

BOGGABRI - TARRAWONGA - MAULES CREEK COMPLEX

WATER MANAGEMENT STRATEGY



June 2025

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1. INTRODUCTION

1.1 BACKGROUND AND PURPOSE

The purpose of the cumulative Boggabri-Tarrawonga-Maules Creek Complex (BTM Complex)¹ Water Management Strategy is to document the approach that will be taken by mines within the BTM Complex to monitor and collectively manage the cumulative surface water and groundwater impacts of their operations. The Water Management Strategy details the relevant water resources, the potential cumulative impacts on those water resources, and the cumulative water management protocols within the BTM Complex.

With the approval of:

- the Vickery Extension Project (VEP) (SSD-7480) in 2020 and the commencement of mining in 2023; and
- the approval of a pipeline from Tarrawonga Coal Mine (TCM) to the VEP in Modification 7 (2021),

an approved pipeline between TCM and VEP has been included for consideration of water sharing with the BTM complex as per the direction of the Department of Planning and Environment (DPE) now the Department of Planning, Housing and Infrastructure (DPHI) as part of TCM Mod 7 approval in February 2021. However, VEP is not included in the cumulative impacts consideration as it is not located within the BTM complex footprint.

The BTM Complex is an existing mining precinct located within and around the Leard State Forest, approximately 15 kilometres (km) north-east of Boggabri in the Narrabri Local Government Area (LGA) (Figure 1.1). The BTM Complex includes the Tarrawonga Coal Mine (TCM) in the south, the Boggabri Coal Mine (BCM) to the north and the Maules Creek Coal Mine (MCCM) to the north-west. The extent of the relevant tenements for each of the mines that comprise the BTM Complex are presented in Figure 1.1.

BCM is operated by Boggabri Coal Operations Pty Limited (BCOPL), a wholly owned subsidiary of Idemitsu Australia Pty Limited (IA).

MCCM is operated by Maules Creek Coal Pty Ltd, a wholly owned subsidiary of Whitehaven Coal Mining Limited (Whitehaven). TCM is operated by Tarrawonga Coal Pty Ltd, a wholly owned subsidiary of Whitehaven.

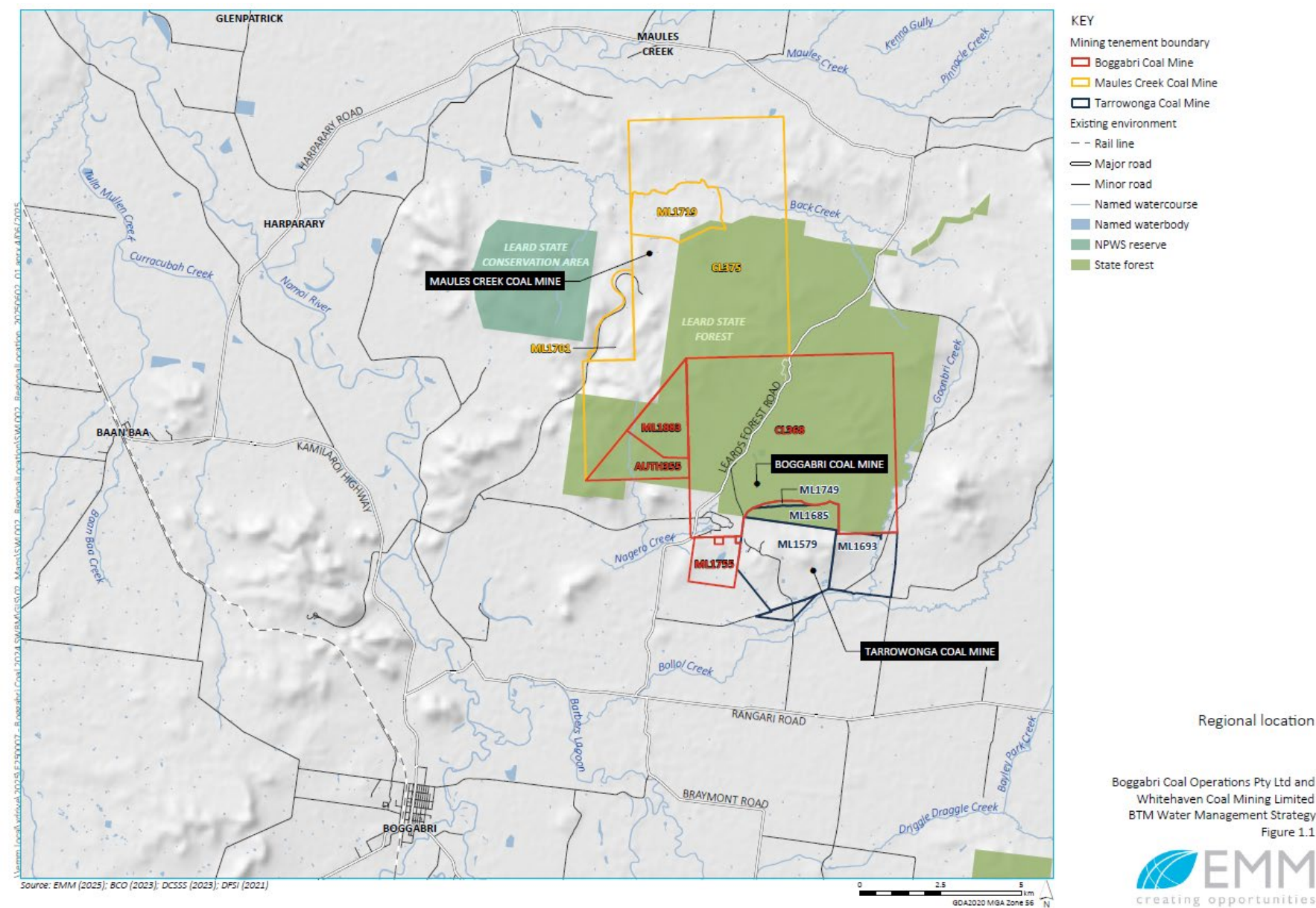
A summary of the ownership details for each mine within the BTM Complex is provided below in Table 1.1.

Table 1.1
Management and ownership of BTM Complex Mines

Mine	Management	Ownership	Share
Boggabri Coal Mine	Boggabri Coal Operations Pty Limited	Idemitsu Australia Resources Pty Ltd	80%
		Chugoku Electric Power Australia Resources Pty Ltd	10%
		NS Boggabri Pty Ltd	10%
Maules Creek Coal Mine	Maules Creek Coal Pty Ltd	Aston Coal 2 Pty Limited (owned 100% by Whitehaven Coal Limited)	75%
		Itochu Coal Resources Australia Maules Creek Pty Ltd (ICRA MC)	15%
		J-Power Australia (J-Power) Pty Ltd	10%
Tarrawonga Coal Mine	Tarrawonga Coal Pty Ltd	Whitehaven Coal Mining Limited	100%

¹ In previous environmental assessments and approval documents this group of mines has been referred to as the Leard Forest Mining Precinct. For the purposes of the Water Management Strategy and all other relevant cumulative impact management documents, all references to the 'Leard Forest Mining Precinct' have been replaced with the term 'BTM Complex'.

Figure 1.1 – Regional Location



Development applications for the continued operation of the BCM (Project Approval 09_0182) and the development of the MCCM (Project Approval 10_0138) were determined by the NSW Planning Assessment Commission (PAC) in July and October 2012 respectively, under delegation by the NSW Minister for Planning and Infrastructure. Subsequent to this, the Department of the Environment and Energy (DoEE) (now the Commonwealth Department of Climate Change, Energy, Environment and Water [DCCEEW]), granted conditional approvals to BCM (EPBC 2009/5256 Variation on 20th February 2020) & (EPBC 2021/8875 approved 19 December 2024) and the MCCM (EPBC 2010/5566 on 11 February 2013). These projects were granted approval subject to stringent conditions related to the management of cumulative impacts.

The TCM application for continuation of mining was approved on 22 January 2013, with similar cumulative impact management conditions to those detailed in the BCM and MCCM approvals.

Approval conditions require the preparation of a suite of environmental strategies developed in partnership by all three mines of the BTM Complex. This Water Management Strategy has been developed to satisfy each mine's project approval conditions. Approval conditions relevant to the management of cumulative water impacts within the BTM Complex are detailed in Table 1.2.

Table 1.2
Approval requirements for a Water Management Strategy

BCM PA 09_0182	MCCM PA 10_0138	TCM PA 11_0047	Details	Section
Sch. 3 Cond. 38 (d)	Sch. 3 Cond. 40 (d)	Sch. 3 Cond. 39 (c)(iv)	<i>The Proponent shall prepare and implement a Water Management Plan for the project... this plan must include: "... a Leard Forest Mining Precinct Water Management Strategy that has been prepared in consultation with other mines within the Precinct to:</i>	
			▪ <i>minimise the cumulative water quality impacts of the mines;</i>	Section 1.1
			▪ <i>review opportunities for water sharing/water transfers between mines;</i>	Sections 1.1, 3 and 4.3
			▪ <i>co-ordinate water quality monitoring programs as far as practicable;</i>	Sections 1.1 and 6.2
			▪ <i>undertake joint investigations/studies in relation to complaints/exceedances of trigger levels where cumulative impacts are considered likely; and</i>	Sections 1.1 and 8
			▪ <i>co-ordinate modelling programs for validation, re-calibration and re-running of the groundwater and surface water models using approved mine operation plans.</i> <i>Note: The Leard Forest Mining Precinct Water Management Strategy can be developed in stages and will need to be subject to ongoing review dependent upon the determination of and commencement of other mining projects in the area."</i>	Section 4

1.2 SCOPE

This document is the overarching strategy for cumulative surface water and groundwater management at the BTM Complex.

Individual mines manage their ongoing operations and associated surface water and groundwater management in accordance with their site-specific Water Management Plans (WMPs). Statutory requirements relating to water quality are considered in each site-specific WMP. Table 1.3 outlines the status of the site-specific WMPs for the BTM Complex at the time of writing this document.

Table 1.3
Status of Site-Specific Water Management Plans

Mine	Site-specific WMP Status
BCM	Last published 2024. Available on the Idemitsu website (https://www.idemitsu.com.au/mining/operations/boggabri-coal/approvals-plans-reports/)
MCCM	WMP last published March 2023, along with Addendum A (March 2020) and Addendum B (2022). Available on the Whitehaven website (https://whitehavencoal.com.au/our-business/our-assets/maules-creek-mine/)
TCM	WMP last published July 2023. Available on the Whitehaven website (https://whitehavencoal.com.au/our-business/our-assets/tarrawonga-mine/)

1.3 SUMMARY OF PREVIOUS STUDIES

Previous environmental studies carried out for individual BTM Complex projects have been used in preparation of this document. A summary of these studies is presented in Table 1.4. These studies are publicly available on the respective company websites and on the Major Projects database.

Given the location of the BTM Complex within the Namoi Catchment, reference is also made to findings of the Namoi Catchment Water Study (Schlumberger, 2012), commissioned by the NSW Government in August 2010. The study involved a strategic assessment of the likelihood of potential impacts from coal and gas development in the Namoi Catchment on the quantity and quality of surface and groundwater resources.

Table 1.4
Summary of Previous Water Impact Assessment Studies

Surface Water	Groundwater
Boggabri Coal Mine	
Parsons Brinckerhoff, <i>Continuation of Boggabri Coal Mine Project – Surface Water Assessment</i> , prepared for Hansen Bailey as part of the Environmental Assessment, October 2010*	Parsons Brinckerhoff, <i>Boggabri Coal Project Modification – Surface Water Assessment</i> , March 2013
Water & Environment Pty Ltd (WRM), <i>Continuation of Boggabri Coal Mine- Namoi River Flood Impact Assessment</i> , prepared for Hansen Bailey, December 2009	Parsons Brinckerhoff, <i>Boggabri Coal Mine - Project Approval Modification Environmental Assessment (MOD 5)</i> , November 2015
Australasian Groundwater & Environmental Consultants Pty Ltd (AGE), <i>Continuation of Boggabri Coal Mine Groundwater Assessment</i> , prepared for Boggabri Coal Pty Ltd, October 2010	
Tarrawonga Coal Mine	
Resource Strategies, <i>Tarrawonga Coal Project – Environmental Assessment</i> , prepared for Whitehaven Coal Pty Ltd, 2011	Whitehaven Coal, <i>Tarrawonga Coal Mine – Life Of Mine Modification - Modification Report</i> , October 2019
Gilbert and Associates Pty Ltd, <i>Tarrawonga Coal Project-Surface Water Assessment</i> , prepared for Whitehaven Coal Pty Ltd, November 2011	GeoTerra Pty Ltd, <i>Surface Water and Groundwater 2006/2009 Monitoring Tri-annual Review</i> , prepared for Tarrawonga Coal Pty Ltd, November 2009
Heritage Computing Pty Ltd, <i>A Hydrogeological Assessment in Support of the Tarrawonga Coal Project Environmental Assessment</i> , prepared for Tarrawonga Coal Pty Ltd, January 2012*	Hydro Engineering and Consulting (HEC), <i>Tarrawonga Coal Mine – Life of Mine Modification Surface Water Assessment and Site Water Balance</i> , October 2019.
Maules Creek Coal Mine	
Hansen Bailey, <i>Maules Creek Coal Project – Environmental Assessment</i> , prepared for Aston Resources, 9 February 2011	Australasian Groundwater & Environmental Consultants Pty Ltd (AGE), <i>Maules Creek Coal Project Groundwater Impact Assessment</i> , prepared for Aston Resources Ltd, June 2011*

Table 1.4 (Continued)
Summary of Previous Water Impact Assessment Studies

Surface Water	Groundwater
WRM, <i>Surface Water Impact Assessment for Maules Creek Coal Project</i> , prepared for Aston Resources, 9 February 2011	NSW Planning Assessment Commission, <i>Review Report- Maules Creek Coal Project</i> , March 2012
Heritage Computing Pty Ltd, <i>Peer Review of the Maules Creek Coal Project Groundwater Impact Assessment</i> , prepared for Aston Resources Ltd, February 2011	NSW Planning and Environment, <i>Director General's Environmental Assessment Report- Major Project Assessment Maules Creek Coal Project</i> , August 2012
NSW Planning Assessment Commission, <i>Review Report- Maules Creek Coal Project</i> , March 2012	AGE Pty Ltd, <i>Installation of Monitoring Bore Network & Updating Groundwater Model</i> , 2014
BTM Complex	
AGE, <i>Boggabri; Tarrawonga Maules Creek Complex Numerical Model Update</i> , August 2018*	Whitehaven Coal & Idemitsu, <i>Boggabri – Tarrawonga – Maules Creek Complex Water Management Strategy</i> , May 2019
AGE, <i>Boggabri; Tarrawonga Maules Creek Complex Numerical Groundwater Model Update</i> , December 2020*	AGE, <i>Boggabri; Tarrawonga Maules Creek Complex Numerical Groundwater Model Update</i> , December 2021*

* Study details the potentially cumulative impacts of the BTM Complex.

