

METROPOLITAN COAL LONGWALLS 308-310

BUILT FEATURES MANAGEMENT PLAN



METROPOLITAN COAL

LONGWALLS 308-310

BUILT FEATURES MANAGEMENT PLAN

SYDNEY WATER

Revision Status Register

Section/Page/ Annexure	Revision Number	Amendment/Addition	Distribution	DPE Approval Date
All	LW308-310 BFMP_SYDWATER-R01-A	Original	Sydney Water, MEG and DPE	-

February 2022

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1 INTRODUCTION

The Metropolitan Coal Mine is owned and operated by Metropolitan Coal Pty Ltd (Metropolitan Coal), which is a wholly owned subsidiary of Peabody Energy Australia Pty Ltd (Peabody). The Metropolitan Coal Mine is located adjacent to the township of Helensburgh (Figure 1), approximately 30 kilometres (km) north of Wollongong in New South Wales (NSW).

Metropolitan Coal was granted approval for the Metropolitan Coal Project (the Project) under section 75J of the NSW *Environmental Planning and Assessment Act 1979* (EP&A Act) on 22 June 2009. A copy of the Project Approval is available on the Peabody website (<http://www.peabodyenergy.com>).

The Project comprises the continuation, upgrade and extension of underground coal mining operations (Longwalls 20-27 and Longwalls 301-317) and surface facilities at Metropolitan Coal. Longwalls 308-310 are situated to the west of Longwalls 301-307 and define the next mining sub-domain within the Project underground mining area (Figures 1, 2 and 3). Longwall 311 on will be subject to future Extraction Plans.

1.1 PURPOSE AND SCOPE

In accordance with Condition 6(f), Schedule 3 of the Project Approval, this Built Features Management Plan – Sydney Water (BFMP-SYDNEY WATER) has been developed to manage the potential consequences of longwall extraction on the Sydney Water assets.

The relationship of this BFMP-SYDNEY WATER to the Metropolitan Coal Environmental Management Structure is shown on Figure 4.

This BFMP-SYDNEY WATER includes post-mining monitoring and management of Sydney Water assets subject to the previously approved Metropolitan Coal Longwalls 305-307 Extraction Plan.

In accordance with Condition 6, Schedule 3 of the Project Approval, the suitably qualified and experienced experts that have prepared this BFMP-SYDNEY WATER, namely representatives from Mine Subsidence Engineering Consultants (MSEC) and Metropolitan Coal were endorsed by the Secretary of the Department of Planning and Environment (DP&E) (now the NSW Department of Planning and Environment¹ [DPE]). This BFMP-SYDNEY WATER has been prepared in consultation with Sydney Water, including consideration of prior consultation during the development of the previously approved Built Features Management Plans.

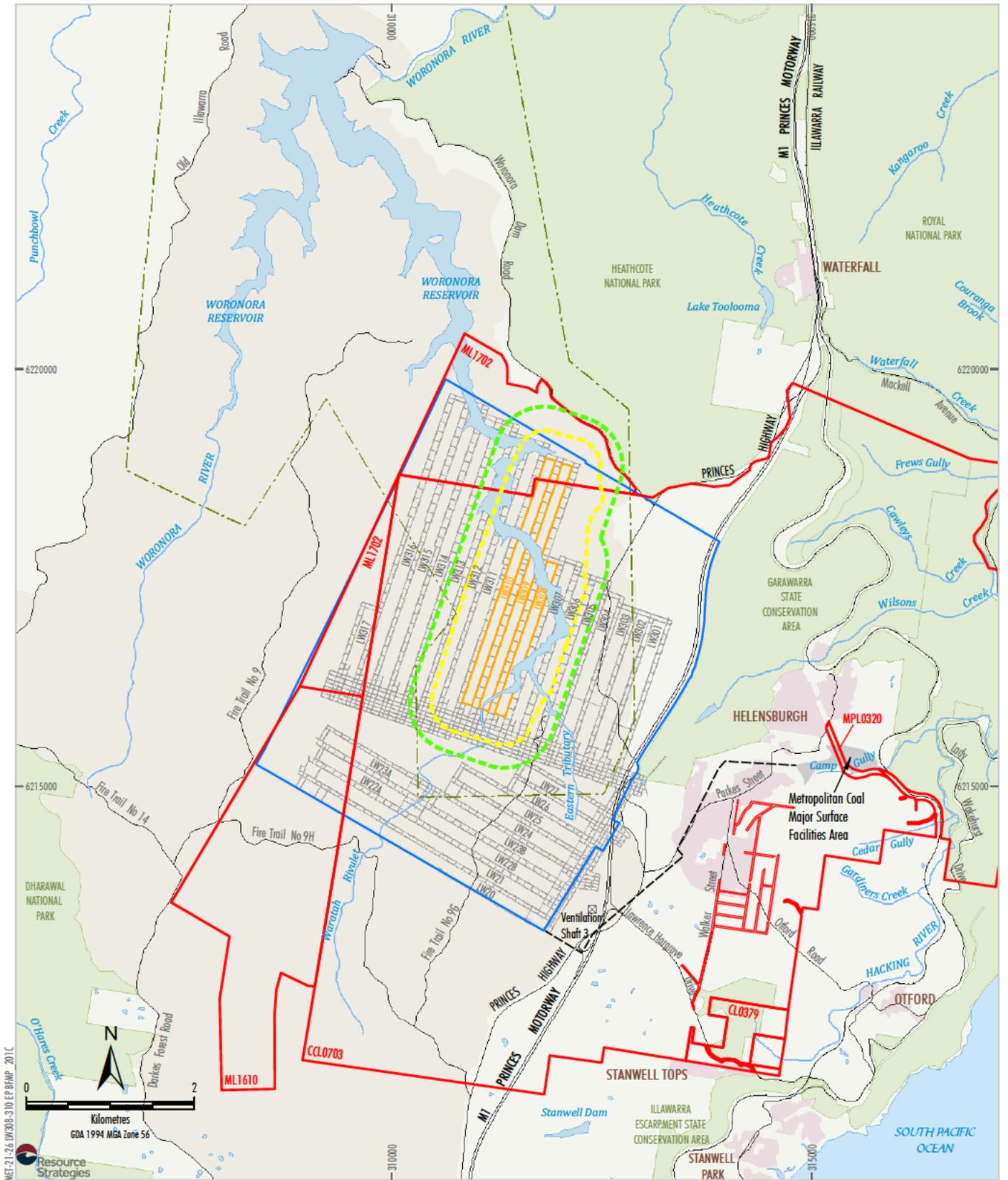
1.2 STRUCTURE OF THE BFMP-SYDNEY WATER

The remainder of the BFMP-SYDNEY WATER is structured as follows:

- Section 2: Describes the review and update of the BFMP-SYDNEY WATER.
- Section 3: Outlines the statutory requirements applicable to the BFMP-SYDNEY WATER.
- Section 4: Provides a revised assessment of the potential subsidence impacts and environmental consequences for Longwalls 308-310.
- Section 5: Details the performance measures and indicators that will be used to assess the Project.
- Section 6: Provides the detailed baseline data.
- Section 7: Describes the monitoring program.

¹ The former Department of Planning, Industry and Environment (DPIE) was renamed to the Department of Planning and Environment (DPE) on 21 December 2021. References to DPIE have been retained throughout the remainder of this document.

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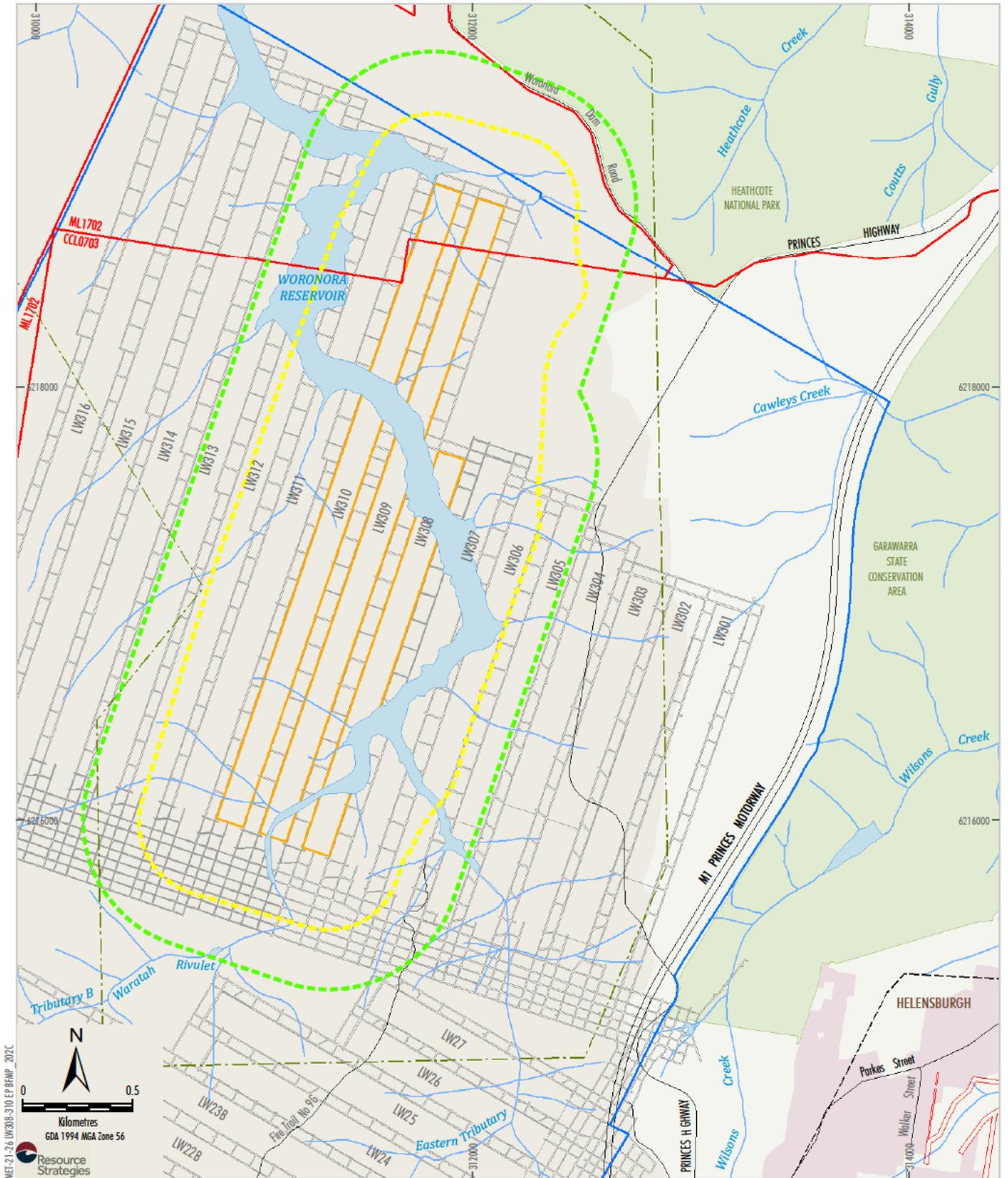


- LEGEND**
- Mining Lease Boundary
 - Woronora Special Area
 - Railway
 - Project Underground Mining Area
Longwalls 20-27 and 301-317
 - Longwalls 308-310 Secondary Extraction
 - Longwalls 308-310 35° Angle of Draw and/or
Predicted 20 mm Subsidence Contour
 - 600 m from Longwalls 308-310
Secondary Extraction
 - Woronora Notification Area
 - Existing Underground Access Drive (Main Drift)

Source: Land and Property Information (2015); Department of Industry (2015);
Metropolitan Coal (2021); MSEC (2021)

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Longwalls 308-310 and
Project Underground Mining Area

Figure 1



MET-21-26 LW308-310 EP BHP 2021



LEGEND

- Mining Lease Boundary
- Woronora Special Area
- Project Underground Mining Area
Longwalls 20-27 and 301-317
- Longwalls 308-310 Secondary Extraction
- Longwalls 308-310 35° Angle of Draw and/or
Predicted 20 mm Subsidence Contour
- 600 m from Longwalls 308-310
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- Woronora Notification Area
- Existing Underground Access Drive (Main Drift)

Source: Land and Property Information (2015); Department of Industry (2015);
Metropolitan Coal (2021); MSEC (2021)

