> <p>[Issue: Section 18.5.4.10 Monitoring Surface Water] <i>Commitments are made to monitor at the</i></p>	<p>Condition D21 provides for the monitoring of water storage quality.</p>	<p>C15. Proposed Condition (D21) provides no information on the frequency of monitoring mine affected water in storage dams. Stock should not have access to dams containing hazardous waste. Condition (D21) ["(D21) In</p>	<p>R15. Remove Condition (D21) from the Proposed Environmental Authority Conditions: Schedule D – Water (Section 18.5.4.12; EMP; SEIS). R16. Mine affected water</p>

	<p><i>Environmental Dams (EDs) and the proposed ongoing sampling locations (refer section 18.5.4.12 - EA) for both water quality and flow (subsidence impacts). There should also be ongoing monitoring of water quality in the mine-affected water dam also.</i></p> <p><i>There is repeated reference to “water quality levels which exceed the WQOs set out in the EA and Water MP, upstream (control) values will be compared to the water quality within and downstream of the Project area to determine if the exceedence is likely to be Project area specific”. There is no mention however of the sampling frequency or how this comparison will be undertaken. Strictly speaking it should be the median of test site data which is compared to the WQO. If weekly sampling is undertaken, a rolling median could for example be calculated and used for interpretation purposes.]</i></p>		<p><i>the event the water quality within any dam containing hazardous waste does not comply with the contaminant limits defined in Table 18-30, measures will be implemented to minimise access by stock to the dam.”]</i> should be removed from the Proposed Environmental Authority Conditions: Schedule D – Water (Section 18.5.4.12; EMP; SEIS). Stock should not have access to dams containing hazardous waste.</p> <p>C16. It is still important to monitor the quality of mine affected water in storage dams because this information can be used to (a) assess potential impacts to ground and surface waters (diffuse and point source emissions/release); (b) set release limits should mine affected water be released to surface waters, and (c) test the efficacy of mitigation and management measures to avoid and / or reduce impacts.</p>	<p>in storage dams should be monitored. A condition to monitor mine affected water in storages and / or a commitment to monitor mine affected water in the EMP should be sufficient. A detailed plan on how this monitoring will be carried out should be included within a Mine Affected Water Monitoring Plan or incorporate this information into the Water Quality Monitoring Plan.</p>
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	<p>Recommendation: It is recommended that proposed EA Condition D3 is altered and does not allow for the uncontrolled environmental discharge of mine affected water to receiving waters. Just because a creek is unnamed and is located in full or in part on the mine lease area does not mean that it should be considered part of the on-site water infrastructure (nor for on-site farm dam wetlands). The QWQGs clearly state that all waterways including highly ephemeral waterways are assigned a level of protection. We do support however the assertion that receiving waters monitoring is undertaken (as outlined in the second half of proposed EA Condition D3).</p> <p>Throughout the EIS, very limited information is presented regarding the locations of discharge points, relative to the receiving waterways, farm dam wetlands, riverine regional ecosystems etc. No modelling or assessment of the impacts of mine discharges on these waterways is presented. Given that discharge locations appear to upstream of farm dams, and discharge waters are likely to be trapped within these farm dam wetlands, a comprehensive understanding of the likely dilutions, mixing zones and wetland specific issues should be presented in the SEIS. If mine-affected discharges occur with high Electrical Conductivity (EC) into a poorly mixed receiving environment (farm dams) it is highly likely that stratification of waters will occur with higher concentration EC water falling to the bottom layers of the water column, and potentially adversely affecting</p>	<p>Farm dams and creeks will not be used to provide or store water as part of the Project. Any uncontrolled discharges during flood events to existing waterways from these dams will be via an spillway and in accordance with quality criteria presented in condition D15. There is no need to amend condition D3.</p>	<p>WAS are satisfied with the information supplied here.</p>	<p>WAS have no further recommendations on this issue.</p>
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	<p>biota within the benthic zone. Insufficient attention has been placed on these and similar issues. It is strongly recommended that thorough consideration, assessment and/or modelling is undertaken and presented in the relevant sections of the EIS</p> <p>[Issue: Section 18.5.4.12 Proposed Environmental Authority Conditions: Schedule D- Water Surface Water] <i>The proponents propose the following conditions;</i> <i>“Condition (D3) Waters within un-named creek 1 has the potential to be affected by storm water contaminated by the mining activities and therefore must be monitored at the locations and frequencies defined in the Table 18-24”</i> <i>Contaminated stormwater should not be allowed to run-off freely into receiving waterways and needs to be contained for treatment and/or for controlled discharges. Unnamed Creek 1 is stated to flow into Farm Dam 2 (Den Lo Park). Discharges to Unnamed Creek 1 are complicated by the downstream Farm Dam. What are the EV's of this dam? Aquatic ecosystems, irrigation, stock watering? The proponent has not presented any information in regards to how the EV's of this dam will be protected from mining impacts. Mine-affected water which is proposed to be discharged into dams is a far more complicated discharge scenario. No modelling or assessment of mixing zones has been presented in the EIS]</i></p>			
	<p>Recommendation: It is strongly recommended that the proponent obtain</p>	<p>Schedule D has been updated considering the Model water</p>	<p>C17. Given release of mine affected water to surface waters</p>	<p>R17. As advised above consider removing Condition</p>

	<p>and consider the “Model water conditions for coal mines in the Fitzroy basin”. Deviations to these conditions are able to be proposed by the proponent however this needs to be adequately justified on a scientific basis. We could not locate any scientific justification for the proposed conditions regarding waters. Significant revision is required for the proposed EA.</p> <p>[Issue: Section 18.5.4.12 Proposed Environmental Authority Conditions: Schedule D- Water Surface Water <i>This mine is located in the Fitzroy Basin and yet the proponents do not refer to the “Model water conditions for coal mines in the Fitzroy basin”.]</i></p>	<p>conditions for coal mines in the Fitzroy basin. New conditions have been presented and existing conditions updated.</p>	<p>will be rare or highly unlikely then a controlled release of mine affected water condition will not be required in the EA.</p> <p>C18. Condition (D21) is poorly written and needs to be reviewed or removed.</p> <p>C19. The Water Quality Monitoring Plan (WQMP), which is described in brief in the EMP section of the SEIS (pp18-19), shows that the proponent intends to conduct receiving environment monitoring throughout the life of the project. A requirement to conduct a receiving environment monitoring program (REMP) is usually also conditioned in the EA, especially where there is a potential for release of mine affected water to surface waters.</p> <p>C20. The WQMP / REMP is only described in brief in the EMP section of the SEIS.</p>	<p>D15, which conditions the uncontrolled release of mine affected water to surface waters given that uncontrolled release is highly unlikely.</p> <p>R18. Remove Condition (D21) from the Proposed Environmental Authority Conditions: Schedule D – Water (Section 18.5.4.12; EMP; SEIS). A condition to monitor mine affected water in storages and / or a commitment to monitor mine affected water in the EMP should be sufficient, along with a detailed plan on how this monitoring will be carried out (a Mine Affected Water Monitoring Plan).</p> <p>R19. We recommend adding a requirement to conduct a REMP in the EA. Conditions for monitoring of the receiving environment as per Model Mining Conditions (http://www.ehp.qld.gov.au/land/mining/pdf/model-mining-conditions-em944.pdf).</p> <p>R20. The full details of the environmental monitoring to be carried out under the WQMP / REMP would need to be reviewed to ensure that the program is well designed enough to (a) to assess the potential impact of any release of mine affected</p>
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				water on EVs; (b) to test the accuracy of an environmental impact statement and whether management and mitigation measures are effective and (c) to set and / or amend release limits and trigger levels for specific water quality parameters and related conditions within an approval)
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RTI DL Release

References

DERM (2011) *Environmental Protection (Water) Policy 2009 Comet River Sub-basin Environmental Values and Water Quality Objectives Basin No. 130 (part), including all waters of the Comet River Sub-basin September 2011*, Department of Environment and Resource Management, Brisbane:

http://www.ehp.qld.gov.au/water/policy/pdf/plans/fitzroy_comet_river_wqo_290911

Queensland Government (2011) *Water Resource (Fitzroy Basin) Plan 2011*, Queensland Government, Brisbane:

<http://www.legislation.qld.gov.au/LEGISLTN/CURRENT/W/WaterReFBP11.pdf>

Attachments



Adobe Acrobat
Document



Adobe Acrobat
Document

Disclaimer:

Any opinions, advice or comments provided in this memo (i.e. the work request 'response') or associated attachments or emails should not be used as part of legal proceedings or expert statements. Please advise the Water Assessment and Systems (WAS) Group immediately if the response to this work request could be used in relation to legal proceedings.

WAS work request responses are typically based largely on the information and data provided by other parties. Although the information and data provided will be cross-checked and verified wherever possible, WAS cannot be held liable for interpretations based on incorrect, inaccurate, incomplete or otherwise invalid information or data, nor for any subsequent decisions or actions made by any individuals or organisations that were based on misinformed responses.

Phillips Erin

From: michael.a.nelles@tmr.qld.gov.au
Sent: Friday, 12 July 2013 12:19 PM
To: Rhodes Monika
Cc: EIS External Submissions; Jason.O.Hoolihan@tmr.qld.gov.au; cmo.rockhampton@tmr.qld.gov.au; Andrew.E.Armstrong@tmr.qld.gov.au; mdp@tmr.qld.gov.au; tom.k.orr@tmr.qld.gov.au; warwick.z.williams@tmr.qld.gov.au
Subject: TMR comments on SEIS for Springsure Creek coal project
Attachments: Final CQ Reg comments SEIS Springsure Creek July13.doc; TMR comment Springsure Ck mine SEIS July 13.pdf; PM Bch comments on Springure Ck coal project SEIS July 13.doc; DTMR Guide to preparing a Traffic Mgt Plan rev1, June13.doc

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Monika

thank you for inviting TMR to comment on the SEIS for Springsure Ck mine project.

An e-copy of the departmental submission and Word files are attached.

Pls call me if you have any queries.

regards

Michael Nelles
A/Principal Advisor (Development Outcomes) | Policy & Planning Branch
Policy, Planning & Investment Division | Department of Transport and Main Roads

Floor 12 | Brisbane - Terrica Place | 140 Creek Street | Brisbane Qld 4000
GPO Box 213 | Brisbane Qld 4001
P: (07) 3066 1812 | F: (07) 3146 2008
E: michael.a.nelles@tmr.qld.gov.au
W: www.tmr.qld.gov.au

From: "Rhodes Monika" <Monika.Rhodes@ehp.qld.gov.au>
To: undisclosed-recipients;;
Date: 10/07/2013 07:15 AM
Subject: Reminder - comments on SEIS for Springsure Creek due this Friday

Dear All

Please keep in mind that the comments on any outstanding issues on the SEIS for the Springsure Creek Coal Mine Project are due this Friday, 12 July 2013 COB.

Your advice should be forwarded to:

The EIS Coordinator – Springsure Creek Coal Mine Project
Department of Environment and Heritage Protection
GPO Box 2454 BRISBANE QLD 4001
Level 9, 400 George Street BRISBANE QLD 4000
or by email to eis@ehp.qld.gov.au.

Note that EHP has only 20 bd to make a decision.

Kind regards

Dr Monika Rhodes
Principal Environmental Officer
Statewide Environmental Assessments
Telephone 07 3330 6293 **Facsimile** 3330 5875
Email: monika.rhodes@ehp.qld.gov.au
www.ehp.qld.gov.au
Department of Environment and Heritage Protection
Level 9, 400 George Street, Brisbane Q 4000
GPO Box 2454, Brisbane Q 4001

From: Rhodes Monika
Sent: Tuesday, 25 June 2013 12:24 PM
Subject: RE: SEIS_Email-Out_submission of supplementary EIS_Springsure_20130624

Dear All

Please note that the proponent will not send out hard copies, but electronic copies of the amended EIS (as sticks), including the response to your submissions. I have heard that the proponent has sent them only yesterday (Monday).

Alternatively, the amended EIS can be accessed through the proponent's web page:
<http://www.springsurecreekproject.com.au/project-development-and-approvals/springsure-creek-coal-mine-eis>

Please note that there was some confusion regarding the term 'final EIS' – as labelled on the documents; however, this EIS is the amended EIS (or supplementary EIS) based on submissions.

If you have any questions, please don't hesitate to contact me.

Regards

Dr Monika Rhodes
Principal Environmental Officer
Statewide Environmental Assessments
Telephone 07 3330 6293 **Facsimile** 3330 5875
Email: monika.rhodes@ehp.qld.gov.au
www.ehp.qld.gov.au
Department of Environment and Heritage Protection
Level 9, 400 George Street, Brisbane Q 4000
GPO Box 2454, Brisbane Q 4001

From: Rhodes Monika
Sent: Monday, 24 June 2013 7:50 AM
Subject: SEIS_Email-Out_submission of supplementary EIS_Springsure_20130624

Dear All

Your organisation lodged a submission on the environmental impact statement (EIS) for the proposed Springsure Creek Coal Mine Project, located 47 kilometres south-east of Emerald in central Queensland.

The proponent, Springsure Creek Coal Pty Ltd, has prepared a supplementary EIS and response to submissions that were received during the public notification period for the EIS. In the interests of facilitating the assessment of submissions provided by your department, please consider the response to your submissions and advise the Department of Environment and Heritage Protection (EHP) of any comments or recommended conditions that should

apply to the project by **close of business Friday, 12 July 2013** (note that EHP will have to make a decision under section 56A of the *Environmental Protection Act 1994* if the EIS can proceed within 20 bd, so any comments should be received by 12/07/13; the Act does not allow for any extensions).

Your advice should be forwarded to:

The EIS Coordinator – Springsure Creek Coal Mine Project
Department of Environment and Heritage Protection
GPO Box 2454 BRISBANE QLD 4001
Level 9, 400 George Street BRISBANE QLD 4000
or by email to eis@ehp.qld.gov.au.

Should you have not received a copy of the SEIS and a response to your submission by COB today, please contact Mr Pete Jones, Springsure Creek Pty Ltd (Bandanna Energy), on 3041 4434.

I will be the EIS Coordinator and primary contact for this project.

Kind regards

Dr Monika Rhodes
Principal Environmental Officer
Statewide Environmental Assessments
Telephone 07 3330 6293 **Facsimile** 3330 5875
Email: monika.rhodes@ehp.qld.gov.au
www.ehp.qld.gov.au
Department of Environment and Heritage Protection
Level 9, 400 George Street, Brisbane Q 4000
GPO Box 2454, Brisbane Q 4001

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Opinions contained in this email do not necessarily reflect the opinions of the Department of Transport and Main Roads, or endorsed organisations utilising the same infrastructure.

Attachment A

Queensland Department of Transport and Main Roads response to Dept Environment & Heritage Protections as EIS Coordinating Agency: Supplementary Environmental Impact Statement (S-EIS) – Springsure Creek Coal Mine Project

Program Delivery & Operations Division			
Name:	Mr Rex Cowan (Corridor Management & Operations), Program Delivery & Operations Division		
Address:	PO Box 5096, Central Queensland Mail Centre 4702	Contact:	Mr Jason Hoolihan, Senior Designer, (07) 4983 8736

General

DTMR has reviewed the proponent's response regarding the issues raised in the department's EIS submissions and is satisfied with some of the proponents proposed intentions to provide suitable mitigation measures. However, further consultation is required regarding a number of issues not adequately addressed in the Supplementary EIS (SEIS).

- Safety and efficiency of the State Controlled Road Network due to the increased traffic from the development;
- Mitigation of impacts on the State Controlled Network due to increased traffic volumes from the development.

The Department is not in a position to fund the safety improvements that may be required, nor would it be likely that this funding could be made available to undertake the immediate works necessary to ensure the ongoing safety and efficiency of the SCR network for the proposal to proceed with the construction phase. Therefore, once further information is available on the final design of the project, the proponent is required to undertake a review of the RIA and provide an updated assessment which clearly identifies any necessary safety improvements works, rehabilitation and maintenance costs to mitigate the impacts of project traffic prior to undertaking any project construction works. It is strongly recommended that the proponent and their consultants continue to liaise with Mr Jason Hoolihan (contact details noted above) to discuss and resolve these issues in a timely manner.

Recommendation for “Requirements” (generally these will not be conditions attached to the mining lease).

1. Post-Assessment Contact with the Department of Transport and Main Roads

Once the proponent has received final approval to proceed with the Springsure Creek Coal Mine Project, the proponent shall contact the Manager of the DTMR Emerald Office, Mr Rex Cowan no later than nine (9) months prior to the commencement of any project construction works to discuss the preparation of the finalised road impact assessment (RIA), road-use management plan (RMP) and traffic management plan (TMP).

2. Proposed Infrastructure Agreement condition

The proponent shall enter into an Infrastructure Agreement with DTMR for:

- a. contribution or upgrade to any intersections with the State-controlled Road network that are significantly impacted upon, as determined and agreed upon with TMR Emerald Office, following completion of a comprehensive Road Impact Assessment (RIA), which is carried out in accordance with the departments “Guidelines for Assessment of Road Impacts of Development” (GARID);
- b. contribution to minimising impacts on road links associated with project traffic as calculated and agreed upon with TMR Emerald Office, following completion of a comprehensive RIA which is carried out in accordance with the departments GARID;
- c. rehabilitation and maintenance contributions associated with project traffic as calculated and agreed upon with TMR Emerald Office, following completion of a comprehensive RIA which is carried out in accordance with the departments’ GARID.

This infrastructure agreement between the proponent and TMR should be concluded prior to commencement of any construction works on site.

TMR is the agency responsible for monitoring compliance with this condition.

3. Road Impact Assessment and Road Use Management Plan

When additional information regarding the final design and traffic generation of the project is available, the proponent shall undertake the following no later than six months prior to the commencement of any project construction works;

- a. review and finalise the road impact assessment (RIA) to include details of the latest project traffic generation and all project transport impacts on the safety and efficiency of state controlled roads in accordance with *Guidelines for Assessment of Road impacts of Development (2006)* in consultation with the Manager of DTMR Emerald Office;
- b. submit the RIA to the Manager of the DTMR Emerald Office for review and approval;
- c. prepare a road-use management plan (RMP) for all use of state-controlled roads for each phase of the project, in accordance with DTMR’s *Guide to Preparing a Road Use Management Plan* (attached). The RMP must receive DTMR’s approval prior to its implementation and must include:
 - o Latest traffic generation (vehicle numbers/types/routes etc.);
 - o Summary of finalised assessment of impacts on safety and efficiency at intersections, on road links and on network condition for example, pavements etc.; and
 - o Updated impact mitigation strategies, both road-use management strategies, such as bussing workers to minimise road-based trips and “infrastructure” strategies such as any road maintenance or any necessary improvements.

4. Traffic Management Plan

Three months prior to the commencement of any project construction works, the proponent shall prepare detailed drawings and traffic management plans (TMP) for all construction and other activities in state-controlled road corridors to demonstrate how these road works will be safely undertaken.

