



METROPOLITAN COAL

LONGWALLS 301-303

BUILT FEATURES MANAGEMENT PLAN TRANSGRID

Section/Page/ Annexure	Revision Number	Amendment/Addition	Distribution	DP&E Approval Date
All	LW301-303 BFMP_TRA-R01-A	Original – Draft for Consultation	TransGrid, DRG and DP&E	-
Sections 4.2.3, 7.2 & 9.1 and Tables 6, 9 & 10.	LW301-303 BFMP_TRA-R01-B	Revised – Incorporating Table 9 and updates	TransGrid	-
Sections 4.2.2 & 9.1, Table 6 and Figure 4	LW301-303 BFMP_TRA-R01-C	Revised – Incorporating TransGrid edits (email 2 Nov 16)	TransGrid, DRG and DP&E	11 May 2017*
Section 7.3.2, Tables 2, 8 & 12 and Appendix 3	LW301-303 BFMP_TRA-R01-D	Revised – Addressing DP&E and DRG requirements	TransGrid	-
Section 6.1 and Tables 8 & 11	LW301-303 BFMP_TRA-R01-E	Revised – Incorporating TransGrid edits (email 26 Jun 17)	TransGrid, DRG and DP&E	-
All	LW301-303 BFMP_TRA-R01-F	Revised TARP. Revised for LW 303	TransGrid and DRG	-

Revision Status Register

* The approval allows for the extraction of Longwalls 301 and 302 only.

June 2018

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1 INTRODUCTION

Metropolitan Coal is a wholly owned subsidiary of Peabody Energy Australia Pty Ltd (Peabody). Metropolitan Coal was granted approval for the Metropolitan Coal Project (the Project) under section 75J of the New South Wales (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 and surface facilities at Metropolitan Coal. The underground mining longwall layout is shown on Figure 1. Following the completion of Longwall 27 in 2017, Longwalls 301, 302 and 303 (herein referred to as Longwalls 301-303) define the next mining sub-domain within the Project underground mining area (Figures 1 to 3).

1.1 PURPOSE AND SCOPE

In accordance with Condition 6(f), Schedule 3 of the Project Approval, this Built Features Management Plan – TransGrid (Longwalls 301-303 BFMP-TRA) has been developed to manage the potential consequences of Longwalls 301-303 extraction on the TransGrid assets.

The relationship of this Longwalls 301-303 BFMP-TRA to the Metropolitan Coal Environmental Management Structure and to the Metropolitan Coal Longwalls 301-303 Extraction Plan is shown on Figure 4.

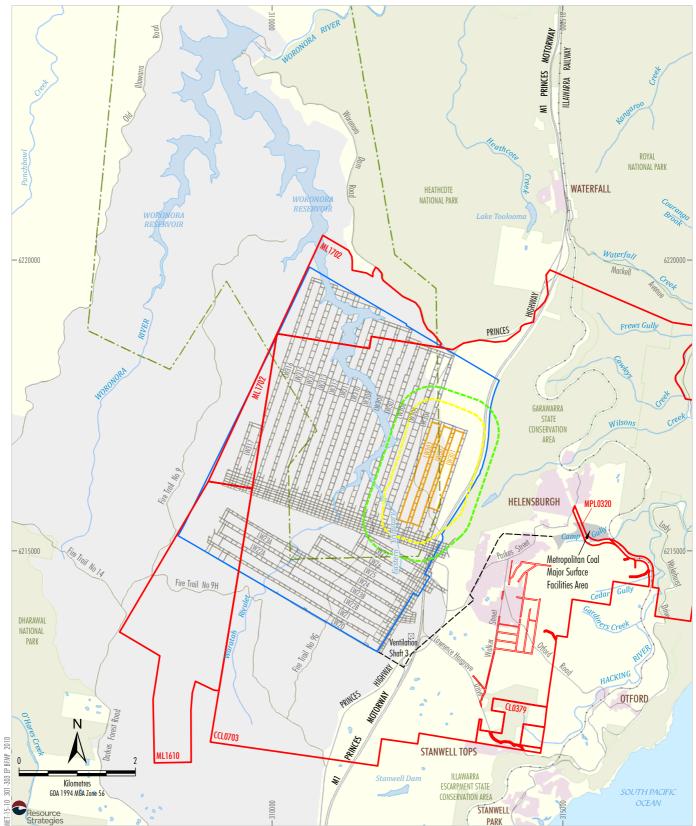
In accordance with Condition 6, Schedule 3 of the Project Approval, the suitably qualified and experienced experts that have prepared this Longwalls 301-303 BFMP-TRA, namely representatives from Mine Subsidence Engineering Consultants (MSEC) and Metropolitan Coal were endorsed by the Director-General (now Secretary) of the Department of Planning (DP&E) on 6 June 2016. This Longwalls 301-303 BFMP-TRA has been prepared in consultation with TransGrid, including consideration of prior consultation during the development of the previously approved Longwalls 20-22, Longwalls 23-27 and Longwalls 301-303 Built Features Management Plans.

1.2 STRUCTURE OF THE LONGWALLS 301-303 BFMP-TRA

The remainder of the Longwalls 301-303 BFMP-TRA is structured as follows:

- Section 2: Describes the review and update of the Longwalls 301-303 BFMP-TRA.
- Section 3: Outlines the statutory requirements applicable to the Longwalls 301-303 BFMP-TRA.
- Section 4: Provides a revised assessment of the potential subsidence impacts and environmental consequences for Longwalls 301-303.
- 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.
- Section 8: Describes the management measures that will be implemented.

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LEGEND

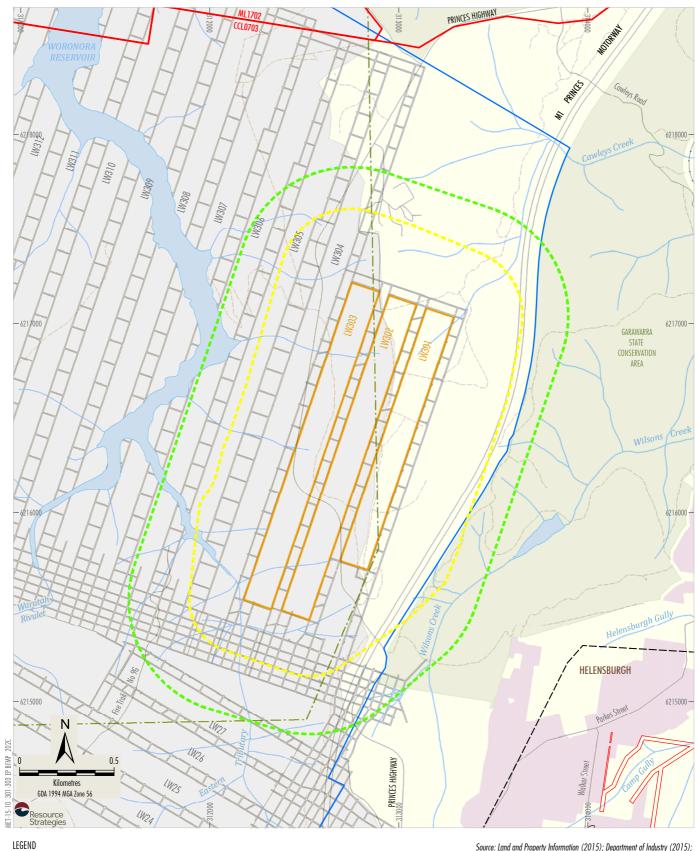
LLULIND	
	Mining Lease Boundary
	Woronora Special Area
+	Railway
	Project Underground Mining Area
	Longwalls 20-27 and 301-317
	Longwalls 301 - 303 Secondary Extraction
	35° Angle of Draw and/or Predicted
	20 mm Subsidence Contour
	600 m from Secondary Extraction of
	Longwalls 301-303
<u></u>	Woronora Notification Area
	Existing Underground Access Drive (Main Drift)

Source: Land and Property Information (2015); Department of Industry (2015); Metropolitan Coal (2016); MSEC (2016)

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Project Longwalls 20 - 27 and Longwalls 301 - 317 Layout



Road

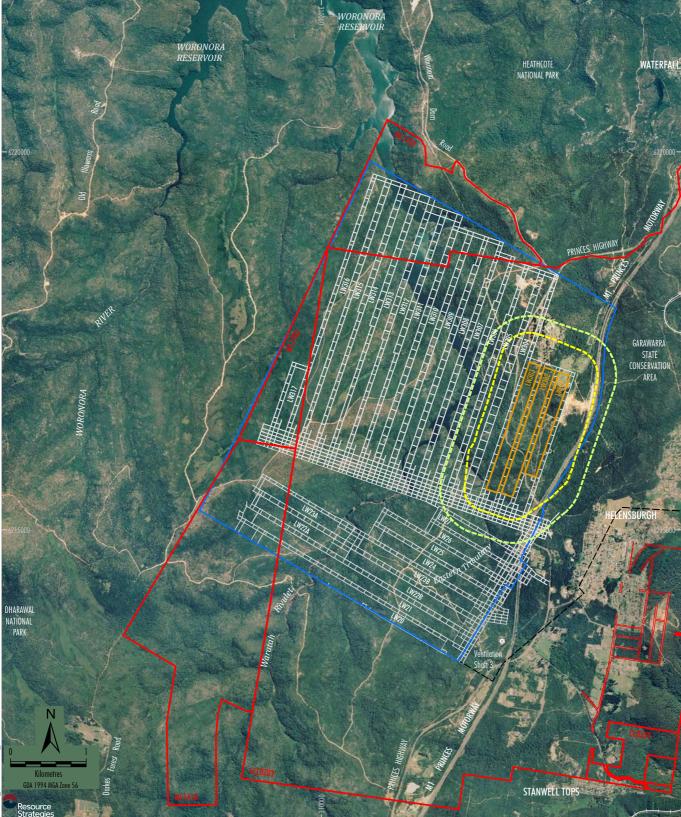
Vehicular Track



Existing Underground Access Drive (Main Drift)