Peabody
METROPOLITAN COAL
Longwalls 308-310 Layout

Figure 2

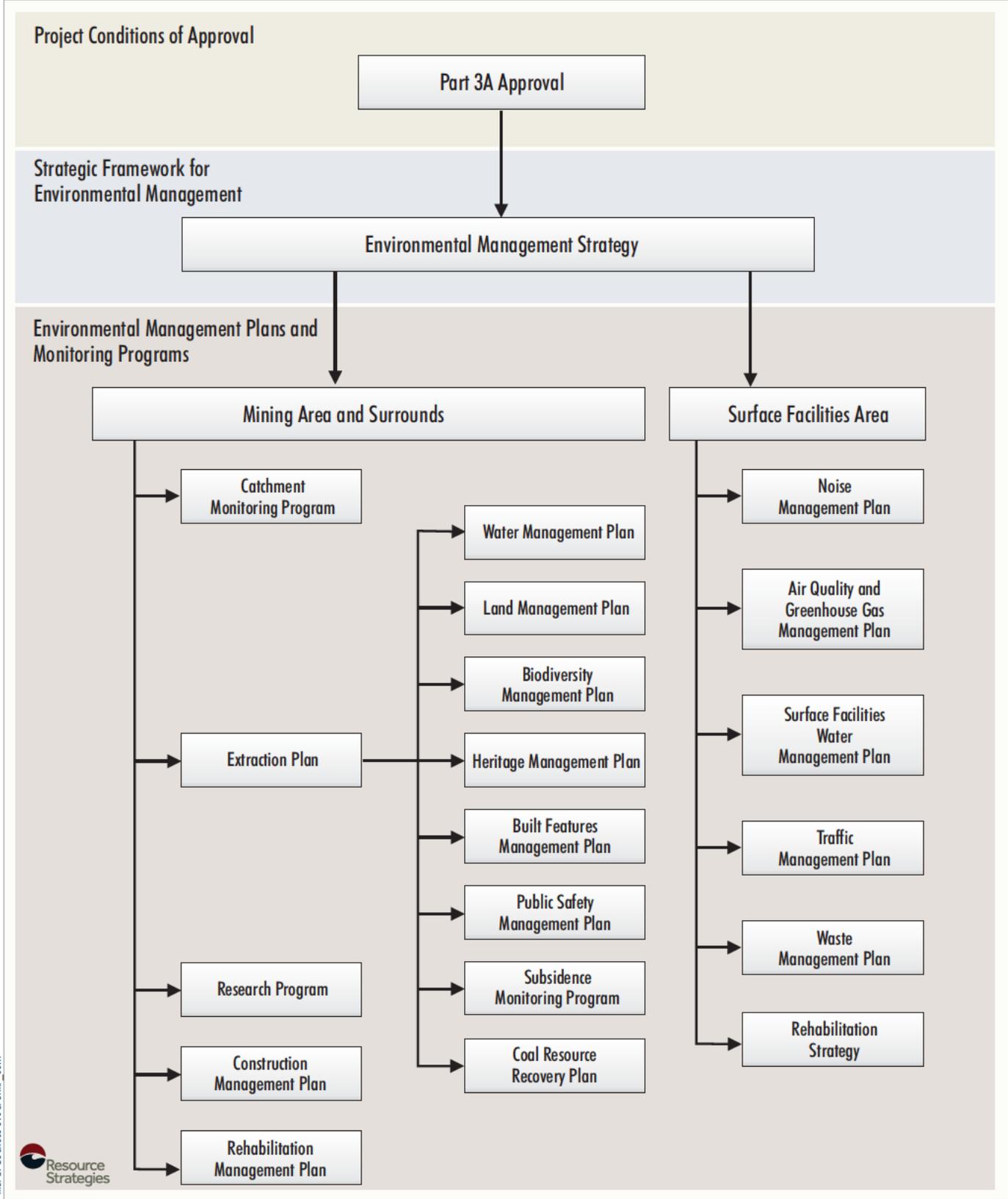


Figure 4

- Section 8: Describes the management measures that will be implemented.
- Section 9: Provides a contingency plan to manage any unpredicted impacts and their consequences.
- Section 10: Describes the Trigger Action Response Plan (TARP) management tool.
- Section 11: Describes the program to collect sufficient baseline data for future Extraction Plans.
- Section 12: Describes the annual review and improvement of environmental performance.
- Section 13: Outlines the management and reporting of incidents.
- Section 14: Outlines the management and reporting of complaints.
- Section 15: Outlines the management and reporting of non-compliances with statutory requirements.
- Section 16: Lists the references cited in this BFMP-SYDNEY WATER.

2 BFMP-SYDNEY WATER REVIEW AND UPDATE

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

- an audit under Condition 8, Schedule 7;
- an incident report under Condition 6, Schedule 7;
- an annual review under Condition 3, Schedule 7; and
- if necessary, revised to the satisfaction of the Director-General (now Secretary) of the DPIE, to ensure the plan is updated on a regular basis and to incorporate any recommended measures to improve environmental performance.

This BFMP-SYDNEY WATER will also be reviewed within three months of approval of any Project modification and if necessary, revised to the satisfaction of the DPIE.

The revision status of this plan is indicated on the title page of each copy of the BFMP-SYDNEY WATER. The distribution register for controlled copies of the BFMP-SYDNEY WATER is described in Section 2.1.

Revisions to any documents listed within this BFMP-SYDNEY WATER will not necessarily constitute a revision of this document.

2.1 DISTRIBUTION REGISTER

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

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

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

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

Metropolitan Coal will be responsible for maintaining the Distribution Register and for ensuring that the notification of revisions is sent by email or post as appropriate. In addition, Metropolitan Coal employees with local computer network access will be able to view the controlled electronic version of this BFMP-SYDNEY WATER on the Metropolitan Coal local area network. Metropolitan Coal will not be responsible for maintaining uncontrolled copies beyond ensuring the most recent version is maintained on Metropolitan Coal's computer system and the Peabody website.

3 STATUTORY REQUIREMENTS

Metropolitan Coal's statutory obligations are contained in:

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

These are described below.

3.1 EP&A ACT APPROVAL

Condition 6(f), Schedule 3 of the Project Approval requires the preparation of a BFMP as a component of Extraction Plan(s) for second workings. Project Approval Condition 6(f), Schedule 3 states:

SECOND WORKINGS

Extraction Plan

6. *The Proponent shall prepare and implement an Extraction Plan for all second workings in the mining area to the satisfaction of the Director-General. This plan must:*

...

- (f) *include a:*

...

- *Built Features Management Plan, which has been prepared in consultation with the owner of the relevant feature, to manage the potential environmental consequences of the Extraction Plan on any built features;*

...

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In addition, Condition 2, Schedule 7 and Condition 7, Schedule 3 of the Project Approval outline management plan requirements that are applicable to the preparation of the BFMP-SYDNEY WATER. Table 1 indicates where each component of the conditions is addressed within this BFMP-SYDNEY WATER.

**Table 1
Management Plan Requirements**

Project Approval Condition	BFMP-SYDNEY WATER Section
<p>Condition 2 of Schedule 7</p> <p>2. The Proponent shall ensure that the management plans required under this approval are prepared in accordance with any relevant guidelines, and include:</p> <p>a) detailed baseline data;</p> <p>b) a description of:</p> <ul style="list-style-type: none"> • the relevant statutory requirements (including any relevant approval, licence or lease conditions); • any relevant limits or performance measures/criteria; • the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the project or any management measures; <p>c) a description of the measures that would be implemented to comply with the relevant statutory requirements, limits, or performance measures/criteria;</p> <p>d) a program to monitor and report on the:</p> <ul style="list-style-type: none"> • impacts and environmental performance of the project; • effectiveness of any management measures (see c above); <p>e) a contingency plan to manage any unpredicted impacts and their consequences;</p> <p>f) a program to investigate and implement ways to improve the environmental performance of the project over time;</p> <p>g) a protocol for managing and reporting any:</p> <ul style="list-style-type: none"> • incidents; • complaints; • non-compliances with statutory requirements; and • exceedances of the impact assessment criteria and/or performance criteria; and <p>h) a protocol for periodic review of the plan.</p>	<p>Section 6</p> <p>Section 3</p> <p>Section 5</p> <p>Section 5</p> <p>Sections 7, 8, 9 and 10</p> <p>Sections 7, 8 and 12</p> <p>Section 9 and Appendix 3</p> <p>Sections 7 and 12</p> <p>Section 13</p> <p>Section 14</p> <p>Section 15</p> <p>Section 9 and Appendix 3</p> <p>Section 2</p>
<p>Condition 7 of Schedule 3</p> <p>7. In addition to the standard requirements for management plans (see condition 2 of schedule 7), the Proponent shall ensure that the management plans required under condition 6(f) above include:</p> <p>a) a program to collect sufficient baseline data for future Extraction Plans;</p> <p>b) a revised assessment of the potential environmental consequences of the Extraction Plan, incorporating any relevant information that has been obtained since this approval;</p> <p>c) a detailed description of the measures that would be implemented to remediate predicted impacts; and</p> <p>d) a contingency plan that expressly provides for adaptive management.</p>	<p>Section 11</p> <p>Section 4</p> <p>Section 8</p> <p>Section 9 and Appendix 3</p>

3.2 LICENCES, PERMITS AND LEASES

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

- The conditions of mining leases issued by the NSW Division of Resources and Geoscience (DRG) (now Mining, Exploration and Geoscience [MEG]), under the NSW *Mining Act 1992* (e.g. Consolidated Coal Lease [CCL] 703, Mining Lease [ML] 1610, ML 1702, Coal Lease [CL] 379 and Mining Purpose Lease 320).
- The *Metropolitan Coal Mining Operations Plan 1 October 2021 to 30 September 2023* approved by the Resources Regulator.
- The conditions of Environment Protection Licence (EPL) No. 767 issued by the NSW Environment Protection Authority (EPA) under the NSW *Protection of the Environment Operations Act 1997*. Revision of the EPL will be required prior to the commencement of Metropolitan Coal activities that differ from those currently licensed.
- The prescribed conditions of specific surface access leases within CCL 703 for the installation of surface facilities as required.
- Water Access Licences (WALs) issued by the NSW Department of Industry – Water (now DPIE – Water) under the NSW *Water Management Act 2000*, including WAL 36475 under the *Water Sharing Plan for the Greater Metropolitan Region Groundwater Sources 2011* and WAL 25410 under the *Water Sharing Plan for the Greater Metropolitan Region Unregulated River Water Sources 2011*.
- Mining and workplace health and safety related approvals granted by the Resources Regulator and WorkCover NSW.
- Supplementary approvals obtained from WaterNSW for surface activities within the Woronora Special Area (e.g. fire road maintenance activities).

3.3 OTHER LEGISLATION

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

The following Acts may be applicable to the conduct of the Project (Helensburgh Coal Pty Ltd [HCPL], 2008)²:

- *Biodiversity Conservation Act 2016*;
- *Biosecurity Act 2015*;
- *Contaminated Land Management Act 1997*;
- *Crown Land Management Act 2016*;
- *Dams Safety Act 2015*;
- *Dangerous Goods (Road and Rail Transport) Act 2008*;
- *Energy and Utilities Administration Act 1987*;
- *Fisheries Management Act 1994*;

² The list of potentially applicable Acts has been updated to reflect changes to the Acts that were in force at the time of submission of the Metropolitan Coal Project Environmental Assessment (Project EA) (HCPL, 2008).

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- *Mining Act 1992;*
- *National Parks and Wildlife Act 1974;*
- *Protection of the Environment Operations Act 1997;*
- *Rail Safety (Adoption of National Law) Act 2012;*
- *Roads Act 1993;*
- *Water Act 1912;*
- *Water Management Act 2000;*
- *Water NSW Act 2014;*
- *Work Health and Safety Act 2011;* and
- *Work Health and Safety (Mines and Petroleum Sites) Act 2013.*

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

4 REVISED ASSESSMENT OF POTENTIAL ENVIRONMENTAL CONSEQUENCES

4.1 EXTRACTION LAYOUT

Longwalls 308-310 and the area of land within 600 metres (m) of Longwalls 308-310 secondary extraction are shown on Figures 2 and 3. Longwall extraction will occur from north to south. The layout of Longwalls 308 and 309 include 138 m panel widths (void) and 70 m pillar widths (solid). The layout of Longwall 310 includes a 138 m panel width (void) and a 70 m tailgate pillar width. Approximately 1,370 m from the commencing end of Longwall 310, the maingate pillar width of Longwall 310 decreases from 70 m to 45 m until the finishing end of Longwall 310 (Figure 2).

The provisional extraction schedule for Longwalls 308-310 is provided in Table 2.