The proponent shall implement the traffic management plan during construction and commissioning of the project and construction of all access road intersection/s and other works to be undertaken within a SCR corridor.

The TMP shall incorporate a provision that, prior to commencing any program of oversize/over-mass transport movements that may be required for the construction of the project, the proponent will consult with DTMR, the Queensland Police Service and the Central Highlands Regional Council.

The proponent shall obtain the necessary permits for any excess mass or over-dimensional loads associated with the project as required under *the Transport Operations (Road Use Management) Act (Qld) 1995*.

5. Undertaking road impact mitigation strategies

The proponent shall present detailed drawings of any required roadworks and traffic management plans for review and approval by DTMR and take account of the reviews. The proponent shall undertake any required roadworks and road-use management strategies detailed in the RMP and TMP.

Our ref 455/00617
Your ref Proponent letter dated 24/6/13
Enquiries Michael Nelles

Department of Transport and Main Roads
Policy, Planning and Investment Division
Planning Management Branch
Floor 12 Brisbane - Terrica Place
140 Creek Street Brisbane Queensland 4000
GPO Box 213 Brisbane Queensland 4001

10 July 2013

Telephone +61 7 3066 1812
Facsimile +61 7 3146 2008
Website www.tmr.qld.gov.au
Email michael.a.nelles@tmr.qld.gov.au

The EIS Coordinator – Springsure Creek Coal Mine Project
Statewide Environmental Assessments
Department of Environment and Heritage Protection
GPO Box 2454
Brisbane Qld 4001
Attention: Dr Monika Rhodes

Dear Monika,

Thank you for providing the Department of Transport and Main Roads (TMR) the opportunity to comment on the Finalised (supplementary) EIS for the **Springsure Creek coal mine project**.

TMR has reviewed the transport-related information provided in the Finalised EIS and again acknowledges its useful traffic information and also consultation with TMR undertaken to this stage. The attachments summarise a few key issues that need to be highlighted and lists TMR requirements, should the project proceed. Key issues include:

- ensuring road impacts of the overall project, including the traffic from the rail loadout facility (and the worker accommodation village if the proponent constructs it) are dealt with, irrespective of whether separate approvals for these will be sought later
- more detailed analysis of the potential increase in road safety risk from project traffic, on all key routes, including at level crossings
- further clarity about what the road-use management plan (RMP) should contain and how proposed impact mitigation strategies such as fatigue management will be implemented and documented
- a more detailed list of commitments, to comprehensively summarise proposed impact mitigation strategies, including a commitment to mitigate coal loss and coal dust generation during rail-haul of coal.

The attachments provide further information on these issues.

If you have any queries regarding these comments, please contact Michael Nelles on (07) 3066 1812.

Yours sincerely

sch4p4(6) Personal information
[Redacted signature]

Tom Orr
A/Director (Development Outcomes)

Attachments (3)

- A** Program Delivery & Operations Div. – Central Qld Region (Emerald office) submission
- B** Planning Mgt Branch submission
- C** Guideline for preparing a traffic management plan.

Cc (Via email only)

File Number: 455/00617

- | | |
|--|--|
| 1. Mr Damian Colclough
Executive Director
Freight, Ports and Governance
Roads, Rail and Ports System
Management
Attn: Andrew Armstrong | 2. Mgr (Project Planning & Corridor Mgt)
Central Queensland Region
– Emerald office
Program Delivery and Operations
Division
Attn: Mr Jason Hoolihan |
|--|--|

For your information.

Attachment A

Queensland Department of Transport and Main Roads response to Dept Environment & Heritage Protection as EIS Coordinating Agency: Finalised Environmental Impact Statement – Springsure Creek Coal Mine Project

Program Delivery & Operations Division			
Name:	Mr Rex Cowan (Corridor Management & Operations), Program Delivery & Operations Division		
Address:	PO Box 5096, Central Queensland Mail Centre 4702	Contact:	Mr Jason Hoolihan, Senior Designer, (07) 4983 8736

General

The Department of Transport & Main Roads' (TMR) Central Queensland Region has reviewed the proponent's response regarding the issues raised in TMR's EIS submission and is satisfied with some of the proponents proposed intentions to provide suitable mitigation measures. However, further consultation is required regarding a number of issues not adequately addressed in the Finalised EIS.

- Safety and efficiency of the State Controlled Road Network due to the increased traffic from the development
- Mitigation of damage to the State Controlled Network due to increased traffic volumes from the development

TMR is not in a position to fund the safety improvements that may be required, nor would it be likely that this funding could be made available to undertake the immediate works necessary to ensure the ongoing safety and efficiency of the SCR network for the proposal to proceed with the construction phase. Therefore, once further information is available on the final design of the project, the proponent is required to undertake a review of the RIA and provide an updated assessment which clearly identifies any necessary safety improvements works, rehabilitation and maintenance costs to mitigate the impacts of project traffic prior to undertaking any construction works. It is strongly recommended that the proponent and their consultants continue to liaise with Mr Jason Hoolihan (contact details noted above) to discuss and resolve these issues in a timely manner.

TMR Requirements

1. Post-Assessment contact with TMR

Once the proponent has received final approval to proceed with the Springsure Creek Coal Mine Project, the proponent shall contact the Manager of the TMR Emerald Office, Mr Rex Cowan no later than nine (9) months prior to the commencement of any project construction works to discuss the preparation of the finalised road impact assessment (RIA), road-use management plan (RMP) and traffic management plan (TMP).

2. Infrastructure Agreement

The proponent shall enter into an Infrastructure Agreement with TMR for:

- a. contribution or upgrade to all intersections with the State-controlled Road network that are adversely impacted upon, as determined and agreed upon with the TMR Emerald Office, following completion of a comprehensive Road Impact Assessment (RIA), which is carried out in accordance with TMRs "Guidelines for Assessment of Road Impacts of Development" (GARID);

- b. roadway link contribution associated with project traffic as calculated and agreed upon with the TMR Emerald Office, following completion of a comprehensive RIA which is carried out in accordance with TMRs GARID;
- c. rehabilitation and maintenance contributions associated with project traffic as calculated and agreed upon with the TMR Emerald Office, following completion of a comprehensive RIA which is carried out in accordance with TMRs' GARID.

This infrastructure agreement between the proponent and TMR shall be concluded prior to commencement of any construction works on site.

TMR is the agency responsible for monitoring compliance with this condition.

3. Road Impact Assessment and Road-use Management Plan

When additional information regarding the final design of the project is available, the proponent shall undertake the following no later than six months prior to the commencement of any project construction works;

- a. review and finalise the road impact assessment (RIA) to include details of the latest project traffic generation and all project transport impacts on the safety and efficiency of state controlled roads in accordance with *Guidelines for Assessment of Road impacts of Development (2006)* in consultation with the Manager of the TMR Emerald Office;
- b. submit the RIA to the Manager of the TMR Emerald Office for review and approval;
- c. prepare a road-use management plan (RMP) for all use of state-controlled roads for each phase of the project, in accordance with TMR's *Guide to Preparing a Road Use Management Plan* (attached). The RMP must receive TMR's approval prior to its implementation and must include:
 - o Latest traffic generation (vehicle numbers etc.);
 - o Finalised assessment of impacts on safety and efficiency at intersections, on road links and on pavements etc.; and
 - o Updated impact mitigation strategies such as any road maintenance or any necessary improvements.

4. Traffic Management Plan

Three months prior to the commencement of any project construction works, the proponent shall prepare detailed drawings and traffic management plans (TMP) for all construction and other activities in state-controlled road corridors to demonstrate how these road works will be safely undertaken.

The proponent shall implement the traffic management plan during construction and commissioning of the project and construction of all access road intersection/s and other works to be undertaken within a SCR corridor.

Attachment A

Queensland Department of Transport and Main Roads response to Dept Environment & Heritage Protection as EIS Coordinating Agency: Finalised Environmental Impact Statement — Springsure Creek Coal Mine Project

The TMP shall incorporate a provision that, prior to commencing any program of oversize/over-mass transport movements that may be required for the construction of the project, the proponent will consult with TMR, the Queensland Police Service and the Central Highlands Regional Council.

The proponent shall obtain the necessary permits for any excess mass or over-dimensional loads associated with the project as required under *the Transport Operations (Road Use Management) Act (Qld) 1995*.

5. Undertaking road impact mitigation strategies

The proponent shall present detailed drawings of any required roadworks and traffic management plans for review and approval by TMR and take account of the reviews. The proponent shall undertake any required roadworks and road-use management strategies detailed in the RMP and TMP.

RTI DL Release

Attachment B
Queensland Department of Transport and Main Roads response to Dept Environment & Heritage Protections as EIS Coordinating Agency:
Supplementary Environmental Impact Statement (S-EIS) – Springsure Creek Coal Mine Project

Policy & Planning Branch, Department of Transport & Main Roads			
Name:	Mr Tom Orr, A/Director (Development Outcomes)		
Address:	GPO Box 213, Brisbane 4001	Contact:	Mr Michael Nelles, A/ Principal Advisor (Development Outcomes) Ph 3066 1812

Section	Describe the issue [Omission/lack of clarity/incorrectness]	Additional information/ clarification/correction required	Reason for requirement/ other related sections or level of detail required
Final EIS (Suppl.) Chapter 6 Traffic & Transport			
1) Section 6.1.1.1, pg 6-2	This section again states the EIS/ road impact assessment (RIA) do not include providing traffic estimates and assessing the impacts of traffic generated by constructing and operating the transport and infrastructure corridor and the train loadout facility, given they will be dealt with under other approvals. TMR simply wishes to ensure all significant road impacts of the entire project are identified and dealt with and is not sure whether other approvals will be referred to TMR.	In keeping with comments made about the RIA, TMR requires all aspects of traffic generation for the project to be assessed and addressed.	
2) Section 6.6, pg 6-35 and Table 6-14	The issue of the identifying the increased risk of traffic incidents resulting from project traffic was previously commented on in the EIS. Assessing the level of risk seems largely based on current crash rates rather than further road safety assessment, for example, field inspections of the likely high-use routes and whether project traffic may result in road safety hotspots". While road safety audits are proposed at Glenorina Rd/ Gregory Hwy intersection and accommodation village access which will be upgraded to accommodate project traffic (see s6.7.1.2), some further road safety assessment may be warranted.	The proponent should consider undertaking road safety field inspections of most highly used routes to ensure project traffic does not create any road safety "hotspots", including at level crossings.	

3) Section 6.7.1.1, pg 6-39	Previous TMR comments on the EIS about focussing the objectives of the Road-use Management Plan stand.	Given the RIA calculations are re-run prior to project construction, using latest traffic figures but are generally not documented (that is, the RIA report is often not properly updated or published), TMR sees the RMP's purpose as 3 fold: 1) to document finalised impact mitigation strategies, primarily road-use management strategies e.g using buses to limit vehicle trips, managing heavy vehicle and oversize/mass vehicles and so on, but also funded (works or contributions if appropriate, 2) to summarise final traffic generation, and 3) summarise revised impact assessment, in accordance with TMR's guidelines (provided with EIS comments).	
4) Section 6.7.1.3, pg 6-40	This section discusses how the proponent will undertake works in road/rail reserves, but makes no reference to preparing Traffic Management Plans (TMPs) to document how works will be safely undertaken.	The proponent must prepare TMPs to document how works will be safely undertaken, in accordance with TMR's guidelines (attached).	
5) Section 6.7.1.6, pg 6-42	This section states fatigue management will be addressed in the SIMP. TMR believes fatigue management and other road safety issues are road-use management issues best documented in the RMP.	If these strategies are dealt with in the SIMP, they should also be summarised or cross-referenced in the RMP.	
Section 20.5, pg 20-3; Key Commitments	As previously commented on in the EIS, this table lists only 3 commitments with a number of diverse sub-elements. The list should be expanded to more clearly canvass commitments that need to be made.	<p>Commitments should include:</p> <ol style="list-style-type: none"> 1. upgrading local roads; 2. upgrading the state-controlled road (SCR) access at the accommodation village and intersection of Gregory Hwy with Glenorina Rd; 3. develop traffic management plans (TMPs) for those 2 SCR works (above); 4. finalise the RMP; 5. ensure oversize/ over-dimension issues are managed: impacts and permits, not just near schools; 6. revise the RIA with pre-construction traffic numbers if changed significantly; 7. ensure any increased road safety risk from project traffic including at level crossings is dealt with. 	

Traffic Management PlanREVISED General GuidelinesVersion 1: June 2013

As part of their development application or under an environmental impact assessment (EIS) process, proponents of large development projects are generally required to undertake a road impact assessment (RIA). RIAs should be undertaken in accordance with the Department of Transport & Main Roads' "Guidelines for Assessment of Road Impacts of Development". The RIA identifies and deals with the road impacts of traffic generated by the proposal. This helps manage increased road safety risk, impacts on structures and pavement condition, congestion and intersection performance, maintain community access and amenity and so on.

A Road-use Management Plan (RMP) is then required to demonstrate how road impacts of project traffic, particularly from heavy vehicle use, will be managed during the construction and operational phases of the development project.

Before construction of major development projects, proponents and their consultants must contact the relevant TMR regional office/s before preparing a Traffic Management Plan (TMP).

The **purpose** of the TMP is to document how any required works in or near a State-controlled road will be undertaken in a safe and efficient manner, providing for the needs of other road users, including pedestrians and cyclists. Regional contact officer names will generally have been provided as part of the EIS consultation process.

The TMP should include the following elements:

For the Department of Transport and Main Roads (TMR) a **Traffic Management Plan (TMP)** is a separate document to the Road-use Management Plan (described in its RMP - Revised General Guidelines) and shall be prepared in accordance with the latest edition of the "Manual of Uniform Traffic Control Devices: Part 3 - Works on Roads" (MUTCD) and the TMR Specification: "MRTS02- Provision for traffic".

The Traffic Management Plan shall apply to all works and activities in or near a state-controlled road corridor for each stage of the project, namely planning/ pre-construction, construction, operation, decommissioning (establishment, implementation, commissioning and decommissioning). The TMP is required as part of gaining an approval for such works under the *Transport Infrastructure Act 1994* from the TMR regional office.

In the "Manual of Uniform Traffic Control Devices: Part 3- Works on Roads" (MUTCD), the Traffic Management Plan (TMP) is an element in a Traffic Guidance Scheme which should provide for the following:

- Planning, via a traffic guidance scheme
- Traffic management plan, which provides for the following:
 - safety of workers and safety/convenience for road-users;
 - traffic through, past & around the work area (including side-tracks/detours)
 - night conditions
 - pedestrians & cyclists
 - temporary footpaths & pedestrian crossings
 - signage/barrier fences
 - speed zone matters
 - traffic controllers and so on.
- Risk management.

Please refer to the MUTCD and *TMR Specification: "MRTS02- Provision for traffic"* for full details and prepare the TMP in close consultation with TMR's Program Delivery & Operations Division regional officers. (for contact details visit the departmental website: <http://www.tmr.qld.gov.au/About-us/Contact-us.aspx>)

For an electronic copy of the *MUTCD* visit the departmental weblink:

<http://www.tmr.qld.gov.au/Business-and-industry/Technical-standards-and-publications/Manual-of-uniform-traffic-control-devices.aspx>

Any necessary approvals/permits for undertaking any works in or near State-controlled road reserves or for access to state-controlled roads should also be applied for and approved while preparing the TMP.

Please contact your regional TMR office for further details.

For further general information on Traffic Management Plans, please contact the Development Outcomes team, Planning Management Branch, Policy, Planning & Investment Division, Brisbane; email: MDP@tmr.qld.gov.au

Before preparing a TMP for TMR, please contact TMR's regional Program Delivery & Operations Division contacts which are provided during the EIS process. Alternatively, for regional contact details, visit the departmental website: <http://www.tmr.qld.gov.au/About-us/Contact-us.aspx>)

(Please note: TMR has developed a Traffic Management Company Registration Scheme which requires proponents using traffic controllers to only use registered companies when implementing Traffic Management Plans.)

RTI DL Release

Central Queensland's Golden Triangle

PO Box 42, Springsure Qld 4722
Phone: (07) 4984 4072
Email: goldentriangle.cq@bigpond.com



Philip Rowland & Monica Rhodes
Department of Environment and Heritage Protection
Attention: The EIS Coordinator (Springsure Creek Coal Mine Project)
G.P.O. Box 2454
Brisbane QLD 4001
Email: eis@ehp.qld.gov.au & Monika.Rhodes@ehp.qld.gov.au

12th July 2013

Dear Sir/Madam,

Submission on the Springsure Creek Coal Mine Project Supplementary Environmental Impact Statement

It has come to our attention today (12th July 2013) that we do have the opportunity to respond to the supplementary EIS released by Bandanna Energy on 24th June 2013. The last day for submissions being today, however Monika Rhodes had informed other members of the community that a submission would be accepted if received by Sunday 14th July 2013.

The following is a brief outline of some of the deficiencies identified in the response (40-Golden Triangle) we received from Bandanna Energy regarding our submission to the draft EIS and consequently not addressed in the final EIS. Due to time constraints this is by no means exhaustive.

1. The Supplementary EIS continues in its failure to address to Terms of Reference

2. ***Section 40.13 : “One of the aims of the Agricultural Co-existence Research Committee is to define co-existence with regard to this project to enable a baseline to be established prior to mining taking place. This will enable co-existence to be measured once mining starts and compliance with conditions of approval relating to co-existence to be monitored.***

It is not the role of a committee (particularly one that claims to be independent and not involved with the EIS approvals process) paid by the resource company to determine what co-existence will be and to then establish the baseline that is considered acceptable. This appears to be a deliberate attempt by Bandanna Energy to bypass (and potentially lead) the current Statutory Regional Planning Process.

3. ***Section 40.18: Assessment within the EIS demonstrates that subsidence is not a ‘serious adverse environmental impact’ and that the impacts of subsidence can be managed so as to maintain agricultural activities and maintain or improve agricultural yields.***

This claim is completely unsubstantiated – there is no subsidence management plan. Please see the attached report from Cotton Australia “*The Risks and Impacts of Coal Mine Subsidence on Irrigation Areas*”.

4. ***Section 40.64: The subsidence management plan and framework are not required to be submitted with the EIS. They will be developed once an Environmental Authority has been granted.***

Subsidence is one of the major issues of this project – these plans need to form part of the Environmental Authority, not be a condition of it.

5. ***Section 40.93: We have asked to be conditioned on co-existence making it a condition of an Environmental Authority that we demonstrate co-existence prior to mining activity extending beyond Den-Lo Park. As noted previously, the independent Agricultural Co-existence Research Committee will, among other things, develop a definition of co-existence by which performance will be measured. We will be required***

to report on progress in meeting the specified performance on an annual basis to state government as part of annual compliance reporting.

Bandanna Energy are in breach of their current Environmental Authority for Exploration (MIN200822008) issued on 25 Sept 2008 for failing to rehabilitate exploration drill sites in a reasonable time frame and failure to submit annual returns and reports as required.