1.4 AGENCY CONSULTATION

The Water Management Strategy draws upon the site-specific WMPs and site water balance reports for the three mines. These documents have undergone extensive review by DP&E on numerous occasions and subsequent approval.

The site-specific mine WMPs which form the basis of the Water Management Strategy have been prepared in consultation with representatives from the NSW Office of Environment and Heritage (OEH), DoI – Water and North West Local Land Services (NWLLS) (formerly Namoi Catchment Management Authority).

1.5 DOCUMENT STRUCTURE

The structure of this report is as follows:

- Section 1** Provides an introduction to the Water Management Strategy, including the background and scope of the Water Management Strategy. A list of previous studies is also included.
- Section 2** Provides an overview of the BTM Complex mines (BCM, TCM, MCCM).
- Section 3** Briefly outlines the existing surface water and groundwater resources of the area and the administrative context of their management.
- Section 4** Summarises the existing site-specific surface water and groundwater models for each mine, and cumulative modelling for the BTM Complex.
- Section 5** Describes potential cumulative impacts and issues associated with the BTM Complex.
- Section 6** Describes surface water and groundwater monitoring networks relevant to the BTM Complex.

- Section 7** Describes surface water and groundwater impact mitigation and response to triggers.
- Section 8** Describes how the Water Management Strategy will be implemented and the complaint management strategy.
- Section 9** Outlines the requirements for reviewing and revising the Water Management Strategy.
- Section 10** Lists the references used in this document.

2. THE BTM COMPLEX AND VICKERY COAL MINE

The BTM Complex is located in the Narrabri LGA in the Northwest Slopes and Plains of New South Wales. The BTM Complex is located within and adjoining the Leard State Forest, north-east of Boggabri and south of Maules Creek. The major regional centres of Narrabri and Gunnedah are located approximately 50 km north-west and 40 km south-east of the BTM Complex, respectively.

The Vickery Coal Mine (VCM) is located within the northwest slopes and plains of New South Wales (NSW), approximately 25 km north of Gunnedah within both the Gunnedah and Narrabri LGA.

2.1 BOGGABRI COAL MINE

BCM is an existing open cut mine that consists of an open cut pit, overburden dump, infrastructure area including coal processing facilities, water management structures, and a rail spur.

BCM obtained NSW State Government approval on the 18 July 2012, and Commonwealth Government approvals on 11 February 2013 (2009/5256) and 19 December 2024 (2021/8875). These approvals (as modified) allow operations at BCM to extend until December 2036 at a rate of 8.6 million tonnes per annum (Mtpa) of run-of-mine (ROM) coal. The project approval for BCM provides for operation of existing ancillary equipment; construction and operation of a new coal handling and preparation plant (CHPP); 17 km rail spur line; bridges over the Namoi River and Kamilaroi Highway; a rail load-out facility located at the mine; upgrade of the overburden and coal extraction haulage fleet (with an option for a drag-line); upgrade of electricity transmission lines; and establishment of a water supply borefield and other ancillary infrastructure.

2.2 TARRAWONGA COAL MINE

TCM is an existing open cut coal mine located immediately south of BCM. TCM initially had approval to extract 2 Mtpa of ROM coal until 2017. TCPL submitted an application in July 2011 under Part 3A of the Environment Planning and Assessment Act 1979 (EP&A Act) for an extension of open cut mining operations to 3 Mtpa of ROM coal for a further 17 years. This application was approved by the NSW State Government on 22 January 2013.

TCM have modified Project Approval 11_0047 on a number of occasions since then, with the most recent being in October 2023. Project Approval 11_0047 allow operations at TCM until December 2030 at a rate of 3.5 Mtpa of ROM coal.

2.3 MAULES CREEK COAL MINE

A Project Application for the MCCM was submitted to the NSW Department of Planning (now Department of Planning and Environment) in August 2010 under Part 3A of the EP&A Act. Project approval was granted by the Planning Assessment Commission under delegation of the Minister for Planning and Infrastructure on 23 October 2012. The project approval allows for the construction and operation of an open cut coal mine, with the recovery of up to 13 Mtpa of ROM coal until the end of December 2034. Key features of the project include transportation of coal by rail to Newcastle, and development of site infrastructure including a CHPP and associated facilities, a train loading facility and rail spur and loop, a mine access road, communications and power reticulation, explosives storage, and a water pipeline from the Namoi River.

Construction of the MCCM commenced in December 2013. Extraction of first coal commenced in the fourth quarter of 2014.

2.4 VICKERY COAL MINE

Development Consent (SSD-7480) was granted for the Vickery Extension Project to Vickery Coal Pty Ltd (VCPL) on the 12th of August 2020 by the NSW Independent Planning Commission as a delegate of the NSW Minister for Planning under Section 75J of the NSW *Environmental Planning and Assessment Act, 1979* (EP&A Act). VCPL is a wholly owned subsidiary of Whitehaven Coal Limited [WHC]). The Development Consent allows for the development of an open cut mine and associated infrastructure with a 25 year mine life, extracting run-of-mine (ROM) coal at up to 10 million tonnes per annum (Mtpa) and processing the coal, as well as coal from WHC's Tarrawonga Mine, at an on-site coal handling and processing plant (CHPP) for offsite transport by rail.

Construction of the VCM commenced in August 2023 with mining commencing in October 2023. Extraction of coal commenced in the second quarter of 2024.

3. WATER RESOURCES AND ADMINISTRATIVE CONTEXT

3.1 SURFACE WATER

3.1.1 Catchments and streams

The slopes and upland areas of the BTM Complex are drained by a series of ephemeral streams rising in the Willowtree Range. The local drainage catchments associated with the area are, from the north, Maules Creek, Back Creek, Nagero Creek, Goonbri Creek and Bollol Creek, as shown in Figure 3.1.

BCM is contained within the catchment of an unnamed ephemeral waterway, locally known as 'Nagero Creek'. Nagero Creek drains west towards the Namoi River.

MCCM is largely within the Back Creek catchment with small tributaries flowing north into Back Creek which itself then flows west to meet Maules Creek before flowing into the Namoi River.

TCM is within the catchments of Nagero, Goonbri and Bollol Creeks. These creeks and their unnamed tributaries drain in a westerly and south-westerly direction towards the Namoi River.

VCM is largely located within the Stratford Creek and Driggle Draggie Creek catchments. Stratford Creek discharges into the Namoi River South of the mine and Driggle Draggie Creek enters Barbers Lagoon before entering the Namoi River.

Further detail regarding each site-specific mine's surface water systems is provided in the BCM, MCCM, TCM and VCM surface water assessments (available on each respective company website as listed in Table 1.3).

3.1.2 Relevant surface water sharing plans

The BTM Complex lies within the Maules Creek Water Source, administered under the Water Sharing Plan (WSP) for the Namoi Unregulated and Alluvial Water Sources. The Maules Creek Water Source is divided into two management zones, the Maules and Horsearm Creeks Management Zone, and the Maules Creek Tributaries Management Zone (Figure 3.1). These local unregulated creeks flow into the Namoi River, which is administered under the WSP for the Upper and Lower Namoi Regulated River Water Sources. Water access licences (WALs) for both these water sources are fully allocated. Each mine site is responsible for holding or obtaining sufficient WALs prior to accessing surface water. WALs currently held by each mine site are listed in Section 3.3.

The VCM falls within the Lower Namoi Regulated River Water Source for the purpose of the *Water Sharing Plan for the Upper Namoi and Lower Namoi Regulated River Water Sources 2016*. The Lower Namoi includes the regulated river sections downstream of Keepit Dam to the Barwon River. The local unregulated creeks around VCM are administered under the Bluevale unregulated water source.

3.1.3 Cumulative surface water impacts

To prevent cumulative water quality impacts in the local and regional water sources, all mines in the BTM complex and VCM undertake the following:

- All runoff from disturbed areas is captured in the mines water management system which is design to comply with the mines EPL
- Discharges from the mine may only occur within the EPL limits. These limits are designed to ensure equal to or better, water quality discharges into the receiving environment
- MCCM, VCM and BCM extract water from the Namoi River and Groundwater sources for site operational demands..
- The local and regional water courses of the BTM complex and VCM are monitored for water quality and stream health, which is design to detect any decline in local stream health, with TARPs assigned to take corrective actions.

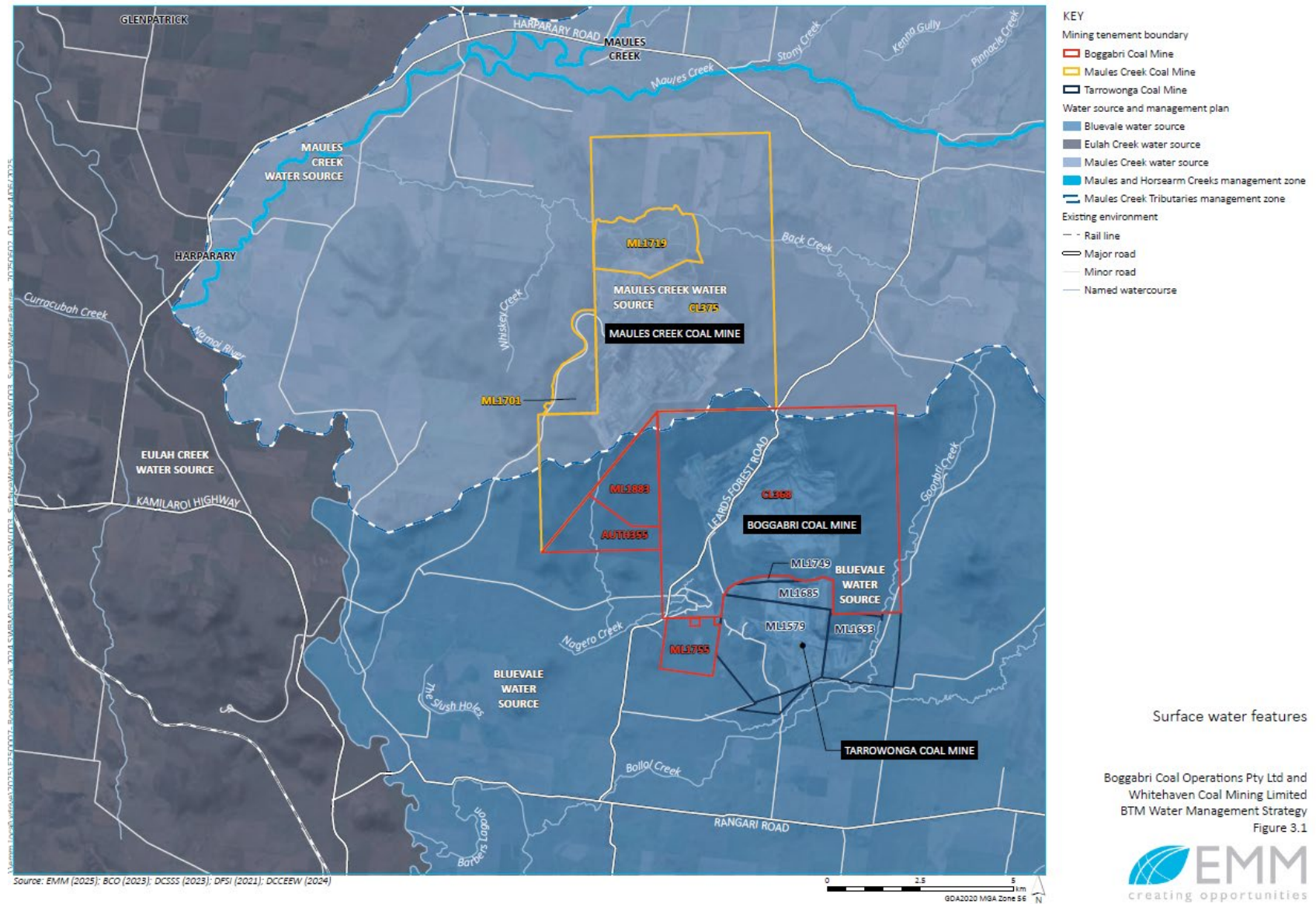
3.2 GROUNDWATER

3.2.1 Regional geology and hydrogeology - BTM

The BTM Complex is located in an area geologically characterised by the Permian Maules Creek Formation, with minor Quaternary alluvium to the south-east and Permian Boggabri Volcanics to the south-west (DMR, 1998). Minor alluvium is also associated with local creeks. Beyond the mining leases, extensive Quaternary alluvium deposits overlie the Boggabri Volcanic deposits to the west and south-west, and the Maules Creek Formation to the south. Coal is extracted from the seams of the Maules Creek Formation. Further south, the alluvium directly overlies the Boggabri Volcanics (Figure 3.2).

The thickness of the highly productive Quaternary alluvial deposits along the Namoi River ranges from approximately 30 m to 120 m, decreasing from the thicker paleochannel in the south-west to a thin cover in the east. The regional groundwater flow direction within this alluvium is generally to the north-northwest. Groundwater in the alluvium associated with Bollol Creek flows south-west towards the Namoi River.

Figure 3.1 – Surface Water Features



The Maules Creek alluvial aquifers are located north of BTM and are divided into two distinct zones by a constriction in the flood plain created by the outcropping Permian basement. Upstream of the constriction the Maules Creek alluvium is some 90 square kilometres (km²) in area and drained by three ephemeral creeks; Horesarm Creek, Middle Creek and Maules Creek (i.e. Upper Namoi Zone 11, Maules Creek Groundwater Source). Downstream of the constriction area, Horsearm Creek and Middle Creek discharge into Maules Creek and a zone of permanent water holes known as Elfin Crossing are present. The Maules Creek alluvial plain widens significantly in this area and Maules Creek eventually discharges into the Namoi River about 11 km west of the MCCM mining lease (AGE, 2011).

Bore yields in the alluvial aquifers are highly variable and dependent on the nature and thickness of the sediment intersected when drilling. The bores in the alluvial aquifers show a very wide range in yields, from less than 1 L/s up to a maximum of 175 L/s (AGE, 2021).

The major groundwater aquifers within the Maules Creek Formation are the coal seams, in particular the Merriown Seam. The Maules Creek Formation aquifers are 'confined' to 'semi-confined', bounded below by fresh volcanic bedrock and above by low permeability sandstones and conglomerates. Leakage from the Permian strata is restricted, both between coal seam layers and from the overlying and underlying sandstone, shale, conglomerate and siltstone. Groundwater flow direction in the Maules Creek Formation is to the south-west (Parsons Brinckerhoff, 2012a), consistent with the topographic gradient. The groundwater flow within the coal seams of the Maules Creek Formation is controlled primarily by lateral flow within the seams.

Residual volcanic soils associated with the Boggabri Volcanics (weathered profile) to the south-west of the mine lease areas are generally thick enough to retain groundwater volumes of consequence, however their permeability is low. The weathered rock aquifer is generally 40 m to 50 m thick and provides a hydraulic connection between the coal seam aquifers and the alluvium associated with ephemeral creeks ('Nagero Creek' and Bollol Creek) and the Namoi River.