Table 2
Provisional Extraction Schedule

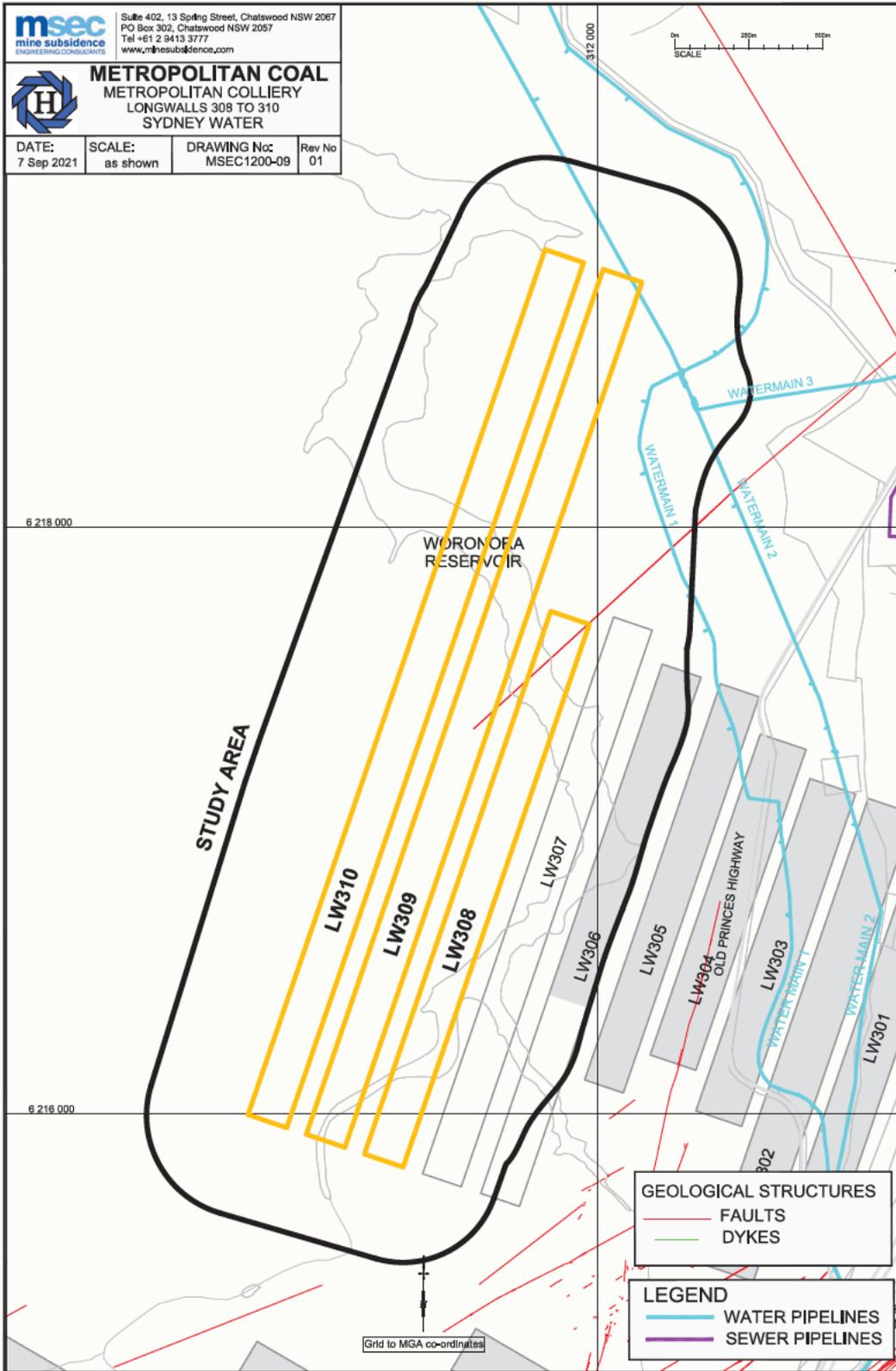
Longwall	Estimated Start Date	Estimated Duration	Estimated Completion Date
Longwall 308	February 2023	7 Months	August 2023
Longwall 309	September 2023	11 Months	July 2024
Longwall 310	August 2024	12 Months	July 2025

The future Extraction Plans will consider the cumulative subsidence effects, subsidence impacts and/or environmental consequences. Note that the total cumulative predicted subsidence effects, subsidence impacts and/or environmental consequences at the completion of the Project are considered in the Metropolitan Coal Project Environmental Assessment (Project EA) (HCPL, 2008) and the Preferred Project Report (HCPL, 2009).

4.1.1 Sydney Water Assets

Figure 5 illustrates the Sydney Water assets in relation to Longwalls 308-310 extraction. The assets include one 300 millimetre (mm) diameter and two 200 mm cast iron cement lined (CICL) potable water supply pipelines (referred in this BFMP as 'Water Main 1', 'Water Main 2' and 'Water Main 3').

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Source: MSEC (2021)

Figure 5

Other networks of potable water and sewer pipelines are located outside the study area at Helensburgh at distances greater than 2 km to the south-east of Longwall 308, as well as sewer mains approximately 1.1 km to the north-east of Longwall 308.

4.2 REVISED SUBSIDENCE AND IMPACT PREDICTIONS

4.2.1 Revised Subsidence Predictions

Subsidence predictions for Longwalls 20-44 in relation to the Sydney Water assets was conducted by MSEC (2008) as part of the Metropolitan Coal Project EA. MSEC (2008) includes a table summarising the incremental systematic subsidence parameters for the extraction of each longwall from Longwalls 20-44. These include:

- maximum predicted incremental subsidence (vertical movement);
- maximum predicted incremental tilt along alignment;
- maximum predicted incremental tilt across alignment;
- maximum predicted incremental tensile strain; and
- maximum predicted incremental compressive strain.

Revised subsidence and impact predictions for the extraction of Longwalls 308-310 on Sydney Water assets were conducted by MSEC and reported in MSEC (2021). In relation to subsidence predictions for Longwalls 308-310, MSEC (2021) make the following conclusions:

- The Sydney Water 'Water Main' 1 is located within the Study Area and is located 145 m to the east of Longwall 309 at its nearest point. The Sydney Water 'Water Main 2' is located within the Study Area and crosses the north-east of Longwall 309. The Sydney Water 'Water Main 3' is located within the Study Area and extends to the north-east from Water Main 2 at approximately 315 m east of Longwall 309. Water Main 1, Water Main 2 and Water Main 3 are pressure mains and are unlikely to be adversely impacted by mining induced vertical subsidence or tilt.
- Water Main 2 crosses a tributary to Woronora Reservoir approximately 110 m to the north of Longwalls 309 and 310. The pipeline is expected to experience valley related effects at this location. It is possible that impacts could occur due to valley closure to the north of Longwalls 309 and 310, however it is noted that the predicted valley closure is small in magnitude.
- Water Main 1, Water Main 2 and Water Main 3 are direct buried and are likely to experience curvatures and ground strains resulting from the extraction of Longwalls 308-310. The predicted strains for the water mains are similar to those where longwalls in the Southern Coalfield have previously mined directly beneath similar pipelines. It has been found from this previous experience that the impacts on CICL pipelines in the Southern Coalfield are rare and generally of minor nature. It is expected that the potential impacts on the Sydney Water infrastructure (e.g. minor leakages) can be managed with the implementation of appropriate monitoring and management strategies. However, the incidence of impacts is likely to be very low and of minor nature. No impacts to Water Main 1 or Water Main 2 have been recorded as a result of the mining of Longwalls 301-305.
- The sewer main located approximately 1100 m to the north-east of Longwall 309, and networks of water and sewerage pipelines located within the township of Helensburgh are not expected to experience any measurable vertical subsidence, tilts, curvatures or strains. The pipelines could experience low level far-field horizontal movements. However, these absolute horizontal movements tend to be bodily movements that are not associated with measurable strains. It is unlikely that these pipelines would experience adverse impacts from the extraction of Longwalls 308-310.

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4.2.2 Risk Assessment

In accordance with the *Guidelines for the Preparation of Extraction Plans* (DP&E and DRE, 2015) a risk assessment meeting for Longwalls 301-303 was held on 15 August 2016. Attendees at the risk assessment meeting included representatives from Metropolitan Coal, Sydney Water, MSEC, Resource Strategies and Axys Consulting (risk assessment facilitator).

The investigation and analysis methods used during the risk assessment included:

- preliminary identification of Sydney Water assets³;
- review of the revised subsidence predictions and potential impacts on Sydney Water assets (including consideration of past experience in the Southern Coalfield); and
- development of a preliminary monitoring plan.

A number of risk control measures and procedures were identified during the risk assessment which considered the extraction of coal beneath the Sydney Water assets.

The risk control measures and procedures were incorporated into the Longwalls 301-303 BFMP and the program and status of implementation is summarised in Table 3.

The risk control measures and procedures identified for Longwalls 301-304 mining directly beneath Sydney Water Pipelines were reviewed and continued for the extraction of Longwalls 305-307.

Table 3
Program for Implementation of Proposed Risk Control Measures and Procedures

Risk Control Measure / Procedure		Timing
<i>Baseline Data / Validation</i>		
1	Carry out an audit of Sydney Water pipelines and valve chambers to confirm physical access is available	Completed
2	Install surface indicators (markers) so that pipelines are easily located	Completed
<i>Management / Monitoring / Response Measures</i>		
3	Include acoustic monitoring to monitor for leakage in water mains during mining of Longwalls 301-303	Completed LW303
4	Investigate and develop a TARP utilising the results of acoustic monitoring	Discontinued following trial
<i>Contingency Planning</i>		
5	Include a list of key contacts of water suppliers that could assist to provide additional water for Sydney Water customers.	Complete

The risk control measures and procedures identified were reviewed and proposed to be continued for the extraction of Longwalls 308-310

³ During the risk assessment meeting, Sydney Water confirmed that the water storage tanks and connecting pipelines at the Garrawarra Centre Complex (initially considered during the Sydney Water risk assessment) were not a Sydney Water asset and are therefore not included in this BFMP.

5 PERFORMANCE MEASURES AND INDICATORS

The Project Approval requires Metropolitan Coal not to exceed the subsidence impact performance measures outlined in Table 1 of Condition 1, Schedule 3. The subsidence impact performance measure specified in Table 1 of Condition 1, Schedule 3 in relation to built features is:

Safe, serviceable and repairable, unless the owner and the MSB agree otherwise in writing.

The performance indicators proposed to ensure that the above performance measure is achieved include:

- no more than repairable (minor) leakages of the water pipelines occur due to mining; and
- no more than repairable (minor) defects (cracks, etc.) in the structural integrity of the pipes and associated connections occur due to mining.

Section 7 of this BFMP-SYDNEY WATER describes the monitoring that will be conducted to assess the Project against the above performance measure. Sections 8 and 9 of this BFMP-SYDNEY WATER provide management measures and a Contingency Plan in the event the performance indicators are triggered or the performance measure is exceeded, respectively.

6 BASELINE DATA

A site inspection and audit of the pipelines occurred prior to commencement of secondary extraction of Longwall 301 to establish the pre-mining condition of the lines. The inspection included:

- confirmation of physical access to the pipeline and valve chambers;
- recording of any existing pipeline defects (cracking, etc.);
- recording of any existing pipeline leaks; and
- inspections of fittings (valves and hydrants) along the water mains in the vicinity of the longwalls for operability and condition.

The site inspection and audit were conducted by representative(s) from Sydney Water and Metropolitan Coal. The inspections conducted as part of baseline included photographic records where appropriate.

Surface indicators (markers) were installed by Metropolitan Coal so that pipelines are easily located if the need to carry out repairs was required. Tracks were restored near pipeline to allow easier access for monitoring with vegetation removal and road repairs.

Prior to Longwall 309 commencement, the baseline audit will be extended from Firetrail 'I' (at the junction of Water Main 3 and Water Main 2) north through the valley overlying the north-east corner of Longwall 309 (along Water Main 2), including vegetation clearing to re-establish the access track and pipeline markers for monitoring purposes.

6.1 KEY CONTACTS LIST

The list of key contacts for Peabody and Sydney Water during the development and implementation of this BFMP are provided in Table 4.

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Table 4
List of Key Contacts

Company / Agency	Peabody (Metropolitan Coal)	Sydney Water	Sydney Water
Position	Manager – Technical Services	Networks Manager South (acting) Senior Networks Operation Engineer	Operations Lead Engineer - Networks South (Status Reports)
Name	Jon Degotardi	Andrzej Krawiec	Brendan Cantlon
Email Contact	[REDACTED]	[REDACTED]	[REDACTED]
24hr Contact	Control Room 24hr 02 4294 7333	24hr Contact 132 090	

7 MONITORING

A monitoring program has been implemented to monitor the impacts of the Project on the Sydney Water assets. Table 5 summarises the BFMP-SYDNEY WATER monitoring components.