These failures have done nothing to impede Bandanna Energy to this point, so it is unlikely that strict conditioning of an EA will ensure any greater compliance into the future.

6. **Section 40.99: As a short term activity the construction of the mine ventilation shaft is not required to be assessed.**

This response is inadequate and does not consider that the construction of the ventilation shaft will be an area of intense activity and the resulting noise modelling does not take into account the closest sensitive receptors – these being the Den-Lo Park and Springton homesteads. Below is taken from our original submission on the draft EIS:

Appendix A4-10 Noise and Vibration

4.4.2 Noise Sources

"Figure 4-2 shows the location of the noise sources, as entered in the noise model"



Construction Phase



Operational Phase

Figure 4-2: Location of Noise sources

There has been no noise source located in the area of the mine ventilation shaft during the construction phase. This will be an area of intense activity during the construction phase, and will continue for a period of more than two weeks. The resulting model as illustrated in **Chapter 11 - Noise and Vibration, Figure 11-2 Construction phase noise contour plots**, fails to consider the true impact of noise on sensitive receptors, as the construction of the mine ventilation area has not been considered. During the construction phase the mine ventilation area is the closest to the marked sensitive receptors and therefore must be considered when modelling the impact of noise during this phase.

7. Section 40.106: It should be noted however that SCC plans on developing a rehabilitation program which will improve vegetation along creek lines and lead to a net benefit to the system.

An inadequate response – there should be no place for such motherhood statements in the approvals process – the plan should already be developed, this plan should prove how it will improve the vegetation and conclude with what the net benefit will be to the system.

8. Supplementary EIS: Chapter 9 – Groundwater.

Figure 9-41 Model grid cross-section – Row 96 and Figure 9-42 Model Grid cross section – Column 123, clearly shows the fracturing of the Rewan seam and the tertiary basalt. This will provide connectivity for ground water to drain into the coal seam, therefore dewatering the tertiary basalt which is where our ground water is sourced.

9. Supplementary EIS: Chapter 5 – Land.

There is still no explanation of how tilt relates to the existing slope of the land:

- Will the post mining slope be no greater than 2.5% in total? Or
- Will the post mining slope be the current slope plus an additional 2.5 % slope?

10. Supplementary EIS: Chapter 8 – Surface Water.

8.5.1 Mine Site Flood Assessment: *A flooding assessment was undertaken for the Project area for the purpose of defining the existing flood behaviour as well as assessing*

potential impacts to the Mine Infrastructure Area (MIA) and operations (refer to Appendix A4-5).

In Appendix A4-5, we can see that Engeny Water Management undertook a mine site flood assessment (6. Mine Site Flood Assessment) *“for the purpose of defining the existing flood behaviour as well as assessing the potential impacts to mine infrastructure and operation.”* The following was raised in our previous submission and was not addressed in the response received from Bandanna Energy:

- Figure 6.4 (**A4-5 6.2.3 TUFLOW Model Results, Flood Levels, Depths and Velocities**), *“provides an illustration of the 1000 year ARI extent of inundation surrounding the proposed MIA infrastructure area.”* The MIA illustrated in Figure 6.4 is in a different location to the MIA referred to, and on the Mine Plans within the body of the EIS.

The majority of the modelling done for the Draft EIS (and subsequently used in the Final EIS) has been done using the area covered by EPC 891, EPC 1221 and MLA 70461. EPC 1221 is irrelevant to this EIS and MLA 70461 was rejected by the Minister for Natural Resources and Mines. The Final EIS suggests that because the footprint of MLA 70486 is smaller than that of MLA 70461 the predictions are conservative. The companies (Engeny Water Management, SCT, Vipac, etc) that undertook the original modelling need to clarify whether the change in areas, boundaries and mine plans/layouts (including the location of the MIA) would have an impact on the resulting models and from this, determine if the current modelling is still relevant to this EIS.

We look forward to your response on these issues.

Kind Regards

Sch 4(1)(6) Personal Information

Lizzie Bradford

Secretary: Golden Triangle Community Group

Phillips Erin

From: George Houen <georgehouen@gmail.com>
Sent: Sunday, 14 July 2013 4:57 PM
To: EIS External Submissions; Rhodes Monika
Subject: Springsure Creek Final EIS - Submissions
Attachments: Signed Submission.Final EIS.14.7.13.pdf; Cotton Australia Report.pdf

EIS Coordinator, Dr Rhodes -

Please find attached our submission and its attachment.

Regards

George Houen
Landholder Services Pty Ltd
Phone: 46321024

RTI DL Release



SPRINGSURE CREEK COAL EIS

SUBMISSIONS ON FINAL EIS

Golden Triangle Community CQ
PO Box 42
Springsure Qld 4722

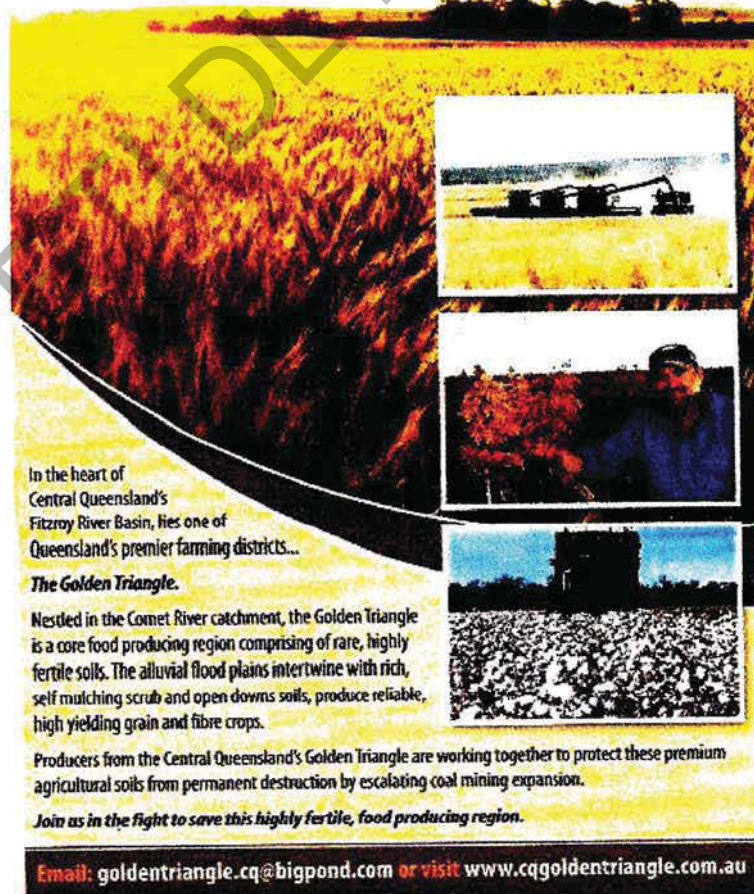
Ken and Sylvia Sullivan
Ben and Sally Sullivan
"Springton"
Springsure Qld 4722

Arcturus Downs Limited
"Arcturus Downs"
Springsure Qld 4722

Eugene & Kate Sullivan
"Cedar Park"
Springsure Qld 4722

Central Queensland's Golden Triangle

EAT!



In the heart of Central Queensland's Fitzroy River Basin, lies one of Queensland's premier farming districts...

The Golden Triangle.

Nestled in the Comet River catchment, the Golden Triangle is a core food producing region comprising of rare, highly fertile soils. The alluvial flood plains intertwine with rich, self mulching scrub and open downs soils, produce reliable, high yielding grain and fibre crops.

Producers from the Central Queensland's Golden Triangle are working together to protect these premium agricultural soils from permanent destruction by escalating coal mining expansion.

Join us in the fight to save this highly fertile, food producing region.

Email: goldentriangle.cq@bigpond.com **or visit** www.cqgoldentriangle.com.au

Chief Executive
Department of Environment and Heritage Protection
GPO Box 2454
BRISBANE QLD 4001
Attention: EIS Coordinator - Springsure Creek Project

14 July 2013

Dear Sir/Madam,

The Submitters (whose addresses are given on the covering page) have been advised by fellow submitters that Dr Rhodes at your office has given an assurance that submissions in response to the Final EIS will be considered if received by Sunday, 14th July.

The Submitters, as listed below, having been submitters in response to the draft EIS, make this further submission **in response to the "Final EIS"**.

Golden Triangle Community Group

Ken and Sylvia Sullivan, Ben and Sally Sullivan

Arcturus Downs Limited

Eugene and Kate Sullivan

If you require any further information on matters arising from this submission, please contact myself, as agent for the Submitters. My authority to make and sign submissions on their behalf was provided as Attachment "C" to the first submission. My contact details are:

G.T. Houen
Landholder Services Pty Ltd
13 Cottesloe Street
Toowoomba 4350 Phone: 4632 1024 Fax: 4632 1768 Email: georgehouen@gmail.com

Timing

The Submitters were notified, by letter from the Proponent dated 24th June 2013 and received on or about 26th June, of its lodgement of the Final EIS with the Department.

Our original submission dated 26th March 2013 in response to the draft EIS focused primarily on the issues of:

- land
- land use
- soils
- surface hydrology
- groundwater

all of which were dealt with by way of reports from independent experts. Those reports were supplemented by our general submissions regarding the proposed transport corridor, productivity of the land, current land use, position of the drift and surface works, noise and groundwater.

In just over two weeks since we received the Final EIS, we have begun a process of evaluation of it by the expert advisers but due to their workloads it will be some weeks before we have the benefit of their evaluation.

Expert Advice to Chief Executive

The Submitters therefore request that the Chief Executive exercise his prerogative under section 62 of the Environmental Protection Act to seek relevant advice, comment or information from our experts on the matters addressed by them in the original submissions. They are Peter Shields and Bill Thompson of LRAM and Paul Smith of Waste Solutions.

The matters listed are fundamental to the process of assessing the impact of the proposed mining and are of such importance that we submit the Chief Executive should avail himself of the advice of those experts. They have already demonstrated the relevance of their work.

Addressing Terms of Reference

The Submitters say that on the basis of their own general experience in respect of the land, land use and overland flow issues, the Final EIS still falls far short of the Proponent's obligation to address the Final Terms of Reference.

As to groundwater issues, the Final EIS contain new modelling work and we await expert advice on it.

In summary, the EIS should not be allowed to proceed until the Proponent provides, *inter alia*, property by property compilations of data and mapping on:

- post-subsidence slopes
- overland flow
- catchment changes affecting storages
- flooding
- pondage
- enforced changes to land use
- post-subsidence erosion management
- consequential changes in volume and value of agricultural commodities

Land Use and Suitability

There is still no clear and full description of the main components of the pre-mining land use systems, no accurate mapping of their extent nor any focus on the features of that land use most prone to subsidence impacts.

Irrigation areas and their associated water storage systems (which are critically sensitive to subsidence) are not sufficiently identified nor have the subsidence impacts on them been properly assessed.

Without the essential detail of present land use and methods and yields and productivity, the Proponent's claim that it will preserve or improve the productive capacity is vacuous.

Surface Water and Overland Flow

Neither is there adequate mapping and description of the overland flow environment and its relationship to the pre-mining soil erosion management systems. There are no benchmarks set for overland flow stability nor is there a base for applying the rational method to management of storm runoff.

The extent of change in overland flow has not been tabulated as to individual property, soil and land use conditions and the impacts of those changes for the with-remediation scenario or the without-remediation scenarios. Key assumptions for a with-remediation scenario should be stated and the type of resulting land use detailed.

Subsidence Issues

The coverage of subsidence in the Final EIS appears to be unchanged.

Despite having modelled subsidence at the micro-catchment level and having developed timelines for subsidence, and despite being able to draw on subsidence experience in the Crinum area to the north and on US experience, there is still no subsidence management plan. This is inexcusable.

The subsidence modelling data, combined with proper descriptions of the rainfed and irrigated farming systems would identify the components that will be impacted, but that has not been done. So the Proponent has not met its obligation to show the extent and nature and the cost of enforced changes, of modifying or replacing existing cultivation, planting and harvesting methods and soil conservation measures.

The Proponent's stance is still that it will work out the details as it goes along, and all concerned can be assured that it will manage the subsidence effectively and, most of all that it will mitigate the impacts so that the productivity and economic viability of existing land use is preserved and even improved.

To the Submitters with their vast practical knowledge and achievements in farming this land, the Proponent's assertion is a completely unfounded and breathtakingly irresponsible claim.

Maximum subsidence, the Proponent predicts, will be 2.3 metres. The Proponent has failed to say what the post-subsidence slopes will be but it goes without saying that in some parts the slopes will be far greater than they are now.

The truth is that the increased slopes and consequential changes to overland flow cannot be mitigated - the volume of soil to be moved (if it were available) to reinstate current contours would run into tens and tens of millions of cubic metres.

The pre-mining broadacre and irrigated cropping systems simply could not continue over the subsided land.

To substantiate that submission as far as irrigation is concerned, we draw attention to the report by Cotton Australia (which is a public document) entitled: *The Risks and Impacts of Coal Mine Subsidence in Irrigation Areas*, May 2013. A copy is **attached** hereto.

In particular, section 12.1 Agricultural Suitability of Emerald Soils, page 27 paragraph 7, explains why centre pivot irrigation is not an effective substitute for furrow or flood irrigation of cotton in soils of the Emerald area. Yet the Proponent relies, for its claim that current farming could continue post-subsidence, on the assertion that centre-pivot irrigation can be used as an alternative.

Cropping of a sort could probably continue post-subsidence where the slopes are not extreme. Appropriate mapping - if the Proponent had fulfilled its obligation to provide it - would show where some cropping could be done and what restrictions on size of area and efficiency would be imposed. From that information the economic viability of such cropping could be assessed.

We, the Submitters, have requested that the Proponent provide its subsidence modelling data to us so that we could explore the scope for the latest mapping technology to deliver the kind of mapping needed to reveal the post-subsidence slopes, overland flow paths, water pondage and changes to the catchments which feed the irrigation storages and farm dams. The Proponent, after discussions, assured me it would forward the subsidence modelling data to me, but it did not do so.

The Submitters ask that these brief submissions be considered.

As set out above, they also ask the Chief Executive seek advice from the independent experts on whose reports our earlier submissions were founded.

On behalf of the Submitters –

SIGNED: 
G.T. Houen
Landholder Services Pty Ltd

DATE: 14 July 2013

Attached: Cotton Australia Report: *The Risks and Impacts of Coal Mine Subsidence on Irrigation Areas* May 2013

Phillips Erin

From: Cipa.AnthonyJa@police.qld.gov.au
Sent: Thursday, 11 July 2013 2:51 PM
To: EIS External Submissions
Cc: Mills.LeesaN@police.qld.gov.au; Chan.RachaelY@police.qld.gov.au
Subject: Springsure Creek Coal SEIS

Follow Up Flag: Follow up
Flag Status: Flagged

Good afternoon,

The QPS has reviewed the proponent's response to the Service's submission on the Springsure Creek EIS, and we have no further comments.

Regards,
Anthony

Anthony Cipa | Senior Project Officer
Research, Planning and Performance
Strategy and Business Review Command
Queensland Police Service
ph 3364 3778 | **fax** 3364 6353
email Cipa.AnthonyJa@police.qld.gov.au

part-time Tuesday, Thursday and Friday

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Phillips Erin

From: Rhodes Monika
Sent: Tuesday, 16 July 2013 2:52 PM
To: Pete Jones
Cc: Dunlop Kylie; Curley Peter; Rowland Philip
Subject: SEIS_Review of SEIS_key issues_Springsure_20130716
Attachments: SEIS_Review of SEIS_key issues_Springsure_20130716.pdf; comet_plan_300811.pdf; fitzroy_comet_river_wqo_290911.pdf

Dear Pete

Please find attached EHP's review of the key issues identified during review of the SEIS for the Springsure Creek Coal Mine Project.

Regards

Dr Monika Rhodes
Principal Environmental Officer
Statewide Environmental Assessments
Telephone 07 3330 6293 **Facsimile** 3330 5875
Email: monika.rhodes@ehp.qld.gov.au
www.ehp.qld.gov.au

Department of Environment and Heritage Protection
Level 9, 400 George Street, Brisbane Q 4000
GPO Box 2454, Brisbane Q 4001

**Springsure Creek Coal Mine Project – Review of the amended EIS (SEIS) and
proponent's response to submissions**

Key issue identified: Inconsistent information on water management and assessment

The key issues identified relate to water management and assessment proposed by the proponent. In particular the water management on site and the discharge practices are inconsistent in the amended EIS and EM Plan. While in some areas the EIS proposed a non-release scenario, in other areas the EIS proposed uncontrolled discharges (outlined as Condition D15 in the EM Plan). Of importance here would be that mine dewatering water (from groundwater inflows) would be stored in dams with a potential for uncontrolled discharge or vertical infiltration of contaminants from dams to water table aquifer.

Recommendation:

EHP recommends that the inconsistencies on water management on site and discharge practices would be addressed in the EIS and EM Plan.

Issue identified: Insufficient information on water parameters and WQOs for receiving waterways

As part of the EIS review, the Department of Science, Information, Technology, Innovation and the Arts (DSITIA) and EHP have recommended that the proponent conducts further water quality assessments for receiving waterways. Water quality data and parameters should be analysed as outlined in the DNRMP, Guideline Model Water Conditions for Coal Mines in the Fitzroy Basin.

Since then, the proponent collected additional surface water quality data has been collected at four locations (February 2013). While an extended suite of water quality parameters have been analysed for the February 2013 survey, the proponent does not provide a clear list of what these additional parameters consisted of.

This is important as sampling program will form the basis of the Projects Water Quality Sampling Program. Data from this sampling program will also be used to develop site specific trigger values for the project.

Furthermore, the water quality objectives (WQOs) have not been specified in full.

For a comprehensive review refer to Table 1.

Recommendation:

EHP recommends the following:

- that a list of additional water quality parameters collected in February 2013 survey should be presented
- that a list of WQOs outlined in the amended EIS should be updated to include all WQOs
- that water conditions proposed should reflect Fitzroy Model Water conditions and their requirements
- that where any new data should be incorporated with data already collected and compared for comparative analysis; i.e. the EM Plan should reflect sufficient data to meet conditions and if not, should otherwise be justified.
- Revise the water chapter and EM Plan to show compliance with acceptable water conditions.

Issue identified: LAmax exceeds criteria

The noise modelling proposed in the amended EIS shows LAmax criteria is exceeded for sensitive receptors NL4, NL5, NL6 and NL7. No mitigation measures have been proposed.

The EIS and the EM Plan did not contain information how acceptable levels of noise can be achieved. In particular, the following issues will need to be addressed:

1. What are the noise sources that are causing the high values of LAmax?
2. What is the timeline of those sound sources and how long will they be running for in comparison with the mine life?
3. What are the proposed mitigation measures to address exceedances in LAmax?
 - a. When will they be put in place?
 - b. What sound reduction is anticipated?