Source: Land and Property Information (2015); Department of Industry (2015); Metropolitan Coal (2016); MSEC (2016)

> METROPOLITAN COAL Longwalls 301 - 303 Layout



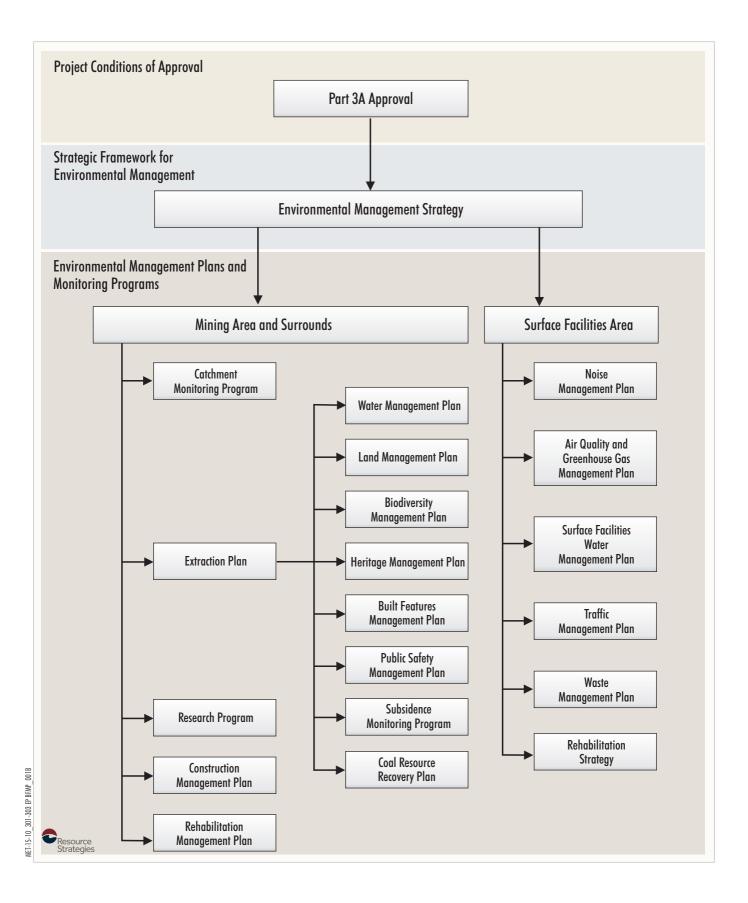
LEGEND	
	Mining Lease Boundary
	Railway
	Project Underground Mining Area Longwalls 20-27 and 301-317
	Longwalls 301 - 303 Secondary Extraction
	35° Angle of Draw and/or Predicted
	20 mm Subsidence Contour
	600 m from Secondary Extraction of
	Longwalls 301-303
	Existing Underground Access Drive (Main Drift)

Source: Land and Property Information (2015); Date of Aerial Photography 1998; Department of Industry (2015); Metropolitan Coal (2016); MSEC (2016)

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Project Longwalls 20 - 27 and Longwalls 301 - 317 Layout -Aerial Photograph





- 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 Longwalls 301-303 BFMP-TRA.

2 LONGWALLS 301-303 BFMP-TRA REVIEW AND UPDATE

In accordance with Condition 4, Schedule 7 of the Project Approval, the Longwalls 301-303 BFMP-TRA will be reviewed within three months of the submission of:

- an audit under Condition 8 of Schedule 7;
- an incident report under Condition 6 of Schedule 7;
- an annual review under Condition 3 of Schedule 7; and

if necessary, revised to the satisfaction of the Director-General (now Secretary) of the DP&E, to ensure the plan is updated on a regular basis and to incorporate any recommended measures to improve environmental performance.

This BFMP will also be reviewed within three months of approval of any Project modification and if necessary, revised to the satisfaction of the DP&E.

The revision status of this plan is indicated on the title page of each copy of the Longwalls 301-303 BFMP-TRA. The distribution register for controlled copies of the Longwalls 301-303 BFMP-TRA is described in Section 2.1.

Revisions to any documents listed within this Longwalls 301-303 BFMP-TRA 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 Longwalls 301-303 BFMP-TRA publicly available on the Peabody website. A hard copy of the Longwalls 301-303 BFMP-TRA will also be maintained at the Metropolitan Coal site.

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:

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- to whom the Metropolitan Coal plans and programs, such as the Longwalls 301-303 BFMP-TRA, 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 Longwalls 301-303 BFMP-TRA 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 Longwalls 301-303 BFMP-TRA. Table 1 indicates where each component of the conditions is addressed within this Longwalls 301-303 BFMP-TRA.

	Project Approval Condition	Longwalls 301-303 BFMP-TRA Section
Condi	tion 2 of Schedule 7	
	e Proponent shall ensure that the management plans required under this approval are epared in accordance with any relevant guidelines, and include:	
a)	detailed baseline data;	Section 6
b)	a description of:	
	 the relevant statutory requirements (including any relevant approval, licence or lease conditions); 	Section 3
	 any relevant limits or performance measures/criteria; 	Section 5
	 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; 	Section 5
c)	a description of the measures that would be implemented to comply with the relevant statutory requirements, limits, or performance measures/criteria;	Sections 7, 8, 9 and 10
d)	a program to monitor and report on the:	Sections 7, 8 and 12
	 impacts and environmental performance of the project; 	
	 effectiveness of any management measures (see c above); 	
e)	a contingency plan to manage any unpredicted impacts and their consequences;	Section 9 and Appendix 3
f)	a program to investigate and implement ways to improve the environmental performance of the project over time;	Sections 7 and 12
g)	a protocol for managing and reporting any;	
	incidents;	Section 13
	complaints;	Section 14
	 non-compliances with statutory requirements; and 	Section 15
	exceedances of the impact assessment criteria and/or performance criteria; and	Section 9 and Appendix 3
h)	a protocol for periodic review of the plan.	Section 2
Condi	tion 7 of Schedule 3	
SC	addition to the standard requirements for management plans (see condition 2 of hedule 7), the Proponent shall ensure that the management plans required under ndition 6(f) above include:	
a)	a program to collect sufficient baseline data for future Extraction Plans;	Section 11
b)	a revised assessment of the potential environmental consequences of the Extraction Plan, incorporating any relevant information that has been obtained since this approval;	Section 4
c)	a detailed description of the measures that would be implemented to remediate predicted impacts; and	Section 8
d)	a contingency plan that expressly provides for adaptive management.	Section 9 and Appendix 3

Table 1Management Plan Requirements

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3.2 LICENCES, PERMITS AND LEASES

In addition to the Project Approval, all activities at or in association with Metropolitan Coal 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 DRG (Division of Resources and Geoscience, previously Division of Resources and Energy [DRE]), 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 [MPL] 320).
- The Metropolitan Coal Mining Operations Plan 1 October 2012 to 30 September 2019 approved by the DRG.
- 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 Primary Industries Water (DPI Water) (now the Department of Industry – Crown Lands and Water Division [CLWD]) 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 NSW Resources Regulator and WorkCover NSW.
- Supplementary approvals obtained from WaterNSW (previously the Sydney Catchment Authority [SCA]) 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):

- Biodiversity Conservation Act, 2016;
- Contaminated Land Management Act, 1997;
- Crown Lands Act, 1989;
- Dams Safety Act, 1978;
- Dangerous Goods (Road and Rail Transport) Act, 2008;
- Energy and Utilities Administration Act, 1987;
- Fisheries Management Act, 1994;
- Mining Act, 1992;

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- Noxious Weeds Act, 1993;
- 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 LONGWALLS 301-303 EXTRACTION LAYOUT

Longwalls 301-303 and the area of land within 600 metres (m) of Longwalls 301-303 secondary extraction are shown on Figures 2 and 3. Longwall extraction occurs from north to south. The longwall layout includes 163 m panel widths (void) with 45 m pillars (solid).

The provisional extraction schedule for Longwalls 301-303 is provided in Table 2.

Longwall	Estimated Start Date	Estimated Duration	Estimated Completion Date
301	June 2017	6 months	February 2018
302	March 2018	7 months	October 2018
303	November 2018	7 months	May 2019

Table 1Provisional Extraction Schedule

The layout for Longwalls 301-303 (i.e. 163 m panel widths [void] and 45 m pillars [solid]) will be trialled to build on the experience and dataset obtained from Longwalls 20-27. The outcomes of the trial will be used to inform the potential for a similar mine layout to be applied to the next Extraction Plan (i.e. Longwall 304 onwards). The assessment of the trial longwall layout is described in Section 11.1.

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).

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4.1.1 TransGrid Assets

Figure 5 illustrates the TransGrid 330 kilovolt (kV) transmission line and towers. The 330 kV transmission line is composed of:

- Transmission (suspension) towers (field numbers TL11-103 to TL11-108) located near or within the 35 degree angle of draw of Longwalls 301-303; and
- Dapto to Sydney South 330 kV Transmission Line (Feeder number 11).