Table 5
BFMP-SYDNEY WATER Monitoring Program Overview

Program	Aspect	Method	How	Why	Timing	Frequency
Baseline	Pipelines	Survey	Firetrail 'I' water subsidence monitoring points at approximately 20 m spacing	Establish base condition	Prior to Longwall 308 extraction – Firetrail I from southern edge of study area up to junction with Water Main 3	Once
		Visual inspection	Identify evidence of pre-existing cracks or leaks in the pipelines or fittings		Prior to Longwall 309 extraction - extension into the northern valley, north-west of Water Main 3 connection, to northern limits of study area	
During Mining	Pipelines	Survey	Firetrail I water subsidence monitoring points at approximately 20 m spacing	Monitor subsidence effects during mining (subsidence, tilt, strain)	At the completion of each longwall or Weekly on commencement of Longwall 309 and Longwall 310 (when longwall is within \pm 400 m of passing under pipeline and continuing until subsidence observations reduce below survey tolerance	
		Visual inspection (Metropolitan Coal)	Identify evidence of subsidence effects (surface ground cracks), or cracks or leaks in the pipelines or fittings		During survey events or Weekly when longwall \pm 400 m of passing under pipeline	

Table 5 (continued)
BFMP-SYDNEY WATER Monitoring Program Overview

Program	Aspect	Method	How	Why	Timing	Frequency
During Mining (cont.)	Pipelines (cont.)	Visual inspection (Sydney Water)	Identify evidence of subsidence effects (surface ground cracks), or cracks or leaks in the pipelines or fittings		As per Sydney Water routine inspection program	
	Helensburgh Tank Reservoir	Storage Levels (Sydney Water)	Monitor for sudden reduction in water levels		24 hours, 7 days per week (Sydney Water)	
Post Mining	Pipelines	Visual inspection (Sydney Water)		Validation	Next scheduled post mining	Once

Metropolitan Coal understands that Sydney Water monitors the nearby Helensburgh Tank/reservoir storage levels 24 hours, 7 days per week to operate as an indicator of significant water loss.

The frequency of monitoring will be reviewed either:

- in accordance with the Annual Review outlined in Section 12; or
- if triggered as a component of the Contingency Plan as outlined in Section 9 of this BFMP-SYDNEY WATER.

Where relevant, inspections of subsidence impacts will include photographic record of the impacts for comparison with baseline photographic records. Sydney Water or their delegates will conduct the various visual inspections. Metropolitan Coal will be notified of the timing of inspections and accompany Sydney Water or delegates if considered necessary. All personnel will complete necessary inductions or orientation relevant to the tasks required.

7.1 SUBSIDENCE PARAMETERS

Subsidence parameters (i.e. subsidence, tilt, tensile strain, compressive strain, absolute horizontal translation, and differential leg movement) associated with mining will be measured by Metropolitan Coal in accordance with the Longwalls 308-310 Subsidence Monitoring Program (Figure 6).

In summary, surveys will be conducted to measure subsidence movements in three dimensions using a total station survey instrument. Subsidence movements (i.e. subsidence, tilt, tensile strain and compressive strain) will be measured along subsidence lines that have been positioned across the general landscape.

Monitoring of subsidence parameters specific to the Sydney Water assets include the survey line along the Firetrail I Water Line. The surveys will monitor the general movement about the longwalls and the data will allow evaluation of the likely ground movements about the pipelines (by comparison between measured and predicted movements).

7.2 SUBSIDENCE IMPACTS

7.2.1 Pipelines

Routine visual inspections by Sydney Water will also be conducted of the pipelines in accordance with the Sydney Water inspection program. For pipelines, this generally includes:

- assessment of the condition of water mains and associated fittings;
- inspection on fittings (valves and hydrants); and
- detection of leaks, breaks or water pressure drops in the pipeline reported by Sydney Water customers.

A visual inspection of the pipeline route will occur prior to commencement of Longwall 308 and following completion of Longwall 308, 309 and 310 to identify surface ground cracks, cracks or leaks in the pipelines, and to confirm that fittings can be accessed beneath surface fittings and are operable.

Weekly observations of subsidence impacts along the pipeline route within ± 400 m of the longwall extraction face will be conducted on commencement of Longwalls 309 and 310⁴ for the first 400 m of extraction until subsidence reduces below the level of survey accuracy. Specific details that will be noted and/or photographed include:

- the date of the inspection;
- the location of longwall extraction (i.e. the longwall chainage);
- assessment against the performance indicators and performance measure;
- whether any actions are required (e.g. initiation of the Contingency Plan, incident notification, implementation of appropriate safety controls, review of public safety, etc.); and
- any other relevant information.

At any stage during the mining of Longwalls 308-310, if an abnormal leak is noted then this will be reported directly to Sydney Water contact in Table 4 by email.

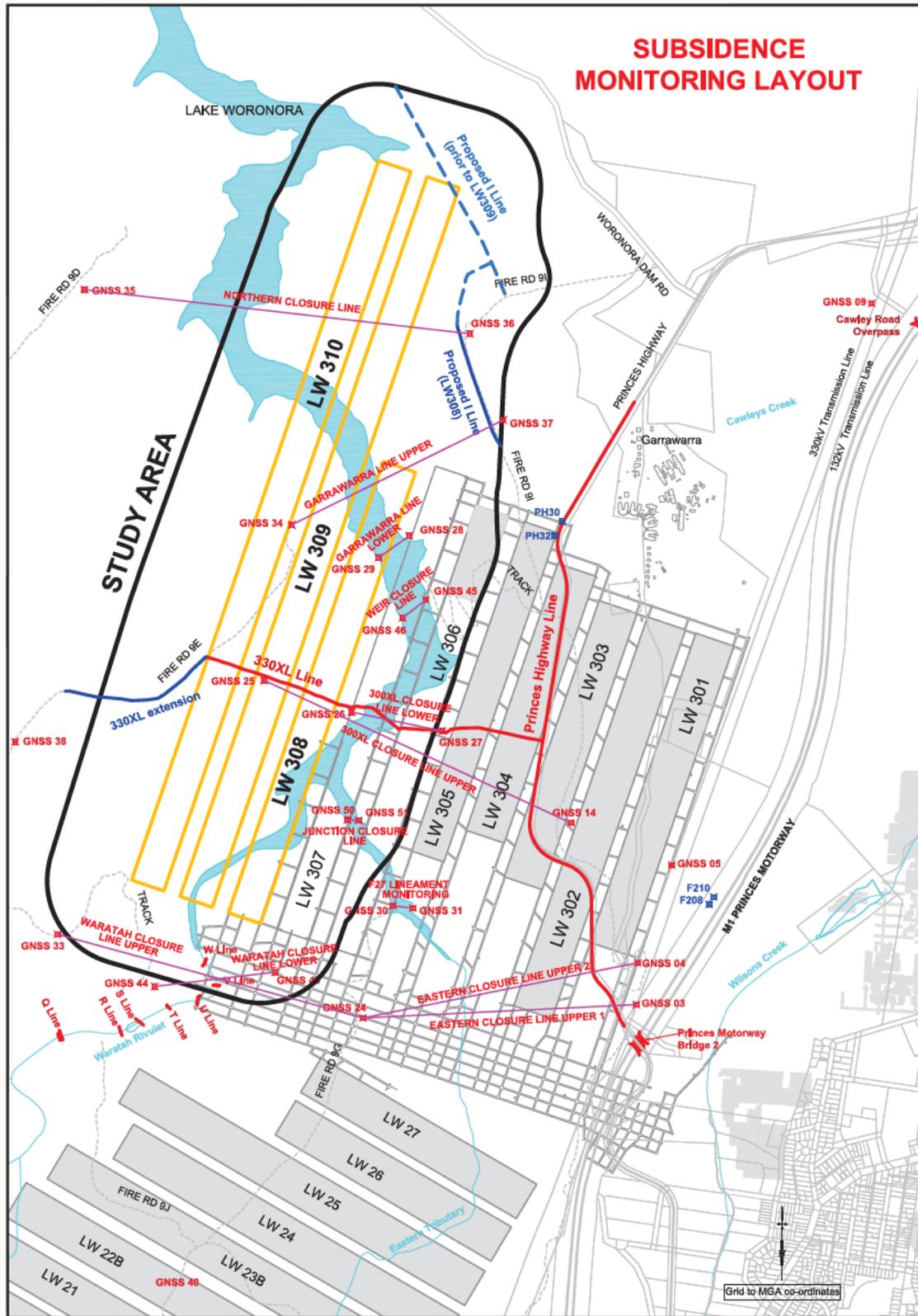
An acoustic monitoring trial was initiated in consultation with Sydney Water for Watermain 1 during Longwall 303 extraction to confirm suitability of technique. The acoustic monitoring was continued for Longwalls 304 to 307, with the network extended. The acoustic trial will be discontinued beyond Longwall 307 with limited benefits being realised from the technology for this style of subsidence monitoring application.

7.3 ENVIRONMENTAL CONSEQUENCES

Metropolitan Coal and Sydney Water will compare the results of the subsidence impact monitoring against the built features performance indicators and performance measure. In the event the observed subsidence impacts exceed the performance measure, Metropolitan Coal and Sydney Water will assess the consequences of the exceedance in accordance with the Contingency Plan described in Section 9.

⁴ The commencing position (i.e. northern end) of Longwall 308 is greater than 400 m from the pipeline route, therefore has not been identified for weekly visual inspections.

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MET-21-26 LW308-310 EPRHWP_017A

Source: MSEC (2021)

Figure 6

8 MANAGEMENT MEASURES

A number of potential management measures in relation to pipelines are considered to be applicable. These include:

- repair of broken pipes or fittings by Sydney Water maintenance staff⁵; and
- if major adjustment is required to re-align pipe, the pipe can be temporarily end capped to maintain supply to customers either side of break and/or alternative water supply provided to service properties while repair of the water main is in progress⁶.

A list of potential water suppliers (and key contact details) to temporarily supply water to Sydney Water customers (if required) is provided below:

- Aquarius (0438 383 848); and
- CAC Transport (0418 386 177).

Follow-up inspections will be conducted to assess the effectiveness of the management measures implemented and the requirement for any additional management measures.

Management measures will be reported in the Annual Review (Section 12).

9 CONTINGENCY PLAN

In the event the subsidence impacts observed exceed the performance measure detailed in Section 5 of this BFMP–SYDNEY WATER, Metropolitan Coal will implement the following Contingency Plan (Appendix 3):

- The observation will be reported to the Technical Services Manager within 24 hours.
- The observation will be recorded in the Built Features Management Plan – Subsidence Impact Register (Appendix 2) consistent with the monitoring program described in Section 7 of this BFMP-SYDNEY WATER.
- Metropolitan Coal will report any exceedance of the performance measure to the DPIE and Sydney Water as soon as practicable after Metropolitan Coal becomes aware of the exceedance.
- Metropolitan Coal will assess public safety and where appropriate implement safety measures in accordance with the Metropolitan Coal Longwalls 308-310 Public Safety Management Plan.
- Metropolitan Coal will conduct an investigation to evaluate the potential contributing factors. The investigation will:
 - include the re-survey of relevant subsidence monitoring lines;
 - compare and critically analyse measured versus predicted subsidence parameters;
 - review measured subsidence parameters against the observed impact; and
 - review the subsidence monitoring program and update the program where appropriate.

⁵ It is understood that given the dual water pipe lines there is system redundancy to continue providing water to customers even with a pipeline out of service. A pipeline failure (non-mining related) was observed to occur in 2019 in the valley north of the future LW309 that took a number of days to repair and did not result in disruption of services.

⁶ It is understood that water supply via reservoirs at Helensburgh, Stanwell Tops and Stanwell Park is available for a period of up to 12 hours.

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- The course of action with respect to the identified impact(s), in consultation with specialists and relevant agencies, will include:
 - a program to review the effectiveness of the contingency measures; and
 - consideration of adaptive management.
- Contingency measures are provided in Section 9.1.
- Metropolitan Coal will submit the proposed course of action to the DPIE for approval.
- Metropolitan Coal will implement the approved course of action to the satisfaction of the DPIE.

In accordance with Condition 6, Schedule 6 of the Project Approval, Metropolitan Coal will provide a suitable offset to compensate for the impact to the satisfaction of the Secretary of DPIE if either the contingency measures implemented by Metropolitan Coal have failed to remediate the impact or the Secretary determines that it is not reasonable or feasible to remediate the impact.