Further details regarding the hydrogeology of the BTM Complex area are provided in the site-specific groundwater assessments and in the *Boggabri, Tarrawonga, Maules Creek Complex Groundwater Model Update* (AGE, 2021).

3.2.2 Relevant groundwater sharing plans - BTM

The three BTM Complex mines target coal seams in the Maules Creek Formation within the Gunnedah-Oxley Basin MDB Groundwater Source defined in the WSP for the NSW Murray Darling Basin Porous Rock Groundwater Sources 2020. The surrounding alluvial sediments lie within the following groundwater sources, defined in the WSP for the Namoi Alluvial Groundwater Sources 2020 (Figure 3.3):

- Upper Namoi Zone 4, Namoi Valley (Keepit Dam to Gin's Leap) Groundwater Source.
- Upper Namoi Zone 5, Namoi Valley (Gin's Leap to Narrabri) Groundwater Source.
- Upper Namoi Zone 11, Maules Creek Groundwater Source.

The BTM Complex mines are required to obtain access licences for any volumetric groundwater impacts on these water sources. These may be direct impacts such as drainage of the alluvial or porous rock groundwater sources via bores and/or pumps from mine workings, or indirect impacts resulting from drainage, or reduction in inflows to the alluvial groundwater sources. The Upper and Lower Namoi alluvial groundwater sources are fully allocated. As such, licences to account for volumetric impacts would need to be obtained from existing holders. Water entitlements currently held across the BTM Complex are detailed in each mine's respective surface water and groundwater management plans and are provided in Section 3.3.

3.2.3 Regional geology, hydrogeology and water sharing plans - VCM

VCM is located in the Gunnedah Basin in the NSW Gunnedah Coalfield, which contains alluvial deposits overlying sedimentary and igneous rocks, including coal measures of Permian and Triassic age as shown in Figure 3.3. The two groundwater systems identified in the relevant water sharing plans, within the VCM mining area and surrounds, are:

- Alluvial groundwater system – associated with the unconsolidated alluvial sediments of the Namoi River floodplains (Upper Namoi Zone 4 Water Source).
- Porous rock groundwater system – including coal measures of the Maules Creek Formation (Gunnedah-Oxley Basin MDB Groundwater Source).

Below the Maules Creek Formation are the Goonbri and Leard Formations. The Formations are basal units of the Gunnedah Basin sedimentary sequence and unconformably overlie the Boggabri Volcanics. The Boggabri Volcanics are the basement layer of groundwater model. The Boggabri Volcanic is not a groundwater source and is not monitored.

There are two major fault structures in the region (Boggabri Thrust to the west and Mooki Thrust to the east) and eight minor fault structures across the Project area.

3.2.4 Cumulative groundwater impacts

The BTM complex and VCM are modelled separately due to the spatial separation and lack of connectivity as noted in the Cumulative Groundwater Impact Assessment Approaches information paper (NSW DPE, 2022). Section 4.3.3 states:

Groundwater impacts from the BTM Complex mines do not interfere with those from the Vickery mine to the south and the Narrabri Coal Mine to the west due to large separating distances between these operations and the BTM Complex, more than 12 km and more than 20 km, respectively. In addition, analytical and numerical groundwater modelling assessments do not suggest overlapping of impacts between the BTM Complex and the operations to the south and west. Hence, there is no need to include impacts from the Vickery and Narrabri mines in BTM Complex assessments, and vice versa.

Due to this separation and lack of cumulative impacts, groundwater impacts for VCM are not documented in the BTM Complex WMP. The impacts are documented in the VCM WMP.

The BTM complex and VCM are required to undertake periodic reviews and updates of their groundwater models. If cumulative impacts are determined in these updates, it will be documented in future updates of the BTM WMP.

3.3 WATER ACCESS LICENCES

Table 3.1 and Table 3.2 summarises the surface water and groundwater WALs currently held (at the time of writing) by each mine site. Mine-specific WMPs contain the predicted annual take per mine.

Table 3.1
Water Access Licences for the BTM Complex

Water Source	Predicted Water Take**	Licence No.	Total Entitlement (units) ^	Use
Maules Creek Coal Mine				
Lower Namoi Regulated River Water Source	As required	WAL13050	3,000	Namoi River pump extraction
Maules Creek Water Source (Maules Creek Tributaries Management Zone)	-	WAL41585	30	Surface water extraction
Upper Namoi Zone 4, Namoi Valley (Keepit Dam to Gin's Leap) Groundwater Source	144 – FY30	WAL36548	36	Indirect Aquifer Interception (passive take)
		WAL27385	38	Indirect Aquifer Interception (passive take)
		WAL12613	50	Indirect Aquifer Interception (passive take)
	-	WAL12645	35	Indirect Aquifer Interception (passive take)
	As required	WAL12722	77	Bore Extraction
		WAL12718	102	Bore Extraction
Upper Namoi Zone 5, Namoi Valley (Gin's Leap to Narrabri) Groundwater Source	As required	WAL12811	135	Bore Extraction
		WAL12791	112	Bore Extraction
Upper Namoi Zone 11, Maules Creek Groundwater Source	15 – FY25	WAL12479	78 (39) ~	Indirect Aquifer Interception (passive take)
	Not in use	WAL12480	215	NA
	Not in use	WAL12491	77	NA
	Not in use	WAL12473	241	NA
	Not in use	WAL12482	77	NA
	Not in use	WAL12486	77	NA
	Not in use	WAL12489	28	NA
Gunnedah - Oxley Basin MDB Groundwater Source (Gunnedah - Oxley Basin MDB [Other] Management Zone)	956 ML – FY24	WAL29467	306	Aquifer interception
		WAL36641	800	Aquifer interception
		WAL36576	600	Aquifer interception
	-	WAL29588	0 (subject to conditions)	N/A
Maules Creek Unregulated Water Source (Maules and Horsearm Creek Management Zone)	Not in use	WAL32474	302	N/A
Boggabri Coal Mine				
Lower Namoi Regulated River Water Source	As required	WAL2571	51	Surface water extraction
	As required	WAL2572	5.6	Surface water extraction
	As required	WAL2595	143	Surface water extraction
	As required	WAL2596	26.5	Surface water extraction
Upper Namoi Regulated River Water Source	-	WAL37067	128	Surface water extraction

Upper Namoi Zone 4, Namoi Valley (Keepit Dam to Gin's Leap) Groundwater Source	-	WAL12691	457	Aquifer Extraction
	-	WAL12767	3	Aquifer Extraction
	-	WAL15037	172	Aquifer Extraction
	-	WAL24103	275	Aquifer Extraction
	-	WAL36547	37	Aquifer Extraction
	60	WAL37519	84	Aquifer Extraction/ Indirect Aquifer interception
Upper Namoi Zone 11, Maules Creek Groundwater Source	4	WAL42234	20	Indirect Aquifer Interception
Gunnedah - Oxley Basin MDB Groundwater Source (Gunnedah - Oxley Basin MDB [Other] Management Zone)	-	WAL29473	142	Aquifer Extraction
	381	WAL29562	700	Aquifer Interception
Bluevale Water Source	As required	WAL44134	93	Pit interception
Tarrawonga Coal Mine				
Gunnedah - Oxley Basin MDB Groundwater Source (Gunnedah - Oxley Basin MDB [Other] Management Zone)	529 – FY26	WAL29548	50	Aquifer Interception
		WAL31084	250	Aquifer Interception
		WAL29461	120	Aquifer Interception
		WAL29537	120	Aquifer Interception
Upper Namoi Zone 4, Namoi Valley (Keepit Dam to Gin's Leap) Groundwater Source	91 – FY25	WAL12716	43	Indirect Aquifer Interception
		WAL36548	36	Indirect Aquifer Interception
Upper Namoi Zone 11, Maules Creek Groundwater Source	9 – FY36	WAL12479	78 (39) ~	Indirect Aquifer Interception
	Not in use	WAL12480	215	Indirect Aquifer Interception

* Value provided via predictive water modelling of the BTM Groundwater Model to be revised periodically. Please refer to section 5.2.

Predicted modelled water take maximum value to 2036 as per Table 12.5 of BTM Complex Numerical Model Update until a future model review identifies revised predicted values.

^ Licenced entitlement does not include accounting for any licenced carryover permitted under applicable Water Sharing Plan conditions.

~ Shared between MCCM and TCM. MCCM will use up to 15 ML/yr, TCM will use up to 9 ML/yr. Therefore, sufficient allocation to share.

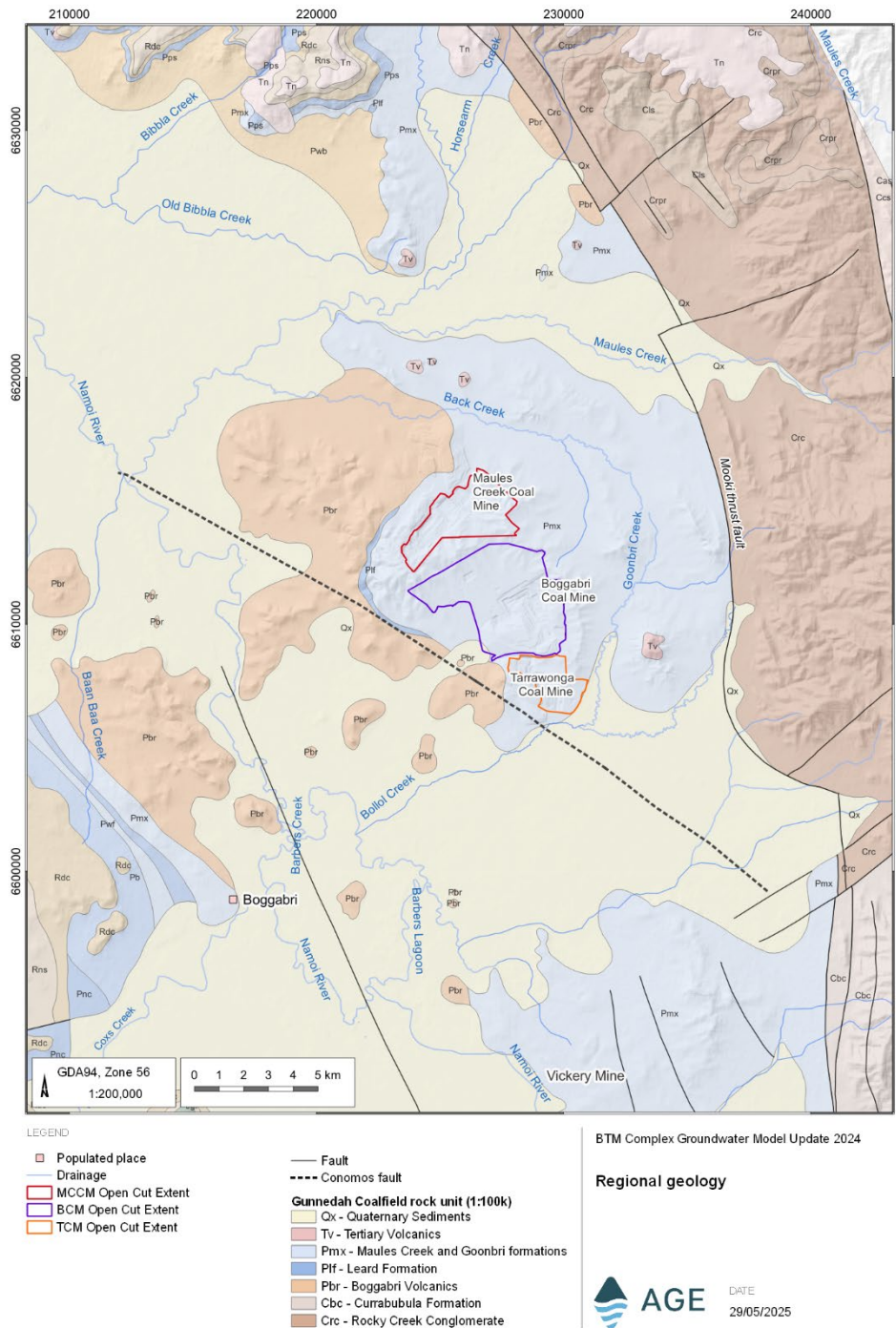
Table 3.2
Water Access Licences for VCM

Water Source	WAL No.	Entitlement (Unit Shares)	Category / Nominated Works and Use
Gunnedah-Oxley Basin MDB Groundwater Source	36576	600	Aquifer "passive take" / Works 90MW933092
Upper Namoi Zone 4, Namoi Valley (Keepit Dam to Gin's Leap)	12645	35	Aquifer / Works 90CA807002*
	12651	52	Aquifer / Works 90CA807002
	12653	166	
	12701	20	Aquifer "passive take" / To be assigned to 90MW833083*
	12715	75	Aquifer / Works 90CA807002*
	12724	45	
Total Zone 4		393	
Lower Namoi Regulated River Water Source	16034	50	High Security / Works 90CA801779*
	14936	1,056	General Security / Works 90CA801779*
	2577	144	General Security / Works 90CA801779

Water Source	WAL No.	Entitlement (Unit Shares)	Category / Nominated Works and Use
Lower Namoi Regulated River Water Source	2682	486	General Security/ Works 90CA801779
	13051	96	General Security "passive take"/ To be assigned Works 90MW833084*
Total High and General Security		1,832	