Recommendation:

Revise the noise chapter and EM Plan to show compliance with acceptable noise levels. Address the questions outlined above and present mitigation measures and their effectiveness.

Issue identified: Subsidence modelling outside MLA

The modelling of subsidence shows impacts outside of the MLA.

Recommendation:

Reconsider the subsidence model based on the existing MLA and any potential environmental impacts associated with changes in hydrology.

Table 1. Specific comments in regards to water assessment (*Timing requirements inserted by EHP)

Advice provided to EHP by Water Assessment & Systems, Environmental Monitoring and Assessment, Science Delivery, the Department of Science, Information Technology, Innovation and the Arts

Topic	Recommendation / Suggestion	Response	Comments	Recommendations	Timing*
Chapter 8 – Surface Water	<p>Recommendation: It is recommended that baseline water quality assessments continue and be amended according to the issues identified above.</p> <p>[Issue: Section 8.4 and subsection relating to the Water Quality Assessment] <i>A preliminary baseline water quality assessment was undertaken for the Springsure Creek Coal Mine Investigation area, over two sampling events (with a total of 12 data points both upstream and downstream collected so far). From the mapping presented in Figure 8-5, it does not appear that a water quality and quantity monitoring site has been placed at a location downstream of the proposed mine dams. It is necessary to include a site downstream of the major source of contaminants to receiving waters, in the flowing section of the waterways. It will also be necessary to design monitoring for Dam 2 and Dam 4 which are listed as being downstream of the mine discharges in other sections of the EIS.</i></p>	<p>This submission was discussed between DSITIA, EHP and SCC on 1 May 2013 (as per minutes circulated between attendees). Additional surface water quality data has been collected at four locations (February 2013) and include the Springsure Creek Inflow to Den-Lo Park Dam, Upstream from the Project area on Springsure Creek, Upstream from the Project area on Station Creek and Upstream of the Project area on Unnamed Creek 4. Water quality data and parameters measured at these sites during this period include an extended suite of tested and measured parameters as outlined in the DNRM Guideline Model Water Conditions for Coal Mines in the Fitzroy Basin. This additional data is presented in Chapter 8 of the EIS. Sampling at these sites is ongoing and data will be used to develop specific water Quality trigger</p>	<p>The proponent response has largely fulfilled the recommendation made by WAS, however there is some issue with the details, including:</p> <p>C1. The proponent should better incorporate any new data collected. For instance two of the four sites sampled in February coincide with sites already sampled in summer. How do these sampling events for the same site compare in water quality?</p> <p>C2. There are no surface water survey site descriptions for the new sites that have not been sampled before, namely (a) Springsure Creek Inflow to Den-Lo Park Dam and (b) Upstream of the Project area on Unnamed Creek 4.</p> <p>[NB February survey sites:</p> <ul style="list-style-type: none"> – Springsure Creek Inflow to Den-Lo Park Dam (new site); – Upstream from the Project area on Springsure 	<p>R1. Where any new data are collected it should be incorporated with data already collected, for example sites samples in February, 2013 have been sampled previously in summer and this data should be compared.</p> <p>R2. A description should be included in Section 8.4.3.1 (Site Conditions) of any new sites.</p>	<p>Prior to SEIS approval and represented in EM Plan.</p>

16/07/2013

3

Topic	Recommendation / Suggestion	Response	Comments	Recommendations	Timing*
	<p>Section 8.4.3.2 lists the indicators measured as part of the baseline water quality assessment for the Springsure project. This list is not comprehensive and should include all indicators listed in Tables 2 and 3 of the "Model water conditions for coal mines in the Fitzroy basin".</p> <p>Section 8.4.4.2 Electrical Conductivity discusses the results obtained so far for EC. The conclusions made are not based on sufficient data or thorough investigation of the relationship between flow and EC for the relevant creeks. Far more data collected over a longer period of time and representative of various seasons and conditions will be required if the proponents wish to establish locally relevant water quality objectives for EC. Graphing EC vs. recorded stream flow at the time of sampling would be useful to inform this process.]</p>	<p>values for the Project. This sampling program will be extended to include additional sites (potentially including locations used in initial sampling program) as necessary, and will form the basis of the Projects Water Quality Sampling Program. Data from this sampling program will also be used to develop site specific trigger values for the Project.</p> <p>No discharges are proposed as part of the Project except during major flood events, in which case contaminants will be diluted within receiving waters.</p>	<p>Creek (site 5);</p> <ul style="list-style-type: none"> – Upstream from the Project area on Station Creek (site 2) and, – Upstream of the Project area on Unnamed Creek 4 (new site).] 		
		<p>As noted above, additional surface water quality data has been collected at four locations (February 2013) and include the Springsure Creek Inflow to Den-Lo Park Dam, Upstream from the Project area on Springsure Creek, Upstream from the Project area on Station Creek and Upstream of the Project area on Unnamed Creek 4. Water quality data and parameters measured at these sites during this period include an extended suite of tested and measured</p>	<p>C3. While an extended suite of water quality parameters have been analysed for the February, 2013 survey (4 sites) the proponent does not provide a clear list of what these additional parameters are in Chapter 8.</p> <p>C4. Some water quality objectives are missing from Table 8-8 (pp8-32 – 8-33; Chapter 8; SEIS).</p>	<p>R3. Include a list of additional water quality parameters included in the February, 2013 survey in Section 8.4.3.2 (Water Quality and Sediment Sampling Method).</p> <p>R4. Update Table 8-8 (pp8-32 – 8-33; Chapter 8; SEIS) to include all WQOs)</p>	<p>Prior to SEIS approval and represented in EM Plan.</p>

16/07/2013

4

Topic	Recommendation / Suggestion	Response	Comments	Recommendations	Timing*
		<p>parameters as outlined in the DNRM, Guideline Model Water Conditions for Coal Mines in the Fitzroy Basin.</p> <p>(As discussed at meeting, the DNRM Guidelines were not released at the time of preparing the draft EIS, hence they were not referenced at that time.) Chapter 8 of the EIS has been updated accordingly.</p>			
		<p>As noted above, additional surface water quality data has been collected at four locations (February 2013). Sampling at these sites is ongoing and data will be used to develop specific water Quality trigger values for the Project. This sampling program will be extended to include additional sites (potentially including locations used in initial sampling program) as necessary, and will form the basis of the Projects Water Quality Sampling Program. Data from this sampling program will also be used to develop site specific trigger values for the Project. Surface water monitoring criteria are thus to be announced as per Chapter 18 – EM Plan.</p>	<p>C5. The reference to the information on surface water monitoring criteria in Chapter 18 is not specific enough.</p>	<p>R5. The proponent should outline the specifics of the surface monitoring program and criteria in Chapter 18 as stated - <i>“surface water monitoring criteria are thus to be announced as per Chapter 18”</i></p>	<p>Prior to SEIS approval and represented in EM Plan.</p>

16/07/2013

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Topic	Recommendation / Suggestion	Response	Comments	Recommendations	Timing*
	<p>Recommendation: It is recommended that potential impacts to aquatic ecosystem from reduced stream flow volumes are adequately assessment [sic] and presented in the SEIS.</p> <p>[Issue: Section 8.5.6 Stream Flows]</p> <p><i>The median predicted decrease in stream flow is predicted to be up to 42% for local waterways. Very little consideration has been given to the potential impacts this may have on aquatic ecosystems downstream, including wetlands or semi-permanent or permanent pools in the receiving waters.]</i></p>	Information in relation to the aquatic ecosystems from reduced stream flows within and downstream of the Project area has been assessed in Chapter 12 - Ecology. This chapter identifies that it is not anticipated that the project will result in significant impacts to aquatic values.	<p>The proponent does discuss the subsidence as potentially reducing connectivity and impacting stream flow within and downstream of the project area (including a wetland protection area) with potential impacts to aquatic flora and fauna (Table 12-19). The risk level is considered medium (Table 12-19). Subsidence management measures are also outlined (Section 12.7.10) and these should decrease the risk of impacts from the predicted decrease in flow in Springsure Creek if carried out appropriately.</p> <p>The proponent has committed to ongoing monitoring of streams and wetlands downstream for subsidence related impacts (Section 12.7.11) throughout the construction; operational phases and decommissioning phases of the mine.</p>	No further recommendations.	
	<p>Recommendation: It is strongly recommended that a clear and consistent proposal is submitted in the SEIS. It is impossible for the administering authority to assess the proposal when conflicting statements are observed throughout</p>	The mine site water management strategy identified a water deficit, or shortage of water, for proposed operations. Water will therefore be piped to the site from a secured allocation.	C6. There is still inconsistent information in the SEIS regarding whether there will be a controlled discharge from dams. For example, the proponent has not updated point 3 under the heading of	R6. Clarification is required on the inconsistencies stated throughout the SEIS and EM Plan regarding water management practices and whether the mine will be practicing and conditioned for	Prior to SEIS approval and represented in EM Plan.

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Topic	Recommendation / Suggestion	Response	Comments	Recommendations	Timing*
	<p>the documents. How exactly will water management be undertaken on-site? All sections of the EIS need to be updated to ensure that a consistent message is presented throughout, in the text, tables and diagrams.</p> <p>[Issue: Chapter 8 Surface Water</p> <p>Table 8-13</p> <p><i>Potential impacts to surface water, clearly states that a no controlled release policy will be in place during the operation of the mine. Again under section 8.6.1 Cumulative Impacts the proponent states</i></p> <p><i>"However, this Project will not be undertaking controlled releases and may only discharge water during extreme high flow or dangerous events"</i></p> <p><i>In other section of the EIS the proponents mention that a strategy to undertake controlled discharges is incorporated in the water management (e.g. Section 18.5.4.9 Control Strategies). Inconsistencies of this nature are repeatedly observed throughout the EIS. The proposal needs to be clarified, and</i></p>	<p>This plus rain water collected on site and groundwater removed from the mine working area will be recycled for operational uses. Using 86 years of historical rainfall data in a water balance model, dams have been sized to have no discharge during the 86 years of historical rainfall records to reduce the need for any potential uncontrolled discharges from the site. There are no proposed piped (controlled) releases from dams to the receiving environment. The "Manual for Assessing Hazard Categories and Hydraulic Performance of Dams" (DERM 2012) was used as a basis of design document. All mine water infrastructure will comply with release limits and conditions contained in any Environmental Authority issued by DEHP. A Water Management Plan will be required to be prepared and approved as a condition of any Environmental Authority. This Plan will detail measures for: use and movement of water for operations, water quality and quantity monitoring, and</p>	<p>"Mobilisation of contaminants" [p18-99; Chapter 17; SEIS]. If there will be not controlled discharges from dams then this point should be removed from the text.</p>	<p>controlled or uncontrolled releases. Point 3 under the heading of "Mobilisation of contaminants" [p18-99; Chapter 18; SEIS] references controlled discharges from dams. Under the next heading <i>Mine Water Management System</i>, it states a mine water management system has been developed based on no controlled discharges.</p> <p>The SEIS must clearly identify the proponents intention when and if the following scenarios will occur –</p> <ul style="list-style-type: none"> - Controlled releases - Uncontrolled releases <p>Both scenarios must also include appropriate assessment and monitoring to satisfy the Fitzroy Model water conditions.</p>	

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Topic	Recommendation / Suggestion	Response	Comments	Recommendations	Timing*
	<i>consistently presented throughout the EIS. It is impossible to assess the environmental risks posed by the proposal if there has been no decision as to how the water management will be undertaken.]</i>	stormwater management, etc.			
	<p>Recommendation: It is strongly recommended that a clear and consistent proposal is submitted in the SEIS. It is impossible for the administering authority to assess the proposal when conflicting statements are continually encountered.</p> <p>[Issue: Chapter 8]</p> <p><i>During the information session presented on 12th April, the proponents mentioned that;</i></p> <ul style="list-style-type: none"> <i>No coal processing is proposed within the mining lease area; hence no tailings will be generated within the mining lease area (which is the subject of the current EIS process).</i> <i>During construction, overburden is proposed to be re-used for the construction of roads and dams, where possible.</i> 	<p>Reference to a coal processing plant has been removed from the final EIS as this is not required.</p> <p>Overburden from the construction of a cut and cover and the drift will be recycled to provide construction material onsite.</p> <p>No overburden will be stored on site in a waste rock or tailings storage facility.</p> <p>As discussed during meeting, Table 8-13 and Table 8-14 present impacts and their mitigation during different stages of the Project i.e. construction phase versus operations phase.</p>	<p>The response provides sufficient information to understand that overburden will not be stockpiled on site, yet there will be coal stockpiled during the mine operation. Erosion and stormwater runoff from the coal stockpile is listed as a potential cause of impacts to surface water (sedimentation and contamination) during the operation phase of the project.</p>	No further recommendations.	

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Topic	Recommendation / Suggestion	Response	Comments	Recommendations	Timing*
	<ul style="list-style-type: none"> During operation, 100% of mined material will be exported from the site; hence, no overburden stockpiles will be required on the surface within the MLA. <p>In contrast to this Table 8-13 mentions that "Erosion and sedimentation during the operation phases is most likely to occur from stormwater runoff from the coal stockpile, MIA and ongoing minor earthworks..." Additionally Table 8-14 specifically identifies an environmental dam which is planned to receive run-off from the coal stockpile. What is the actual proposal?]</p>				
General Water Management Strategy	<p>Recommendation: It is better to manage discharges in a controlled fashion rather than identifying that uncontrolled discharges will occur but should hopefully not impact on downstream environmental values. Discharging controlled volumes of water to minimum flow triggers in the receiving waters represents a better environmental management strategy as a level of dilution and flushing is then assured. Of course, rainfall event/s can be so extreme as to cause uncontrolled discharge but in terms of managing water on-site where discharge has been</p>	<p>Please refer to response above regarding water management. The proposal does not include any controlled discharges. The dams located on drainage lines are those that already exist in the Project area as used by landholders primarily for agricultural uses. Existing water practices within the Project area have been clarified within Chapter 8.</p>	<p>C7. The proponent has added information that there will be not controlled discharge of mine wastewater to surface water and that uncontrolled release will be rare and restricted to high rainfall events. The proponent needs to ensure that all references to controlled discharge in the SEIS are removed.</p>	<p>R7. EHP requires that the inconsistencies on water management on site and discharge practices would be addressed – as per R6 above.</p>	<p>Prior to SEIS approval and represented in EM Plan.</p>

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Topic	Recommendation / Suggestion	Response	Comments	Recommendations	Timing*
	<p>identified as being required, then this should be managed in a controlled fashion.</p> <p>[Issue: General Water Management Strategy]</p> <p><i>There are major concerns regarding the plans for on-site water management for the Springsure Creek Coal Project. The repeated claim that discharges will only be of an uncontrolled nature presents a number of significant problems.</i></p> <p><i>The presented intent of the water management on site is to control excess water using uncontrolled discharges (which are modelled to be quite rare). However, the proponent admits that quite a high uncertainty remains in relation to the volumes of groundwater which will be encountered during this long wall mining operation, which may mean the models are not representative. This mean that when the one single dam designated to contain mine-affected water from the underground operations is approaching capacity, continued pumping of mine-affected water from underground operations (estimated 1.5-3.7 ML/DAY, and</i></p>				

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Topic	Recommendation / Suggestion	Response	Comments	Recommendations	Timing*
	<p><i>potentially more) to the surface may cause a discharge. By definition this would not be considered an “uncontrolled” discharge, since on-site pumping would be causing this discharge. However, we question whether the proponents will cease underground mining operations to avoid a discharge under these circumstances (and wait until space becomes available to store more mine-affected water in the mine water dam). Given that the sizing of the mine water dam has been based on several layers of modelling (and the associated assumptions and limitations) we have concerns regarding this strategy.</i></p> <p><i>The mine water dam could be gradually filling up over a particular wet season (with high rainfall). This may be due to water falling directly over the mine dam footprint itself (and surrounding catchment, is this planned as a Turkey’s Nest Dam?) but also due to the fact that when high rainfall is experienced on the surface, the levels of groundwater will also be expected to increase in the underground operation. As the level of water in the mine water dams approaches the spillway level, it may in fact be a relatively small rainfall event, or series of small</i></p>				

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	<p>rainfall events that trigger uncontrolled discharge/s. The assumption made by the proponent that significant dilution with receiving waters will occur during an uncontrolled discharge is not necessarily the case.</p> <p>Is the mine water dam a dam without any outside catchment? At the information session it was mentioned that certain dams were located on drainage lines, which dams?]</p>				
EIS and Environmental Management Plan (Chapter 18)	<p>Recommendation: It is recommended the proponent clearly map all wetlands identified through Queensland wetland mapping both on-site and downstream. Identify potential impacts from anticipated water quality and quantity changes for each of these identified wetlands.</p> <p>[Issue: Section 12 Environmental Management Plan]</p> <p>Figure 18-11 in the Draft EM Plan maps five wetlands identified through Queensland wetland mapping (which are also farm dams). From our mapping the lower reaches of Springsure Creek are</p>	This figure has been updated.	<p>C8. Figure 18-11 in Chapter 18 of the EIS is now Figure 18-12 in Chapter 18 of the SEIS. Figure does not appear to show any new information when compared to Figure 18-11. The proponent should indicate (what information has been added) how the figure has been updated apart from the numbering.</p>	<p>R8. The proponent should say what has been updated in Figure 18-12 (Chapter 18) of the SEIS.</p>	Prior to SEIS approval and represented in EM Plan.