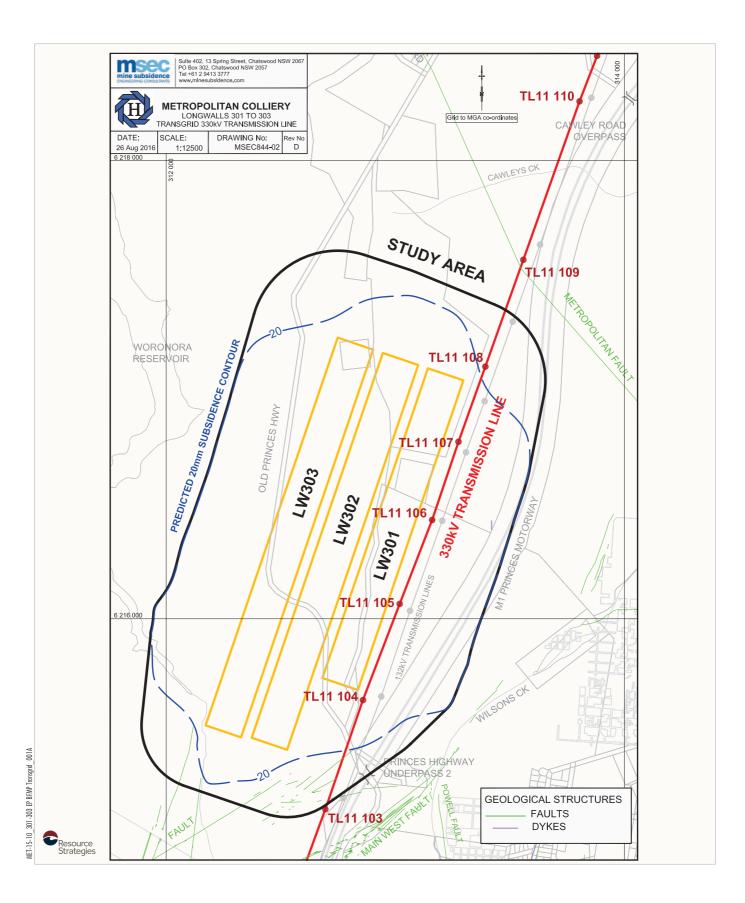
There are no tension towers within the Study area for Longwalls 301-303.

The 330 kV transmission line and towers are located to the east of the proposed Longwalls 301-303 and the longwalls will not pass beneath these electrical services. There are six towers located near or within the 35 degree angle of draw line around the proposed longwalls as shown on Drawing No. MSEC844-02 (Figure 5). The distances from the towers to the nearest longwalls are summarised in Table 3 below.

Table 3
Transmission Towers Distance to Proposed Longwalls 301-303

Tower Number	Tower Type	Nearest Longwall	Approximate Distance to Longwall (m)
TL11-103	Suspension	Longwall 301	310
TL11-104	Suspension	Longwall 301	50
TL11-105	Suspension	Longwall 301	50
TL11-106	Suspension	Longwall 301	70
TL11-107	Suspension	Longwall 301	70
TL11-108	Suspension	Longwall 301	110

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METROPOLITAN COAL TransGrid Assets

4.2 REVISED SUBSIDENCE AND IMPACT PREDICTIONS

4.2.1 Revised Subsidence Predictions

Subsidence predictions for Longwalls 20-44 in relation to the TransGrid 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 301-303 on TransGrid assets were conducted by MSEC and reported in MSEC (2016) (Appendix 1). The maximum predicted total systematic subsidence parameters in relation to the transmission lines for the extraction of Longwalls 301-303 is shown in Table 4. The maximum predicted total systematic subsidence parameters at the transmission towers for the extraction of Longwalls 301-303 is shown in Table 5.

 Table 4

 Total Subsidence Predictions for the Transmission Line After Longwalls 301-303

Longwall	Maximum Predicted Total Subsidence (mm)	Maximum Predicted Total Tilt along Alignment (mm/m)	Maximum Predicted Total Tilt across Alignment (mm/m)
After LW301	60	<0.5	0.5
After LW302	110	0.5	1.0
After LW303	140	0.5	1.0

Source: Table 3 in MSEC (2016) (Appendix 1).

Mm = millimetres.

Mm/m = millimetres per metre.

 Table 5

 Total Subsidence Predictions for the Towers After Longwalls 301-303

Field Tower	Maximum Predicted Total Subsidence (mm)			Maximum Predicted Total Tilt Along Alignment at Base of	Maximum Predicted Total Tilt Across Alignment at Base of	
	After LW301	After LW302	After LW303	the Tower (mm/m) [+ve north; -ve south]	the Tower (mm/m) [+ve east; -ve west]	
TL11-103	<20	<20	<20	<± 0.5	<± 0.5	
TL11-104	<20	40	50	<± 0.5	<± 0.5	
TL11-105	40	100	125	<± 0.5	- 1.0	
TL11-106	30	90	100	<± 0.5	- 0.5	
TL11-107	30	90	100	<± 0.5	- 0.5	
TL11-108	<20	30	50	<± 0.5	<± 0.5	

Source: Tables 4 and 5 in MSEC (2016) (Appendix 1).

The maximum predicted subsidence of 125 mm and total tilt of 1.0 mm/m both occur at Tower TL11-105 after the extraction of Longwall 303. The maximum predicted horizontal movement at the top of the towers (i.e. T11-105) is -60 mm orientated to the west (towards the longwalls).

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4.2.2 Risk Assessment Meeting

In accordance with the draft *Guidelines for the Preparation of Extraction Plans* (DP&E and DRE, 2014) a risk assessment meeting was held on 26 August 2016. Attendees at the risk assessment meeting included representatives from Metropolitan Coal, TransGrid, MSEC, Resource Strategies and Axys Consulting (risk assessment facilitator).

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

- preliminary identification of TransGrid assets;
- review of the revised subsidence predictions and potential impacts on TransGrid 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 land within the Study area and in proximity to the TransGrid assets, and are summarised as follows:

Baseline Data / Validation

- 1. Carry out a visual / baseline audit of the TransGrid assets (i.e. 330 kV transmission line and towers) within the Study area.
- 2. Conduct a visual inspection of the access roads/tracks to the TransGrid assets to document the existing condition and serviceability.

Management / Monitoring / Response Measures

- 3. Establish a key contacts list between Peabody and TransGrid to provide a regular update of status of mining activities, and for ongoing liaison.
- 4. Include in the BFMP a schedule of times/frequency of communication with TransGrid for the status of mining of Longwalls 301-303.
- 5. Provide indicative timeframes in the BFMP between when the survey monitoring is carried out and information is provided to TransGrid.
- 6. Provide an indicative timeframe for implementation of real-time monitoring of towers.
- 7. Include in the BFMP, increased monitoring frequency to be implemented from the commencement of extraction of Longwall 301 with focus on the first tower(s) that may be affected (i.e. TL11-107 and TL11-108).
- 8. Develop a Trigger Action Response Plan (TARP) and include triggers for conditions that may need to be actioned by TransGrid.
- 9. Include in the BFMP relevant details regarding the potential for underground blast vibration impacts at the surface.
- 10. TransGrid to confirm if any maintenance activities or capital works are scheduled for the towers within the Study area during the extraction of Longwall 301-303.

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Contingency Planning

- 11. Undertake preliminary design works for contingency measures. This may include the opportunity to purchase/obtain emergency tower structures that could be used as a contingency.
- 12. TransGrid to determine where emergency towers could be installed in the Study area if required as a contingency.

Metropolitan Coal considers all risk control measures and procedures to be feasible to manage all identified risks.

The proposed risk control measures and procedures have been incorporated where relevant in this BFMP and the program for implementation is summarised in Table 6.

 Table 6

 Program for Implementation of Proposed Risk Control Measures and Procedures

	Risk Control Measure / Procedure	BFMP Section	Timing
Basel	ine Data / Validation		
1	Carry out a visual / baseline audit of the TransGrid assets (i.e. 330 kV transmission line and towers) in the Study area	Section 6	Complete
2	Conduct a visual inspection of the access roads/tracks to the TransGrid assets	Section 7.3.2	Complete
Mana	gement / Monitoring / Response Measures		
3	Establish key contacts list in the BFMP	Section 6.1	Complete
4	Include a schedule of times/frequency of communication with TransGrid for the status of mining of Longwalls 301-303 in the BFMP	Sections 7 and 10 / Table 2	Complete
5	Provide indicative timeframes in the BFMP between when the survey monitoring is carried out and information is provided to TransGrid	Section 7.3.1	Complete
6	Provide an indicative timeframe for the implementation of real-time monitoring for the towers	Section 7.3.1	Complete
7	Include in the BFMP, increased monitoring frequency to be implemented from the commencement of extraction of Longwall 301 with focus on the first tower(s) that may be affected (TL11-107 and TL11-108)	Section 7 / Table 8	Complete
8	Include in the TARP triggers for conditions that may need to be actioned by TransGrid	Section 10 / Table 11	Complete
9	Include in the BFMP relevant details regarding the potential for underground blast vibration impacts at the surface	Section 4.3	Complete
10	TransGrid to confirm if any maintenance activities or capital works are scheduled for the towers within the Study area during the extraction of Longwall 301-303	Section 4.2.3	As required
Conti	ngency Planning		
11	Undertake preliminary design works for contingency measures. This may include the opportunity to purchase/obtain emergency tower structures that could be used as a contingency	Section 9.1	Complete
12	TransGrid to determine where emergency towers could be installed in the Study area if required as a contingency	Section 9.1	Complete

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4.2.3 TransGrid Impact Assessment

TransGrid carried out an assessment of the impacts of the predicted subsidence on the 330 kV transmission line and towers based on MSEC (2016) predictions. In summary:

- Cruciforms are not necessary.
- Conductor sheaves are not necessary.
- Earthwire sheaves are not necessary.
- Survey monitoring will be necessary for towers legs on Towers TL11-103 to TL11-108.

TransGrid will inform Metropolitan Coal if any maintenance activities and/or capital works are scheduled for the towers within the Study area during the extraction of Longwalls 301-303.

4.3 UNDERGROUND BLAST VIBRATION IMPACTS

Use of explosives is not required for existing or proposed general underground coal mining. Occasionally, geological structures (e.g. dykes) may be encountered underground that have to be broken up using very low mass explosives. This underground blasting would be undertaken at significant depth (e.g. greater than 400 m below the surface).

Ground vibration and airblast levels which cause human discomfort are generally lower than the recommended structural damage limits. Therefore, compliance with the lowest applicable human comfort criteria ensures that the potential to cause structural damage is minimal. Based on the assessment results presented in the Metropolitan Coal Project Noise Impact Assessment (Heggies, 2008), ground vibration levels are predicted to meet the most stringent night-time criteria of 1 mm/s at a distance of 500 m from the blast site. As blasting is conducted at least 400 m below the surface, vibration impacts are likely to be minimal (which is consistent with the existing Metropolitan Colliery blasting practices and experience).