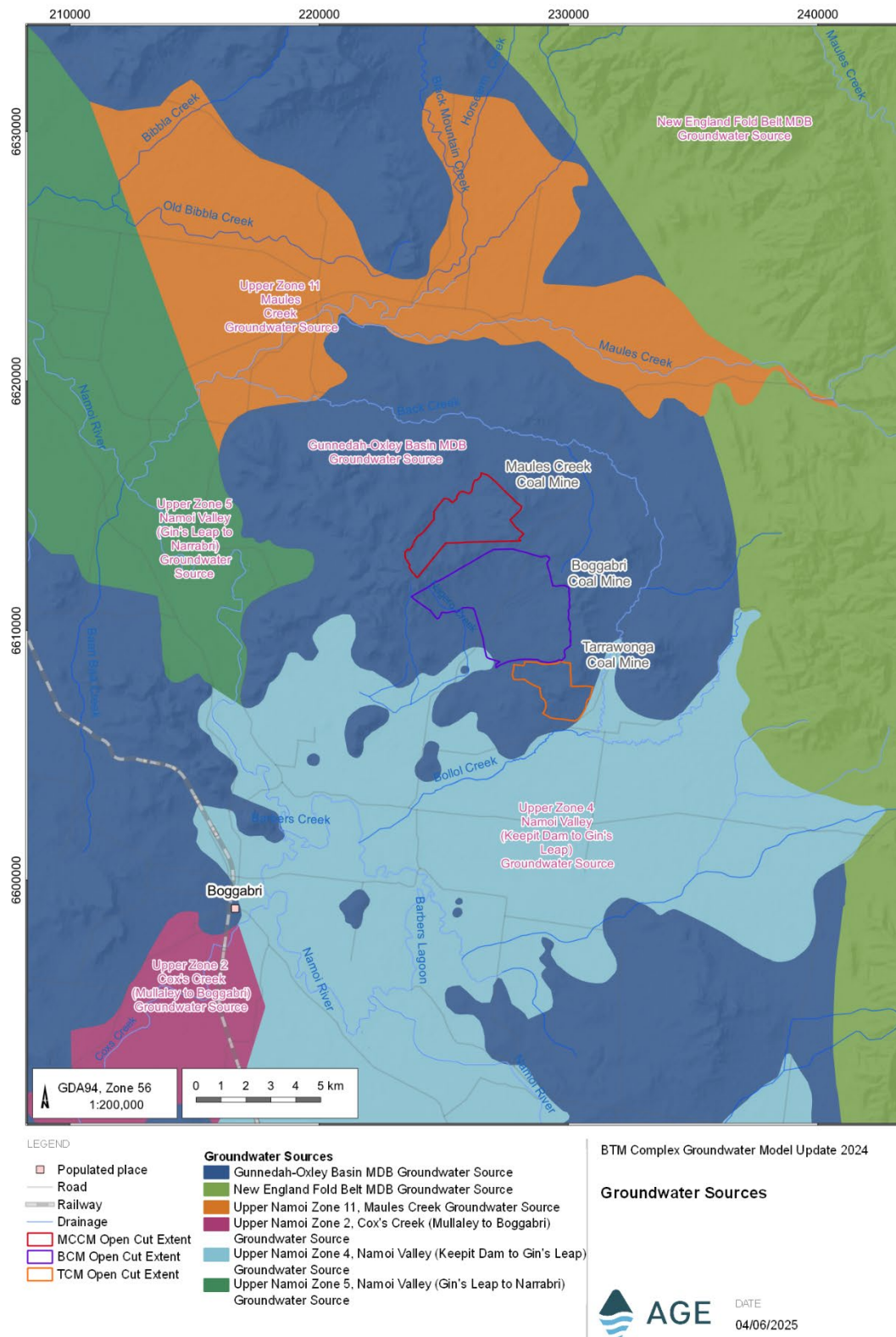
* application to assign WAL to the works approval required prior to use

Figure 3.2 – Regional Geology



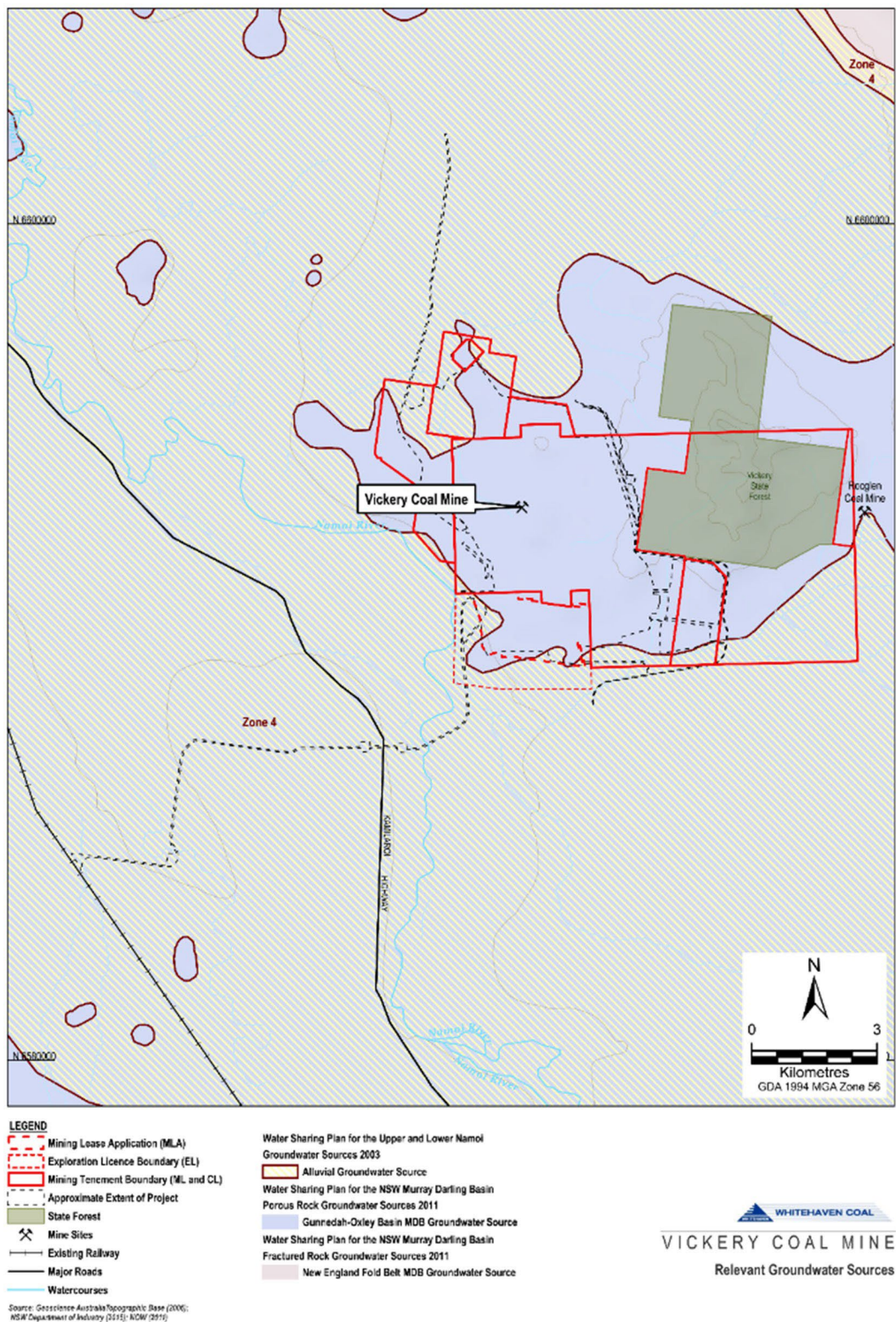
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Figure 3.3 – Relevant Groundwater Sources BTM



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Source: LIDAR DEM © Department Finance, Services and Innovation, 2016; GEODATA TOPO 250K Series 3 - © Commonwealth of Australia (Geoscience Australia) 2006;
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Figure 3.4 Relevant Groundwater Sources – VCM



3.4 WATER SHARING – PROPOSED TCM TO VEP PIPELINE

As part of TCM Modification 7 approval, WHC proposed the construction of a pipeline between TCM and the approved Vickery Extension Project (VEP) to facilitate contingency transfer of water between the two sites.

The indicative location of the approved TCM Modification Pipeline is shown in Figure 3.5. The whole proposed alignment from TCM to VEP is shown in Figure 3.6. These figures show indicative locations where the pipeline will cross public roads, non-minor hydrolines and lessee access roads on Whitehaven-owned property.

WHC are investigating increasing the originally planned 300mm pipeline diameter to 355 mm to increase flow rates. The maximum approved corridor width for disturbance during construction is 6 m, which is sufficient to accommodate a 355 mm pipe. Localised erosion and sediment controls will be implemented during the pipeline installation consistent with best practice guidelines as per Landcom (2004). The pipeline will be buried at waterways crossings to prevent damage from debris during flow, as well as public road crossing (indicative locations shown in Figure 3.6).

The system will be capable of two-way transfer of water and will connect into the TCM water management system and the VEP water management system. This water sharing capability provides a number of benefits to both sites, including:

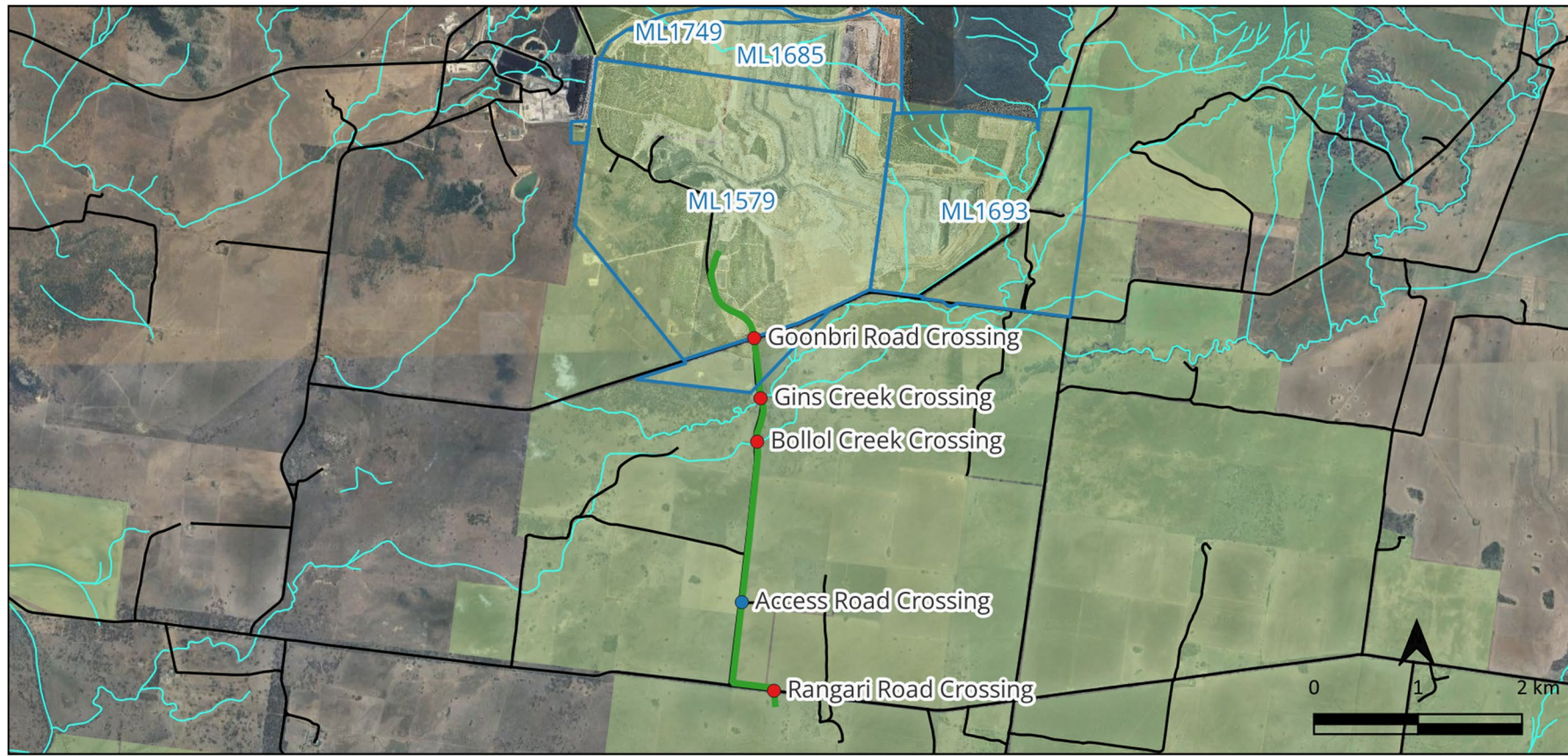
- Improvement in water security;
- Improvement in containment compliance risk by allowing excess water to be moved between sites;
- Allows TCM to use excess external water from VEP when VEP water storage is sufficient; and
- At the cessation of mining at TCM, the final void can be used to store VEP excess water and transfer back during drought, reducing external water requirements for VEP. The use of the final void will be considered in TCM final void modelling to show that the void will be used in a way that does not introduce any new impacts.

A comprehensive monitoring and maintenance program will be implemented for the pipeline prior to its construction and commissioning. Key aspects of the program will include:

- Installation of flow meters that can measure flow rate and cumulative volume in both directions to assess leak potential.
- Leak detection at waterway crossings.
- Monitoring of the receiving dams, including triggers/alarms to prevent overfilling receiving dams.
- Routine inspections and maintenance including after significant rainfall events to monitor.

A preliminary TARP for leak detection monitoring of the TCM to VEP pipeline is provided in Table 3.2. An updated set of TARPs for the operation and monitoring of the pipeline will be developed prior to construction and will be incorporated into the TCM and VEP water management plans.

Figure 3.5 – TCM Modification Pipeline



Title: Approved TCM Mod 7 Pipeline Alignment	Legend	
Project: BTM Complex Water Management Strategy	TCM tenement boundaries	TCM pipeline section
	Whitehaven-owned property	Road/creek crossings - directional drilling required
	Roads	Private/access road crossing
	NSW Hydrolines	

HydroBalance

Figure 3.6 TCM to VEP Proposed Pipeline Alignment



Title: TCM to VEP Pipeline Alignment

Project: BTM Complex Water Management Strategy

HydroBalance

Legend

TCM tenement boundaries

VEP tenement boundaries

Whitehaven-owned property

Roads

NSW Hydrolines

TCM pipeline section

VEP pipeline section

Public road/creek crossings - directional drilling required

Private/access road crossing

Table 3.3
Preliminary TARP – TCM to VEP Pipeline Leak Detection Monitoring

Level	Trigger	Action	Response
Level 1 (normal)	Flow/pressure monitoring within acceptable levels	<ul style="list-style-type: none"> Continue to monitor flow/ pressure 	<ul style="list-style-type: none"> No response required.
Level 2 (minor leak)	Flow/pressure monitoring indicates minor loss in flow/pressure	<ul style="list-style-type: none"> Send team to investigate Leave pumps on to allow for easier identification of leak 	<ul style="list-style-type: none"> If minor leak detected, turn off pumps and repair pipeline/valve where leak is occurring. Visually confirm successful repair once pumps are turned back on. If leak occurred at waterway crossing, implement incident response and reporting protocol and assess whether leakage could potentially have caused environmental harm and take remedial action, if appropriate. Undertake post-event review to confirm suitability of pump/pipe and leakage detection infrastructure. Implement any appropriate mitigation measures after considering all reasonable and feasible options
Level 2 (major leak/ pipe burst)	Flow/pressure monitoring indicates major/total loss in flow/pressure	<ul style="list-style-type: none"> Immediately turn off pumps Send team to investigate immediately 	<ul style="list-style-type: none"> Once leakage location is identified, repair pipeline/valve where leak is occurring. Visually confirm successful repair once pumps are turned back on. If leak occurred at waterway crossing, implement incident response and reporting protocol and assess whether leakage could potentially have caused environmental harm and take remedial action, if appropriate. Complete detailed incident review to identify cause of major leak. Implement any appropriate mitigation measures after considering all reasonable and feasible options

4. MODELLING

Site-specific surface water and groundwater assessments have previously been prepared for Environmental Assessments and Environmental Impact Statements for the MCCM, TCM and BCM (Table 1.3). The surface water and groundwater models developed to support these assessments are described in Sections 4.1.1 and 4.2.1.