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Topic	Recommendation / Suggestion	Response	Comments	Recommendations	Timing*
	<p><i>mapped as Riverine RE (Regional Ecosystems) and there are additional wetlands relevant to the site. The proponents also mention a "wetland protection area 2.4 km to the east of the Project area along Springsure Ck". This is not currently mapped in the EIS. Downstream wetlands are also important to identify and consider given the changes to flows anticipated due to subsidence.]</i></p>				
	<p>Recommendation: It is recommended that the proponent specifically outline the mitigation measures for each and/or all types of mine-affected waters in Section 12.8.8.</p> <p>[Issue: Section 12.8 Mitigation Measures]</p> <p><i>The proponents state in Section 12.8 Mitigation Measures 12.8.8 Accidental Release of Pollutants that "the redirection of all infrastructure area runoff to environmental dams" will occur, however this should be altered to read "the redirection of all mine affected run-off and mine affected waters are made to appropriately managed dams". No mention is</i></p>	<p>This section has been reworded to clarify the meaning. Groundwater mitigation measures and inflows are addressed in Chapter 9 - Groundwater and Chapter 18 - EM Plan.</p>	<p>Wording in dot point 5; p12-106; Section 12.7.8 (formerly 12.8.8) of Chapter 12 has been changed to "<i>The redirection of all mine affected runoff and mine affected waters are made to appropriately managed dams which have been designed to be above the 1:1000 year ARI level</i>"</p> <p>It is also apparent from the EMP (Chapter 18) of the SEIS that mine dewatering water (from groundwater inflows) will be stored in dams with a potential for uncontrolled discharge or vertical infiltration of contaminants from dams to water table aquifer.</p>	<p>R9. Review the performance criteria for ground and surface water impacts and ensure all environmental protection commitments are measurable and auditable.</p>	<p>Prior to SEIS approval and represented in EM Plan.</p>

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Topic	Recommendation / Suggestion	Response	Comments	Recommendations	Timing*
	made in this section of the mitigation measures and destination for groundwater inflows (one of the major concerns in terms of water quality and volumes).]		<p>C9. Not all of the performance criteria associated with potential groundwater impacts from groundwater inflow and disposal/removal (e.g. in italics below) are measurable and should be reconsidered. “all valid groundwater complaints from down gradient users will be taken seriously and investigated in accordance with Project investigation procedures”</p> <p>Without measureable performance criteria it will be difficult to assess impacts and / or efficacy of mitigation and management measures.</p>		
	<p>Recommendation: Scientific justification of the above statement is required and should be presented in Chapter 8 –Surface Water (and appropriate appendices) and Section 12.8. The proponents should prepare and present an assessment of the anticipated water quality of all the various types of mine waters.</p> <p>[Issue: Section 12.8 Mitigation</p>	As noted above, a baseline water quality monitoring program is being prepared at present. This will be implemented and data gathered prior to construction. The findings of this additional monitoring will determine specific trigger values. Sizing of dams will ensure that any uncontrolled discharges resulted in highly diluted water being released that will not	C10. The proponent not only need to ensure that they have a good characterisation of water in the receiving environment but will also need to characterise the quality of mine affected water that may be discharged and under what conditions (if there is natural stream discharge at the time of mine affected water release then potential contaminants will be diluted to some extent)	R10. More information would be required on the quality of mine affected water that may be released and under what scenarios or conditions this water would be released in order for the proponent to justify the statement “The discharge of wastewater and stormwater will be similar to water quality of receiving waters and in accordance with the water quality objectives for the Comet	Prior to SEIS approval and represented in EM Plan.

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Topic	Recommendation / Suggestion	Response	Comments	Recommendations	Timing*
	<p>Measures</p> <p><i>The proponents state in Section 12.8 Mitigation Measures 12.8.8 Accidental Release of Pollutants that “The discharge of wastewater and stormwater will be similar to water quality of receiving waters and in accordance with the water quality objectives for the Comet River sub-basin” however we have found no evidence in the EIS that an assessment of the anticipated water quality onsite has been undertaken. Without presentation of this estimated water quality it is unclear how this statement can be scientifically justified.]</i></p>	<p>impact the system. This has been discussed in Chapter 8 - Surface Water.</p>	<p>to the environment before they can understand the potential impacts of mine affected water release (controlled or uncontrolled) to the receiving environment.</p>	<p><i>River sub-basin”</i></p>	
	<p>Recommendation: It is recommended that the proponents update Section 18.5.4.6 Potential Impacts on Environmental Values (Surface Water) and other relevant sections of the EIS to include impacts listed under “groundwater” but which actually pertain to “surface waters”. The proponents should also detail the potential impact to downstream environmental values in further detail, i.e. list the contaminants of greatest concern and assess potential impacts to identified EVs downstream outside of the mixing zone (quantitatively), from</p>	<p>Section 18.5.4.9 Control Strategies for the management of surface water impacts has been updated to include monitoring of downstream discharges. Monitoring will account for all existing uses and values of water and adopt a risk based approach to management as appropriate. As discussed at meeting, the Arcturus Coal Mine project is on hold and thus cumulative impacts for this project need not be assessed as part of this EIS.</p>	<p>The proponent has added more detail on potential impacts to surface and groundwater EVs, and proposed control strategies to Sections 18.5.4.6 and 18.5.4.9 of the SEIS, respectively. Included in Section 18.5.4.9 of the SEIS is some broad information on the monitoring program to be implemented to;</p> <p>(a) “supplement the water management strategy to confirm that any potential uncontrolled discharges (overflows from the</p>	<p>R11. Where possible measure local stream flow data rather than estimating it. R12. Provide greater detail within a Mine Affected Water Monitoring Plan or incorporate this information into the Water Quality Monitoring Plan.</p>	<p>Prior to SEIS approval and represented in EM Plan.</p>

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Topic	Recommendation / Suggestion	Response	Comments	Recommendations	Timing*
	<p>alterations to both water quality and quantity including for aquatic ecosystems e.g. farm dam wetlands, semi-permanent or permanent waterholes, Riverine regional ecosystems etc., irrigation and stock watering. Cumulative impact's also needed to be assessed. This is required under the EIS ToR and has not been adequately addressed in the EIS.</p> <p>[Issue: Environmental Management Plan : Section 18.5.4.6 Potential Impacts on Environmental Values (page 18-84)</p> <p><i>The potential impacts to surface waters identified by the proponents during the operational phase are listed as:</i></p> <p><i>“ Altered catchment conditions and subsidence on the hydrology of waterways and drainage lines; and</i></p> <p><i>Stormwater runoff, erosion and contaminants from the CHP and MIA areas.”</i></p> <p><i>Yet in the groundwater section (page 18-85) a more descriptive assessment of potential impacts to</i></p>		<p><i>Environmental Dams) do not adversely impact on downstream water quality”, and</i></p> <p><i>(b) “serve as a continual improvement mechanism for the ongoing management of stormwater including operational calibration of the water balance model”</i></p> <p>C11. According to sub-point 3 p18-101; Chapter 18; SEIS (“Relevant water quality parameters, including physico-chemical and estimation of local stream flow,”) local stream flow data will be estimated rather than measured.</p> <p>C12. Very limited detail is provided in Section 18.5.4.9 (EM Plan section of the SEIS) on the intended monitoring of mine affected water in storages. This information is integral in determining the potential impacts should mine affected water be released. This information would also be used to set release limits and / or trigger values should the</p>		

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Topic	Recommendation / Suggestion	Response	Comments	Recommendations	Timing*
	<p><u>surface waters</u> is presented.</p> <p><i>“Mine dewatering water will be stored in a dewatering dam on the eastern side of the MIA. Due to the quality (“poor”) of mine water, potential impacts to above ground ecosystems could results from uncontrolled discharge into the surrounding waterways...”</i></p> <p><i>In general however, the descriptions and assessment presented in this section of the EIS is not considered adequate. The ToR clearly require;</i></p> <p><i>“ Describe any cumulative impacts on environmental values caused by the project, in isolation and in combination with the proposed Arcturus Coal Mine and other known existing or planned development or sources of contamination.”</i></p> <p><i>and</i></p> <p><i>“ Impact on environmental values: describe quantitatively the likely impact of the project on the identified environmental values of the area. The cumulative impacts of the project must be considered over time or in combination with other (all) impacts in the dimensions of scale, intensity, duration or</i></p>		<p>mine affected water ever be released to surface waters.</p>		

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Topic	Recommendation / Suggestion	Response	Comments	Recommendations	Timing*
	<p><i>frequency of the impacts. In particular, address any requirements and recommendations of relevant state planning policies, environmental protection policies, national environmental protection measures and integrated catchment management plans."</i></p> <p><i>and</i></p> <p><i>"Cumulative impacts on the environmental values of land (including agricultural land), air and water and cumulative impacts on public health and the health of terrestrial and aquatic ecosystems must be discussed in the relevant sections. This assessment may include air and watersheds affected by the project and other proposals, such as the Arcturus Coal Mine, competing for use of the local air and water sheds."</i></p> <p><i>and</i></p> <p><i>"Where impacts from the project will not be felt in isolation to other sources of impact, it is recommended that the proponent develop consultative arrangements with the Arcturus Coal Project and other industries in the project's area to undertake cooperative monitoring and/or management of</i></p>				

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Topic	Recommendation / Suggestion	Response	Comments	Recommendations	Timing*
	<p><i>environmental parameters. Describe such arrangements in the EIS"]</i></p> <p>Recommendation: It is recommended that a much greater emphasis is placed on site-specific assessment in regards to potential impacts and environmental protection objectives for surface waters.</p> <p>[Issue: Environmental Management Plan : Section 18.5.4.7 Environmental Protection Objectives (page 18-85)]</p> <p><i>The environmental protection objectives listed for water resources are scarce and apart from protecting agricultural use the only objective listed is as follows:</i></p> <p><i>“Maintain chemical, physical and biological properties of existing water resources within acceptable parameters”</i></p> <p><i>There is no consideration of protecting water flow as a protection objective, and there is a wide leeway in how “acceptable parameters” could be interpreted.</i></p>	<p>As noted above, a baseline water quality monitoring program is being prepared at present. This will be implemented and data gathered prior to construction. The findings of this additional monitoring will determine specific trigger values appropriate to the context of the Project.</p>	<p>C13. The proponent has not fully addressed the recommendation. There is a combination of information that is used in the site specific assessment of potential impacts and to quantitatively assess the efficacy of impact mitigation and management measures. Initially, environmental values and objectives to protect or enhance these values should be identified. WAS wish to reiterate that while the baseline water quality monitoring information is important the Scheduled environmental values and water quality objectives for the region (attached) should also be considered in impact assessment.</p>	<p>R13. Scheduled environmental values and water quality objectives for the region (attached) where the project occurs are as important as baseline monitoring data and should also be considered in impact assessment. EVs and the objectives used to protect or enhance these values should be detailed in the EIS and EM Plan. There are Scheduled EVs for surface and groundwater flow and Scheduled WQOs for flow objectives in high ecological value waters. Regional surface and groundwater flow objectives should also be taken into account (Queensland Government, 2011).</p>	<p>Prior to SEIS approval and represented in EM Plan.</p>

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Topic	Recommendation / Suggestion	Response	Comments	Recommendations	Timing*
	<p><i>It would appear that very little time and consideration has been given to identify, and clearly assess that site-specific environmental values and environmental protection objectives for surface waters both on-site and downstream of the proposed site. This is a major concern in regards to this EIS. How can the objective be to maintain existing properties for surface waters when an inadequate assessment of local surface waters has been undertaken? If information is not currently available then the EPO's should include to an objective to comprehensively assess the local surface waterways and aquatic ecosystems and detail the spatial location of all relevant EVs (mapping).]</i></p>				
	<p>Recommendation: It is recommended that the proponent makes the suggested alteration listed above.</p> <p>[Issue: Environmental Management Plan: Section 18.5.4.8 Performance Criteria (page 18-85)]</p>	<p>Section 18.5.4.8 has been amended as recommended.</p>	<p>The proponent has fulfilled the recommendations made by WAS.</p>	<p>No further recommendations.</p>	

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Topic	Recommendation / Suggestion	Response	Comments	Recommendations	Timing*
	<p><i>The proponent lists the following Performance Criteria for surface waters:</i></p> <p><i>“ Compliance with the regulatory conditions outlined by the Project’s Environmental Activity (EA);</i></p> <p><i>Monitoring to be undertaken in accordance with outlined control strategies;</i></p> <p><i>Develop monitoring criteria including trigger values using site specific data ;</i></p> <p><i>....</i></p> <p><i>Quantity of groundwater complaints from down gradient users”</i></p> <p><i>The terminology is incorrect for EA, as this should read “Environmental Authority” rather than “Environmental Activity”. Given that the main Performance Criteria is based on compliance with the EA, the EA will need to be designed in such a way to protect the receiving waters and associated environmental values environment. As it stands the current proposed EA does not achieve these aims.</i></p> <p><i>It is not a performance criteria to “<u>develop</u> a monitoring program and trigger values” rather, it would be a</i></p>				

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Topic	Recommendation / Suggestion	Response	Comments	Recommendations	Timing*
	<p>performance criteria to “adequately monitor and <u>maintain</u> water quality within receiving waters in order to meet the Water Quality Objectives (WQOs) for identified environmental values”.</p> <p><i>It is unclear how a “quantity of complaints” is an adequate environmental performance criteria. By this criteria in the current EIS, if a small number of complaints are received regarding the projects impact on down-gradient groundwater users, then the site is “performing” adequately. We would suggest that any and all complaints should be considered seriously.]</i></p>				
	<p>Recommendation: It is recommended that the proponent clarify the water management strategies as there is a general lack of consistency throughout the EIS and Appendices. Follow the advice above to undertake the planning of a controlled discharge</p> <p>[Issue: Environmental Management Plan: Section 18.5.4.9 Control Strategies (page 18-87)]</p> <p><i>For the first time, the proponents</i></p>	<p>As confirmed during meeting, the Project is not proposing any controlled discharges. As such, no draft EA conditions are proposed to manage this. Conditions to manage the event of an uncontrolled release are proposed at Condition D15, which includes quality objectives for monitoring and reporting requirements.</p>	<p>C14. It is not usual to condition for an uncontrolled release, especially if the release will be rare or unlikely to occur at all during the lifetime of the project. In instances where an uncontrolled release is foreseeable the proponent may apply for a Temporary Emissions Licence (TEL). The information collected to characterise baseline surface water quality and the quality of mine affected water in storage dams monitoring would be useful in this application. There</p>	<p>R14. In relation to condition (D15) - EHP requires that the inconsistencies on water management on site and discharge practices would be addressed – as per R6 above.</p>	<p>Prior to SEIS approval and represented in EM Plan.</p>

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Topic	Recommendation / Suggestion	Response	Comments	Recommendations	Timing*
	<p><i>mention anything about a controlled discharge. In all or most other sections of the EIS the proponents only refer to "uncontrolled" discharges.</i></p> <p><i>"Controlled discharges from dams (i.e. actively controlled discharges) will only be undertaken in the event water quality parameters are in accordance with the relevant guidelines"</i></p> <p><i>While we are not against the proposal of controlled discharges if designed in such a way that WQOs are adequately protected (i.e. with dilution specifically designed), this should not be the first and only mention of this water management option. There does not appear to be any EA conditions relating to controlled discharges, if controlled discharges are to be considered further then further information and site-specific assessment will need to be incorporated in Chapter 8 – Surface Water, Site Water Management Plans and Site Water Balance, and detailed conditions proposed in the EA water conditions (refer to Model Conditions for Coal Mine in the Fitzroy for more guidance on this). The Technical guideline "Wastewater release to Queensland waters" (2012) should</i></p>		<p>would also be some monitoring requirements under the TEL.</p>		

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Topic	Recommendation / Suggestion	Response	Comments	Recommendations	Timing*
	<p><i>also be followed.]</i></p> <p>Recommendation: It is recommended that this statement is removed from the Mine Water Management System section of Section 18.5.4.9 Control Strategies. The mine water management should clearly aim to keep “clean” or “raw” water separate from “dirty” or mine affected waters. This should be updated in Section 18.5.4.9 and any other relevant sections of the EIS.</p> <p>[Issue: Issue: Environmental Management Plan : Section 18.5.4.9 Control Strategies (page 18-87)]</p> <p><i>The proponents [sic]</i></p> <p><i>“Raw water will also be used to top up the mine dewatering dam to ensure there is enough water for underground mine use and stockpile sprays”</i></p> <p><i>This statement does not align with the stated aim to separate “clean” and “mine-affected water” on-site, where separation of these water types represents best-practice management. It is not best-practice</i></p>	<p>All water within the MIA is classes as ‘dirty’ or “mine affected” water. Clean water is either that from outside the site that will be diverted around the mine site, or bought into the site. Bandanna Energy has purchased an allocation of 1,000 mega litres of water per year from Sunwater’s Nogoa–McKenzie Water Supply Scheme for use at the mine site. Water from this scheme will be piped to the site. The purchase will ensure the mine is self-sufficient and does not draw upon existing local water supplies and or aquifers. In the event that the dam does not contain sufficient quantities of water to undertake underground mining activities, water from the pipeline will be utilised as a supplement.</p>	<p>The proponent has provided sufficient information on this issue.</p>	<p>WAS have no further recommendations on this issue.</p>	

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Topic	Recommendation / Suggestion	Response	Comments	Recommendations	Timing*
	<i>to combine clean or raw water with contaminated waters (impacted by mining activities), as this in-effect increases the volumes of contaminated water onsite.]</i>				
	<p>Recommendation: It is recommended that the proponent state that the baseline water assessment and interpretation of water quality data will follow the appropriate guidelines including the DERM Monitoring and Sampling Manual, Queensland Water Quality Guidelines (QWQG, 2009), ANZECC guidelines, Model water conditions for coal mines in the Fitzroy Basin etc. As a minimum, but not limited to including;</p> <ul style="list-style-type: none"> • Measure for those all indicators listed in Tables 2 and 3 the Model water conditions for coal mines in the Fitzroy Basin (including both field filtered (dissolved) metals and totals metals). • When deriving local WQOs make sure included data is only collected from true reference sites (as per the definition in Section 4.4.3 of the QWQGs (2009)). It is not adequate to use data collected from locations downstream of discharging 	A detailed monitoring plan is currently being developed. Please refer to Chapter 18, Section 18.5.4.10	The proponent has provided sufficient information on this issue.	WAS have no further recommendations on this issue.	