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:

- the structural integrity of the transmission line and towers is maintained;
- the electrical clearance from vegetation is maintained; and
- the serviceability of the access roads/tracks is maintained.

Section 7 of this Longwalls 301-303 BFMP-TRA describes the monitoring that will be conducted to assess the Project against the above performance measure. Section 9 of this Longwalls 301-303 BFMP-TRA provides a Contingency Plan in the event the performance measure is exceeded.

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6 BASELINE DATA



A photograph of a 330 kV transmission tower is shown in Plate 1.

Plate 1 – 330 kV Transmission Tower (Source: MSEC, 2016)

A site inspection of the 330 kV line was conducted prior to commencement of secondary extraction of Longwall 301 to establish the condition of the line. The inspection included:

- recording of existing structure conditions;
- two dimensional image records of the affected structures; and
- condition of the access road/tracks with specific attention to surface cracks.

6.1 KEY CONTACTS LIST

The list of key contacts for Peabody and TransGrid during the development and implementation of this BFMP are provided in Table 7.

Company	Position	Contact
Dechady (Matropalitan Cool)	Manager – Technical Services	Metropolitan 24hr Control Room
Peabody (Metropolitan Coal)	Jon Degotardi	02 4294 7333
Transpirit	Proposal Manager	Transgrid 24hr Contact
TransGrid	John Psarologos	1800 027 253
T O · · ·	Sales and Support Coordinator	Transgrid General Enquiry
TransGrid	Juan Duriavig	02 9284 3000

Table 7 List of Key Contacts

If an emergency situation arises and alternative supply is required, the following TransGrid stakeholders would be notified:

- TransGrid System Operation (phone: 02 9620 0102; email: <u>system.operator@transgrid.com.au</u>)
- TransGrid Maintenance Group (phone: 02 9620 0350; email: <u>TransmissionLinesandEasementsMaintenance@transgrid.com.au</u>)

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7 MONITORING

A monitoring program will be implemented to monitor the impacts of the Project on the 330 kV transmission line and access roads/tracks as determined in consultation with TransGrid. Table 8 summarises the Longwalls 301-303 BFMP-TRA monitoring components.

Where relevant, inspections of subsidence impacts will include photographic record of the impacts for comparison with baseline photographic records.

TransGrid or their delegates will conduct the various visual inspections. Metropolitan Coal will be notified of the timing of inspections and accompany TransGrid or delegates if considered necessary. All personnel will complete necessary inductions or orientation relevant to the tasks required.

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 Longwalls 301-303 BFMP-TRA.

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 in accordance with the Longwalls 301-303 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 TransGrid 330 kV Transmission Line will be measured by a single survey line along the transmission corridor occupied by the transmission lines, and by survey of each tower (Towers TL11-103 to TL11-108).

The survey line within the transmission line corridor will consist of survey pegs or pins installed every 20 m (subject to terrain constraints) and measured by total station with a survey accuracy of ± 5 mm.

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Program	Aspect	Method	How	Why	Timing	Frequency
Baseline	Towers (TL11-103 to TL11-108)	Survey	Adjacent subsidence line points at approximately 20 m spacing	Establish base conditions	Prior to Longwall 301 extraction	Once
			4 x ground points outside each leg for each tower	Establish base conditions	Prior to Longwall 301 extraction	Once
			4 x tower leg mounted prisms for each tower	Establish base condition	Prior to Longwall 301 extraction	Once
			Earth wire peak point for each tower	Establish base condition	Prior to Longwall 301 extraction	Once
		Condition Repor existing structure dimensional ima structures)	e conditions and two	Establish base condition	Prior to Longwall 301 extraction	Once
	Transmission Line (between TL11-103 to TL11-108)	Survey	± 10 points either side of each tower	Establish base conditions (including clearance heights for roads, land and vegetation)	Prior to Longwall 301 extraction	Once
	Access roads/tracks	Visual inspection (including notes on general condition of access roads/tracks)		Establish base condition	Prior to Longwall 301 extraction	Once
During Mining	Towers (TL11-103 to TL11-108)	Survey	Adjacent subsidence line points at approximately 20 m spacing	Monitor subsidence effects during mining (subsidence, tilt, strain)	At the completion of each longwall	Twice (once per Longwall 301 & 302)
			12 x ground points outside each leg for each tower extending to 60 m from tower legs	Monitor subsidence effects during mining (subsidence, tilt, strain, absolute horizontal translation)	At each tower within 400 m of the active longwall face until subsidence negligible	Weekly
			4 x tower leg mounted prisms for each tower	Monitor subsidence effects during mining (differential leg movement)	At each tower within 400 m of the active longwall face until subsidence negligible	Weekly
			Earth wire peak point for each tower	Monitor subsidence effects during mining (tilt, absolute horizontal translation)	At each tower within 400 m of the active longwall face until subsidence negligible	Weekly

 Table 8

 Longwalls 301-303 BFMP-TRA Monitoring Program Overview

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Program	Aspect	Method	How	Why	Timing	Frequency
During Mining (Cont.)	Towers (TL11-103 to TL11-108) (Cont.)	Visual inspection	Field notes and observations recorded by surveyors		At each tower within 400 m of the active longwall face until subsidence negligible	Weekly
		Visual inspection (TransGrid)		OPGW), and for any t or impact on integrity	At any time in case emergency	e of fault or
	Transmission Lines (between TL11-103 to TL11-108)	Survey	± 10 points either side of each tower	Monitor subsidence effects during mining (subsidence, tilt, absolute horizontal translation)	At each tower within 400 m of the active longwall face until subsidence negligible	Weekly
		Visual inspection	Field notes and observations recorded by surveyors	Monitor for evidence of subsidence effects on Transmission Lines including changes in clearance heights for roads, land and vegetation, or movement of insulator strings	At each tower within 400 m of the active longwall face until subsidence negligible	Weekly
		Visual inspection (TransGrid)	Visual check by TransGrid of earth wire/ OPGW, and for any conductor movement or impact on integrity and function of support clamps.		At any time in case emergency	e of fault or
	Access roads/tracks	Visual inspection	Field notes on general condition of access roads/tracks by	Monitor for surface cracks, buckling and general safety	At the completion of each longwall	Twice (once per Longwall 301 & 302)
			surveyors		At each tower within 400 m of the active longwall face until subsidence negligible	Weekly
					As per Longwalls	301-303 LMP

 Table 8 (Continued)

 Longwalls 301-303 BFMP-TRA Monitoring Program Overview

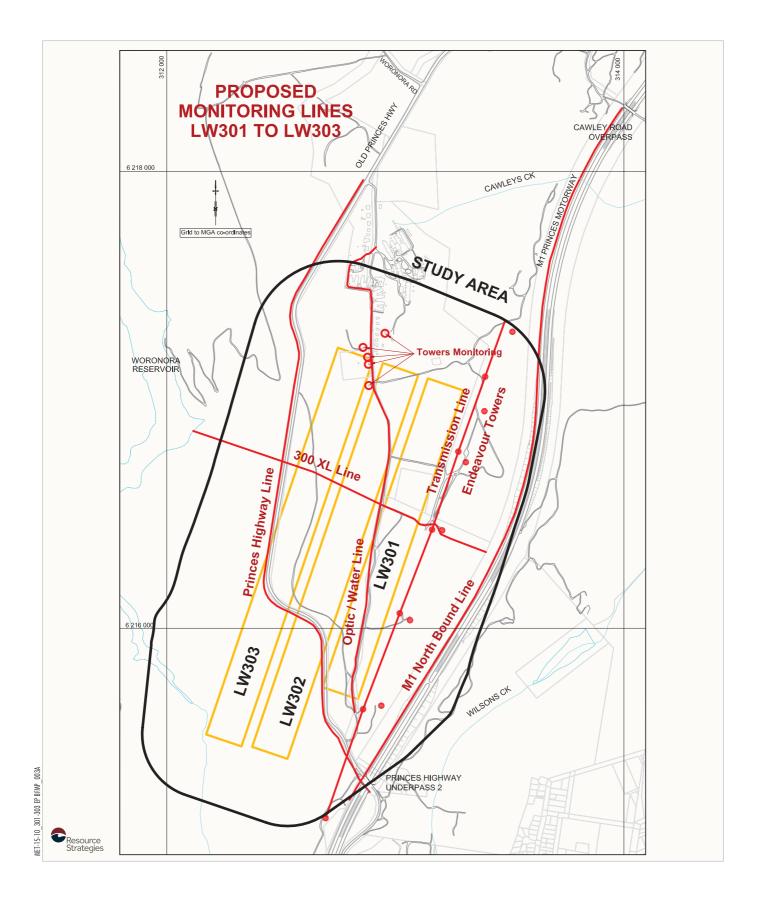
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Program	Aspect	Method	How	Why	Timing	Frequency									
Post Mining	(TL11-103 to TL11-108)		Adjacent subsidence line points at approximately 20 m spacing	Determine level of impact of mining (if any)	Within 3 months of the completion of Longwall 302 and 303	Twice									
			4 x ground points outside each leg for each tower	Determine level of impact of mining (if any)	Within 3 months of the completion of Longwall 302 and 303	Twice									
			4 x tower leg mounted prisms for each tower	Determine level of impact of mining (if any)	Within 3 months of the completion of Longwall 302 and 303	Twice									
	(rec two										Earth wire peak point for each tower	point for each	Determine level of impact of mining (if any)	Within 3 months of the completion of Longwall 302 and 303	Twice
		Condition Report (recording of struc two dimensional in structures)	ture conditions and nage records of	Determine level of impact of mining (if any)	Within 3 months of the completion of Longwall 302 and 303	Twice									
		Visual inspection (TransGrid)	Ground inspection	Validation	Next scheduled post mining	Twice									
			Climbing inspection	Validation	Next scheduled post mining	Twice									
	Transmission Lines (between TL11-103 to TL11-108)	Survey	± 10 points either side of each tower	Determine level of impact of mining (if any)	Within 3 months of the completion of Longwall 302 and 303	Twice									
		Visual inspection (TransGrid)	Ground inspection	Validation	Next scheduled post mining	Twice									
			Climbing inspection	Validation	Next scheduled post mining	Twice									
	Access roads/tracks	Visual inspection	Field notes on general condition of access roads/tracks by surveyors	Determine level of impact of mining (if any)	Within 3 months of the completion of Longwall 302 and 303	Twice									
		Visual inspection (TransGrid)	Ground inspection	Validation	Next scheduled post mining	Once									

 Table 8 (Continued)

 Longwalls 301-303 BFMP-TRA Monitoring Program Overview

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METROPOLITAN COAL Longwalls 301-303 Subsidence Monitoring Layout

7.2 SPECIFIC MONITORING FOR TOWERS TL11-103 TO TL11-108

The specific monitoring program developed in conjunction with TransGrid while mining near towers TL11-100 to TL11-102 is to be extended to towers TL11-103 to TL11-108. This is detailed in Table 9.