In addition to site-specific assessment, cumulative consideration and modelling of surface water and groundwater has been conducted for the BTM Complex in support of this WMS, which is described in Sections 4.1.2 and 4.2.2.

The overall goal of cumulative consideration/modelling is to demonstrate the conceptual understanding of the cumulative behaviour of surface and groundwater resources in the BTM Complex area, and as such:

1. to estimate quantitatively the cumulative impacts from the BTM Complex on groundwater and surface water resources to inform appropriate management responses (e.g. licence acquisition, compensatory measures for affected landholders, structural measures, additional monitoring, etc.);
2. to estimate the contribution to impacts by individual mines in order to determine appropriate responsibilities for management responses; and
3. to verify the predicted impacts over the course of mining operations through evaluation of design hydraulic behaviour, mine inflows and groundwater drawdown magnitude/extent, with this information feeding back into the above management responses.

4.1 SURFACE WATER

4.1.1 Site-Specific Modelling

Hydrologic and hydraulic models have been developed for BCM (Parsons Brinckerhoff, 2010). The purpose of the modelling was to assess the potential impact of BCM on peak flows in the 'Nagero Creek' catchment, and for the preliminary sizing of diversion drains. The hydrologic and 1D hydraulic models were developed using XPSWMM (version 10.6) software. These models do not include hydraulic structures (such as culverts) but do include sediment basins from the northern spoil dump at the existing TCM.

The Boggabri XPSWMM model provided results for the 5-, 20- and 100-year Average Recurrence Interval (ARI) design storm events, for Years 1, 5, 10 and 21 of BCM. The modelling suggests that peak flow rates at the catchment outlet (where 'Nagero Creek' meets the Namoi River floodplain, approximately 1 km downstream of BCM) will reduce over the life of the mine, as a result of water being captured and reused on site (Parsons Brinckerhoff, 2010).

A flood study was prepared by WRM (2011) for BCM, using TUFLOW software. The intent of the model was to assess the impact of the proposed rail bridge, haul road upgrade and Therribri Road overpass on the Namoi River floodplain. The model boundary was restricted to the infrastructure area of the Namoi River and predicted a negligible to minor impact to flood levels, extent and velocities.

Hydrologic and hydraulic modelling has been carried out for TCM by WRM (WRM, 2021). The purpose of the modelling was to assess the requirement for the Goonbri Creek flood bund. Based on the assessment, it was found that the Goonbri Creek flood bund would no longer be required due to the MOD 7 changes, as documented in the approved Water Management Plan.

Hydrological analysis for MCCM was carried out using the Rational Method (WRM, 2011). The method was used to estimate the 100 year ARI design flood discharges in Back Creek along the reach adjacent to the proposed northern overburden area. The estimated flows were then input into a HEC-RAS model to determine the extent of flooding along Back Creek and to quantify potential impacts of MCM on flood levels and behaviour. The results of the modelling indicate that the proposed limit of disturbance is outside of the 100 year ARI flood extent, and therefore no adverse impact to flood levels or behaviour from MCCM is expected for flood events up to the 100 year ARI.

Hydrologic and hydraulic modelling has been carried out for VCM by WRM for the EIS (2019) and updated in 2023. A flood frequency analysis was undertaken of the 130 years (1864 to 2021) of recorded and inferred stream flow data from the Namoi River stream gauge at Gunnedah (gauge number 419001) to estimate the 20%, 5% and 1% Annual Exceedance Probability (AEP) design discharges (WRM, 2023).

Updated Namoi River flood studies are currently in progress as part of detailed design of the Project Rail Spur and will be documented in a future WMP update.

4.1.2 Cumulative Considerations

To achieve the cumulative objectives, it is proposed that a detailed review of site-specific surface water models be undertaken to determine if and how cumulative flow behaviour has been incorporated, in terms of flow distribution, timing, depth and velocities throughout the BTM Complex area and downstream. The models should be assessed for their capabilities and limitations with respect to prediction of cumulative surface water impacts as a result of the BTM Complex.

4.2 GROUNDWATER

4.2.1 Historical Site-Specific Modelling

The three existing regional groundwater models are already standardised on common software, namely MODFLOW-SURFACT Version 4 that is distributed commercially by HydroGeoLogic, Inc. (Virginia, USA). This software is able to simulate variably saturated flow and can handle desaturation and re-saturation of multiple aquifers without the “dry cell” problems of Standard-MODFLOW. This is pertinent to the dewatering of water-bearing formations adjacent to open cut mines and to reliable prediction of water level recovery post-mining.

However, there are differences in the user interfaces to each model. The TCM model (Heritage Computing, 2012b) uses the Groundwater Vistas Version 6 graphic user interface (GUI), while the BCM and MCCM models (AGE, 2010 and 2011) rely on proprietary FORTRAN code with some assistance from the PMW in GUI.

More fundamentally, the models differ in the number of model layers and in the way in which target coal seams have been aggregated, reflecting different mining objectives and variable seam geometry for each site.

Each of the BCM, TCM and MCCM models undergo regular maintenance and recalibration as additional data on groundwater responses to progressive mining improves the understanding of the groundwater systems.

Groundwater level monitoring at VCM will be conducted on a quarterly basis and the results will be used to validate modelling predictions on a five-yearly basis and inform progressive refinement of the

groundwater model as the open cut mining area is developed. Revised outputs from the groundwater model will be reported in the Annual Review, as relevant over the life of the VCM and used to inform regular site water balance reviews.

Consistent with Condition B53(g)(v), Schedule 2 of SSD-7480, the VCM groundwater model (including the borefield and open cut) will be independently reviewed at least once every 5 years after the commencement of mining. The model will be updated and reviewed will be undertaken by an independent, suitably qualified person endorsed by the department.

4.2.2 Cumulative Modelling

Heritage Computing (2012)

Groundwater modelling of cumulative groundwater impacts was undertaken by Heritage Computing (2012a) as part of the development of the Water Management Strategy. This is in addition to two regional models developed incrementally by AGE for BCM and MCCM, and a separate regional model for TCM developed by Heritage Computing.

The Heritage Computing (2012) groundwater model utilised the geological layers developed during the data sharing process established between the BCM, TCM and MCCM.

The potential cumulative surface water and groundwater impacts and issues are discussed in Section 5.1.

Australasian Groundwater and Environmental Consultants (2018; 2021)

Australasian Groundwater and Environmental Consultants Pty Ltd (AGE) prepared the report *Boggabri, Tarrawonga, Maules Creek Complex Numerical Model Update* (AGE, 2018) to satisfy the approval conditions for the verification of predicted groundwater impacts against observed datasets every three years. AGE updated the groundwater impact assessment in 2021 in the report entitled *Boggabri, Tarrawonga, Maules Creek Complex Groundwater Model Update* (AGE, 2021). Each of the BTM Complex mines are required to prepare a “*Groundwater Management Plan, which includes... a program to validate the groundwater model for the project, including an independent review of the model every 3 years, and comparison of monitoring results with modelled predictions*”.

The BTM Complex groundwater model shall be updated in 2025 in consultation with NSW DCCEEW. Any new impacts of water licensing requirements will be documented in an updated BTM complex WMP and the site specific WMP.

As part of the reports, the numerical model for the BTM complex was reviewed and verified against monitoring data collected since 2013. Prior to further calibration the model was imported into MODFLOW USG to allow the geological units to be more accurately represented. Further calibration of the model aimed at reproducing the water level trends observed within the BTM complex monitoring bore network. The calibration resulted in increasing the coal seam hydraulic conductivity (AGE, 2021).

The modelling results and outcomes are described in Sections 5.2 and 5.3.

5. POTENTIAL CUMULATIVE IMPACTS AND ISSUES

Regional numerical modelling conducted as part of the Namoi Catchment Water Study (Schlumberger, 2012) concluded that the area encompassing the BTM Complex and VCM (defined as Upper Namoi Zone 4, Namoi Valley [Keepit Dam to Gin's Leap] Groundwater Source) is considered to be at moderate risk from coal and gas developments. In addition, Upper Namoi Zone 5 Namoi Valley (Gin's Leap to Narrabri) Groundwater Source and Upper Namoi Zone 11, Maules Creek Groundwater Source have been located in the vicinity of the BTM Complex and are considered to be at moderate and high risk from mining and coal seam gas developments, respectively. Schlumberger (2012) indicated potential impacts within the Namoi Catchment would likely occur as follows:

- Interception of rainfall and run-off; There is a greater potential for open-cut mines to intercept rainfall and run-off. Where possible operators tend to divert existing surface water drainage around the perimeter of the site to minimise drainage into the open cut. Water intercepted is removed from the surface/groundwater systems and stored on-site for use in operations or treated and discharged.
- Lowering of groundwater levels; Mining below the water table can have an impact on groundwater resources. Dewatering of pits can potentially induce local changes in groundwater gradients and flow directions.
- Pit runoff water and pumped groundwater can be contaminated with suspended solids and/or dissolved minerals and metals, and would need to be treated before discharge into the local drainage system.

Sections 5.1 and 5.2 provide an overview of the detailed assessments of the potential surface water and groundwater impacts associated with BTM Complex operations undertaken as part of the Environmental Assessments (EAs) and technical reports prepared in support of development applications for each project. A summary of previous surface water and groundwater studies is provided in Table 1.4.

5.1 SURFACE WATER

5.1.1 Contaminant export

Mine water, containing suspended solids and soluble salts, will be generated from coal stockpiles and the mining void, as well as groundwater inflows to the mining void. In addition, dirty water containing suspended solids will be generated from runoff from disturbed areas within the mine sites, including from infrastructure areas, unshaped spoil dumps and haul roads. For all mines, mine water will be retained onsite for use, and dirty water will report to settlement ponds for on-site use or discharged from site in line with approval conditions and licences for each of the mines. Excess water, or imported from a licensed extractions source, may be shared with other mines within the BTM Complex and VCM, subject to water sharing agreements being reached on terms acceptable to the mines acting reasonably. Water shared between mines shall be reported in each mines annual return.

The management of dirty water and mine water at each of the mines is detailed in each site-specific WMP. It will remain the responsibility of each mine to implement the mitigation measures detailed in their WMP's to reduce any cumulative impacts on the surrounding environment during operations and post-mining until relinquishment of the relevant leases.

5.1.2 Catchment areas and flows to local creeks and Namoi River

Mining operations will result in modifications to local surface water catchments. The area of undisturbed (or rehabilitated) catchment draining to the local creeks will reduce over the life of each mine, as the area draining to dirty and mine water management systems increases. Areas draining to local catchments will subsequently increase as rehabilitation is established and runoff is of suitable quality.

Peak flow rates at the catchment outlets are likely to reduce over the life of the mines. This reduction may be attributed to dirty water runoff being captured in sediment dams, thus attenuating peak flow rates. An overall reduction in catchment outflow may also be associated with mine water runoff being stored on-site for reuse, rather than being discharged to the creeks.

Surface water will also, where possible, be diverted around disturbed and mining areas and directed into catchment outlets.

Given the very small contribution of these creeks to the Namoi River catchment, the impacts on the Namoi River flows downstream and the Namoi River water users are likely to be minimal. However, local creek environmental flows may be affected.

The extent to which impacts on stream flows persist beyond the life of BTM Complex will depend on the final landform for each mine (i.e. changes in runoff direction due to the final landforms and permanent catchment excision due to final voids). It will remain the responsibility of each mine to ensure rehabilitation and landform design (including final void catchment areas) is undertaken in accordance with the relevant site-specific approvals.

In locations where the landforms interface, the following will occur:

- Landforms will be designed to interface in a way that creates a safe, stable and non-polluting landform which create a natural topography;
- Drainage as part of the final landform will be design to a 1% AEP peak discharge;
- The final void catchments will be mined as far as possible and practical in accordance with the mines approvals; and

Any consultation will be conducted between the relevant BTM Complex mines to achieve beneficial cumulative landform objectives (e.g. to minimise long term water impacts). Final landforms will be included in individual mines Rehabilitation and closure plans 5 years prior to closure.

5.1.3 Flooding

Investigations undertaken as part of the EAs for each mine found that peak flow rates at catchment outlets in the BTM Complex area are likely to reduce as mine areas increase, as described in the section above.

Changes to landforms and hydrology from BTM Complex mining and overburden emplacement have the potential to change flood characteristics for flood prone areas.

For BCM, analysis undertaken by WRM Water and Environment Pty Ltd, and summarised in the EA (WRM, 2009) indicated that mine infrastructure would cause no riverbank erosion upstream or downstream of the project, and predicted a minor impact on flood levels, extent and velocities.

WRM completed a hydraulic assessment of Goonbri Creek to satisfy Condition 37 of TCM's Project Approval PA 11_0047 (WRM, 2021a). The hydraulic model was run for a Probable Maximum Flood (PMF) event in Goonbri Creek and Bollol Creek, which represents the maximum possible flood extent

that could conceivably be expected to occur in this location. Based on the assessment, it was found that the Goonbri Creek flood bund would no longer be required due to the MOD 7 changes.

The TCM flood model will be periodically reviewed and if required updated to determine if there are any potential impacts. In accordance with PA Condition 39, if any downstream flooding impacts are identified by the updated flood model, a monitoring program will be established to monitor downstream flooding impacts.

Hydrologic and hydraulic analysis for MCCM was carried out by WRM (WRM, 2011) for the MCCM EIS to determine the extent of flooding along Back Creek and to quantify potential impacts of the MCCM on flood levels and behaviour. Results indicated that the proposed limit of disturbance is outside of the 100-year ARI flood extent, and therefore no adverse impact to flood levels or behaviour from the project is expected for flood events up to the 100 year ARI.

5.2 GROUNDWATER

5.2.1 Groundwater flow

Changes to groundwater flows in areas surrounding each mine are anticipated. Schlumberger (2012) highlighted potential for below water table mining in either open-cut or underground mines to have an impact on quantity and quality of groundwater resources. Dewatering of pits and mines can potentially induce local changes in groundwater gradients and flow directions.

Worst case cumulative groundwater impact assessment undertaken by AGE (2021) determined that cumulative groundwater depressurisation impacts could be expected from the TCM, BCM and MCCM projects.

5.2.2 Alluvial aquifer impacts

Changes in alluvial groundwater volumes and levels have the potential to occur as a result of mining within the BTM Complex.