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Re

Topic	Recommendation / Suggestion	Response	Comments	Recommendations	Timing*
	<p>mines.</p> <ul style="list-style-type: none"> • Include a measure or estimate of local stream flow at the time of each sampling event. The relationship between flow vs. EC should be investigated at local reference sites. • A minimum of 10 data points, but preferably 24 data points should be used and collected over a minimum of 12-18 months, and be representative of all seasons; • All data used to determine locally-derived trigger values should be presented in electronic format for review by DEHP or DSITIA <p>IMPORTANT NOTE: Reference to these documents, and the minimum requirements listed above should also be added to other relevant sections of the EIS which refer to future plans to undertake water and aquatic ecosystem health monitoring and WQO derivation</p> <p>[Issue: Section Environmental Management Plan: Section 18.5.4.9 Control Strategies (page</p>				

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Topic	Recommendation / Suggestion	Response	Comments	Recommendations	Timing*
	<p>18-88)</p> <p><i>The proponents commit to developing a Water Management Plan (Water MP) under the Construction Environmental Management Plan (CEMP), and as part of this program they plan to develop:</i></p> <p><i>“Criteria will be developed with trigger values set at the 20th and 80th percentiles identified through baseline investigations which will be further undertaken prior to construction”</i></p> <p><i>No clear plans are presented in regards to how these “baseline investigations” will be undertaken. There is no presentation of the monitoring program design, indicators to be measures, QA/QC, etc. There is also no reference to the appropriate guideline documents.]</i></p>				
	<p>Recommendation: The issues listed should be addressed in the relevant sections of the EIS</p> <p>[Issue: Section 18.5.4.10 Monitoring Surface Water</p>	Condition D21 provides for the monitoring of water storage quality.	C15. Proposed Condition (D21) provides no information on the frequency of monitoring mine affected water in storage dams. Stock should not have access to dams containing hazardous waste. Condition (D21) [“(D21) In the event the water quality within any dam	R15. Remove Condition (D21) from the Proposed Environmental Authority Conditions: Schedule D – Water (Section 18.5.4.12; EM Plan; SEIS). R16. Mine affected water in storage dams should be monitored. A condition to	<p>Prior to SEIS approval and represented in EM Plan.</p> <p>Refer to guidelines-EM99 Model mining conditions.</p>

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Topic	Recommendation / Suggestion	Response	Comments	Recommendations	Timing*
	<p><i>Commitments are made to monitor at the Environmental Dams (EDs) and the proposed ongoing sampling locations (refer section 18.5.4.12 - EA) for both water quality and flow (subsidence impacts). There should also be ongoing monitoring of water quality in the mine-affected water dam also.</i></p> <p><i>There is repeated reference to “water quality levels which exceed the WQOs set out in the EA and Water MP, upstream (control) values will be compared to the water quality within and downstream of the Project area to determine if the exceedence is likely to be Project area specific”. There is no mention however of the sampling frequency or how this comparison will be undertaken. Strictly speaking it should be the median of test site data which is compared to the WQO. If weekly sampling is undertaken, a rolling median could for example be calculated and used for interpretation purposes.]</i></p>		<p><i>containing hazardous waste does not comply with the contaminant limits defined in Table 18-30, measures will be implemented to minimise access by stock to the dam.”]</i> should be removed from the Proposed Environmental Authority Conditions: Schedule D – Water (Section 18.5.4.12; EM Plan; SEIS). Stock should not have access to dams containing hazardous waste.</p> <p>C16. It is still important to monitor the quality of mine affected water in storage dams because this information can be used to (a) assess potential impacts to ground and surface waters (diffuse and point source emissions/release); (b) set release limits should mine affected water be released to surface waters, and (c) test the efficacy of mitigation and management measures to avoid and / or reduce impacts.</p>	<p>monitor mine affected water in storages and / or a commitment to monitor mine affected water in the EM Plan should be sufficient. A detailed plan on how this monitoring will be carried out should be included within a Mine Affected Water Monitoring Plan or incorporate this information into the Water Quality Monitoring Plan.</p>	<p>EM634 Structures which are dams or levees constructed as part of ERAs.</p>

Topic	Recommendation / Suggestion	Response	Comments	Recommendations	Timing*
	<p>Recommendation: It is recommended that proposed EA Condition D3 is altered and does not allow for the uncontrolled environmental discharge of mine affected water to receiving waters. Just because a creek is unnamed and is located in full or in part on the mine lease area does not mean that it should be considered part of the on-site water infrastructure (nor for on-site farm dam wetlands). The QWQGs clearly state that all waterways including highly ephemeral waterways are assigned a level of protection. We do support however the assertion that receiving waters monitoring is undertaken (as outlined in the second half of proposed EA Condition D3).</p> <p>Throughout the EIS, very limited information is presented regarding the locations of discharge points, relative to the receiving waterways, farm dam wetlands, riverine regional ecosystems etc. No modelling or assessment of the impacts of mine discharges on these waterways is presented. Given that discharge locations appear to upstream of farm dams, and discharge waters are likely to be trapped within these farm dam wetlands, a comprehensive understanding of the likely dilutions,</p>	<p>Farm dams and creeks will not be used to provide or store water as part of the Project. Any uncontrolled discharges during flood events to existing waterways from these dams will be via a spillway and in accordance with quality criteria presented in condition D15. There is no need to amend condition D3.</p>	<p>WAS are satisfied with the information supplied here.</p>	<p>WAS have no further recommendations on this issue.</p>	

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Topic	Recommendation / Suggestion	Response	Comments	Recommendations	Timing*
	<p>mixing zones and wetland specific issues should be presented in the SEIS. If mine-affected discharges occur with high Electrical Conductivity (EC) into a poorly mixed receiving environment (farm dams) it is highly likely that stratification of waters will occur with higher concentration EC water falling to the bottom layers of the water column, and potentially adversely affecting biota within the benthic zone. Insufficient attention has been placed on these and similar issues. It is strongly recommended that thorough consideration, assessment and/or modelling is undertaken and presented in the relevant sections of the EIS</p> <p>[Issue: Section 18.5.4.12 Proposed Environmental Authority Conditions: Schedule D- Water Surface Water]</p> <p><i>The proponents propose the following conditions;</i></p> <p><i>“Condition (D3) Waters within unnamed creek 1 has the potential to be affected by storm water contaminated by the mining activities and therefore must be</i></p>				

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Topic	Recommendation / Suggestion	Response	Comments	Recommendations	Timing*
	<p>monitored at the locations and frequencies defined in the Table 18-24"</p> <p>Contaminated stormwater should not be allowed to run-off freely into receiving waterways and needs to be contained for treatment and/or for controlled discharges.</p> <p>Unnamed Creek 1 is stated to flow into Farm Dam 2 (Den Lo Park). Discharges to Unnamed Creek 1 are complicated by the downstream Farm Dam. What are the EV's of this dam? Aquatic ecosystems, irrigation, stock watering? The proponent has not presented any information in regards to how the EV's of this dam will be protected from mining impacts. Mine-affected water which is proposed to be discharged into dams is a far more complicated discharge scenario. No modelling or assessment of mixing zones has been presented in the EIS]</p>				
	<p>Recommendation: It is strongly recommended that the proponent obtain and consider the "Model water conditions for coal mines in the Fitzroy basin". Deviations to these conditions are able to be proposed by the proponent however this needs to be adequately justified</p>	<p>Schedule D has been updated considering the Model water conditions for coal mines in the Fitzroy basin. New conditions have been presented and existing conditions updated.</p>	<p>C17. Given release of mine affected water to surface waters will be rare or highly unlikely then a controlled release of mine affected water condition will not be required in the EA.</p> <p>C18. Condition (D21) is</p>	<p>R17. In relation to the proposed condition (D15) - EHP requires that the inconsistencies on water management on site and discharge practices would be addressed – as per R6 above..</p> <p>R18. Remove Condition</p>	<p>Prior to SEIS approval and represented in EM Plan.</p> <p>Refer to guidelines - EM99 Model</p>

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Topic	Recommendation / Suggestion	Response	Comments	Recommendations	Timing*
	<p>on a scientific basis. We could not locate any scientific justification for the proposed conditions regarding waters. Significant revision is required for the proposed EA.</p> <p>[Issue: Section 18.5.4.12 Proposed Environmental Authority Conditions: Schedule D- Water Surface Water]</p> <p><i>This mine is located in the Fitzroy Basin and yet the proponents do not refer to the "Model water conditions for coal mines in the Fitzroy basin".]</i></p>		<p>poorly written and needs to be reviewed or removed.</p> <p>C19. The Water Quality Monitoring Plan (WQMP), which is described in brief in the EM Plan section of the SEIS (pp18-19), shows that the proponent intends to conduct receiving environment monitoring throughout the life of the project. A requirement to conduct a receiving environment monitoring program (REMP) is usually also conditioned in the EA, especially where there is a potential for release of mine affected water to surface waters.</p> <p>C20. The WQMP / REMP is only described in brief in the EM Plan section of the SEIS.</p>	<p>(D21) from the Proposed Environmental Authority Conditions: Schedule D – Water (Section 18.5.4.12; EM Plan; SEIS). A condition to monitor mine affected water in storages and / or a commitment to monitor mine affected water in the EM Plan should be sufficient, along with a detailed plan on how this monitoring will be carried out (a Mine Affected Water Monitoring Plan).</p> <p>R19. We recommend adding a requirement to conduct a REMP in the EA. Conditions for monitoring of the receiving environment as per Model Mining Conditions (http://www.ehp.qld.gov.au/land/mining/pdf/model-mining-conditions-em944.pdf).</p> <p>R20. The full details of the environmental monitoring to be carried out under the WQMP / REMP would need to be reviewed to ensure that the program is well designed enough to (a) to assess the potential impact of any release of mine affected water on EVs; (b) to test the accuracy of an environmental impact statement and whether management and mitigation measures are effective and (c) to set and / or</p>	mining conditions

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Topic	Recommendation / Suggestion	Response	Comments	Recommendations	Timing*
				amend release limits and trigger levels for specific water quality parameters and related conditions within an approval)	

RTI DL Release

References

DERM (2011) *Environmental Protection (Water) Policy 2009 Comet River Sub-basin Environmental Values and Water Quality Objectives Basin No. 130 (part), including all waters of the Comet River Sub-basin September 2011*, Department of Environment and Resource Management, Brisbane:

http://www.ehp.qld.gov.au/water/policy/pdf/plans/fitzroy_comet_river_wqo_290911

Queensland Government (2011) *Water Resource (Fitzroy Basin) Plan 2011*, Queensland Government, Brisbane:

<http://www.legislation.qld.gov.au/LEGISLTN/CURRENT/W/WaterReFBP11.pdf>

Attachments



Adobe Acrobat
Document



Adobe Acrobat
Document

Disclaimer:

Any opinions, advice or comments provided in this memo (i.e. the work request 'response') or associated attachments or emails should not be used as part of legal proceedings or expert statements. Please advise the Water Assessment and Systems (WAS) Group immediately if the response to this work request could be used in relation to legal proceedings.

WAS work request responses are typically based largely on the information and data provided by other parties. Although the information and data provided will be cross-checked and verified wherever possible, WAS cannot be held liable for interpretations based on incorrect, inaccurate, incomplete or otherwise invalid information or data, nor for any subsequent decisions or actions made by any individuals or organisations that were based on misinformed responses.

Phillips Erin

From: Rhodes Monika
Sent: Friday, 21 June 2013 3:08 PM
To: Dunlop Kylie
Cc: Rowland Philip
Subject: SEIS_SEIS submission_Springsure_20130621
Attachments: Supplementary_Memo regional EHP_Springsure_20130621.doc

Dear Kylie

The supplementary EIS for the Springsure Creek Coal Mine Project will be released on 21 June 2013. The proponent, Springsure Creek Pty Ltd, proposes to develop an underground coal mine operation located approximately 47 kilometres south-east of Emerald in central Queensland.

As part of this stage of the EIS process, provide comments from EHP's regional review team on the supplementary EIS for the above referenced project. Please consider the response to your submissions and advise me of any comments and recommended conditions that should apply to the project **by close of business 12 July 2013**.

I have established a folder on **T:_City\Springsure** where electronic copies of the SEIS, EHP's submission and the proponent's response to all submissions will be saved for distribution to the team. The proponent will send you directly your copies. Please note that I have not received response to all submissions, only EHP. I will put this on as soon as I receive it from the proponent.

If you have any questions, please contact me.

Cheers

Moni

Dr Monika Rhodes
Principal Environmental Officer
Statewide Environmental Assessments
Telephone 07 3330 6293 **Facsimile** 3330 5875
Email: monika.rhodes@ehp.qld.gov.au
www.ehp.qld.gov.au

Department of Environment and Heritage Protection
Level 9, 400 George Street, Brisbane Q 4000
GPO Box 2454, Brisbane Q 4001

Memorandum

Enquiries Monika Rhodes
Telephone 3330 6293

Our reference CBD/111013

25 February 2013

To: Kylie Dunlop

Through: Philip Rowland, Project Manager, SEA

From: Monika Rhodes, EIS Coordinator, SEA

Subject: Springsure Creek Coal Mine Project – Supplementary EIS

Dear Kylie

The supplementary EIS for the Springsure Creek Coal Mine Project will be released on 21 June 2013. The proponent, Springsure Creek Pty Ltd, proposes to develop an underground coal mine operation located approximately 47 kilometres south-east of Emerald in central Queensland.

As part of this stage of the EIS process, provide comments from EHP's regional review team on the supplementary EIS for the above referenced project. Please consider the response to your submissions and advise me of any comments and recommended conditions that should apply to the project **by close of business 12 July 2013**.

I have established a folder on **T:\City\Springsure** where electronic copies of the SEIS, EHP's submission and the proponent's response to all submissions will be saved for distribution to the team. The proponent will send you directly your copies.

Should you have any queries regarding this matter please do not hesitate to contact me on telephone (07) 3330 6293 or by email to monika.rhodes@ehp.qld.gov.au.

Yours sincerely

Monika Rhodes
EIS Coordinator
Statewide Environmental Assessments

400 George Street
Brisbane Queensland 4000
Australia
PO Box 2454
Brisbane Queensland 4001
Australia
Telephone (07) 3330 6293
Facsimile (07) 3330 5754
Website www.derm.qld.gov.au
ABN 46 640 294 485

Phillips Erin

From: SACRE, Glenda <glenda.sacre@skills.qld.gov.au>
Sent: Monday, 24 June 2013 1:19 PM
To: Rhodes Monika
Subject: RE: SEIS_Email-Out_submission of supplementary EIS_Springsure_20130624

Good afternoon Monika

Skills Queensland is happy with the response from Springsure Creek Coal Mine Project

Many thanks

Glenda

Glenda Sacre
Principal Policy Officer

Level 8, 133 Mary Street, Brisbane 4000 or PO Box 15137, City East, Brisbane 4002
P +61 7 3836 0068 F +61 7 3836 0080 E glenda.sacre@skills.qld.gov.au W www.skills.qld.gov.au



From: Rhodes Monika [<mailto:Monika.Rhodes@ehp.qld.gov.au>]
Sent: Monday, 24 June 2013 7:50 AM
Subject: SEIS_Email-Out_submission of supplementary EIS_Springsure_20130624

Dear All

Your organisation lodged a submission on the environmental impact statement (EIS) for the proposed Springsure Creek Coal Mine Project, located 47 kilometres south-east of Emerald in central Queensland.

The proponent, Springsure Creek Coal Pty Ltd, has prepared a supplementary EIS and response to submissions that were received during the public notification period for the EIS. In the interests of facilitating the assessment of submissions provided by your department, please consider the response to your submissions and advise the Department of Environment and Heritage Protection (EHP) of any comments or recommended conditions that should apply to the project by **close of business Friday, 12 July 2013** (note that EHP will have to make a decision under section 56A of the *Environmental Protection Act 1994* if the EIS can proceed within 20 bd, so any comments should be received by 12/07/13; the Act does not allow for any extensions).

Your advice should be forwarded to:

The EIS Coordinator – Springsure Creek Coal Mine Project
Department of Environment and Heritage Protection
GPO Box 2454 BRISBANE QLD 4001
Level 9, 400 George Street BRISBANE QLD 4000
or by email to eis@ehp.qld.gov.au.

Should you have not received a copy of the SEIS and a response to your submission by COB today, please contact Mr Pete Jones, Springsure Creek Pty Ltd (Bandanna Energy), on 3041 4434.

I will be the EIS Coordinator and primary contact for this project.

Kind regards

Dr Monika Rhodes
Principal Environmental Officer
Statewide Environmental Assessments
Telephone 07 3330 6293 **Facsimile** 3330 5875
Email: monika.rhodes@ehp.qld.gov.au
www.ehp.qld.gov.au
Department of Environment and Heritage Protection
Level 9, 400 George Street, Brisbane Q 4000
GPO Box 2454, Brisbane Q 4001

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Phillips Erin

From: Rhodes Monika
Sent: Friday, 21 June 2013 2:52 PM
To: Pete Jones
Cc: Rowland Philip; Dunlop Kylie
Subject: SEIS_Submission of SEIS_Springsure_20130621

Dear Pete

EHP acknowledges receipt of:

- Amended EIS (hard copy and electronically)
- S66 notice (signed original)
- Proponent's response to submissions (hard copy, with electronic copy of the proponent's response to the EHP submission).

Could you please also send me through an electronic copy of the proponent's submission to all other 48 submissions by COB today? This is important as EHP will need to save this copy electronically.

EHP has now until the 19 July 2013 to make a decision under s56A(2) EP Act (whether the EIS will proceed to EIS assessment report stage).

Kind regards

Dr Monika Rhodes
Principal Environmental Officer
Statewide Environmental Assessments
Telephone 07 3330 6293 **Facsimile** 3330 5875
Email: monika.rhodes@ehp.qld.gov.au
www.ehp.qld.gov.au

Department of Environment and Heritage Protection
Level 9, 400 George Street, Brisbane Q 4000
GPO Box 2454, Brisbane Q 4001

Reference: SCCMP Final EIS

Department of
**Agriculture, Fisheries
and Forestry**

10 July 2013

Dr Monika Rhodes
The EIS Coordinator – Springsure Creek Coal Mine Project
Department of Environment and Heritage Protection
GPO Box 2454
BRISBANE QLD 4001

Dear Dr Rhodes

I refer to your email of 24 June 2013 to the Department of Agriculture, Fisheries and Forestry (DAFF) regarding the Final Environmental Impact Statement (Final EIS) for the Springsure Creek Coal Mine Project.

Thank you for providing DAFF with the opportunity to review this project's Final EIS. The respective business areas across DAFF have taken the opportunity to review the project documents and have, where appropriate, provided comments. These comments have been edited and collated in to a whole-of-DAFF submission. Please find enclosed this submission. Could you please forward any future correspondence on this matter, including requests for further information on the technical matters raised in this submission, to the DAFF EIS Coordinator, Mr Ross Savage and also to the daff_eis_unit@daff.qld.gov.au mailbox.

Mr Savage's contact details are: DAFF EIS Coordinator
Attention: Ross Savage
Department of Agriculture, Fisheries and Forestry
Primary Industries Building
Level 6, 80 Ann Street
Brisbane Qld 4000
T: 07 3405 6535, F: 07 3239 3074
E: ross.savage@daff.qld.gov.au

Yours sincerely

sch4b4(16) Personal information

for.
Elton Miller
General Manager
Strategic Policy and Planning

DEPARTMENT OF AGRICULTURE, FISHERIES AND FORESTRY

Submission on the Final EIS for the Springsure Creek Coal Mine Project (Springsure Creek Coal Pty Ltd).

Section	DAFF Division	Describe the issue	Suggested Solution
Final EIS Chapter 5	Regional Services & Biosecurity Queensland	<p>Issues:</p> <ol style="list-style-type: none"> (s5.4.7, p5-52) In response to DAFF's EIS submission no. 18.16, the information in this section contains generalised descriptions of farm practices in the Central Highlands, but does not provide specific data on the Project area. (RS) (s5.7.5, p5.76) The application of appropriate legislation where chemical control is the proposed mitigation measure for weeds. Herbicides such as flupropanate used to control invasive grasses like tussock, Parramatta, Giant rats tail, Chilean needle and African lovegrass, have long withholding periods and put obligations on landholders to move livestock to clean feed prior to slaughter. (BQ) 	<p>Comments:</p> <ol style="list-style-type: none"> As previously requested, the EIS should address the full requirements of the TOR in particular the existing land uses, any productivity loss due to mine development and how the mine will be designed to minimise the extent of disturbance to existing agricultural activities. The EIS should ensure that the Project is compliant with both the <i>Chemical Usage (Agricultural and Veterinary) Control Act 1988</i> (use controls) and <i>Agricultural Chemicals Distribution Controls Act 1966</i> (licensing controls) to ensure that use of agricultural chemicals or other industrial chemicals does not have an adverse impact on human health, trade or the environment through contamination of agricultural produce. Note: It is essential that landholders are involved in consultation on uses of herbicides to ensure that appropriate risk management actions can be implemented where stock could be exposed.
Final EIS Chapter 7	Biosecurity Queensland	(Table7-2, p7-10) With reference to the management methods for mulching of green waste, this section does not mention plant species that are declared under the <i>Land Protection (Pest and Stock Route Management) Act 2002</i> or declared species under local government laws.	Species that are declared under the <i>Land Protection (Pest and Stock Route Management) Act 2002</i> or declared under local government laws need to be identified in the survey to guide best practice management and disposal of weeds.
Final EIS Chapter 8	Fisheries Queensland	(s8.3.2, p8-6) Further to the response to DAFF's EIS submission no. 18.04 and 18.05, the EIS does not satisfy DAFF's recommendation that consultation between the Proponent and DAFF occur for all waterway works that might affect fish movement.	The EIS should commit the Project to consult DAFF on all matters concerning potential impacts to fish movements including waterway barrier works, irrespective of their location with respect to the MLA.