Management Period	Monitoring		Trigger	Response
Baseline studies prior to mining	 Survey of monitoring lines/points. Survey of Tower legs (TL11-103 to TL11-108). Earth Peaks Monitoring. 		Oocumentation of base onditions.	 Document and report to: TransGrid; and Principal Subsidence Engineer – Department of Industries.
Mining within 400 m of towers: TL11-103 TL11-104 TL11-105 TL11-106 TL11-107	 Survey Monitoring At each tower within 400 m of the active longwall face, carry out the following survey monitoring: Survey 4 x ground monitoring points outside each leg. Survey 4 x tower leg 	GREEN	 Less than <4 mm separation between tower leg; and/or No observable surface deformations at a tower; and/or Survey data within predictions. 	 At weekly monitoring frequency, document and report to: TransGrid; and NSW Principal Subsidence Engineer.
TL11-108 Minimum weekly monitoring frequency unless trigger requires otherwise	 mounted prisms. Survey the earth wire peak point. Survey transmission line ± 10 points either side of the tower being monitored. Visual Monitoring For each survey event the surveyors will record on their field notes and provide in the weekly report the following: 	ORANGE	 Separation between tower legs (4-8 mm); and/or Observable surface deformations at a tower. 	 Notify the following key stakeholders, as appropriate, within 24hrs of becoming aware of the trigger/s: TransGrid; and NSW Principal Subsidence Engineer. Continue consultation with TransGrid. Consult with TransGrid about increasing monitoring frequency.
	 Any observable surface deformations or other subsidence related effects at the tower being surveyed. Any observable subsidence effects on the road accessing each tower. Any observable effects will be noted quantitatively in regards width, length, orientation. 	RED	 Separation between tower legs (>8mm); and/or Observable surface deformations at a tower. 	 Notify key stakeholders, as appropriate, immediately following awareness of the trigger/s being met: TransGrid; and NSW Principal Subsidence Engineer. Undertake additional 3D survey and check against pre-mining monitoring data and review against predictions. Consult with TransGrid about increasing monitoring frequency. Undertake visual inspections accordingly. Liaise with asset owner TransGrid regarding any remediation action/s plan. Report monitoring data to NSW Principal Subsidence Engineer within 48hrs following collection of data. Review mining options.

Table 9Monitoring Program Specific to Towers TL11-103 to TL11-108

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Management Period	Monitoring	Trigger	Response
Post mining	 Survey of monitoring lines/points. Survey of Tower legs (TL11-103 to TL11-108). Earth Peaks Monitoring. 	Check against subsidence predictions and baseline survey.	 Undertake 3D survey and review against predictions. Document actual subsidence against predictions. Report monitoring data to TransGrid. Report NSW Principal Subsidence Engineer. Continue weekly surveys until subsidence has reached a point of post mining stability (i.e. weekly movement less than limit of survey accuracy for period of three weeks).

Table 9 (Continued)Monitoring Program Specific to Towers TL11-103 to TL11-108

7.3 SUBSIDENCE IMPACTS

7.3.1 Towers and Transmission Line

Visual inspections will be conducted of the towers and transmission line between Tower TL11-103 to TL11-108 inclusive in accordance with the TransGrid inspection program. This generally includes:

- annual inspection of the structure integrity sites from the ground;
- annual inspection of vegetation growth and electrical clearances from the air;
- six yearly climbing inspection; and
- fault and emergency patrols from either the air or ground at any time.

An audit / baseline inspection will occur prior to commencement of Longwall 301 and within three months of the completion of Longwalls 301-303. Weekly survey inspections will be conducted at each tower when the active longwall face is within 400 m of the tower until subsidence is negligible¹. Additional observations of subsidence impacts will be conducted during routine works and recorded by surveyors during tower monitoring survey.

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.

The information will be recorded in the Built Features Management Plan - Subsidence Impact Register (Appendix 2) and reported in accordance with the Project Approval conditions.

¹ Survey information will be provided to TransGrid as soon as possible following completion of the weekly survey/ inspection, and allowing for data entry/download and review (e.g. 24 hours) or as otherwise indicated in Table 9.

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Real-Time Monitoring Trial

In addition to the above monitoring, Metropolitan Coal is currently trialling the use of real-time survey monitoring at the towers as an additional management tool. Upon completion of the trial and subject to review of the trial outcomes (e.g. survey accuracy, trigger development, etc.), Metropolitan Coal will review and consider the continued use of real-time monitoring during the extraction of Longwalls 301-303.

7.3.2 Access Roads/Tracks

Visual inspection of the access roads/tracks to the TransGrid assets will occur prior to the commencement of Longwall 301, and following extraction of each longwall panel.

Visual observations of access roads/tracks would occur as part of routine works and inspections as well as during catchment visits within 600 m of Longwalls 301-303 secondary extraction as described in the Metropolitan Coal Longwalls 301-303 Land Management Plan (Longwalls 301-303 LMP).

Specific details that will be noted and/or photographed that are relevant to the TransGrid access roads/tracks include:

- the location, approximate dimensions (length, width and depth), and orientation of surface tension cracks;
- the location of the surface tension crack in relation to the access road/track to the TransGrid asset;
- whether any actions are required (e.g. implementation of management measures as outlined in the Longwalls 301-303 LMP, initiation of the Contingency Plan as outlined in the Longwalls 301-303 LMP, incident notification, implementation of appropriate safety controls, review of public safety, etc.); and
- any other relevant information.

The date of the observation, details of the observer and the location of longwall extraction will also be documented.

The information obtained will be recorded in the Longwalls 301-303 LMP - Subsidence Impact Register and reported in accordance with the Project Approval conditions.

The information obtained will be used to assess the potential environmental consequences of the subsidence impact (described in the Longwalls 301-303 LMP) and to identify required management measures. Management measures are discussed in the Longwalls 301-303 LMP.

In the event the subsidence impacts are deemed to present a safety hazard (i.e. regardless of the nature or extent of the subsidence impact), actions will be implemented in accordance with the Metropolitan Coal Longwalls 301-303 Public Safety Management Plan.

7.4 ENVIRONMENTAL CONSEQUENCES

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

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8 MANAGEMENT MEASURES

A number of potential management measures in relation to towers and transmission lines are considered to be applicable. These include:

- alteration of conductor tensions;
- install temporary structures;
- modification to attachment points such as placement of stringing sheaves to earth wires and/or phase conductors; and
- strengthening of tower structures (e.g. through installation of cruciform footings).

The requirement for these management measures will be determined by TransGrid (Section 4.2.3) and if required, constructed prior to mining within 600 m of the towers.

Where significant subsidence impacts on access roads/tracks are detected (e.g. those that affect the serviceability) or at any time Metropolitan Coal, TransGrid or the landholder considers that the integrity of the access roads/tracks may be compromised, the following management measures would be applied. Where significant cracks are detected, the cracks would be repaired as soon as practicable in consultation with the landholder. This may include the use of earthmoving equipment if considered the most appropriate means of repair. Appropriate sedimentation controls will be implemented during repair works. Management measures for access roads/tracks will be implemented in accordance with the Longwalls 301-303 Land Management Plan.

Metropolitan Coal will assess the potential impacts to public safety and where appropriate, implement measures in accordance with the Longwalls 301-303 Public Safety Management Plan.

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 or indicators detailed in Section 5 of this Longwalls 301-303 BFMP-TRA, Metropolitan Coal will implement the following Contingency Plan (Appendix 3):

- The observation will be reported to the Metropolitan Coal Manager Technical Services within 24 hours.
- With the exception of access roads/tracks, 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 Longwalls 301-303 BFMP-TRA.
- If relating to an access road/track, the observation will be recorded in the Metropolitan Coal Longwalls 301-303 Land Management Plan Subsidence Impact Register.
- Metropolitan Coal will report any exceedance of the performance measure or indicators to the DP&E and TransGrid as soon as practicable after Metropolitan Coal becomes aware of the exceedance.

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- Metropolitan Coal will assess public safety and where appropriate implement safety measures in accordance with the Metropolitan Coal Longwalls 301-303 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.
- 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 DP&E for approval.
- Metropolitan Coal will implement the approved course of action to the satisfaction of the DP&E.

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 Director-General (now Secretary) of DP&E if either the contingency measures implemented by Metropolitan Coal have failed to remediate the impact or the Director-General (now Secretary) determines that it is not reasonable or feasible to remediate the impact.

Metropolitan Coal will comply with the NSW *Coal Mine Subsidence Compensation Bill 2017* in the event that property damages occur as a result of mining Longwalls 301-303.

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).

TransGrid designs its network with full redundancy provision (i.e. n-1 capability). In the unlikely event that TL11 became unserviceable due to a subsidence impact, TransGrid can potentially switch around TL11 for a period of time to effect emergency works, continuing to provide power to its customers (unless there are planned outages/faults in other connected parts of the transmission network).

Contingency measures that could be considered in the event the performance measure for the towers and transmission line is exceeded are summarised in Table 10. The decision tree for the contingency measures is shown in Appendix 3.