Metropolitan Coal will comply with the NSW *Coal Mine Subsidence Compensation Act 2017* in the event that property damages occur as a result of mining Longwalls 308-310.

9.1 CONTINGENCY MEASURES

Contingency measures will be developed in consideration of the specific circumstances of the feature (e.g. the location, nature and extent of the impact, and the assessment of environmental consequences).

Contingency measures that could be considered in the event the performance measure for the pipelines is exceeded are summarised in Table 6. The decision tree for the contingency measures are shown in Appendix 3.

Table 6
Contingency Measures – Pipelines

Environmental Consequence	Contingency Measures	
	Measure	Description
Impact on Pipelines	Re-install water main.	<ul style="list-style-type: none"> • Construction of new section of water main.

10 TARP – MANAGEMENT TOOL

The framework for the various components of the BFMP-SYDNEY WATER are summarised in the BFMP-SYDNEY WATER TARP shown in Table 7. The BFMP-SYDNEY WATER TARP shows how the various predicted subsidence impacts, monitoring components, performance measures, and responsibilities are structured to achieve compliance with the relevant statutory requirements, and the framework for management and contingency actions.

The TARP comprises:

- baseline conditions;
- predicted subsidence impacts;
- trigger levels from monitoring to assess performance; and
- triggers that flag implementation of contingency measures.

The TARP system provides a simple and transparent snapshot of the monitoring of environmental performance and the implementation of management and/or contingency measures.

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**Table 7
BFMP-SYDNEY WATER Trigger Action Response Plan**

SYDNEY WATER Pipelines				
<i>Risk: Subsidence effect on pipelines resulting in impact to structural integrity and leakage / loss of water.</i>				
TRIGGER LEVEL				RESPONSE
Level 1 - Normal				
Expected subsidence conditions (at M1 Princes Motorway)				
LW303 <ul style="list-style-type: none"> less than 975 mm Tilt <ul style="list-style-type: none"> less than 4.0 mm/m Tensile strain <ul style="list-style-type: none"> less than 0.9 mm/m Compressive strain <ul style="list-style-type: none"> less than 1.6 mm/m 	LW304 <ul style="list-style-type: none"> less than 1,050 mm Tilt <ul style="list-style-type: none"> less than 4.0 mm/m Tensile strain <ul style="list-style-type: none"> less than 0.9 mm/m Compressive strain <ul style="list-style-type: none"> less than 1.6 mm/m 	LW305-307 <ul style="list-style-type: none"> less than 1,100 mm Tilt <ul style="list-style-type: none"> less than 3.5 mm/m Tensile strain <ul style="list-style-type: none"> less than 0.9 mm/m Compressive strain <ul style="list-style-type: none"> less than 1.6 mm/m 	LW308-310 Tensile strain <ul style="list-style-type: none"> less than 0.9 mm/m Compressive strain <ul style="list-style-type: none"> less than 11 mm/m Valley Closure <ul style="list-style-type: none"> less than 100 mm 	Normal Operations <ul style="list-style-type: none"> Pipelines are safe and serviceable. Negligible impact to Sydney Water infrastructure. Continue monitoring activities as planned. Note: Subsidence for LW308-310 is predicted to be a total of 70 mm and a tilt maxima of 0.5 mm/m. Given the low values compared to recent mining experience with nil impacts it is reasonable for the monitoring TARP to focus on observed strains and valley closure
Level 2 - Monitor				
Subsidence elevated up to +15% of predicted but pipeline condition normal				
LW303 <ul style="list-style-type: none"> between 975 and 1,120 mm Tilt <ul style="list-style-type: none"> between 4.0 and 4.6 mm/m Tensile strain <ul style="list-style-type: none"> between 0.9 mm/m and 1.0 mm/m Compressive strain <ul style="list-style-type: none"> between 1.6 mm/m and 1.8 mm/m 	LW304 <ul style="list-style-type: none"> between 1,050 and 1,200 mm Tilt <ul style="list-style-type: none"> between 4.0 and 4.6 mm/m Tensile strain <ul style="list-style-type: none"> between 0.9 mm/m and 1.0 mm/m Compressive strain <ul style="list-style-type: none"> between 1.6 mm/m and 1.8 mm/m 	LW305-307 <ul style="list-style-type: none"> between 1,100 and 1,265 mm Tilt <ul style="list-style-type: none"> between than 3.5 and 4.0 mm/m Tensile strain <ul style="list-style-type: none"> between 0.9 mm/m and 1.0 mm/m Compressive strain <ul style="list-style-type: none"> between 1.6 mm/m and 1.8 mm/m 	LW308-310 Tensile strain <ul style="list-style-type: none"> between 0.9 mm/m and 1.0mm/m Compressive strain <ul style="list-style-type: none"> between 11 mm/m and 12.7 mm/m Valley Closure <ul style="list-style-type: none"> less than 115 mm 	Continue operations but report on subsidence anomaly <ul style="list-style-type: none"> Pipelines are safe and serviceable. Negligible impact to Sydney Water infrastructure. Metropolitan Coal <ul style="list-style-type: none"> Immediately resurvey subsidence line in affected area to confirm results. Engage subsidence expert to assess results. Confirm results are consistent with adjacent subsidence lines. Compare and critically analyse measured versus predicted subsidence. Inform and provide report to Sydney Water of subsidence results. Collaboratively share information with Sydney Water to monitor situation. Sydney Water <ul style="list-style-type: none"> Assess information provided by Metropolitan Coal. Continue to conduct routine inspection program.

Table 7 (Continued)
BFMP-SYDNEY WATER Trigger Action Response Plan

SYDNEY WATER Pipelines					
<i>Risk: Subsidence effect on pipelines resulting in impact to structural integrity and leakage / loss of water.</i>					
TRIGGER LEVEL				RESPONSE	
Level 3 - Cautionary					
Anomalous service condition detected or Subsidence beyond +15% of predicted					
SYDNEY WATER Pipelines	LW303	LW304	LW305-307	LW308-310	<p>Investigate & Resolve</p> <ul style="list-style-type: none"> Pipelines are safe and serviceable. Indication of impact (cracks / leakage) to Sydney Water infrastructure. <p>Metropolitan Coal</p> <ul style="list-style-type: none"> Steps as per Level 2 event, plus: <ul style="list-style-type: none"> Inform Sydney Water and NSW Principal Subsidence Engineer of subsidence results (immediately following awareness of trigger). Inform Sydney Water, contact in Table 4, of any abnormal leaks observed Increase frequency of subsidence surveys to weekly in affected area. In conjunction with Sydney Water identify impact location and have Sydney Water assess pipeline condition. Review the subsidence monitoring program and update the program where appropriate. Provide report on issue to both Sydney Water and DPIE. <p>Sydney Water</p> <ul style="list-style-type: none"> Inform Metropolitan Coal of deformations, cracks or leaks observed during routine monitoring inspections. In conjunction with Metropolitan Coal identify impact location, inspect pipeline infrastructure, assess condition and determine appropriate response (e.g. greater monitoring data or frequency, or schedule maintenance on the pipeline infrastructure). Make determination if other measures necessary to avoid further impact.
	<ul style="list-style-type: none"> greater than 1,120 mm 	<ul style="list-style-type: none"> greater than 1,200 mm 	<ul style="list-style-type: none"> greater than 1,265 mm 	Tensile strain <ul style="list-style-type: none"> greater than 1.0 mm/m 	
	Tilt	Tilt	Tilt	Compressive strain	
	<ul style="list-style-type: none"> greater than 4.6 mm/m 	<ul style="list-style-type: none"> greater than 4.6 mm/m 	<ul style="list-style-type: none"> greater than 4.0 mm/m 	<ul style="list-style-type: none"> greater than 12.7 mm/m 	
	Tensile strain	Tensile strain	Tensile strain	Valley Closure	
	<ul style="list-style-type: none"> greater than 1.0 mm/m 	<ul style="list-style-type: none"> greater than 1.0 mm/m 	<ul style="list-style-type: none"> greater than 1.0 mm/m 	<ul style="list-style-type: none"> greater than 115 mm 	
	Compressive strain	Compressive strain	Compressive strain	Observable subsidence ground deformations or surface cracks at/near pipelines	
	<ul style="list-style-type: none"> greater than 1.8 mm/m 	<ul style="list-style-type: none"> greater than 1.8 mm/m 	<ul style="list-style-type: none"> greater than 1.8 mm/m 	Cracks or leaks in the pipelines or fittings	
	Observable subsidence ground deformations or surface cracks at/near pipelines	Observable subsidence ground deformations or surface cracks at/near pipelines	Observable subsidence ground deformations or surface cracks at/near pipelines	Loss of flow /pressure (acoustic monitoring for leakage)	
	Cracks or leaks in the pipelines or fittings	Cracks or leaks in the pipelines or fittings	Cracks or leaks in the pipelines or fittings		

Table 7 (Continued)
BFMP-SYDNEY WATER Trigger Action Response Plan

SYDNEY WATER Pipelines	
<i>Risk: Subsidence effect on pipelines resulting in impact to structural integrity and leakage / loss of water.</i>	
TRIGGER LEVEL	RESPONSE
Level 4 – Restoration Subsidence Impact occurs with significant flow/water loss	
Subsidence Impact occurs resulting in significant water loss <ul style="list-style-type: none"> Sudden water loss at nearby tank reservoir levels 	<p><u>Implement Contingency Plan</u></p> <ul style="list-style-type: none"> As per BFMP Section 9 and Appendix 4. <p><u>Metropolitan Coal</u></p> <ul style="list-style-type: none"> As per Level 3 event, plus: <ul style="list-style-type: none"> General Manager to be involved in all decision-making processes. Assess public safety implications and where appropriate implement safety measures in accordance with Metropolitan Coal Longwalls 308-310 Public Safety Management Plan. Report exceedance of the performance measure or indicators to the DPIE and Sydney Water as soon as practicable. Update the 'Built Features Management Plan – Subsidence Impact Register'. Investigate circumstances of the fault / flow loss and determine requirement for adaptive management of mining operations prior to future operations. <p><u>Sydney Water</u></p> <ul style="list-style-type: none"> As per Level 3 event, plus: <ul style="list-style-type: none"> Sydney Water to enact emergency measures (e.g. temporary supply of water to customers) and determine restoration works required. Complete restoration works. Work in conjunction with Metropolitan Coal to investigate root cause of incident and determine appropriate future control measures.

11 FUTURE EXTRACTION PLANS

In accordance with Condition 7, Schedule 3 of the Project Approval, Metropolitan Coal will collect baseline data for the next Extraction Plan (i.e. Longwalls 311 on). The collection of baseline data will be consistent with the baseline data collected for Longwalls 301-310. Where possible, the baseline (and post-mining) data collected for Longwalls 308-310 will be used as baseline for Longwalls 311 onward as longwall mining progressively moves further away from the Sydney Water assets.

In addition to the baseline data collection, consideration of the environmental performance and management measures in accordance with the review(s) conducted as part of this BFMP-SYDNEY WATER will inform the appropriate type and frequency of monitoring of the assets relevant to the next Extraction Plan.

12 ANNUAL REVIEW AND IMPROVEMENT OF ENVIRONMENTAL PERFORMANCE

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

The Annual Review will:

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

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

13 INCIDENTS

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

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

Sydney Water will be notified within 24 hours of any access limitations or restrictions.

14 COMPLAINTS

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

The Environment & Community Superintendent is responsible for maintaining a system for recording complaints.

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

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

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

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

The Environment & Community Superintendent is responsible for ensuring that all complaints are appropriately investigated, actioned and that information is fed back to the complainant, unless requested to the contrary.

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

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15 NON-COMPLIANCE WITH STATUTORY REQUIREMENTS

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

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

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

As described in Section 13, Metropolitan Coal will notify the Secretary of the DPIE and any other relevant agencies of any incident associated with Metropolitan Coal as soon as practicable after Metropolitan Coal becomes aware of the incident. Within seven days of the date of the incident, Metropolitan Coal will provide the Secretary of the DPIE and any relevant agencies with a detailed report on the incident.

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

Additionally, in accordance with Condition 8, Schedule 7 of the Project Approval, an independent environmental audit was undertaken by the end of December 2011, and is undertaken a minimum of once every three years thereafter. A copy of the audit report will be submitted to the Secretary of the DPIE and made publicly available on the Peabody website. The independent audit will be undertaken by an appropriately qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary of the DPIE.