DEPARTMENT OF AGRICULTURE, FISHERIES AND FORESTRY

Final EIS Chapter 12	Biosecurity Queensland	<p>Issues:</p> <ol style="list-style-type: none"> 1. (s12.6, p12-91) The Project area may be subject to aerial spraying for the management of migratory and spur-throated locusts. 2. (s12.7.7, p12-105 & s14.6.4, p14-39) The EIS does not refer to the possible application of the <i>Plant Protection Act 1989</i>. For example, the whole of QLD is a pest quarantine area for grape phylloxera and the Project site is located in a grape growing area. The Project also transverses the Special Control Zone (which is designated as a phylloxera exclusion zone). For further information refer to - http://www.daff.qld.gov.au/4790_20983.htm#Grape. 	<p>Comments:</p> <ol style="list-style-type: none"> 1. The EIS should acknowledge that the Project area might be subject to the control of locusts, which could include aerial spraying. Any process should be developed in collaboration with state and local authorities. 2. No immediate issues are foreseen, however, there is the possibility that machinery contaminated with plant pests (e.g. insects) or disease (e.g. fungi) could move to, or from, sensitive zones. While it is unlikely that plant and machinery has been in contact with grape vines, general biosecurity awareness of plant risks amongst the workforce can reduce the risk of introducing pests of concern into QLD. The EIS should describe the compliance strategy for the requirements of the <i>Plant Protection Act 1989</i> (e.g. s73 of the subordinate legislation <i>Plant Protection Regulation 2002</i>). For specific movement conditions refer to Inspector's Approval 4.6 - http://www.daff.qld.gov.au/documents/Biosecurity_MovingPlantsAndPlantProducts/IA_4.6.pdf
Final EIS Chapter 16	Regional Services & Plant Industries and Food	<p>Issues:</p> <ol style="list-style-type: none"> 1. (c16) In response to DAFF's EIS submission no. 18.22, the EIS is relying on the Agricultural Research Co-existence Committee to gather and provide relevant information about impacts on agricultural production. The delivery of this work should occur prior to Project's impacts occurring. (RS & PIF) 2. (s16.7.7.1, p16-34) The cumulative impacts that the broader project (that is, the mine and the train load out facility and transport and infrastructure corridor) needs to be examined with regard to the totality of potential impacts on existing agricultural land uses and business enterprises (i.e. productivity and yields, farming systems, cost structures and economic returns). (RS & PIF) 	<p>Comments:</p> <ol style="list-style-type: none"> 1. As previously requested, the Project should determine or provide for an estimate of the costs and value of agricultural production that has been and continues to be generated annually from the Project area. This should be done for a period of years so that seasonal variations can be averaged out. 2. As a demonstration of the Proponent's commitment to coexistence between agriculture and mining, the cumulative impacts should be considered on a whole of project basis, not on separate project components basis, as is the current approach. Without this undertaking, the EIS assessment and mitigation of impacts to potential affected agricultural land uses and business enterprises will remain incomplete. Note: This should be cross referenced with an updated Chapter 20 – <i>Key Commitments</i>.

DEPARTMENT OF AGRICULTURE, FISHERIES AND FORESTRY

		<p>3. (s16.7.7.1, p16-34) The EIS references co-existence between agriculture and mining activities but is silent on how this will be formally managed and delivered for benefit of affected landholders. The Proponent is providing a process via the Agricultural Research Co-existence Committee by which rehabilitation and productivity enhancement measures could be developed, however greater commitment to actions in this regard is sought. (RS)</p>	<p>3.1 The EIS should recognise the important role of Agricultural Management Plans and should commit to finalising these quickly with all affected landholders.</p> <p>3.2 The EIS should commit to detailed planning for the rehabilitation of affected land, including addressing subsidence (including all earthworks and soil renovation procedures), the infrastructure to control runoff on dryland area and distribute water to irrigated areas and the agronomic approaches that will be adopted to improve agricultural productivity. The Agricultural Management Plans should also contain measures to ensure that productivity and economic returns are maintained over the long term. These Plans would also contain alternative strategies should the measures proposed to restore land and maintain productivity are not successful.</p> <p>Notes:</p> <p>A. This should be crossed referenced with an updated Chapter 20 – Key Commitments.</p> <p>B. To support the development of Agricultural Management Plans, the EIS should provide updated subsidence modelling for all affected areas, including modelling of all affected agricultural areas outside of the MLA.</p>
Final EIS Chapter 18	Biosecurity Queensland	<p>(s18.5.8, p18-214) With reference to the statement <i>"This Plan will be developed and implemented prior to commencement of construction through consultation with the Department of Agriculture, Fisheries and Forestry (DAFF), and managed in accordance with the requirements of the LP Act."</i></p>	<p>Comments:</p> <p>1.1 The EIS should ensure that a weed and pest animal management plan be developed consistent with state and local pest and weed priorities.</p> <p>1.2 In addition to state and regional priorities, this plan should align with local government weed and pest animal priorities.</p>

ENDORSED / NOT ENDORSED

Comments

sch4p4(6) Personal Information

Date: 10/7/13.

for **Elton Miller**
General Manager
Strategic Policy and Planning
Department of Agriculture, Fisheries and Forestry

Springsure Creek Coal Project Supplementary EIS

Submission prepared by
Department of Natural Resources and Mines
July 2013

Water Management and Use – Groundwater

General Comment

Firstly it should be noted that in the document provided by Bandanna Energy, 'Response to Submissions to EIS' the responses provided in relation to comments made by DNRM on groundwater related issues were in places poor and at times did not address the comment. However a review of the updated groundwater report often resulted in answers to the original comments being obtained.

It is noted that Water Resource Australia Pty Ltd have reviewed the updated groundwater model and provided comment. Water Resource Australia have generally supported the quality of the modelling work carried out, with some qualifications. It is a positive step that Bandanna have arranged for this peer review of the groundwater model. The comments of Water Resource Australia, the updated model report and draft EMP have been reviewed by DNRM along with the proponent's responses referred to above. The more significant outstanding issues are noted below.

Monitoring Bores

Issue

It should be noted that in the course of the groundwater investigation work carried out as part of this EIS, nine monitoring or production bores were drilled. Of these bores strata details are supplied for two (SPR107C and SPR138) and construction details supplied for four bores in the original EIS. In the SEIS documents, basic construction details are supplied for the nine bores, but no additional strata details are provided.

Recommendation

Strata details are required to be provided for the remaining seven bores.

Section 9.5.4.3 – Calibrated Model (Page-9-77)

Issue

In table 9-20 a vertical hydraulic conductivity (permeability) for the Rewan Formation of 1×10^{-6} m/day has been adopted. In determining this figure, references are provided for work carried out by AGE on the Ensham mine in 2006 and by Ausenco – Norwest (2012) in work carried out on a groundwater model for the northern Bowen Basin for Arrow Energy.

However recent work carried out by AGE in 2013 for Minyango (Blackwater) suggest a vertical hydraulic conductivity for the Rewan of 5.4×10^{-5} m/day. Additionally recent work carried out in the southern Galilee Basin in the Alpha area has seen URS (2012) adopt a vertical hydraulic conductivity for the Rewan of 9×10^{-5} m/day for the Alpha/ Kevins Corner model and Heritage Computing (2013) adopt 9.3×10^{-5} m/day for the Galilee Coal Project model. These figures all relate to a formation not yet fractured by the effects of goafing.

In the Springsure Creek model, in the lower fractured zone, an adjusted vertical

hydraulic conductivity of 1×10^{-5} m/day is adopted, which is still considerably lower than the unfractured figures quoted above.

In section 9.5.6.1 it is noted that the vertical hydraulic conductivity is one of a number of parameters to which drawdown predictions are sensitive. This is to be expected as the connection of the basalt aquifer to the dewatered coal measures is directly linked to the vertical hydraulic conductivity of the Rewan Formation which separate them.

In a sensitivity analysis carried out for Springsure Creek the unfractured Rewan vertical conductivity is increased to 1×10^{-5} m/day which is meant to represent a worst case scenario. This approach of sensitivity/ uncertainty testing is supported but again this figure is significantly lower than those quoted above from other mines in Central Queensland so it does not qualify as a worst case scenario.

In the peer review carried by Water Resource Australia it was noted that *while literature references and comparisons are required, it does not completely overcome the need for more site specific data and investigations*. It was further noted that *No packer tests or core permeability test results at site are provided in the report*.

The vertical hydraulic conductivity of the Rewan is probably the most important groundwater issue at this time as it directly dictates the predicted impact on the overlying basalt aquifer and its users.

Recommendation

It is recommended that a further model run/ sensitivity/ uncertainty analysis be carried out using an unfractured vertical hydraulic conductivity figure of 1×10^{-4} m/day which would then be increased in fractured zones. This will then provide a more appropriate upper limit of potential impacts.

Section 9.5 – Groundwater Impact Assessment (Page- 9-60)

Issue

The groundwater model has been developed with no flow boundaries on most boundaries of the model. This means that with the exception of the north east corner of the model, groundwater cannot flow into or out of the model area.

The peer review by Water Resource Australia identified the no flow model boundaries on much of the model as atypical of most modelling projects. Furthermore, they noted that the conceptualisation of the how the system operates, in justifying the no flow boundaries was *based upon data primarily sourced from local water table aquifers with very little data from the deeper geologic units, in particular the coal seams*. The concerns about the lack of data in the deeper formations mirror those expressed by DNRm in response to the EIS.

Water Resource Australia also raise concern about evapotranspiration being the primary source of outflow from the model.

It would appear from the plots provided in Figure 9-37 using the limited historical data available that a combination of the model boundaries and application of recharge and evapotranspiration has resulted in the models inability to match the observed water level declines and rises caused by drought and high rainfall events.

It is considered that more work will be required in relation to these issues in the future to refine the model but for now they are not considered critical.

Recommendation

In future updates of the model the suitability of existing model boundary conditions and application of recharge and evapotranspiration should be addressed to more accurately simulate local hydrogeological conditions.

Section 9.3.3.3 – Title Geologic Structures (Page- 9-15)

Issue

The following description of the Albinia Fault is provided:

A northwest to southeast trending fault called the Albinia Fault traverses along the east of EPC891 (Xenith 2011, Resolve Geo 2011). No significant vertical displacement from one side of the fault to the other has been identified, although a sudden change in the thickness of the Aries 2 seam across the fault is observed. The location of Albinia Fault, as presented in Resolve Geo (2011), is shown in Figure 9-6. Other faults identified in the Project area shown in Figure 9-6 are interpreted to terminate in the basement and do not extend up into the Bandanna Formation (Xenith 2011). The Bandanna Formation and the sedimentary sequence above the Mantuan Formation, occurring approximately 300m below the Aries 2 seam, are interpreted to be notably free of faulting (Resolve Geo 2011).

Figure 9-8 in the groundwater report appears to indicate that there is significant displacement in the Bandanna formation and the Triassic sediments with the fault extending up to ground level. It would appear that the figure contradicts the text.

In section 9.3.6.3 it is stated:

The northwest to southeast trending Albinia Fault traverses along the east of EPC891. With the exception of a sudden change in the thickness of the Aries 2 seam, no displacement of strata has been identified on either side of this fault (Xenith 2011). Therefore the fault is considered unlikely to act as a barrier to horizontal flow along the coal seams although the fault surface, if altered to clay, may locally restrict groundwater flow. Other faults in the Project area are interpreted to terminate within the bedrock at some depth below the Bandanna Formation. The regional groundwater flow along the coal seams would be expected to be most sensitive to the lateral continuity, thickness and associated transmissivity of the coal seams.

Given that the existence of a significant fault in the Rewan could compromise its integrity as an aquitard, there needs to be consistency on how this issue is reported. Is the Rewan Formation faulted or likely to be faulted or not?

Recommendation

Clarification should be provided on the extent of faulting in regard to the Rewan Formation and its potential to effect existing modelled impact predictions.

Section 18.5.4.9 – Environmental Management Plan, Control Strategies (Page- 18-103)

Issue

In this section it is stated:

As drawdown depends on a range of factors, its impacts are best managed adaptively. Adaptive management involves monitoring groundwater impacts and, based on the severity of impacts, modify the mine plan as mining takes place such that impacts could be limited to within designated ranges. In the event impacts are detected, potential adaptation strategies include modifying the dimension of panels, the order of mining of panels or the installation of bulkheads to allow some mined areas (goafs) to refill with groundwater, without water draining from those areas contributing to subsequent dewatering requirements.

This information constitutes a discussion rather than a commitment. There is no discussion about what will trigger the adaptive management. How will trigger levels be developed? There is a commitment in section 18.5.4.11 to develop a groundwater management plan but it is not clear what will be in this plan. Will it include information relevant to adaptive management as discussed above?

Recommendation

The proponent must clearly articulate how the proposal of adaptive management will be developed and function.

Section 18.5.4.9 – Environmental Management Plan, Control Strategies (Page-18-103)

Issue

The following is provided;

Any landholder bores located in areas of significant drawdown which result in an inability or reduction in access to groundwater volumes may need to be deepened or replaced. This is in addition to any structural damage to bores occurring due to subsidence. In most cases, the Basalt aquifer will have sufficient saturated thickness to enable deepening of wells. Four registered bores (RN57358, 57359, 57360 and 57361), are located in where the modelled initial saturated thickness of the basalt aquifer is less than 40 m. Deepening of these bores may not be possible and these bores may need to be re-located. In the event that groundwater bores are damaged due to mining activities, SCC will maintain supply of groundwater as agreed with the landholder.

There appears to be no clear cut commitment about what agreements will be entered into with the landowners and when this will occur. In fact, there appears to be little change in the words provided at EIS stage where it was pointed out that a stronger clearer commitment was required.

Recommendation

The proponent must commit to enter into agreements, prior to mining commencing, with those landowners predicted to be impacted and with others as additional information indicating impacts or potential impacts, becomes available. There must also be a commitment to replace diminished groundwater with the same quantity and quality or better.

Section 3.4.3 – Ongoing Evaluation and Exploration Activities (Page 3-27 to 3-29)

Issue

Thank you for providing the local project area cross-sections. However they require greater vertical exaggeration in order to be interpreted correctly.

Recommendation

Please increase the vertical exaggeration in the project cross-sections.

Water Management and Use – Groundwater Dependant Ecosystems

Section 18.5.4.6 – Environmental values including GDEs (Page 18-97) and parallel section in Chapter 9.

Issue

The mapping in Figure 9-22 is not from EHP but is from the National Atlas of Groundwater Dependent Ecosystems, and indicates that a high potential for GW interaction exists in a significant portion of the project area.

It is an assumption to state that the predicted maximum drawdown of 0.5m, which would be permanent, is comparable to natural system variability. No evidence to prove this assumption is provided. It is hoped that the fractures do not propagate into the basalt, but if they do, there may be significant effects on the deeply rooted components of GDEs. There is no evidence to suggest that these potential GDEs can survive a drought coincident with a permanent drawdown of 0.5m.

Recommendation

Replace:

Although current EHP mapping indicates no GDEs or springs occur within approximately 100 km of the Project area, there is a potential for these to occur along Springsure and Station Creek. The predicted maximum drawdown along these creek systems is approximately 0.5 m. Potential GDEs include deep rooted plants that are drought tolerant and may adjust to declines in groundwater levels without adverse health effects, however in periods of low rainfall, the dependence of GDEs on groundwater is higher.

The predicted reduction in the evapotranspiration rate is likely to be comparable to the systems natural variability, although this is based on a conservative assumption that the fractures above the goaf extends into the Basalt by several 10s of metres in parts of the mine area and that the vertical hydraulic conductivities of key aquitards are an order of magnitude greater than the current best estimates. A model scenario based on local experience indicates that there will be no drawdown related impacts to GDEs as fractures are not assumed to extend into the Basalt.

On this basis, the risk to GDEs is estimated to be medium assuming that some of the deep rooted plants in the riparian zone have high dependence on groundwater particularly during low rainfall periods. It is therefore expected that there will not be any significant impacts to riparian vegetation.

With:

The National Atlas of Groundwater Dependent Ecosystems indicates that there are areas with a high potential for GDEs in the Project area. In periods of low rainfall, the dependence of GDEs on groundwater is higher. As the predicted maximum

drawdown along some creek systems is approximately 0.5 m, in periods of low rainfall, there may be impacts on GDEs.

The risk to GDEs is considered to be medium, based on conservative assumptions that:

- the fractures above the goaf extend into the basalt by several 10s of metres in parts of the mine area*
- some of the deep rooted plants in the riparian zone have high dependence on groundwater particularly during low rainfall periods.*

However, a model scenario based on local experience indicates that there will be no drawdown related impacts to GDEs as fractures are not assumed to extend into the basalt. It is therefore assumed that there will not be any significant impacts to riparian vegetation.

Section 18.5.4.9 – Control Strategies (groundwater – environmental values) (Page 18-101)

Issue

The statement about a water level decline not affecting GDE health is immediately followed by a statement to the effect that, as GW becomes less available, fringing vegetation will transpire less. This is actually a statement about declining health.

Enhanced recharge through increased ponding (a major system change) is generally not considered desirable for the ecosystems or groundwater systems already present.

Recommendation

Please remove the paragraph:

Although a decline in water levels is predicted to occur, there are several ways in which the regional water balance could adjust without adverse effects on the health of GDEs. One possibility is that as the water table declines, fringing vegetation takes less water by evapotranspiration such that withdrawal of groundwater is balanced by a slight decrease in evapotranspiration from vegetation throughout the region. Another possibility is that re-directed flow during episodic flood events continues to supply recharge to the Alluvium that allows water table elevations to recover. Recharge may locally be enhanced as a result of cracking of stream bed and increased ponding depth above subsided panels.

Section 18.5.4.9 – Control Strategies (groundwater - management of drawdown) (Page 18-103)

Issue

Fracturing may impact on both GW levels (drawdown) and surface topography (subsidence). This in turn may impact on environmental values associated with GDEs, water bore function and agricultural practices.