Preliminary design works for contingency measures (e.g. temporary structures for use in an emergency) has been completed in consultation with TransGrid, including proposed locations for temporary pole towers if required.

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Environmental	Contingency Measures	
Consequence	Measure	Description
Impact on Towers	Temporary replacement	• Temporary switching of power to alternate transmission lines to effect repairs to TL11.
		 Installation of temporary emergency tower structures as designed by TransGrid.
		 Emergency structures can be deployed to re-establish line operations within 72hrs (depending on the amount of towers requiring replacement).
	Rebuilding	 Construction of new tower(s) while temporary towers are in operation.
Impact on	Stabilisation techniques	Sheaving of conductors and/or earth wires.
Transmission Wires	Rebuilding	Construction of new transmission lines.

 Table 10

 Contingency Measures – Towers and Transmission Lines

In the event that contingency measures in Table 10 are still expected to exceed performance measures, adaptive management will be implemented. This includes:

- reduction in extraction height;
- modification to layout; or
- stop mining the longwall.

10 TARP – MANAGEMENT TOOL

The framework for the various components of the Longwalls 301-303 BFMP-TRA are summarised in the Longwalls 301-303 BFMP-TRA TARP shown in Table 11. The Longwalls 301-303 BFMP-TRA TARP illustrates 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 11

 Longwalls 301-303 BFMP-TRA Trigger Action Response Plan

TRA	TRANSGRID – Towers (T11-103 to T11-108)		
	Risk: Subsidence effect on towers resulting in impac	t to structural integrity and reduced transmission line clearance.	
	TRIGGER LEVEL	RESPONSE	
	Level 1 - Normal		
	Expected subsidence conditions		
	Subsidence	Normal Operations	
	 less than 100 mm for LW 301-302 	Towers are safe and serviceable.	
	less than 125 mm for LW 303	Negligible impact to towers.	
	Absolute Horizontal Movements	Continue monitoring activities as planned.	
8	less than 80 mm at the base		
T11-108)	Tensile strain		
11	less than 0.6 mm/m		
ę	Compressive strain		
-103	less than 0.6 mm/m		
(T11-	Differential tower leg movements		
	less than 4.0 mm		
Towers	Level 2 - Monitor		
To	Subsidence elevated up to +15% of predicted but tower leg service condition normal		
Ð	Subsidence	Continue operations but report on subsidence anomaly	
TRANSGRID	• between 100 and 115 mm for LW 301-302	Towers are safe and serviceable.	
Ä	• between 125 and 145 mm for LW 303	Negligible impact to towers.	
TR	Absolute Horizontal Movements	Metropolitan Coal	
	between 80 and 100 mm at the base	Resurvey subsidence line, ground points, tower leg mounted prisms and earth wire peak points in affected area to confirm results.	
	Strain	Engage subsidence expert to assess results.	
	between 0.6 and 0.8 mm/m	Confirm results are consistent with other subsidence lines.	
	Differential tower leg movements	Compare and critically analyse measured versus predicted subsidence.	
	less than 4.0 mm	Inform and provide report to TransGrid and NSW Principal Subsidence Engineer of subsidence results (notify within 24 hours of trigger).	
		Collaboratively share information with TransGrid to monitor situation.	
		<u>TransGrid</u>	
		Assess information provided by Metropolitan Coal.	

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Table 11 (Continued)
Longwalls 301-303 BFMP-TRA Trigger Action Response Plan

TRANSGRID – Towers (T11-103 to T11-108)			
	Risk: Subsidence effect on towers resulting in impact to structural integrity and reduced transmission line clearance.		
	TRIGGER LEVEL	RESPONSE	
	Level 3 - Cautionary		
~	Anomalous differential leg movement or subsidence beyond +15% of predicted		
-108)	Subsidence	Investigate & Resolve	
3	 greater than 115 mm for LW 301-302 	Towers are safe and serviceable.	
5	 greater than 145 mm for LW 303 	Indication of impact to towers or reduced transmission line clearance.	
103	Absolute Horizontal Movements	Metropolitan Coal	
÷	 greater than 100 mm at the base 	Steps as per Level 2 event, plus:	
rs (T1	Strain	- Inform TransGrid and NSW Principal Subsidence Engineer of subsidence results (immediately following awareness of trigger).	
we	 greater than 0.8 mm/m 	- Increase frequency of monitoring and subsidence line surveys to weekly in affected area (if not already).	
Ê	Observable subsidence ground deformations at a	- Report monitoring data to NSW Principal Subsidence Engineer within 48hrs following collection of data.	
SGRID	tower Differential tower leg movements	 In conjunction with TransGrid identify impact location and have TransGrid assess tower condition and/or conductor performance. 	
IRANSG	 between 4.0 and 8.0 mm 	- Review the subsidence monitoring program and update the program where appropriate.	
TR		 Provide report on issue to both TransGrid and DP&E. 	
		TransGrid	
		• In conjunction with Metropolitan Coal identify impact location, inspect tower, assess condition and determine appropriate response. (e.g. greater monitoring data or frequency, or schedule maintenance on the structure).	
		Make determination if other measures necessary to avoid further impact (e.g. deployment of emergency structures).	

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TRANSGRID – Towers (T11-103 to T11-108)			
	Risk: Subsidence effect on towers resulting in impact to structural integrity and reduced transmission line clearance.		
	TRIGGER LEVEL	RESPONSE	
	Level 4 – Restoration		
	Exceedance of nominated differential leg movement or fault occurs		
Â	Fault Occurs	Implement Contingency Plan	
-108)	Differential leg movement	As per BFMP Section 9 and Appendix 3.	
T11	Greater than 8.0 mm	Metropolitan Coal	
9		As per Level 3 event, plus:	
-103		- General Manager to be involved in all decision-making processes.	
s (T11-		 Assess public safety implications and where appropriate implement safety measures in accordance with Metropolitan Coal Longwalls 301-303 Public Safety Management Plan. 	
vers		- Report exceedance of the performance measure or indicators to the DP&E and TransGrid as soon as practicable.	
Tow		- Update the 'Built Features Management Plan – Subsidence Impact Register'.	
TRANSGRID		 Investigate circumstances of the fault and determine requirement for adaptive management of mining operations prior to future operations in vicinity of the towers and transmission lines. 	
ANS		TransGrid	
TR		As per Level 3 event, plus:	
		- For fault - TransGrid to enact fault / emergency response measures including switching around TL11 while service is restored.	
		- For greater than 8.0 mm differential leg movement - TransGrid to determine timing of emergency restoration measure.	
		- Complete restoration works.	
		 Work in conjunction with Metropolitan Coal to investigate root cause of incident and determine appropriate future control measures. 	

 Table 11 (Continued)

 Longwalls 301-303 BFMP-TRA Trigger Action Response Plan

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11 FUTURE EXTRACTION PLANS

In accordance with Condition 7, Schedule 3 of the Project Approval, Metropolitan Coal will collect baseline data for the future Extraction Plan (e.g. Longwall 304 onward). However the baseline (and post-mining) data collected for Longwalls 301-303 will be used as baseline for Longwalls 304 onward as longwall mining progressively moves further away from the TransGrid 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 Longwalls 301-303 BFMP-TRA will inform the appropriate type and frequency of monitoring of the assets relevant to the next Extraction Plan.

11.1 ASSESSMENT OF TRIAL LONGWALL LAYOUT FOR LONGWALLS 301-303

As described in Section 4.1, the layout for Longwalls 301-303 (i.e. 163 m panel widths [void] and 45 m pillars [solid]) will be trialled to build on the experience and dataset obtained from Longwalls 20 to 27. The outcomes of the trial will be used to inform the potential for a similar mine layout to be applied to the next Extraction Plan (i.e. Longwall 304 onwards).

Following the completion of Longwall 301 and Longwall 302 and during the mining of Longwall 303, Metropolitan Coal will review the available subsidence monitoring results and assess the changes to, and impacts on, TransGrid assets.

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.

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As described in Section 2, this BFMP 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.

The reporting of incidents will be conducted in accordance with Condition 6, Schedule 7 of the Project Approval. Metropolitan Coal will notify the Director-General (now Secretary) of DP&E 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 Director-General (now Secretary) of DP&E and any relevant agencies with a detailed report on the incident.

Transgrid 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.

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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.

15 NON-COMPLIANCES WITH STATUTORY REQUIREMENTS

A protocol for the managing and reporting of non-compliances with statutory requirements has been developed as a component of Metropolitan Coal's 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 Manager - Technical Services 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 Director-General (now Secretary) of the DP&E 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 Director-General (now Secretary) of the DP&E 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 licenses 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 Director-General (now Secretary) of the DP&E 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 Director-General (now Secretary) of the DP&E.

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16 **REFERENCES**

- Department of Planning & Environment and Division of Resources and Energy (2014) *Guidelines for the Preparation of Extraction Plans.* Draft.
- Heggies (2008) *Metropolitan Coal Project Noise Impact Assessment*. Appendix J in the Metropolitan Coal Project Environmental Assessment.

Helensburgh Coal Pty Ltd [HCPL] (2008) Metropolitan Coal Project Environmental Assessment.

Helensburgh Coal Pty Ltd [HCPL] (2009) Metropolitan Coal Project Preferred Project Report.

- 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 (2016) Metropolitan Colliery Proposed Longwalls 301-303 - Subsidence Predictions and Impact Assessments for the TransGrid 330 kV Transmission Line, dated 7 September 2016.

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APPENDIX 1

MSEC (2016) METROPOLITAN COLLIERY – PROPOSED LONGWALLS 301 TO 303 - SUBSIDENCE PREDICTIONS AND IMPACT ASSESSMENTS FOR THE TRANSGRID 330 KV TRANSMISSION LINE, DATED 7 SEPTEMBER 2016

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7th September 2016

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

Ref: MSEC844-02

Dear Jon,

RE: Metropolitan Colliery - Proposed Longwalls 301 to 303 - Subsidence Predictions and Impact Assessments for the TransGrid 330 kV Transmission Line

This letter report summarises the predicted subsidence movements and the assessed subsidence impacts for the TransGrid 330 kV transmission line resulting from the extraction of the proposed Longwalls 301 to 303 at Metropolitan Colliery.