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16 REFERENCES

Department of Planning & Environment and Division of Resources and Energy (2015) *Guidelines for the Preparation of Extraction Plans*.

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Mine Subsidence Engineering Consultants (2008) *Subsidence Assessment Report on the Prediction of Subsidence Parameters and the Assessment of Mine Subsidence Impacts on Natural Features and Surface Infrastructure Resulting from the Proposed Extraction of Longwalls 20 to 44 at Metropolitan Colliery in Support of a Part 3A Application*.

Mine Subsidence Engineering Consultants (2021) *Metropolitan Colliery – Proposed Longwalls 308 to 310 - Subsidence Predictions and Impact Assessments for the Sydney Water Infrastructure*.

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APPENDIX 1

MSEC (2021) METROPOLITAN COLLIERY – PROPOSED LONGWALLS 308 TO 310 –
SUBSIDENCE PREDICTIONS AND IMPACT ASSESSMENTS FOR THE SYDNEY WATER
INFRASTRUCTURE

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8 December 2021

Jon Degotardi
Peabody Energy Australia
Metropolitan Colliery
PO Box 402
Helensburgh NSW 2508

Ref: MSEC1200-01

Dear Jon,

RE: Metropolitan Colliery – Proposed Longwalls 308 to 310 - Subsidence Predictions and Impact Assessments for Sydney Water Infrastructure

This letter report summarises the predicted subsidence movements and the assessed subsidence impacts for Sydney Water infrastructure resulting from the extraction of the proposed Longwalls 308 to 310 at Metropolitan Colliery.

The locations of the Sydney Water infrastructure and the proposed longwalls are shown in the attached Drawing No. MSEC1200-09. A Study Area is shown in Drawing No. MSEC1200-09 and is based on the outer limits of a 35° angle of draw line from Longwalls 308 to 310 and the predicted 20mm subsidence contour for Longwalls 308 to 310. There are three potable water supply pipelines located in the north east of the Study Area. *Water Main 1* comprises a 300 mm diameter Cast Iron Cement Lined (CICL) pipeline and is located 145 m to the east of Longwall 309 at its nearest point. *Water Main 2* crosses the north east corner of Longwalls 309 and comprises a 200 mm diameter CICL pipeline. *Water Main 3* comprises a 200 mm diameter and extends to the north east from *Water Main 2* at approximately 315 m east of Longwall 309.

A sewer main is located outside the Study Area, 1.1 km to the east of Longwalls 308 and 309. This pipeline is a 150 mm PVC pressure main. There are also networks of potable water and sewer pipelines located outside of the Study Area, within the Garrawarra Centre and nearby township of Helensburgh to the south-east of the longwalls.

The predictions and impact assessments for the Sydney Water infrastructure are provided in the following sections.

Conventional Subsidence Parameters for the Sydney Water Infrastructure

The following provides summaries of the maximum predicted conventional movements for the Sydney Water infrastructure due to the extraction of Longwall 308 to 310. It is possible that localised and elevated movements could develop as the result of non-conventional ground movements due to geological structures or valley closure effects. Discussions on the potential for non-conventional movements are provided in this letter report.

The predicted profiles of total conventional subsidence, tilt and curvature along the alignments of Water Main 1 and Water Main 2, following the extraction of Longwall 307 and after the extraction of Longwall 308 to 310, are shown in the attached Figs. A.01 and A.02. The solid blue lines represent the total or accumulated movements after the completion of each longwall.

Summaries of the maximum predicted values of total subsidence, tilt and curvature within the Study Area for the water mains, following the extraction of Longwall 308 to 310, are provided in Table 1. The values are the maxima anywhere along the pipelines at any time during or after the extraction of the longwalls.

Table 1 Maximum Predicted Total Subsidence, Tilt and Curvature within the Study Area for Water Mains after the Extraction of Longwalls 308 to 310

Longwall	Maximum Predicted Total Subsidence (mm)	Maximum Predicted Total Tilt (mm/m)	Maximum Predicted Total Hogging Curvature (km ⁻¹)	Maximum Predicted Total Sagging Curvature (km ⁻¹)
Water Main 1	70	< 0.5	< 0.01	< 0.01
Water Main 2	60	< 0.5	< 0.01	< 0.01
Water Main 3	40	< 0.5	< 0.01	< 0.01

The maximum predicted total subsidence for the water mains within the Study Area, following the extraction of Longwall 308 to 310, are 70 mm or less for all pipelines. The maximum predicted conventional tilt for these pipelines is less than 0.5 mm/m (i.e. 0.05 %, or 1 in 2000). The maximum predicted conventional curvatures are less than 0.01 km⁻¹ hogging and sagging, which equate to minimum radii of curvature of more than 100 kilometres.

The sewer main and networks of water and sewerage pipelines located within the Garrawarra Centre and the township of Helensburgh are not expected to experience any measurable vertical subsidence, tilts, curvatures or strains. The pipelines could experience low level far-field horizontal movements. However, these absolute horizontal movements tend to be bodily movements that are not associated with measurable strains.

Predicted Strains

The prediction of strain is more difficult than the predictions of subsidence and tilt. The reason for this is that strain is affected by many factors, including ground curvature and horizontal movement, as well as local variations in the near surface geology, the locations of pre-existing natural joints at bedrock and the depth of bedrock. Survey tolerance can also represent a substantial portion of the measured strain, in cases where the strains are of a low order of magnitude. The profiles of observed strain, therefore, can be irregular even when the profiles of observed subsidence, tilt and curvature are relatively smooth.

In previous MSEC subsidence reports, predictions of conventional strain were provided based on the best estimate of the average relationship between curvature and strain. Similar relationships have been proposed by other authors. The reliability of the strain predictions was highlighted in these reports, where it was stated that measured strains can vary considerably from the predicted conventional values.

Adopting a linear relationship between curvature and strain provides a reasonable prediction for the conventional tensile and compressive strains. In the Southern Coalfield, it has been found that a factor of 15 provides a reasonable relationship between the predicted maximum curvatures and the predicted maximum conventional strains. The locations that are predicted to experience hogging or convex curvature are expected to be net tensile strain zones and locations that are predicted to experience sagging or concave curvature are expected to be net compressive strain zones.

At a point however, there can be considerable variation from the linear relationship, resulting from non-conventional movements or from the normal scatters which are observed in strain profiles. When expressed as a percentage, observed strains can be many times greater than the predicted conventional strain for low magnitudes of curvature. We have therefore provided a statistical approach to account for the variability, instead of just providing a single predicted conventional strain.

The range of predicted strains for the Sydney Water infrastructure has been determined using the monitoring data from Metropolitan Colliery and other nearby collieries. The data used in the analysis of observed strains included those resulting from both conventional and non-conventional anomalous movements, but did not include those resulting from valley related movements. The strains resulting from damaged or disturbed survey marks have also been excluded.

The Sydney Water infrastructure within the Study Area is located predominantly above solid coal. A histogram of the maximum tensile and compressive strains measured in survey bays located above solid coal in the Southern Coalfield is provided in Figure 1. The probability distribution functions, based on a fitted *Generalised Pareto Distribution (GPD)*, have also been shown in this figure.

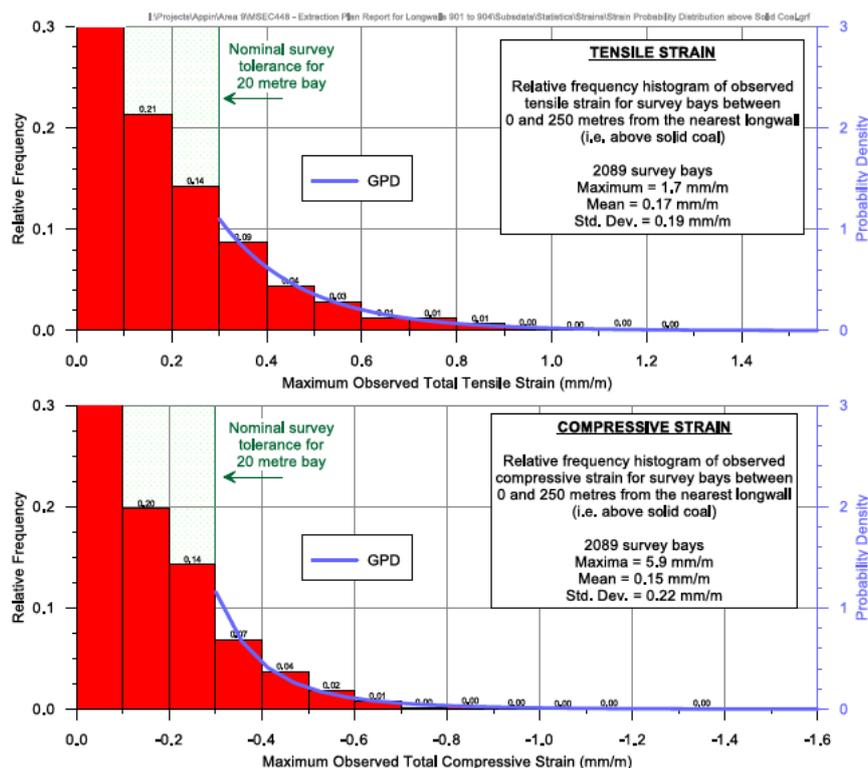


Figure 1 Distributions of the Measured Maximum Tensile and Compressive Strains during the Extraction of Previous Longwalls in the Southern Coalfield Above Solid Coal

Confidence intervals have been determined from the empirical strain data using the fitted GPDs. In the cases where survey bays were measured multiple times during a longwall extraction, the maximum tensile strain and the maximum compressive strain were used in the analysis (i.e. single tensile strain and single compressive strain measurement per survey bay).

A summary of the probabilities of exceedance for tensile and compressive strains for survey bays located above solid coal, based on the fitted GPDs, is provided in Table 2.

Table 2 Probabilities of Exceedance for Strain for Survey Bays Located above Goaf

	Strain (mm/m)	Probability of Exceedance
Compression	-2.0	1 in 2,000
	-1.5	1 in 800
	-1.0	1 in 200
	-0.5	1 in 25
	-0.3	1 in 7
Tension	+0.3	1 in 5
	+0.5	1 in 15
	+1.0	1 in 200
	+1.5	1 in 2,500

The 95 % confidence levels for the maximum total strains that the individual survey bays above solid coal experienced at any time during mining were 0.6 mm/m tensile and 0.5 mm/m compressive. The 99 % confidence levels for the maximum total strains that the individual survey bays above solid coal experienced at any time during mining were 0.9 mm/m tensile and 0.8 mm/m compressive.

Potential for Non-Conventional Movements

Non-conventional movements can develop due to the presence of geological structures or valley related effects. In some cases, non-conventional movements can develop with no known cause and these are often referred to as 'anomalous' movements.

The locations of the known geological structures at seam level and the major streams are shown in Drawing No. MSEC1200-09. A fault at seam level is located to the north of Longwall 307 that extends intersects Water Main 1 and Water Main 2. The fault is located at seam level and is not mined beneath by Longwall 308 to 310. There are also no surface lineaments associated with the fault at the surface location near Water Main 1 and Water Main 2. There are no other mapped faults located within the Study Area that extend beneath the Sydney Water infrastructure. It is possible that the infrastructure located above the longwalls could experience localised and elevated strains due to unknown geological structures (i.e. anomalies). Non-conventional or anomalous movements have not been identified during the extraction of Longwalls 301 to 306. The range of strains provided in the previous section include those resulting from irregular anomalous movements.

Water Main 2 crosses a tributary to Woronora Reservoir approximately 110 m to the north of Longwalls 309 and 310. The pipeline is expected to experience valley related effects at this location. The predicted total valley closure at this location after the extraction of Longwalls 308 to 310 for the Extraction Plan Layout, is 100 mm. The predicted compressive strains due to valley closure effects are 5 mm/m based on a 20 m bay length.

Impact Assessments for the Water Pipelines

The Water Mains are pressure mains and, therefore, are unlikely to be adversely impacted by the mining induced vertical subsidence or tilt. These pipelines are direct buried and are likely to experience the curvatures and ground strains resulting from the extraction of Longwalls 308 to 310.

The maximum predicted conventional curvatures within the Study Area for the water mains are less than 0.01 km^{-1} hogging and sagging, which equate to minimum radii of curvature of over 100 kilometres. Higher curvatures were predicted for the previous Longwalls 301 to 307. Localised and elevated curvatures could develop along the pipelines due to non-conventional movements resulting from unknown near surface geological structures (i.e. anomalies).