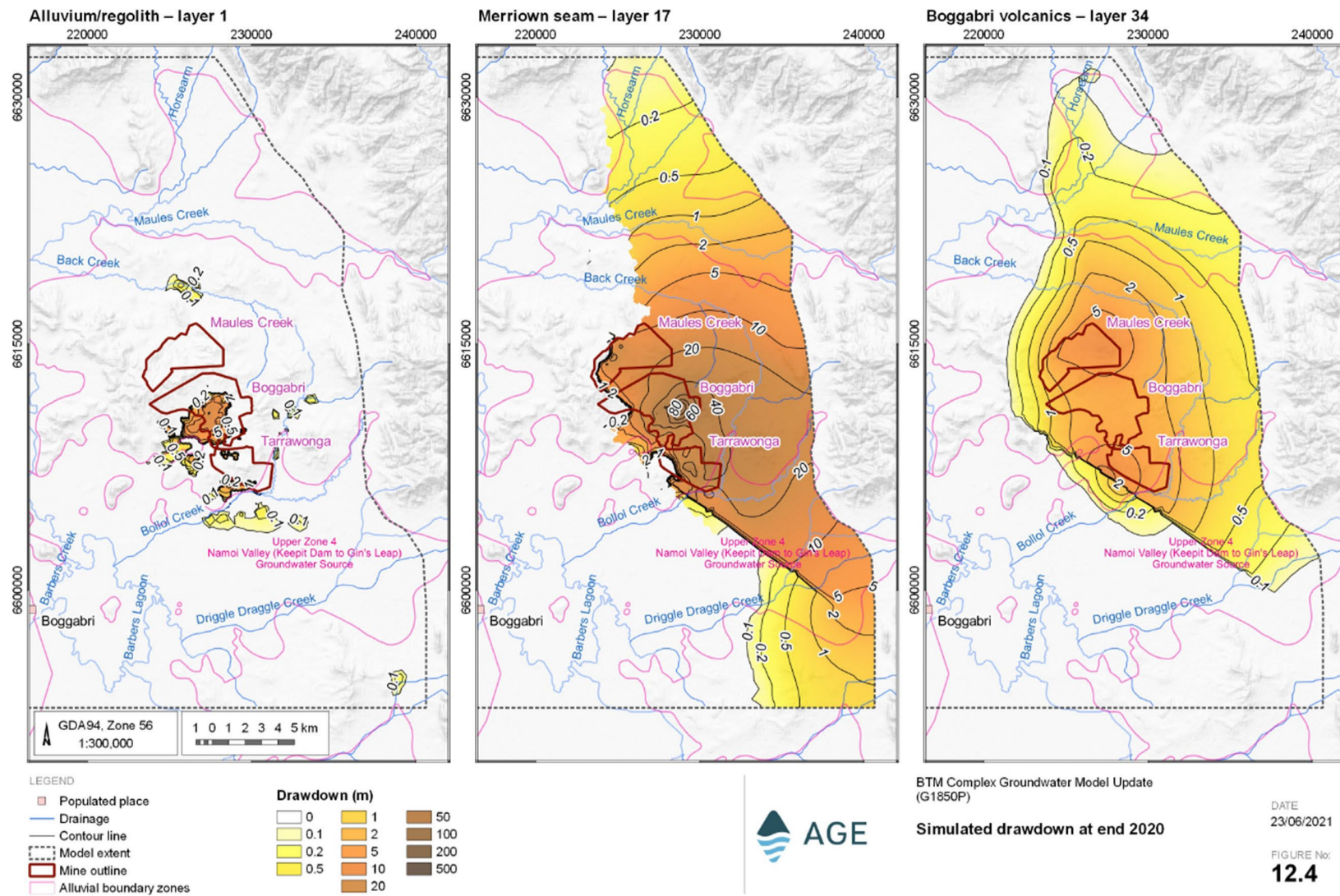
The recalibrated model prepared by AGE (2021) predicted limited and localised drawdown within the Narrabri and Gunnedah alluvium, consistent with previous versions of the model. As shown on Figures 5.1 and 5.2, the drawdown is confined to the zones of alluvium that have infilled valleys immediately adjacent to the active mining areas at Boggabri and Tarrawonga Mine (AGE, 2021).

The drawdown shown in Figures 5.1 and 5.2 represent the cumulative impact on the groundwater regime generated by all three mines operating together.

Modification 5 of the Boggabri Coal Mine involved establishment and operation of a borefield which included two production bores and four contingency production bores. The borefield will contribute to regional cumulative groundwater drawdown associated with the adjacent mining operations. This is estimated to be an additional groundwater drawdown of 1 to 3 m in the alluvium to the east and north-east of the borefield where mine cumulative drawdown is experienced (Parsons Brinckerhoff, 2015).

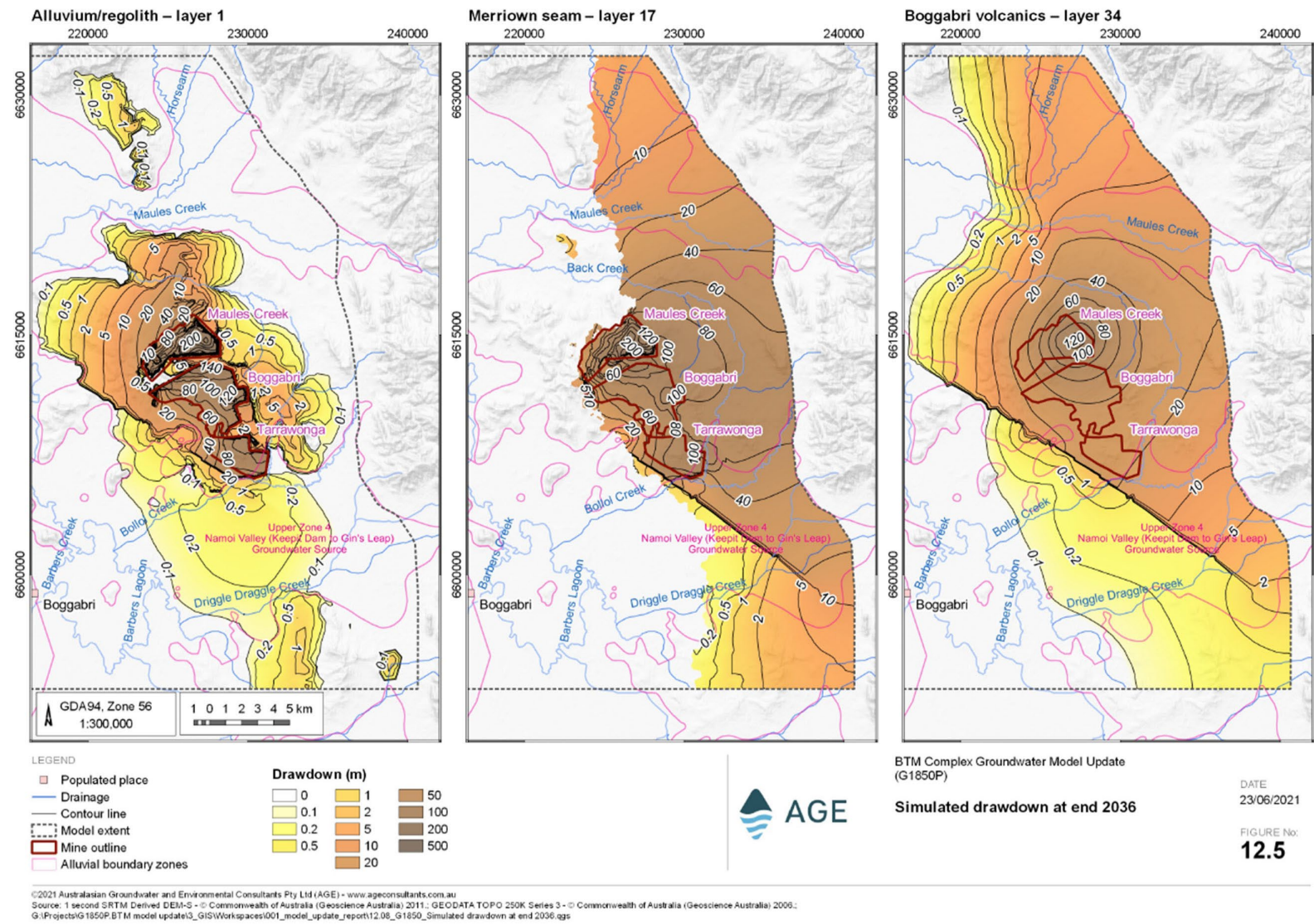
Two of these bores, the Roma (90CA807023) and Brighton (90CA807012) bores are owned by Whitehaven and operated in accordance with the relevant water sharing plan and comply with the aquifer interference policy with no impacts > 2 m to third party infrastructure (WSP, 2020).

Figure 5.1 Cumulative Groundwater Drawdown Extent - 2020



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 Source: 1 second SRTM Derived DEM-S - © Commonwealth of Australia (Geoscience Australia) 2011; GEODATA TOPO 250K Series 3 - © Commonwealth of Australia (Geoscience Australia) 2008;
 G:\Projects\G1850P BTM model update\GIS\Workspaces\001_model_update_report\12.07_G1850_Simulated drawdown at end 2020.ags

Figure 5.2 Cumulative Groundwater Drawdown Extent - 2036



5.2.3 Hard rock aquifer impacts

Impacts to hard rock aquifers are considered to be a potential cumulative issue for the BTM Complex.

Figures 5.1 and 5.2 shows the predicted drawdown extent within the Merriown Seam (refer to AGE [2021] for further details regarding model layers). Similar to the 2019 predictions, the figures show a flatter hydraulic gradient and lower water levels than is predicted for the water table, indicating a downward vertical gradient. The flow directions remain strongly influenced by the active mining areas with flow predicted from the north and south along strike of the coal seams towards the mining areas. Extensive drawdown of the Merriown coal seam is evident, as all mining projects are approved to target this coal seam.

The drawdown shown in Figures 5.1 and 5.2 represents the cumulative impact on the groundwater regime generated by all three mines operating concurrently.

5.2.4 Water quality impacts

The open cuts for each mine in BTM Complex are considered groundwater sinks during operations and post-mining (i.e. final landform) (AGE, 2021). The open cuts will draw in groundwater from surrounding aquifers, preventing the release of potentially brackish to saline water back into the surrounding aquifers.

5.3 WATER SUPPLY AND DEMAND

All site WMPs for the BTM Complex mines aim to:

- divert clean water runoff where possible and practical from undisturbed catchment areas around the mine workings into local creeks ('Nagero Creek' for BCM, 'Nagero', Bollol and Goonbri Creeks for TCM, and Back Creek for MCCM). Any water that is not diverted will be accounted for in accordance with the WM Act;
- capture dirty water from disturbed areas in sediment dams. If the water quality meets licence requirements, and the water is not required for use on-site, it may be discharged into the local catchments.
- use mine and dirty water wherever possible for coal processing and dust suppression;
- use imported water as follows:
 - for BCM, to supplement water from on-site surface water storages and its Zone 4 borefield to meet dust suppression and coal processing demands and as potable water for use in vehicle wash down and construction activities;
 - for TCM, use imported raw water for potable water as well as for other site water deficits. Once established, the pipeline from VEP to TCM will allow for water to be transferred from VEP which has licensed extraction points including the Namoi River and Zone 4 bore; and
 - for MCCM, use imported raw water from an existing high security licence for 3000 ML/yr from the Namoi River for mining operations, as well as Zone 4 and Zone 5 groundwater extracted from the Olivedene, Roma and Brighton bores when the Namoi River is not available.

Each mine may experience shortfalls during prolonged dry periods. Further details are contained within each mine's respective site water balances.

It is proposed that the mines explore opportunities for water sharing and water transfers between mines within the BTM Complex. This may include sharing excess mine water stored on-site as well as purchasing and/or trading of any excess surface water or groundwater (either allocated or produced) between the mines. The infrastructure to be utilised to share the water between the mines will depend on the terms of the agreement reached between the mines (acting reasonably) as to the volume of water to be transferred and the location of the water source and ultimate destination. The water sharing may involve the use of both permanent and temporary water management infrastructure. Water management plans will be updated where required to reflect any new water sharing arrangements and infrastructure.

Where it is not practicable or feasible to share water, additional water may be purchased on the open market, either temporarily or permanently, by the relevant mine to make up any shortfalls. Furthermore, groundwater may also be traded on a temporary or permanent basis within the greater Gunnedah-Oxley Basin Groundwater Source.

AGE (2021) concluded that the three mines cumulatively have sufficient water licenses to account for groundwater intercepted by mining in the areas managed under the Water Sharing Plan for the NSW Murray-Darling Basin Porous Rock Groundwater Sources, and sufficient water licenses to account for water indirectly removed from Zone 4 and 11 of the alluvial aquifers managed under the Water Sharing Plan for the Namoi Unregulated and Alluvial Water Sources.

5.4 COMPLIANCE NOTIFICATION

Notification criteria are contained in the Boggabri Coal Project Approval (09_0182), the Maules Creek Coal Project Approval (10_0138) and the Tarrawonga Coal Project Approval (11_0047). Each mine is required to ensure that notification of non-compliance is undertaken in accordance with their reporting obligations. Reporting obligations for each of the mines in the BTM complex are outlined in Tables 5.1 to 5.3.

Table 5.1 Boggabri Coal Reporting Obligations for Non-Compliances

Boggabri Coal Mine Project Approval 09_0182 Condition	Details
Schedule 5 Condition 8	The Proponent must notify, at the earliest opportunity, the Secretary and any other relevant agencies of any incident that has caused, or threatens to cause, material harm to the environment. For any other incident associated with the project, the Proponent must notify the Secretary and any other relevant agencies as soon as practicable after the Proponent becomes aware of the incident. Within 7 days of the date of the incident, the Proponent must provide the Secretary and any relevant agencies with a detailed report on the incident, and such further reports as may be requested.

Table 5.2 Tarrawonga Coal Mine Reporting Obligations for Non-Compliances

Tarrawonga Coal Mine Project Approval 11_0047 Condition	Details
Schedule 5 Condition 8	The Secretary must be notified in writing via the Major Projects website immediately after the Proponent becomes aware of an incident. The notification must identify the development (including the development application number and the name of the development if it has one) and set out the location and nature of the incident. Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in Appendix 9.
Schedule 5 Condition 8 A	The Secretary must be notified in writing via the Major Projects website within seven days after the Proponent becomes aware of any non-compliance.
Schedule 5 Condition 8 B	A non-compliance notification must identify the development and the application number for it, set out the condition of consent that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.
Schedule 5 Condition 8 C	A non-compliance which has been notified as an incident does not need to also be notified as a noncompliance.

Table 5.3 Maules Creek Coal Mine Reporting Obligations for Non-Compliances

Maules Creek Coal Mine Project Approval 10_0138 Condition	Details
Schedule 5 Condition 8	The Planning Secretary must be notified in writing via the Major Projects website immediately after the Applicant becomes aware of an incident. The notification must identify the development (including the development application number and the name of the development if it has one) and set out the location and nature of the incident. Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in Appendix 9.
Schedule 5 Condition 8 A	The Planning Secretary must be notified in writing via the Major Projects website within seven days after the Applicant becomes aware of any non-compliance.
Schedule 5 Condition 8 B	A non-compliance notification must identify the development and the application number for it, set out the condition of consent that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.
Schedule 5 Condition 8 C	A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.

The requirement for non-compliance reporting is also documented in each respective mines WMPs.

6. MONITORING

6.1 EXISTING MONITORING NETWORK

6.1.1 Surface water

Surface water monitoring in the BTM Complex area is carried out by BCM, TCM and MCCM in line with their respective WMPs.