The locations of the 330 kV transmission line and the proposed longwalls are shown in the attached Drawing No. MSEC844-02. The transmission line is located to the east of Longwalls 301 to 303 and therefore is not proposed to be directly mined beneath.

The transmission towers and reference numbers are also shown in Drawing No. MSEC844-02. There are six towers that are located within or immediately adjacent to the Study Area for Longwalls 301 to 303. The distances of these towers from the nearest longwall, being Longwall 301, are summarised in Table 1.

Tower Number	Tower Type	Distance of the Transmission Towers Centrelines from the Longwalls (m)
TL11 103	Suspension	310
TL11 104	Suspension	50
TL11 105	Suspension	50
TL11 106	Suspension	70
TL11 107	Suspension	70
TL11 108	Suspension	110

Table 1 Distances of the 330 kV Transmission Towers from Longwalls 301 to 303

The transmission towers that are located within the Study Area are all suspension towers. The changes in alignment at the transmission towers are in the order of 1 to 3 degrees.

A photograph of one of the 330 kV transmission towers is provided in Figure 1.





Figure 1 Photograph of a 330 kV Transmission Tower

The predictions and impact assessments for the 330 kV transmission line are provided in the following sections.

Predictions of Conventional Subsidence Parameters

The following provides summaries of the maximum predicted conventional movements for the 330 kV transmission line resulting from the extraction of Longwalls 301 to 303. 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 the following section.

The predicted profiles of transient subsidence, tilt along and tilt across the alignment of the 330 kV transmission line, during the extraction of Longwall 301, are shown in the attached Fig. A.1. The profiles have been shown based on 50 metre advances of the longwall extraction face. The transmission line will initially experience subsidence adjacent to the northern end of Longwall 301 and then subsidence will progressively develop towards the southern end of the longwall during mining.

The predicted profiles of incremental and total conventional subsidence, tilt along and tilt across the alignment of the 330 kV transmission line, resulting from the extraction of Longwalls 301 to 303, are shown in the attached Fig. A.2. The black dashed lines are the incremental profiles that represent the additional movements due to each of the longwalls. The solid blue lines represent the total or accumulated movements after the completion of each longwall.

A summary of the maximum predicted values of incremental subsidence, tilt along and tilt across the alignment of the 330 kV transmission line, due to the extraction of each of the Longwalls 301 to 303, is provided in Table 2. The values are the maxima anywhere along the transmission line (i.e. not necessarily at the tower locations).

Table 2Maximum Predicted Incremental Subsidence, Tilt Along and Tilt Across the Alignment of the
330 kV Transmission Line Resulting from the Extraction of Longwalls 301 to 303

Longwall	Maximum Predicted Incremental Subsidence (mm)	Maximum Predicted Incremental Tilt Along Alignment (mm/m)	Maximum Predicted Incremental Tilt Across Alignment (mm/m)
Due To LW301	40	< 0.5	< 0.5
Due To LW302	80	< 0.5	0.5
Due To LW303	30	< 0.5	< 0.5



The maximum predicted incremental subsidence for the 330 kV transmission line, due to the extraction of each of the Longwalls 301 to 303, varies between 30 mm and 80 mm. It is noted, that the maximum predicted incremental subsidence due to Longwall 302 is greater than that due Longwall 301, as it is a second panel in the series and therefore results in higher magnitudes of subsidence above and outside of the mining area. The maximum predicted incremental tilt due to each of the longwalls is 0.5 mm/m (i.e. 0.05 %, or 1 in 2,000) across the alignment.

A summary of the maximum predicted values of total subsidence, tilt along the alignment and tilt across the alignment, resulting from the extraction of Longwalls 301 to 303, is provided in Table 3. The values are the maxima anywhere along the transmission line (i.e. not necessarily at the tower locations).

Table 3Maximum Predicted Total Subsidence, Tilt Along and Tilt Across the Alignment of the
330 kV Transmission Line Resulting from the Extraction of Longwalls 301 to 303

Longwall	Maximum Predicted Total Subsidence (mm)	Maximum Predicted Total Tilt Along Alignment (mm/m)	Maximum Predicted Total Tilt Across Alignment (mm/m)
After LW301	60	< 0.5	0.5
After LW302	110	0.5	1.0
After LW303	140	0.5	1.0

The maximum predicted total subsidence for the 330 kV transmission line, resulting from the extraction of Longwalls 301 to 303, is 140 mm. The greatest subsidence occurs adjacent to the southern end of Longwall 301. The maximum predicted conventional tilt is 1.0 mm/m (i.e. 0.1 %, or 1 in 1,000) and is orientated across the alignment of the transmission line. The maximum predicted conventional tilt along the alignment of the transmission line is 0.5 mm/m (i.e. 0.05 %, or 1 in 2,000).

There are six transmission towers that are located within or immediately adjacent to the Study Area, being Towers TL11 103 to TL11 108. A summary of the predicted values of total subsidence in the locations of the transmission towers, resulting from the extraction of Longwalls 301 to 303, is provided in Table 4.

Table 4 Predicted Total Subsidence in the Locations of the Transmission Towers Resulting from the
Extraction of Longwalls 301 to 303

Tower	Maximum Predicted Total Subsidence after LW301 (mm)	Maximum Predicted Total Subsidence after LW302 (mm)	Maximum Predicted Total Subsidence after LW303 (mm)
TL11 103	< 20	< 20	< 20
TL11 104	< 20	40	50
TL11 105	40	100	125
TL11 106	30	90	100
TL11 107	30	80	100
TL11 108	< 20	< 20	<20

The transmission towers are predicted to experience vertical subsidence up to 125 mm resulting from the extraction of Longwalls 301 to 303. The highest subsidence is predicted to occur at Tower TL11 105.

A summary of the maximum predicted values of total tilt at the bases of the transmission towers and total horizontal movements at the tops of the towers, resulting from the extraction of Longwalls 301 to 303, is provided in Table 5. The values are the maxima that occur at any time during or after the extraction of these longwalls. The horizontal movements have been based on an overall tower height of 50 metres.



Table 5 Maximum Predicted Total Tilts and Horizontal Movements at the Transmission Towers Resulting
from the Extraction of Longwalls 301 to 303

Tower	Maximum Predicted Total Tilt Along Alignment at the Base of the Tower (mm, +ve towards north and -ve towards south)	Maximum Predicted Total Tilt Across Alignment at the Base of the Tower (mm, +ve towards east and -ve towards west)	Maximum Predicted Total Horizontal Movement Along Alignment at the Top of Tower (mm, +ve towards north and -ve towards south)	Maximum Predicted Total Horizontal Movement Across Alignment at the Top of the Tower (mm, +ve towards east and -ve towards west)
TL11 103	< ±0.5	< ±0.5	< ±20	< ±20
TL11 104	< ±0.5	< ±0.5	< ±20	< ±20
TL11 105	< ±0.5	-1.0	< ±20	-60
TL11 106	< ±0.5	-0.5	< ±20	-50
TL11 107	< ±0.5	-0.5	< ±20	-50
TL11 108	< ±0.5	< ±0.5	< ±20	< ±20

The maximum predicted conventional tilt in the locations of the transmission towers is -1.0 mm/m (i.e. 0.1 %, or 1 in 1,000). The maximum predicted horizontal movement at the tops of the towers is -60 mm. The maximum tilt and horizontal movement both occur at Tower TL11 105 and are orientated towards the west (i.e. towards the longwalls).

A summary of the maximum predicted values of total opening and closure between the tops of the transmission towers, resulting from predicted conventional subsidence movements due to the extraction of Longwalls 301 to 303, is provided in Table 6. The values are the maxima that occur at any time during or after the extraction of these longwalls.

Table 6 Maximum Predicted Total Opening and Total Closure between Transmission Towers Resulting from the Extraction of Longwalls 301 to 303

Span	Maximum Predicted Opening due to LW301 to LW303 (mm)	Maximum Predicted Closure due to LW301 to LW303 (mm)	Final Predicted Opening (+ve) or Closure (-ve) after LW303 (mm)
TL11 103 to TL11 104	< 20	< 20	< ±20
TL11 104 to TL11 105	< 20	< 20	< ±20
TL11 105 to TL11 106	< 20	< 20	< ±20
TL11 106 to TL11 107	< 20	< 20	< ±20
TL11 107 to TL11 108	< 20	< 20	< ±20

The maximum predicted closure and opening between the tops of the transmission towers due to conventional subsidence movement is less than 20 mm.

The 330 kV transmission line is also likely to experience far-field horizontal movements orientated towards the mining area. The far-field horizontal movements are expected to be similar to those observed for previous longwall mining in the Southern Coalfield.

The observed incremental far-field horizontal movements, resulting from the extraction of longwalls in the Southern Coalfield, are provided in Figure 2. The data is based on survey marks located outside of the mining area (i.e. above solid coal).



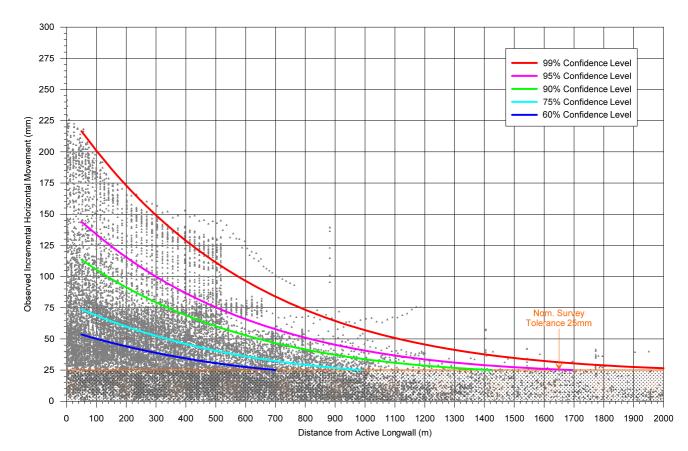


Figure 2 Observed Incremental Far-field Horizontal Movements from the Southern Coalfield (Solid Coal)

The transmission towers are located at distances between 50 and 310 metres from Longwalls 301 to 303. At these distances, the towers could experience absolute horizontal movements in the order of 100 mm to 140 mm based on the 95 % confidence level.