The predicted curvatures and strains for the water mains are less than the limits of survey accuracy and are considered unlikely to result in impacts to the pipelines.

Longwall mining in the Southern Coalfield has previously mined directly beneath similar pipelines. It has been found from this previous experience that the impacts on CICL pipelines in the Southern Coalfield are rare and generally of a minor nature. Some examples of mining beneath water mains in the Southern Coalfield are provided in Table 3. This table includes Longwalls 301 to 305 mining beneath Water Mains 1 and 2.

Table 3 Examples of Mining Beneath Water Mains in the Southern Coalfield

Colliery and Longwalls	Pipelines	Observed Movements	Observed Impacts
Appin LW301 and LW302	0.6 km of 150 dia DICL 0.6 km of 300 dia CICL 0.6 km of 1200 dia SCL	650 mm Subsidence 4.5 mm/m Tilt 1 mm/m Tensile Strain 3 mm/m Comp. Strain (Measured M & N-Lines)	Leakage of the 150 mm DICL and 300 mm CICL pipelines at a creek crossing, elsewhere no other reported impacts
Tahmoor LW22 to LW25	2.7 km DICL pipes 7.3 km CICL pipes	1200 mm Subsidence 6 mm/m Tilt 1.5 mm Tensile Strain 2 mm (typ.) and up to 5 mm/m Comp. Strain (Extensive street monitoring)	One reported impact to the distribution network and a very small number of minor leaks in the consumer connection pipes
West Cliff LW5A3, LW5A4 & LW29 to LW34	2.8 km of 100 dia CICL pipe directly mined beneath	1100 mm Subsidence 10 mm/m Tilt 1 mm/m Tensile Strain 5.5 mm/m Comp. Strain (Measured B-Line)	No reported impacts
Metropolitan Coal LW301 to 305	1km of Water Main 1 1.5km of Water Main 2	1220 mm Subsidence 8.4 mm/m Tilt 2.3 mm/m Tensile Strain 2.9 mm/m Comp. Strain (Optic Water and 300 XL Lines)	No reported impacts

Based on this experience, impact to the Water Mains resulting from conventional subsidence movements are considered unlikely to occur due to the extraction of Longwalls 308 to 310. It is possible that impact could occur due to valley closure to the north of Longwalls 309 and 310, however it is noted that the predicted valley closure is small in magnitude.

It is expected that any impacts could be remediated by locally exposing the pipeline and repairing or replacing the affected section. The pipeline at the tributary crossing is understood to have been exposed due to material wash out and prior repair has been undertaken to the exposed section of pipeline.

It is recommended that monitoring and management strategies developed for the extraction of Longwalls 301 to 304 are updated and continued, in consultation with Sydney Water, to manage potential impacts on the water mains within the Study Area. It is expected that these pipelines can be maintained in serviceable conditions with the implementation of the appropriate monitoring and management strategies.

Summary

Potable water mains are located directly within the Study Area, crossing the north east corner of Longwall 309. Previous experience from the Southern Coalfield has found that potential impacts on these types of pipelines can be managed with the implementation of suitable monitoring and management strategies. It is unlikely that adverse impacts would occur for the water and sewer mains located outside the extents of the longwalls. Water Main 2 crosses a tributary to Woronora Reservoir approximately 110 m to the north of Longwalls 309 and 310. The pipeline is expected to experience valley related effects at this location.

It is expected that potential impacts on Sydney Water infrastructure can be managed with the implementation of the appropriate monitoring and management strategies.

Yours sincerely



Peter DeBono

Attachments:

Drawing No. MSEC1200-09 – Longwalls 308 to 310 – Sydney Water Infrastructure

- Fig. A.1 Predicted Profiles of Conventional Subsidence, Tilt and Curvature for Water Main 1 after LW307 to LW310
- Fig. A.2 Predicted Profiles of Conventional Subsidence, Tilt and Curvature for Water Main 2 after LW307 to LW310



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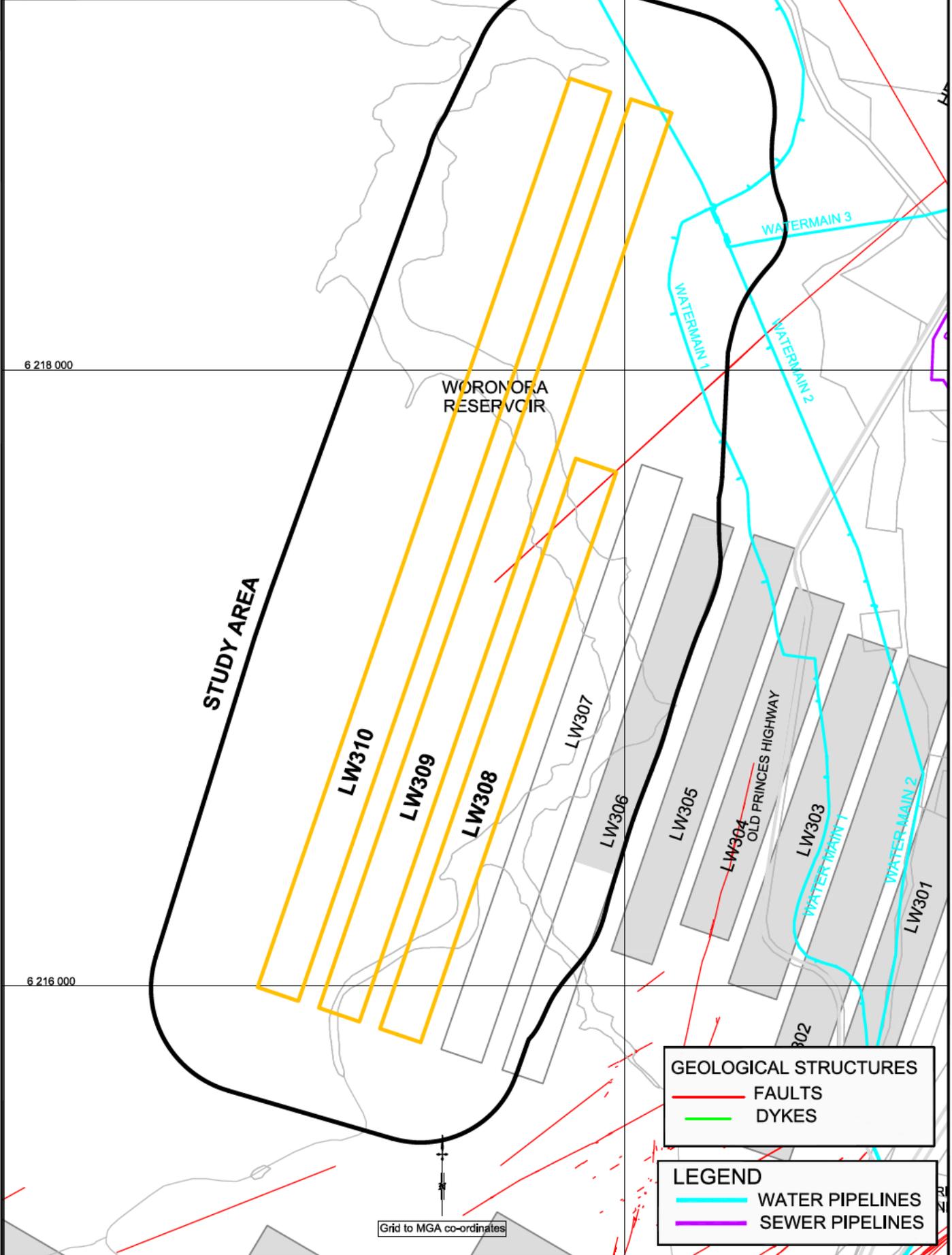
METROPOLITAN COAL
METROPOLITAN COLLIERY
LONGWALLS 308 TO 310
SYDNEY WATER