Each mine's existing surface water monitoring program can be found in its approved site-specific WMP, including locations, frequency and parameters. The approved site-specific WMPs are developed and managed in accordance with the relevant site-specific approvals and licences.

Reporting of surface water monitoring can be found in site-specific Annual Reviews.

6.1.2 Groundwater

Groundwater levels and quality

The current groundwater monitoring network within the BTM Complex comprises a combination of monitoring bores and vibrating wire piezometers (VWPs). Monitoring has been carried out for BCM since mid-2006, TCM since June 2006 and MCCM since June 2010 (AGE, 2021). Installation of the groundwater monitoring network is described in more detail in AGE (2021).

Refer to the approved WMPs for each mine's existing groundwater monitoring locations, frequencies and parameters.

Groundwater seepage

Monitoring of groundwater pit seepage is currently carried out for all mines within the BTM Complex.

The seepage monitoring programs for each of the sites is detailed in their approved site WMPs and includes tracking water pumped from the pit, and calculations of groundwater seepage via water balance calculations.

6.2 BTM COMPLEX CUMULATIVE IMPACT MONITORING NETWORK

6.2.1 Surface water

This section details the cumulative surface water monitoring program to be implemented across the BTM Complex. The program focuses on ambient monitoring in order to identify and manage cumulative impacts on surface water quality, flows and third parties. Monitoring locations have been strategically selected to enable the distribution of surface water quality and quantity impacts from each mine to be understood and appropriately managed.

The cumulative surface water monitoring program does not supersede site WMPs currently in place. Rather the program has been developed to work in parallel. The monitoring locations selected for the cumulative monitoring network are part of the existing networks of each mine (Table 6.1 below). The management of data and reporting for the cumulative network is discussed in Section 8. Table 6.1 sets out the surface water quality and flow monitoring locations, parameters, sampling frequencies and reasoning, with locations shown on Figure 6.1.

Table 6.1
Cumulative Surface Water Monitoring Program

Location	Frequency ^a	Parameters	Rationale
Boggabri Coal Mine			
SW2	Event based ^d	Field parameters - EC & pH, TSS, oil and grease, nutrients ^b , metals ^c	Monitors ambient conditions on 'Nagero Creek' upstream of BCM
SW1	Event based	Field parameters - EC & pH, TSS, oil and grease, nutrients ^b , metals ^c	Monitors conditions on 'Nagero Creek' downstream of BCM, and downstream of TCM (TCM discharges to 'Nagero Creek' and Goonbri Creek)
SW3	Event based	Field parameters - EC & pH, TSS, oil and grease, nutrients ^b , metals ^c	Monitors conditions on 'Nagero Creek' downstream of BCM, and downstream of TCM (TCM discharges to 'Nagero Creek' and Goonbri Creek)
Tarrawonga Coal Mine			
GC-U	Event based when the creek is flowing and until a baseline is established, then quarterly + event based only when the creek is flowing.	Field parameters ^a , TSS, oil and grease, nutrients ^b , metals ^c	Monitors ambient conditions on Goonbri Creek upstream of TCM and proposed Goonbri Creek realignment
BC-U	Event based when the creek is flowing and until a baseline is established, then quarterly + event based only when the creek is flowing.	Field parameters ^a , TSS, oil and grease, nutrients ^b , metals ^c	Monitors conditions of Bollol Creek just upstream of the confluence of Goonbri and Bollol Creeks, upstream of TCM and proposed Goonbri Creek realignment
BC-D	Quarterly + event based only when the creek is flowing.	Field parameters ^a , TSS, oil and grease, nutrients ^b , metals ^c	Monitors conditions just downstream of the confluence of Goonbri and Bollol Creeks, downstream of TCM and proposed Goonbri Creek realignment
Maules Creek Coal Mine			
SW4	Monthly + event based until a baseline is established, then quarterly (March, June, September, December) + event based	Field parameters ^a , TSS, oil and grease, nutrients ^b , metals ^c	Monitors ambient conditions on Back Creek upstream of MCCM
SW9	Quarterly (March, June, September, December) + event based	Flow measurement + field parameters ^a , TSS, oil and grease, nutrients ^b , metals ^c	Monitors conditions on Back Creek downstream of MCCM
SW5	Monthly + event based until a baseline is established, then quarterly (March, June, September, December) + event based	Flow measurement + field parameters ^a , TSS, oil and grease, nutrients ^b , metals ^c	On the Namoi River, upstream of the BTM Complex
SW8	Monthly + event based until a baseline is established, then quarterly (March, June, September, December) + event based	Flow measurement + field parameters ^a , TSS, oil and grease, nutrients ^b , metals ^c	On the Namoi River, downstream of confluence with Maules Creek and downstream of the BTM Complex

a: pH, EC, temperature, dissolved oxygen, turbidity, ORP

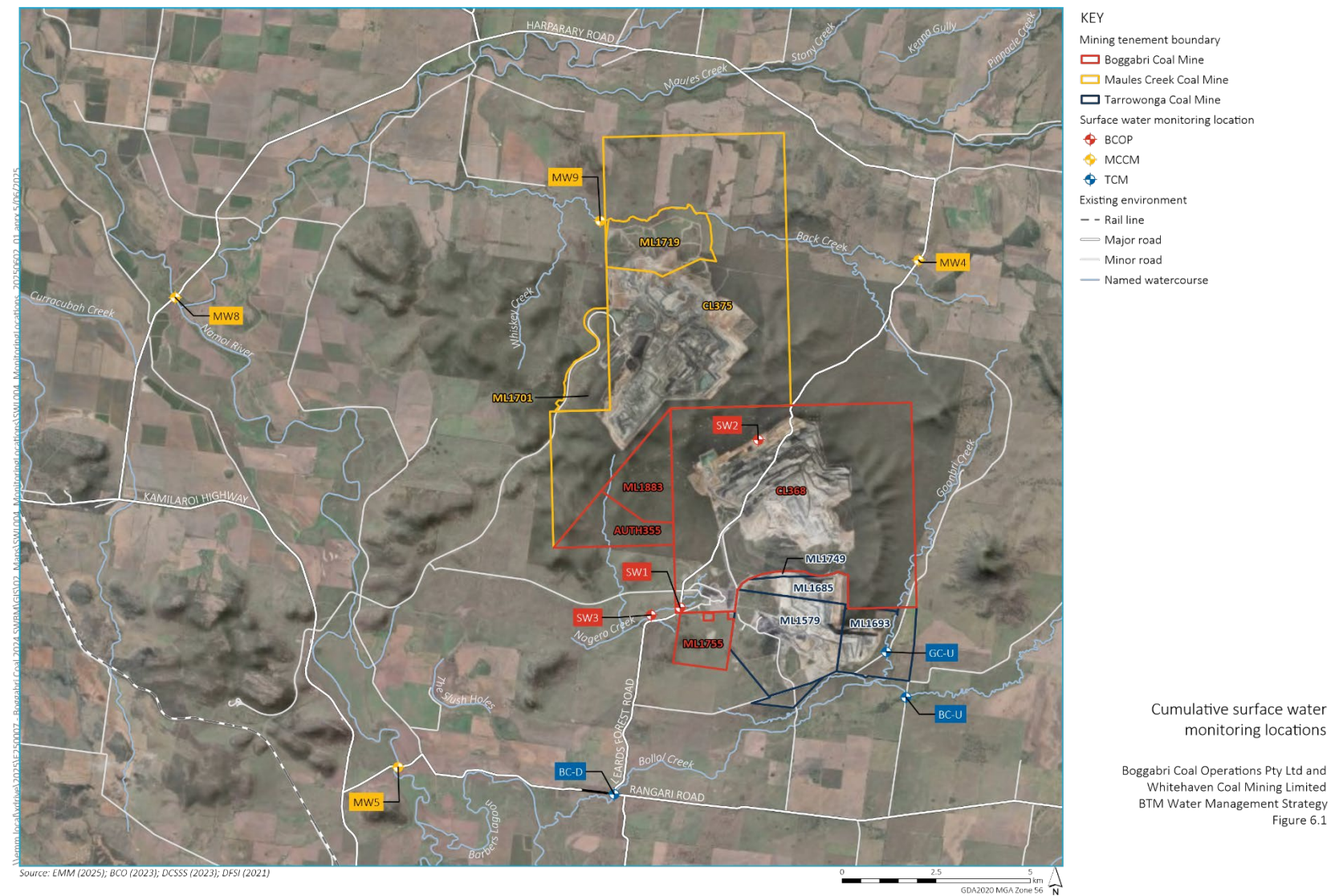
b: Nutrients: phosphorus (total), phosphorus (reactive), nitrogen (total)

c: Aluminium, arsenic, cadmium, chromium, copper, iron, manganese, nickel and zinc.

d: 'Event based' refers to as soon as practicable after a discharge from authorised discharge point has occurred. Please refer to mine specific WMPs for more detailed descriptions of events including post-event monitoring frequency.

e: Quarterly and monthly monitoring within ephemeral creeks (i.e. Nagero Creek, Bollol Creek and Goonbri Creek) will only be undertaken if the creeks are flowing at the time of the scheduled monitoring.

Figure 6.1 Cumulative Surface Water Monitoring Locations



Water quality parameters listed in Table 6.1 have been specified based on a combination of existing Environment Protection Licences (EPL) (12407 for the BCM, 20221 for the MCCM and 12365 for the TCM), Namoi catchment uncontrolled streams Water Quality Objectives (WQOs) (DoI – Water, 2006), monitoring carried out for existing surface water operational plans and recommendations made in previous studies (Parsons Brinckerhoff, 2010; Gilbert & Associates, 2011; WRM, 2011).

Flow monitoring involving the installation of water level logger or similar within the main channel of the creeks has been recommended where feasible at the locations listed in Table 6.1 and are considered to be more appropriate than permanent flow gauging stations for the following reasons:

- flow in each creek is ephemeral;
- SW2 will eventually be rendered obsolete due to the progression of mining; and
- water level recording equipment is easier to deploy, does not require extensive calibration and is easier to maintain than flow gauging station equipment.

6.2.2 Groundwater

Groundwater levels and quality

Recommendations were made by Heritage Computing (2012a) to monitor and manage the cumulative impacts on groundwater conditions as a result of mining within the BTM Complex. Those recommendations have been used to guide the development of the BTM Complex groundwater monitoring program.

The program is based on a network of monitoring bores and VWP's to monitor regional groundwater conditions, in addition to existing monitoring bore networks (Section 6.1.2). During October 2013 to January 2014, the proposed bores were constructed. Some sites selected for groundwater quality monitoring have been aligned with existing bores that monitor alluvial aquifers, with the new bores placed to monitor underlying aquifers at the same location. Some sites were selected for water level monitoring only. A number of bores have automatic dataloggers installed to collect continuous water level data, which can be downloaded during sampling rounds.

Some monitoring bores were combined or substituted for those previously recommended in individual mine EAs, provided the targeted lithology and construction was consistent with the rationale defined by Heritage Computing (2012a). Possible rationalisations are included in Table 6.2.

Table 6.2 sets out the cumulative groundwater monitoring network, along with sampling frequencies, parameters and rationale. MCCM installed all individual bores that make up the cumulative groundwater monitoring network. A consultant engaged by MCCM sample these bores for cumulative data for the BTM Complex. Figure 6.2 shows the cumulative groundwater monitoring network for the BTM Complex. Monitoring locations for the cumulative groundwater monitoring network were selected as per recommendations from Heritage Computing (2012a) and in consultation with regulatory agencies.

Groundwater seepage and use

The current groundwater seepage monitoring program being implemented for each mine (Section 6.1.2) will be used to provide a dataset for periodic water balance modelling across the BTM Complex.

Table 6.2
Cumulative Groundwater Monitoring Locations

Location	Installation type (no. piezometers)	Bore Depth (m)	Screen/Sensor Depth (mgb)	Sampled lithology	Frequency	Parameters	Rationale
Reg1	VWP in interburden and coal seams (4)	N/A	118.7	Alluvium (existing bore GW967138/2), interburden and coal seams	Continuous water level measurement (datalogger).	Water level	Just outside predicted 1 m water table drawdown (Heritage Computing, 2012a). To assess potential impact on middle reaches of Maules Creek. Adjacent Dol – Water bore GW967138/1/2.
			134.5				
			193.5				
			281.5				
Reg2	VWP in interburden and coal seams (4)	N/A	60	Alluvium (existing bore GW041027) and underburden	Continuous water level measurement (datalogger).	Water level	Just outside predicted 1 m water table drawdown (Heritage Computing, 2012a). To assess potential impact on upper reaches of Maules Creek. Adjacent Dol – Water bore GW041027.
			120				
			200				
			260				
Reg3	Bore (1)	57	50.50 – 56.50	Boggabri Volcanics	Quarterly (March, June, September, December) until baseline established, then half yearly.	Water level + field parameters ^a + major ions + metals ^b + nutrients ^c	Just outside predicted 1 m water table drawdown (Heritage Computing, 2012a). To assess potential impact on lower reaches of Maules Creek. Adjacent Dol – Water bore GW030130.
Reg4	Bore (1)	72.5	65.5 – 71.5	Boggabri Volcanics	Quarterly (March, June, September, December) until baseline established, then half yearly.	Water level + field parameters ^a + major ions + metals ^b + nutrients ^c	Outside predicted drawdown impact zones (Heritage Computing, 2012a). 2 km east of Namoi River.

Table 6.2 (Continued)
Cumulative Groundwater Monitoring Locations

Location	Installation type (no. piezometers)	Bore Depth (m)	Screen/Sensor Depth (mgl)	Sampled lithology	Frequency	Parameters	Rationale
Reg5	Bore (1)	78.7	72.2 – 78.2	Boggabri Volcanics	Quarterly (March, June, September, December) until baseline established, then half yearly.	Water level + field parameters ^a + major ions + metals ^b + nutrients ^c	Within predicted 1 m water table drawdown zone in alluvium (Heritage Computing, 2012a).
Reg5a	Bore (1)	22	18 – 21	Alluvium	Quarterly (March, June, September, December) until baseline established, then half yearly.	Water level + field parameters ^a + major ions + metals ^b + nutrients ^c	Within predicted 1 m water table drawdown zone in alluvium (Heritage Computing, 2012a).
Reg6	Bore (1)	96	88.0 – 94.0	Boggabri Volcanics	Quarterly (March, June, September, December) until baseline established, then half yearly.	Water level + field parameters ^a + major ions + metals ^b + nutrients ^c	Within predicted 1 m water table drawdown zone in 'Nagero Creek' alluvium (Heritage Computing, 2012a). To assess potential impact on 'Nagero Creek'.
Reg7	VMP in interburden and coal seams (3)	N/A	67.5	Maules Creek Formation interburden and coal seams	Continuous water level measurement (datalogger).	Water level	On edge of predicted 1 m water table drawdown in Bollol Creek alluvium (Heritage Computing, 2012a). To assess potential impact on Bollol Creek. Adjacent bore BCS6.
			148.2				
			242.5				
Reg7a	Bore (1)	36	24 – 30	Bollol Creek Alluvium	Quarterly (March, June, September, December) until baseline established, then half yearly.	Water level + field parameters ^a + major ions + metals ^b + nutrients ^c	On edge of predicted 1 m water table drawdown in Bollol Creek alluvium (Heritage Computing, 2012a). To assess potential impact on Bollol Creek. Adjacent bore BCS6.