Drawdown: The discussion about drawdown impact mitigation strategies is good overall, but this section is not clear about how fracturing extents will be monitored – is it through monitoring GW levels alone? What would be the triggers for the implementation of mitigation measures? Have there been other projects where bulkheads or grout injection were successfully implemented as mitigation measures?

Subsidence: There is no indication in the SEIS of what the control strategies,

remediation is, or the mitigation measures are, for impacts to GDEs from subsidence.

Recommendation

The discussion about adaptive fracture-related drawdown management needs to be strengthened with commitments about the drawdown impact mitigation strategies. Cite instances where mitigation measures for fracture-related drawdown impacts have been successfully implemented. State what the trigger levels would be for the measures to be implemented.

Add a discussion that includes monitoring methods, triggers and commitments about mitigation and remediation for subsidence-related impacts on GDEs. If possible it should be related to the mitigation measures and commitments about fracture-related drawdown impacts.

Chapter 12 Section 12.5.8.2 – Stygofauna Assessment – Field assessment

Issue

Inadequate sampling for stygofauna and inconsistency between the Ecology and Groundwater chapters regarding the presence of alluvial aquifers.

The Ecology report states that the majority of stygofauna that have been collected to date have been in alluvial aquifers, but that alluvial aquifers do not occur in the study area (Section 12.5.8.2). It also states that stygofaunal sampling may have been inadequate (p. 12-88).

In comments on the EIS, DNRm pointed out that although the Ecology report (Chapter 12) stated that there were no alluvial aquifers in the study area, alluvium was referred to in the Groundwater Report. DNRm requested that chapter 12 be amended to make it consistent with the Groundwater Report. This has not been done. There are a number of references to alluvial aquifers in the revised Groundwater Report (chapter 9) e.g. pp. 9-18, 9-27, 9-31, 9-39, 9-56, 9-64 and the revised EM Plan (Chapter 18) e.g. pp 18-92, 18-93, 18-97, 18-103 and 18-104. Page 18-104 refers to monitoring bores to be installed in the alluvium.

Further, the original EIS stated that bores were purged prior to sampling. DNRm pointed out that this was inconsistent with WA Guidance No.54 and 54a. In response the proponent has simply stated that bores were not purged prior to sampling. It appears that the stygofaunal sampling was carried out during groundwater quality assessment. It is standard procedure to purge bores before sampling for water quality. This then raises the question of whether bores were sampled adequately for water quality, if they were not purged. The best way of establishing how sampling was carried out is through reference to the consultant's report, which was not provided as a technical appendix to the EIS

Recommendation

The EM Plan should include a commitment that monitoring bores to be established in the alluvium will be sampled for stygofauna in a manner consistent with the WA Guidance No.54 and 54a.

The Ecology report should be modified to be consistent with the Groundwater report regarding the presence of alluvium in the study area, as requested in the previous comments on the EIS.

The original consultant's report on the stygofaunal and water quality sampling should

be provided.

Water Management and Use – Surface Water

General Comment

We have noticed that the Appendix document was not updated for subsidence, however we acknowledge that the proponent has noted the comments that we made on that section

Resource Planning – Subsidence Modelling

Subsidence Modelling

Issue

The modelling of subsidence over the mine area as presented in the EIS was based on a mine plan designed to fit within the boundaries of the then ML application. Since that time, the original ML application was rejected and a new ML application has been lodged, with boundaries that are marginally different and over a marginally smaller area than the original. Although the longwall panel layout has been amended (essentially by shortening panels to fit within the new ML boundary), there has been no matching subsidence model presented in the SEIS to show how subsidence at the periphery of the mine plan will relate to the new ML boundary. This is important as DNRM will not permit any subsidence to be caused to any area outside the boundary of the company's ML and the surface area held under same.

Recommendation

It is recommended that a new subsidence model/plan be presented showing the most up to date ML boundary and mine plan (longwall layout) and the surface expression of subsidence that is predicted relative to those.

Issue

The SEIS also includes a modelled subsidence plan showing predicted pondage areas on the surface caused by the layout of the subsurface longwall panels and pillars. This plan overlays the "ponding" areas over existing surface drainage, but does not show any interpretation of changes to surface drainage patterns that may occur "naturally" as a result of subsidence, or of surface engineering works that may need to be done to realign surface drainages to minimise the effects of ponding.

Recommendation

It is recommended that another plan be provided to show an interpretation of the surface drainage pattern that is expected to exist post-subsidence.

Strategic Cropping Land – General Comments

Determining SCL and Non-SCL

The information provided in the SEIS regarding the SCL status of the land does not adequately address Schedule 1 of the *Strategic Cropping Land Act 2011* (SCL Act) or the *Guidelines for applying the proposed strategic cropping land criteria* (criteria guidelines). Without adhering to the SCL Act and criteria guidelines the SEIS could have incorrectly identified areas of SCL and non-SCL, and consequently could have misrepresented the area of SCL impacted by the project. Should a validation application be lodged with DNRM based on the information in the SEIS, it would be unacceptable.

Examples include, but are not limited to:

1. The spatial density of soil assessment sites do not satisfy the requirements set out in the criteria guidelines; and
2. The SCL act and criteria guidelines specify two methods for determining the soil water storage, the SEIS (Appendix A4 – 01, pg 25 and section 3.8 pg257) states that 5 locations are within the 15% margin of the look up table and therefore require further assessment. The SCL Act and criteria guidelines state the other acceptable method of determining soil water storage; the PAWC method used in the SEIS is unacceptable.

Future SCL Protection Decision Application for the Mine Area

As the EIS process does not provide any means of approval relating to SCL, a SCL protection decision will be required before any EA or ML can be issued. The SCL protection decision application for the mine area will be assessed in line with the requirements of the SCL Act. The application will be required to demonstrate:

- the nature of the impacts as a result of the project;
- that SCL has been avoided to the greatest extent practicable;
- impacts have been minimised where they cannot be avoided;
- whether the impacts are temporary or permanent (as per section 14 of the SCL Act) ;
- for temporary impacts, how the SCL will be restored to its pre-development condition, and not impeded from cropping (legally or physically) for more than 50 years: and
- for permanent impacts, mitigation measures in accordance with the SCL Act.

Whether the subsidence from underground mining constitutes a temporary or permanent impact, will be determined by whether the application can demonstrate the land affected by subsidence can be restored to pre-development condition, and is not impeded from being cropped for at least 50 years. Restoration to pre-development condition is more than just maintaining the pre-development land use; it also includes, but is not limited to, the soil profile and soil properties, landform, and productive capacity of the land.

The supplementary SEIS states the predicted subsidence is in the order of 1.2m to 2.3m over the longwall panels and 0.2m to 1m over the pillars. The SEIS also focuses on managing the impacts of subsidence by remediating the subsided areas (i.e. re-contouring, ripping to remove surface cracks etc.), and in the long term does not expect any permanent change in land use will occur. However the SCL Act, in seeking to preserve a strategic resource, applies a more rigorous test than "stable landform and re-vegetated" when determining whether an impact is of a temporary or permanent nature. The SCL Act requires not simply that the land be rehabilitated sufficient to allow a comparable agricultural land use, but requires that land be restored its pre-development condition and all impediments to cropping to be removed (within 50 years) – irrespective of what the predevelopment land use was or the post-development use of adjoining land happens to be.

Based on the information within the SEIS, DNRM has serious concerns whether restoration to pre-development condition (as defined by the SCL Act) is possible. Mining Lease Application 70486 meets the requirements of section 289 of the SCL Act for transitional status, and is therefore exempt from the permanent impact restriction. As a result, the ultimate determination of whether the impact is temporary or permanent does not pose as a show stopper for the mine area.

Transport corridor and Rail load out facility

DNRM notes that the Terms of Reference for the EIS includes the requirements for the construction, upgrading or relocation of any-transport-related infrastructure. This includes road and rail transportation and exportation of products during the construction and operational phases of the project. DNRM notes the previous decision that the transport corridor and rail load out facility should not be included in the EIS, however it would be remiss of DNRM to not raise the issues relating to the SCL approvals required for those components of the overall project, given the successful undertaking of the development is contingent on access to a transport corridor.

The rail load out facility in its current location, being Mining Lease Application 70501, will not require any SCL application as there is no potential SCL on the SCL trigger map in that area.

The transport corridor, being Mining Lease Application 70502, does contain potential SCL and will require a SCL protection decision. The transport corridor is within a SCL protection area and does not have an exemption from the permanent impact restriction. The requirements for the protection decision application for the transport corridor, will need to address the same requirements previously outlined for the mine area.

As no information has been provided regarding the construction, operation, and decommissioning of the haul road, DNRM is unable to provide an indication of the likelihood of it being a temporary or permanent impact (as defined by the SCL Act). If the land is unable to be restored to pre-development condition and all impediments to cropping are not removed within 50 years, the haul road will be a permanent impact. For a permanent impact to proceed, an Exceptional Circumstances application would need to be lodged, and the development would need to be granted Exceptional Circumstances. The process and criteria for making the exceptional circumstance decision are provided for by chapter 4 of the SCL Act. The Minister for Natural Resources and Mines would currently be the decider of the application.

The overall project is dependent on being able to transport the coal from the mine to a rail load out facility via the transport corridor. If any permanent impact is to occur to SCL within that corridor, the ability of the project to proceed could be reliant on obtaining a favourable SCL Exceptional Circumstance decision.

RTI DL Release

Phillips Erin

From: Smith Wedeena
Sent: Friday, 19 July 2013 12:44 PM
To: Rhodes Monika
Cc: Pete Jones (PeteJones@bandannaenergy.com.au); Hambleton Alison; DACoordinationMackay; Bleakley Ashley; Davidson Kylie
Subject: Springsure Creek - DNRM Requirements and draft timing
Attachments: img-719122837

Monika

Here is a copy of our internal document outlining the timing for our requirements in response to the amended EIS. I will get back to you ASAP with our formal advice.

I have included Pete Jones from Bandanna in this email. As you are aware I verbally advised him of our timing requirements yesterday.

Please don't hesitate to call me if you have any concerns.

Regards

Wedeena Smith

senior natural resource officer | regional planning and coordination | department of natural resources and mines
t: 07 4999 6914 | f: 4999 6903 | m: (b) (6) Personal | e: wedeena.smith@dnrm.qld.gov.au

Please note that I am at work part time – Wednesdays, Thursdays and Fridays

Phillips Erin

From: Rhodes Monika
Sent: Tuesday, 16 July 2013 7:59 AM
To: David Antoine
Subject: Springsure Creek - Noise query
Attachments: SEIS_Golden Triangle comments_Springsure_20130714.pdf

Dear Antoine

Could you please look at point 6 on page 3 of the attached response from the Golden Triangle regarding noise from the ventilation shaft and get back to me with an answer?

If there is outstanding noise issues, I will need to outline these by today in a letter and tomorrow in the meeting.

Thanks heaps

Moni

Dr Monika Rhodes
Principal Environmental Officer
Statewide Environmental Assessments
Telephone 07 3330 6293 **Facsimile** 3330 5875
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Department of Environment and Heritage Protection
Level 9, 400 George Street, Brisbane Q 4000
GPO Box 2454, Brisbane Q 4001

Central Queensland's Golden Triangle

PO Box 42, Springsure Qld 4722
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Philip Rowland & Monica Rhodes
Department of Environment and Heritage Protection
Attention: The EIS Coordinator (Springsure Creek Coal Mine Project)
G.P.O. Box 2454
Brisbane QLD 4001
Email: eis@ehp.qld.gov.au & Monika.Rhodes@ehp.qld.gov.au

12th July 2013

Dear Sir/Madam,

Submission on the Springsure Creek Coal Mine Project Supplementary Environmental Impact Statement

It has come to our attention today (12th July 2013) that we do have the opportunity to respond to the supplementary EIS released by Bandanna Energy on 24th June 2013. The last day for submissions being today, however Monika Rhodes had informed other members of the community that a submission would be accepted if received by Sunday 14th July 2013.

The following is a brief outline of some of the deficiencies identified in the response (40-Golden Triangle) we received from Bandanna Energy regarding our submission to the draft EIS and consequently not addressed in the final EIS. Due to time constraints this is by no means exhaustive.

1. The Supplementary EIS continues in its failure to address to Terms of Reference

2. ***Section 40.13 : “One of the aims of the Agricultural Co-existence Research Committee is to define co-existence with regard to this project to enable a baseline to be established prior to mining taking place. This will enable co-existence to be measured once mining starts and compliance with conditions of approval relating to co-existence to be monitored.***

It is not the role of a committee (particularly one that claims to be independent and not involved with the EIS approvals process) paid by the resource company to determine what co-existence will be and to then establish the baseline that is considered acceptable. This appears to be a deliberate attempt by Bandanna Energy to bypass (and potentially lead) the current Statutory Regional Planning Process.

3. ***Section 40.18: Assessment within the EIS demonstrates that subsidence is not a ‘serious adverse environmental impact’ and that the impacts of subsidence can be managed so as to maintain agricultural activities and maintain or improve agricultural yields.***

This claim is completely unsubstantiated – there is no subsidence management plan. Please see the attached report from Cotton Australia “The Risks and Impacts of Coal Mine Subsidence on Irrigation Areas”.

4. ***Section 40.64: The subsidence management plan and framework are not required to be submitted with the EIS. They will be developed once an Environmental Authority has been granted.***

Subsidence is one of the major issues of this project – these plans need to form part of the Environmental Authority, not be a condition of it.

5. ***Section 40.93: We have asked to be conditioned on co-existence making it a condition of an Environmental Authority that we demonstrate co-existence prior to mining activity extending beyond Den-Lo Park. As noted previously, the independent Agricultural Co-existence Research Committee will, among other things, develop a definition of co-existence by which performance will be measured. We will be required***

to report on progress in meeting the specified performance on an annual basis to state government as part of annual compliance reporting.

Bandanna Energy are in breach of their current Environmental Authority for Exploration (MIN200822008) issued on 25 Sept 2008 for failing to rehabilitate exploration drill sites in a reasonable time frame and failure to submit annual returns and reports as required.

These failures have done nothing to impede Bandanna Energy to this point, so it is unlikely that strict conditioning of an EA will ensure any greater compliance into the future.

6. ***Section 40.99: As a short term activity the construction of the mine ventilation shaft is not required to be assessed.***

This response is inadequate and does not consider that the construction of the ventilation shaft will be an area of intense activity and the resulting noise modelling does not take into account the closest sensitive receptors – these being the Den-Lo Park and Springton homesteads. Below is taken from our original submission on the draft EIS:

Appendix A4-10 Noise and Vibration

4.4.2 Noise Sources

"Figure 4-2 shows the location of the noise sources, as entered in the noise model"



Construction Phase



Operational Phase

Figure 4-2: Location of Noise sources

There has been no noise source located in the area of the mine ventilation shaft during the construction phase. This will be an area of intense activity during the construction phase, and will continue for a period of more than two weeks. The resulting model as illustrated in **Chapter 11 - Noise and Vibration, Figure 11-2 Construction phase noise contour plots**, fails to consider the true impact of noise on sensitive receptors, as the construction of the mine ventilation area has not been considered. During the construction phase the mine ventilation area is the closest to the marked sensitive receptors and therefore must be considered when modelling the impact of noise during this phase.

7. Section 40.106: It should be noted however that SCC plans on developing a rehabilitation program which will improve vegetation along creek lines and lead to a net benefit to the system.

An inadequate response – there should be no place for such motherhood statements in the approvals process – the plan should already be developed, this plan should prove how it will improve the vegetation and conclude with what the net benefit will be to the system.

8. Supplementary EIS: Chapter 9 – Groundwater.

Figure 9-41 Model grid cross-section – Row 96 and Figure 9-42 Model Grid cross section – Column 123, clearly shows the fracturing of the Rewan seam and the tertiary basalt. This will provide connectivity for ground water to drain into the coal seam, therefore dewatering the tertiary basalt which is where our ground water is sourced.

9. Supplementary EIS: Chapter 5 – Land.

There is still no explanation of how tilt relates to the existing slope of the land:

- Will the post mining slope be no greater than 2.5% in total? Or
- Will the post mining slope be the current slope plus an additional 2.5 % slope?

10. Supplementary EIS: Chapter 8 – Surface Water.

8.5.1 Mine Site Flood Assessment: *A flooding assessment was undertaken for the Project area for the purpose of defining the existing flood behaviour as well as assessing*

potential impacts to the Mine Infrastructure Area (MIA) and operations (refer to Appendix A4-5).

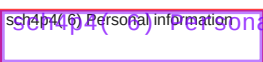
In Appendix A4-5, we can see that Engeny Water Management undertook a mine site flood assessment (6. Mine Site Flood Assessment) *“for the purpose of defining the existing flood behaviour as well as assessing the potential impacts to mine infrastructure and operation.”* The following was raised in our previous submission and was not addressed in the response received from Bandanna Energy:

- Figure 6.4 (**A4-5 6.2.3 TUFLOW Model Results, Flood Levels, Depths and Velocities**), *“provides an illustration of the 1000 year ARI extent of inundation surrounding the proposed MIA infrastructure area.”* The MIA illustrated in Figure 6.4 is in a different location to the MIA referred to, and on the Mine Plans within the body of the EIS.

The majority of the modelling done for the Draft EIS (and subsequently used in the Final EIS) has been done using the area covered by EPC 891, EPC 1221 and MLA 70461. EPC 1221 is irrelevant to this EIS and MLA 70461 was rejected by the Minister for Natural Resources and Mines. The Final EIS suggests that because the footprint of MLA 70486 is smaller than that of MLA 70461 the predictions are conservative. The companies (Engeny Water Management, SCT, Vipac, etc) that undertook the original modelling need to clarify whether the change in areas, boundaries and mine plans/layouts (including the location of the MIA) would have an impact on the resulting models and from this, determine if the current modelling is still relevant to this EIS.

We look forward to your response on these issues.

Kind Regards


 sch4(4)(6) Personal information

Lizzie Bradford

Secretary: Golden Triangle Community Group

Phillips Erin

From: Rhodes Monika
Sent: Wednesday, 26 June 2013 1:39 PM
To: Wirth Jacqueline; O'FLYNN Mick
Cc: Rowland Philip
Subject: Springsure Creek Coal Mine Project - SEIS

Dear Jacki (cc Mick)

I tried to ring to confirm that you have received the SEIS and response to submissions which is currently for review. I would like to check with you on an issue regarding potential subsidence outside the MLA.

DAFF made a comment in the EIS submission that impacts due to subsidence may go beyond the MLA (based on the information provided by the proponent in the EIS and their predictions). At this stage, the EIS proposes underground mining panels almost right to the MLA border (refer to Figure 3-20 in Chapter 3 of the SEIS).

If this would be correct this would have impacts on the agricultural business of the landholders not only within the MLA but also outside. If you have a minute, could you (or Mick) please call me back to discuss?

Many thanks.

Kind regards

Monika

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