DATE:
7 Sep 2021

SCALE:
as shown

DRAWING No:
MSEC1200-09

Rev No
01



GEOLOGICAL STRUCTURES

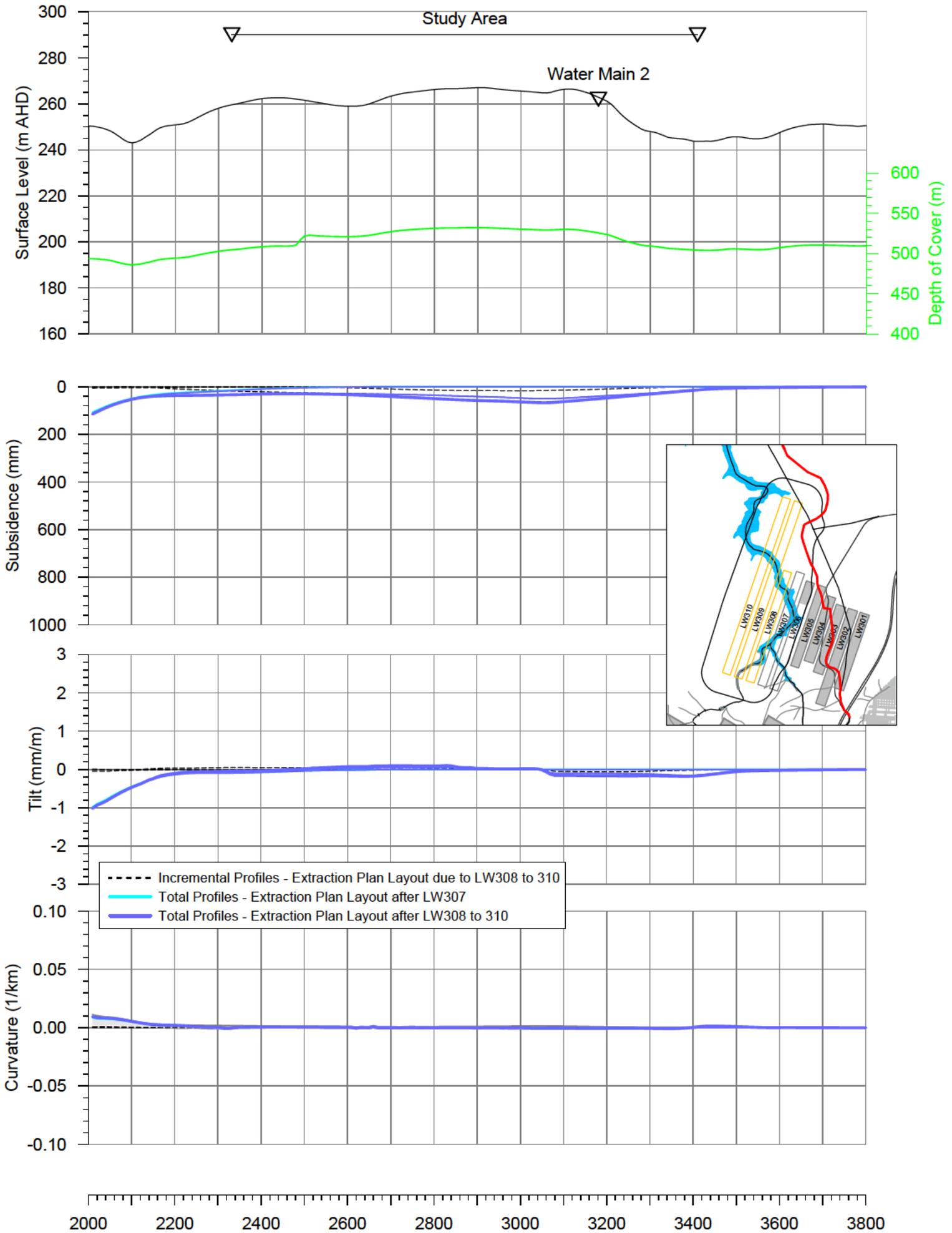
- FAULTS
- DYKES

LEGEND

- WATER PIPELINES
- SEWER PIPELINES

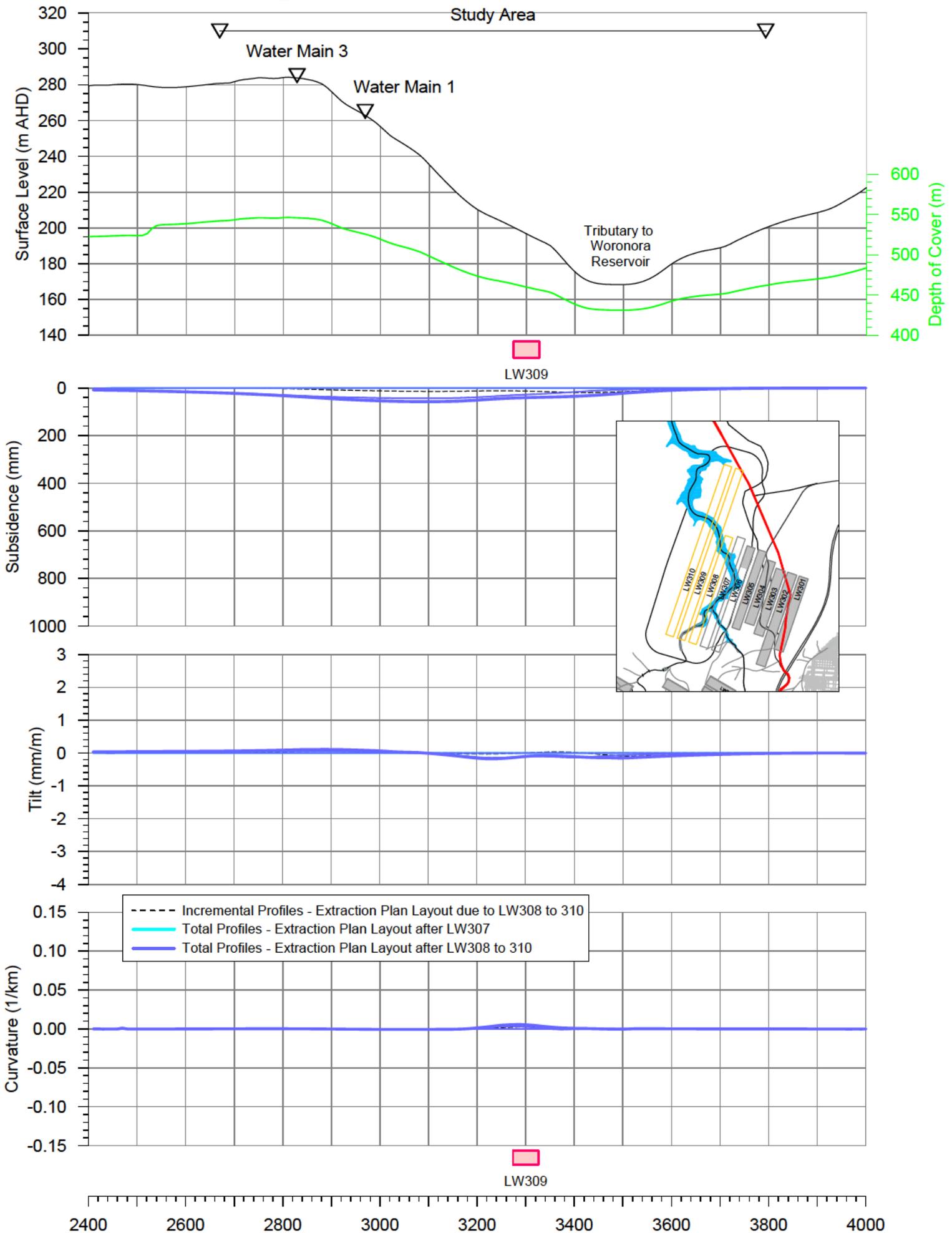
Grid to MGA co-ordinates

Predicted Profiles of Conventional Subsidence, Tilt and Curvature along Water Main 1 due to LW308 to 310



Distance along Pipeline from the Finishing End of Longwall 301 (m)

Predicted Profiles of Conventional Subsidence, Tilt and Curvature along Water Main 2 due to LW308 to 310



Distance along Pipeline from the Finishing End of Longwall 301 (m)

Fig. A.02

APPENDIX 2

BUILT FEATURES MANAGEMENT PLAN – SUBSIDENCE IMPACT REGISTER

Metropolitan Coal – LW308-310 Built Features Management Plan – Sydney Water		
Revision No. BFMP_SYDWATER-R01-A	ME-TSE-MNP-0090	
Document ID: Built Features Management Plan – SYDWATER		

**Built Feature Management Plan – Subsidence Impact Register
Assessment Form**

Date:

Observer (Name and position):

Register Number (i.e. Number 1, 2, etc.):

Longwall Number and Chainage:

Location of Observed Impact:

(Examples: location of tank, include GPS co-ordinates and a sketch)

Description of Observed Impact:

(Examples: nature and extent of impact - cracks in road etc any relevant information, attach photographs)

Person Notified: Manager - Technical Services

Description of Photographs:

Actions Required:	Contingency Plan Initiated	<input type="checkbox"/>	
	Incident Notification	<input type="checkbox"/>	
	Safety	Measures/Public	Safety
	Management Plan Requirements	<input type="checkbox"/>	

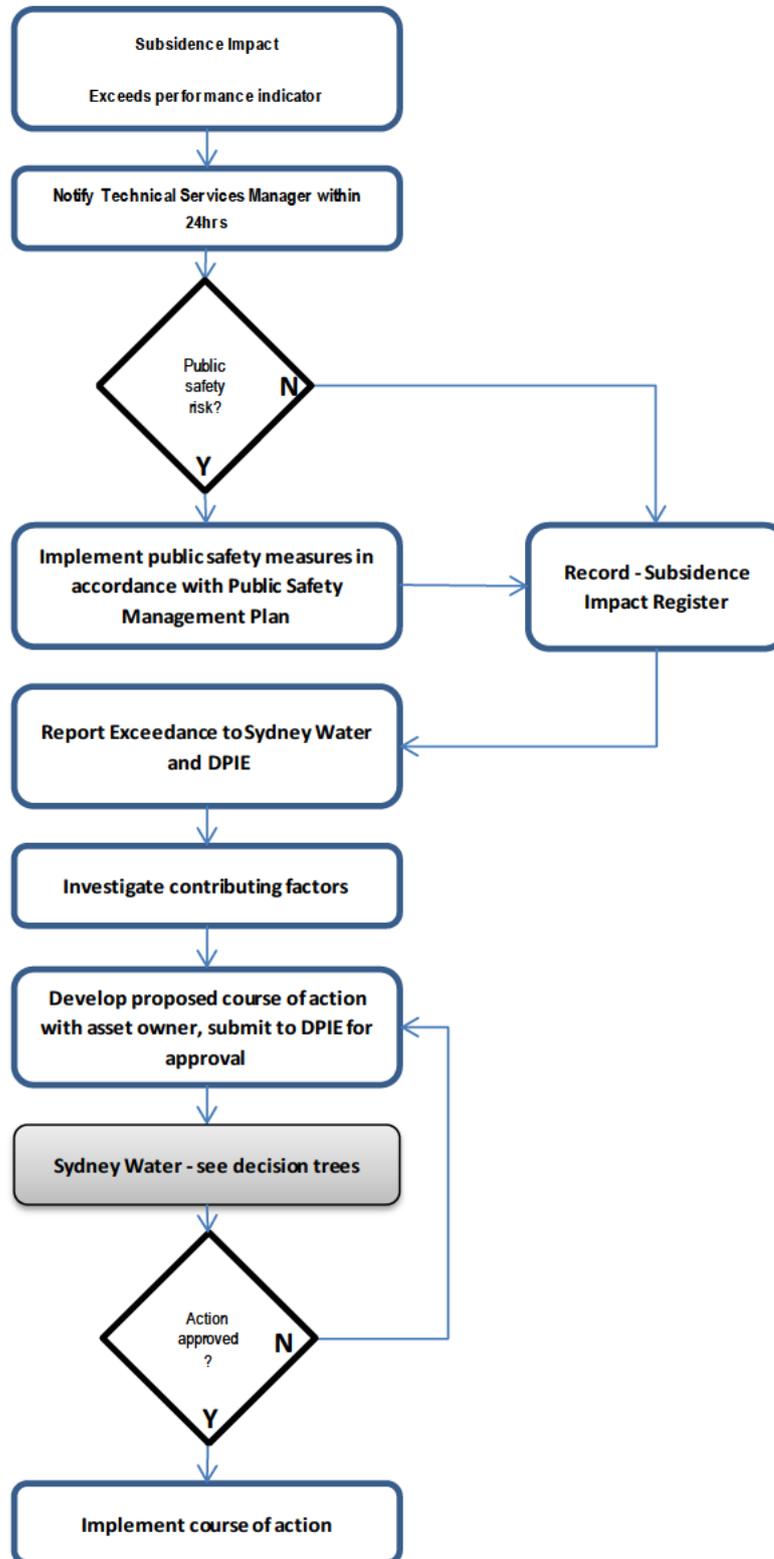
Management or Contingency Measures Implemented:

Effectiveness of Management or Contingency Measures:

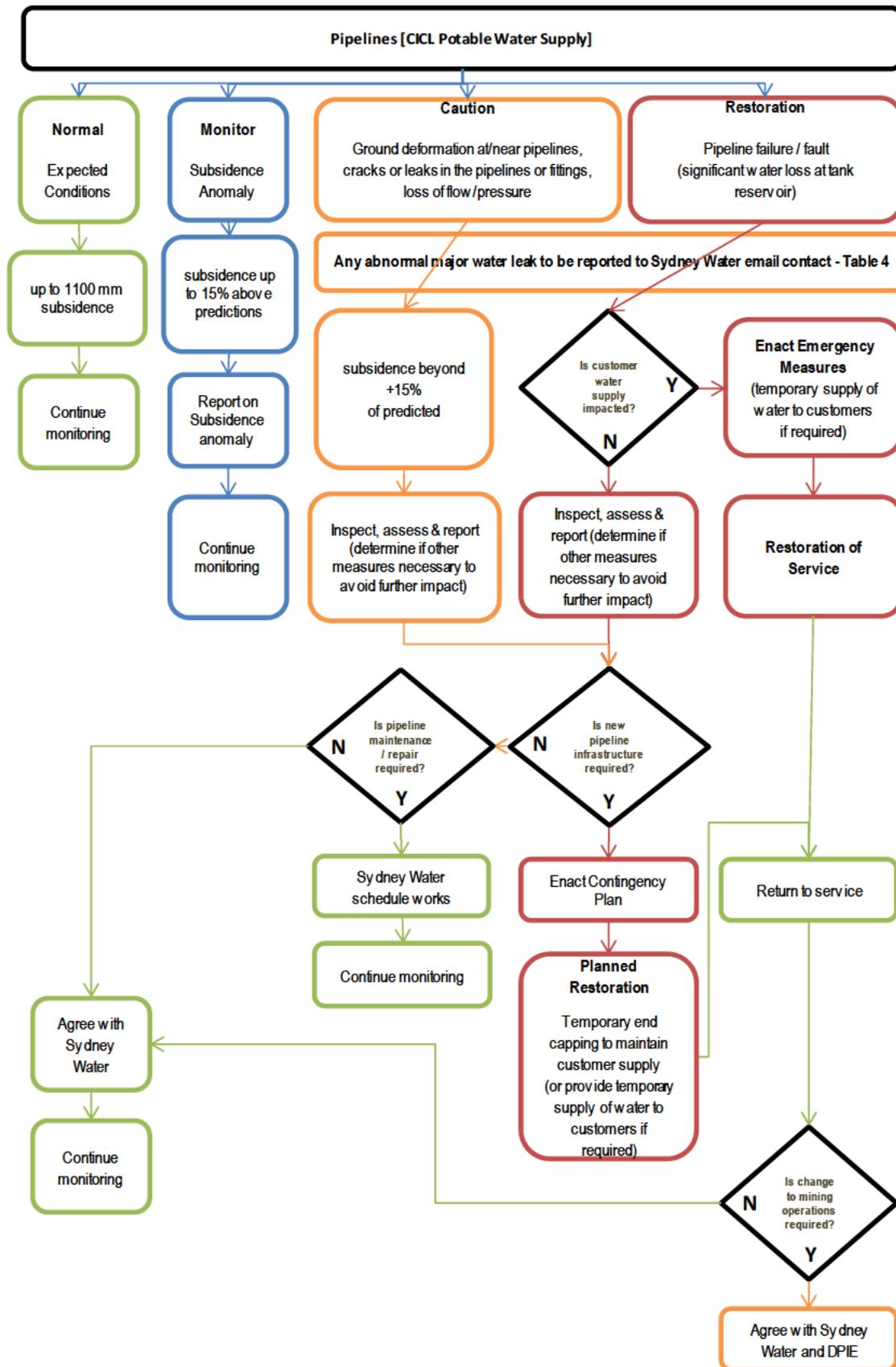
APPENDIX 3

CONTINGENCY PLAN PROCEDURE AND DECISION TREE

Metropolitan Coal – LW308-310 Built Features Management Plan – Sydney Water		
Revision No. BFMP_SYDWATER-R01-A	ME-TSE-MNP-0090	
Document ID: Built Features Management Plan – SYDWATER		



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