Table 6.2 (Continued)
Cumulative Groundwater Monitoring Locations

Location	Installation type (no. piezometers)	Bore Depth (m)	Screen/Sensor Depth (mgl)	Sampled lithology	Frequency	Parameters	Rationale
Reg8	VWP in interburden and coal seams (3)	N/A	91.5	Maules Creek Formation interburden and coal seams	Continuous water level measurement (datalogger).	Water level	In high drawdown zone east of MCCM and north-east of BCM (Heritage Computing, 2012a). In Maules Creek Formation.
			221				
			274				
Reg9	VWP in interburden and coal seams (3)	N/A	115.8	Maules Creek Formation interburden and coal seams	Continuous water level measurement (datalogger).	Water level	In moderate drawdown zone to north- east of TCM and east of BCM (Heritage Computing, 2012a). In Maules Creek Formation.
			175.2				
			268				
Reg10	VWP in interburden and coal seams (4)	N/A	55	Shallow Maules Creek Formation (and Back Creek water)	Continuous water level measurement (datalogger).	Water level	In moderate drawdown zone on Back Creek north of MCCM (Heritage Computing, 2012a). To assess potential impact on Back Creek. In Maules Creek Formation.
			144.2				
			178				
			185.5				
Reg10a	Bore (1)	10	6.75 – 9.75	Alluvium	Quarterly (March, June, September, December) until baseline established, then half yearly.	Water level + field parameters ^a + major ions + metals ^b + nutrients ^c	In moderate drawdown zone on Back Creek north of MCCM (Heritage Computing, 2012a). In Maules Creek Formation.

Table 6.2 (Continued)
Cumulative Groundwater Monitoring Locations

Location	Installation type (no. piezometers)	Bore Depth (m)	Screen/Sensor Depth (mgb)	Sampled lithology	Frequency	Parameters	Rationale
Reg12	Bore (1)	48.3	38.4 – 44.4	Boggabri Volcanics	Quarterly (March, June, September, December) until baseline established, then half yearly.	Water level + field parameters ^a + major ions + metals ^b + nutrients ^c	Within 1 m regolith drawdown zone north- west of MCCM (Heritage Computing, 2012a). In Boggabri Volcanics.
Reg13	Bore (1)	133	128 – 132	Boggabri Volcanics	Quarterly (March, June, September, December) until baseline established, then half yearly.	Water level + field parameters ^a + major ions + metals ^b + nutrients ^c	On edge of 1 m regolith drawdown zone west of BCM (Heritage Computing, 2012a). In Boggabri Volcanics.
Reg14	Bore (1)	102	90 - 96	Alluvium	Quarterly (March, June, September, December) until baseline established, then half yearly.	Water level + field parameters ^a + major ions + metals ^b + nutrients ^c	In Bollol Creek alluvium well outside any predicted drawdown. Adjacent bore Dol – Water GW030472.

a: pH, EC, temperature, dissolved oxygen, turbidity, ORP.

b: Aluminium, arsenic, cadmium, chromium, copper, iron, manganese, nickel and zinc.

c: Nutrients: phosphorus (total), phosphorus (reactive), nitrogen (total).

Figure 6.2 – Cumulative Groundwater Monitoring Locations for the BTM Complex

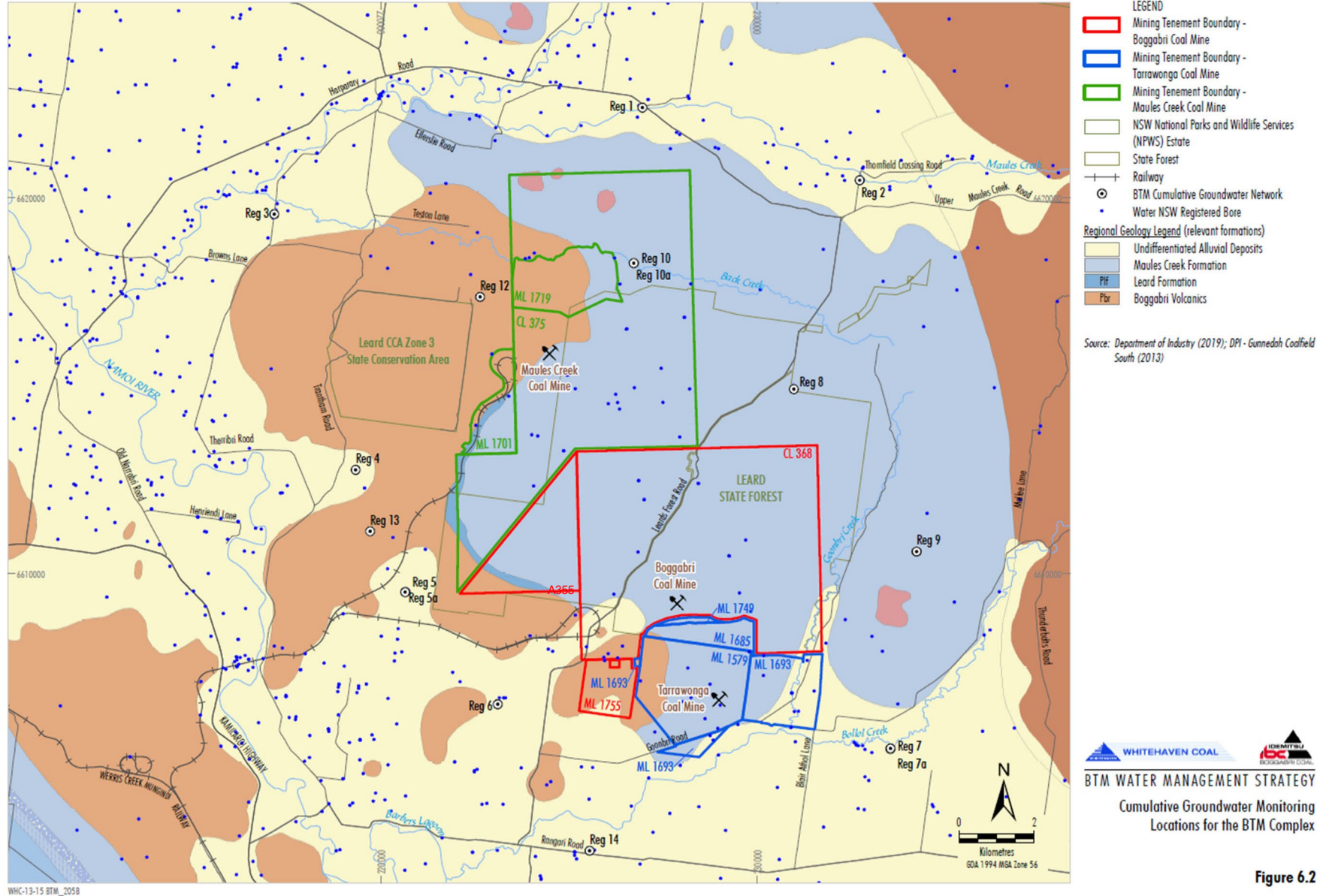


Figure 6.2

7. IMPACT MITIGATION

The site-specific WMPs for each of the mines within the BTM Complex and VCM contain the following:

- water management and mitigations measures;
- water quality and quantity triggers; and
- event definitions.

Where the monitoring program identifies water quality results above a set trigger level then:

- Each mine will be notified as soon as practicable of the monitoring result.
- Monitoring results will be reviewed against previous results to identify a trend or other anomaly.
- An investigation of the potential cause of the impact will be undertaken as well as deliberation between BCM, TCM and MCCM to identify the mine/mines potentially causing the exceedance. The investigator will consider and document:
 - the extent of potential water issue;
 - the receiving environment of the potential water issue; and
 - the timeframe of the potential water issue.
- The mine/mines identified in the previous step as causing the exceedance rectify the issue where possible.
- Report to external agencies will be undertaken, as required by each mine's Project Approval conditions.

8. MANAGEMENT AND IMPLEMENTATION

Each site will maintain the responsibility to comply with the management and monitoring requirements contained in their site management plans, approvals and licences specific to their operation to minimise their impact on water quality and subsequently on the cumulative water quality.

The sites will work collectively to coordinate the modelling programs where required.

The Water Management Strategy is one of a number of cumulative environmental management strategies developed in response to mine development approval conditions. As such, the mines will work collectively to:

- Convene BTM Complex meetings quarterly to discuss cumulative monitoring results.
- Communicate changes to any site-specific monitoring locations.
- Provide access to monitoring locations.
- Share data relating to the cumulative monitoring network.
- Respond in a timely manner to requests to enable the Water Management Strategy to be implemented.

Table 8.1 articulates the roles and responsibilities for identifying and managing cumulative impacts where joint mitigation is required.

Table 8.1
Roles and Responsibilities

Role	Responsibility	Timing
Roles within the BTM Complex Sites Site General Manager or Mine Manager/HSE Manager*	<ul style="list-style-type: none"> • Each site to comply with the management and monitoring requirements contained in their respective site management plans. 	Ongoing
	<ul style="list-style-type: none"> • Each site to complete surface water and groundwater monitoring required under the BTM Water Strategy. 	As required
	<ul style="list-style-type: none"> • Each mine to maintain responsibility for site-specific licencing requirements. 	Ongoing
	<ul style="list-style-type: none"> • Provide the relevant resources to enable implementation of the BTM Water Management Strategy. 	As required
	<ul style="list-style-type: none"> • BTM Complex sites will ensure the relevant operational personnel are aware of this document. 	As required
Site Environmental Representatives (Environmental Superintendent or Environmental Officer*)	<ul style="list-style-type: none"> • Represent respective operations at regular BTM Complex meetings regarding water management. 	As required
	<ul style="list-style-type: none"> • Regularly convene meetings to discuss cumulative monitoring results. 	Quarterly
	<ul style="list-style-type: none"> • Coordinate updates collectively to the Water Management Strategy. 	As required
	<ul style="list-style-type: none"> • Liaise across BTM sites to address trigger events and review mitigation options. 	As required
	<ul style="list-style-type: none"> • Investigate cumulative complaints with other BTM site representatives. 	As required
	<ul style="list-style-type: none"> • Provide access to monitoring locations. 	As required
	<ul style="list-style-type: none"> • Assist in data and information provision as required by the Water Management Strategy. 	Ongoing
	<ul style="list-style-type: none"> • Share data relating to the BTM Complex cumulative monitoring network. 	Ongoing
	<ul style="list-style-type: none"> • Apply and implement the required monitoring and/or modelling methodologies. 	Ongoing and as required
	<ul style="list-style-type: none"> • Notify sites within the BTM Complex of the monitoring result where the monitoring program identifies water quality results exceed trigger level listed in individual WMPs and identify the mine/mines causing the exceedance. 	As required

Role	Responsibility	Timing
	<ul style="list-style-type: none"> Undertake joint mitigation if required as per any relevant agreed terms. 	As required
	<ul style="list-style-type: none"> Implement and coordinate reviews of the Water Management Strategy. 	Refer to Section 9
	<ul style="list-style-type: none"> Implement the site-specific mitigation measures and controls within the applicable site WMP. 	Ongoing
Strategy groundwater & surface water monitoring contractors & modelling consultants	<ul style="list-style-type: none"> Review and if necessary, update any BTM Complex surface water and groundwater models on an agreed periodic basis. 	Refer to Section 9
	<ul style="list-style-type: none"> Advise the relevant site of any in-field monitoring related incidents that may have cumulative relevance to the BTM sites. 	As required

*or delegate

8.1 COMPLAINT MANAGEMENT

It is recognised that each mine has their own complaint handling and incident management protocols, including hotlines, and that these will continue to operate independently. The Water Management Strategy supports the use of the existing mechanisms, with individual mining operations investigating complaints that are raised with them. If the investigating mine considers the complaint to be potentially related to a cumulative impact, it will:

- Advise the other mines of the complaint and potential for cumulative impact as soon as practicable.
- Seek comments from other mines on the complaint/issue.
- Investigate the complaint jointly to determine if the impact was cumulative.
- Develop a response jointly to the complaint.
- Log the complaint on their complaints register where found to be cumulative impact.

9. REVIEW AND REVISION

The BTM Complex WMS has been developed with the input of representatives of BCM, TCM, and MCCM. It is proposed to review, and update if required, the WMS every three years. The review and update of the WMS will be undertaken by BTM, TCM and MCCM collectively. The review would include consideration of new or different monitoring technologies that could be incorporated into the cumulative monitoring program.

Each of the BTM Complex mines are required to prepare a *“Groundwater Management Plan, which includes... a program to validate the groundwater model for the project, including an independent review of the model every 3 years, and comparison of monitoring results with modelled predictions”*. Accordingly, the cumulative groundwater model would be reviewed every three years. Any substantial and relevant changes to the model resulting from the review would be considered in the context of the WMS, and the WMS would be updated to reflect the changes if required. It is noted that this version of the WMS includes consideration of the report *Boggabri, Tarrawonga, Maules Creek Complex Groundwater Model Update* prepared by AGE (2021).

The supporting site-specific WMPs and monitoring plans will be reviewed, and if necessary revised in accordance with Schedule 5, Condition 5 of each site-specific Project Approval:

Within 3 months of the submission of an:

- (a) annual review under condition 4 above;*
- (b) incident report under condition 8 below;*
- (c) audit under condition 10 below; or*
- (d) any modification to the conditions of this approval,*

the Proponent shall review, and if necessary, revise, the strategies, plans, and programs required under this approval to the satisfaction of the Secretary.

The site-specific BCM, TCM and MCCM models undergo regular maintenance and recalibration as additional data on groundwater responses to progressive mining improves the understanding of the groundwater systems.

10. REFERENCES

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Ms Alex Williams
Environment & Community Manager
Boggabri Coal Pty Limited
By: Major Projects Portal

13/01/2026

Subject: BTM Water Management Strategy

Dear Ms Williams

Thank you for lodging an updated version of the Boggabri-Tarrawonga-Maules Creek Complex Water Management Strategy through the major projects portal.

I note the revised strategy includes updated figures, a new surface water monitoring point and minor referencing and formatting changes.

As nominee of the Planning Secretary, I approve the updated Boggabri-Tarrawonga-Maules Creek Complex Water Management Strategy (Version I, 25 June 2025).

Please ensure you make the document publicly available on the project websites at your earliest convenience.

If you wish to discuss the matter further, please contact Rose-Anne Hawkeswood on 9274 6324.

Yours sincerely

A handwritten signature in black ink, appearing to be "SO", written in a cursive style.

Stephen O'Donoghue
Director
Resource Assessments

As nominee of the Planning Secretary