Far-field horizontal movements tend to be bodily movements orientated towards the mining area. The potential for impacts does not result from these absolute horizontal movements, but rather the differential horizontal movements.

These absolute far-field horizontal movements could result in small changes in the distances between the towers since the directions of these far-field horizontal movements are generally expected to be towards the extracted longwalls and the 330 kV transmission line is oriented approximately perpendicular to the longwalls. The greatest differences would therefore be expected to occur between towers that are located close to the longwalls and those located further from the longwalls, such as towers TL11 103 to TL11 104 and towers TL11 108 to TL11 109. A calculation of relative far field movements between towers based on potential far-field horizontal movements from Figure 2, for the 95% confidence level, indicates a potential maximum closure movement of less than 50 mm between the towers. With increasing distance from the extracted longwalls, the potential relative far-field movement between towers could result in an opening of less than 50 mm.

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 330 kV transmission line 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 transmission towers are located at distances of 50 metres or greater from the proposed longwalls. The database has therefore been analysed to extract the maximum tensile and compressive strains that have been measured at any time during the extraction of the previous longwalls in the Southern Coalfield, for survey bays that were located outside between zero and 100 metres of the nearest longwall goaf edge, which has been referred to as "above solid coal".

A histogram of the maximum observed tensile and compressive strains measured in survey bays located above solid coal, for monitoring lines in the Southern Coalfield, is provided in Figure 3. The probability distribution functions, based on a fitted *Generalised Pareto Distribution (GPD)*, have also been shown in this figure.

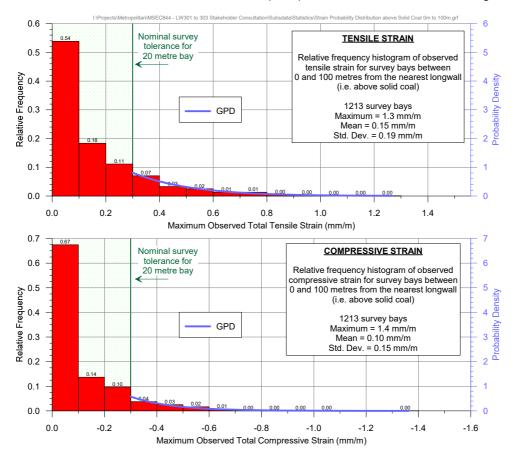


Figure 3 Distributions of the Measured Maximum Tensile and Compressive Strains during the Extraction of Previous Longwalls in the Southern Coalfield Above Solid Coal (0 to 100 metres)



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 7.

Strain (mm/m)		Probability of Exceedance	
	-1.5	1 in 3,100	
Commencian	-1.0	1 in 630	
Compression	-0.5	1 in 40	
	-0.3	1 in 10	
	+0.3	1 in 6	
Tanaian	+0.5	1 in 15	
Tension	+1.0	1 in 250	
	+1.5	1 in 2,200	

Table 7 Probabilities of Exceedance for Strain for Survey Bays Located above Solid Coal

The 95 % confidence intervals for the maximum total strains that the individual survey bays above solid coal experienced at any time during mining are 0.5 mm/m tensile and 0.4 mm/m compressive. The 99 % confidence intervals for the maximum total strains that the individual survey bays above solid coal experienced at any time during mining are 0.8 mm/m tensile and 0.7 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 are shown in Drawing No. MSEC844-02. The Metropolitan Fault has a north west to south east strike and dips to the north east. This fault crosses the alignment of the 330 kV transmission line outside of the Study Area, in close proximity to Tower TL11 109, at a distance of 0.5 kilometres north of Longwall 301. Faults also cross the alignment of the transmission line in the southern part of the Study Area, in close proximity to Tower TL11 103.

If these faults extend from the seam up to the surface, then localised and elevated compressive strains could develop at their surface expressions. It is also possible that localised and elevated strains could occur elsewhere due to unknown geological structures (i.e. anomalies).

If the surface expressions of the faults are located between the towers, then the predicted parameters for the towers do not change from those summarised in Table 4 to Table 7. However, if the surface expression of a fault is coincident with a tower, then it could experience a compressive strain greater than that predicted based on conventional ground movements.

It is difficult to predict the magnitudes of the non-conventional movements at known geological structures, especially in locations outside of mining. Experience from previous mining in close proximity of known geological structures can be used to provide a guide to the potential ground movements.

The greatest strain that has been measured at a known geological structure that was located outside of mining in the Southern Coalfield occurred in Appin Area 4. The surface expression of a low angle thrust fault was located at a distance of 190 metres from Longwall 407. The measured compressive strain at the surface expression due to mining of this longwall was 3.5 mm/m. The development of compressive strain versus the longwall face advance is illustrated in Figure 4. The rate of change of compressive strain per 10 metre longwall face advance is shown in Figure 5.



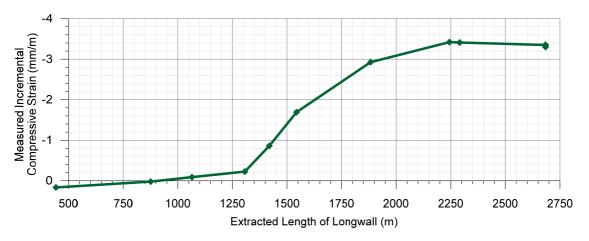


Figure 4 Development of Compressive Strain at the Surface Expression of the Low Angle Thrust Fault due to the Extraction of Appin Longwall 407

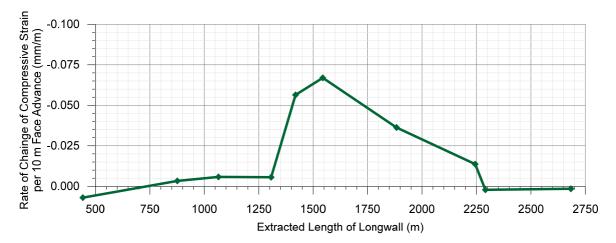


Figure 5 Rate of Change of Compressive Strain at the Surface Expression of the Low Angle Thrust Fault due to the Extraction of Appin Longwall 407

The maximum rate of change of compressive strain was 0.076 mm/m per 10 metre longwall face advance. Based on an average extraction rate of 50 metres per week, this equates to a maximum rate of 0.4 mm/m per week. The compressive strain developed over the period when the longwall had an extracted length between 1,300 and 2,200 metres. This equates to a period of approximately 18 weeks based on an average extraction rate of 50 metres per week.

The localised movements that developed at the surface expression of the low angled thrust fault in Appin Area 4 are an extreme case and greater than other known and measured cases in the Southern Coalfield. This case is likely to provide a conservative indication of potential non-conventional movements at surface expressions of geological structures outside of mining.

There are no major streams that cross the alignment of the 330 kV transmission line adjacent to Longwalls 301 to 303. The are some small tributaries along the alignment of the transmission line, which can be seen from the surface profile shown in Figs. A.1 and A.2. Localised and elevated compressive strains could develop in the bases of these small tributaries due to valley closure effects. However, the towers are located away from the bases of these small tributaries and, therefore, are unlikely to experience these valley closure strains.



Impact Assessments for the 330 kV Transmission Line

The cables along the 330 kV transmission line are not directly affected by ground strains, as they are supported by the towers above ground level. The cables can, however, be affected by the changes in bay lengths, i.e. the distances between the towers at the level of the cables, which result from mining induced differential subsidence, horizontal ground movements and lateral movements at the tops of the towers due to differential tilting of the towers. The stability of the transmission towers can be affected by the mining induced tilts, curvatures and ground strains at the tower locations and by changes in the catenary profiles of the cables.

Potential Impacts due to the Predicted Conventional Movements

The transmission towers are predicted to experience vertical subsidence up to 125 mm resulting from the extraction of Longwalls 301 to 303. The transmission line is orientated parallel to the longwalls and therefore the low level vertical subsidence is predicted to be reasonably uniform along its alignment. It is unlikely, therefore, that these magnitudes of vertical subsidence would result in adverse impacts on the cable ground clearances.

The maximum predicted conventional tilt in the locations of the transmission towers is 1.0 mm/m (i.e. 0.1 %, or 1 in 1,000) orientated across the alignment. The predicted mining induced tilts are very small and generally similar to the order of survey tolerance. The mining induced tilts and horizontal movements along the alignment of the transmission line are predicted to result in opening and closure of less than 20 mm between adjacent towers. It is unlikely, therefore, that the conventional movements would result in adverse impacts on the transmission line.

Far-field horizontal movements could result in small changes in the distances between the towers, particularly those located near the ends of the longwalls. Potential maximum predicted shortening movement of 50 mm between the towers and opening of less than 50 mm could occur between towers, due to far-field horizontal movements.

The predicted strains at the locations of the transmission towers are 0.5 mm/m tensile and 0.4 mm/m compressive based on the 95 % confidence level and are 0.8 mm/m tensile and 0.7 mm/m compressive based on the 99 % confidence level. It is recommended that TransGrid review the structural integrity of the towers based on changes in the tower leg spacings (i.e. k-point distances) resulting from the predicted strains.

Potential Impacts due to Possible Non-Conventional Movements

Localised and elevated compressive strains can develop due to the presence of geological structures or valley related effects. There are no significant streams in the locations of the transmission towers and, therefore, it is unlikely that they will be adversely impacted by valley closure effects.

It is possible that the transmission towers could experience compressive strains greater than those predicted based on conventional movements if they were coincident with the surface expression of a fault. The potential for nonconventional movements in the locations of the towers is very low, due to their distances from the longwalls, however, the potential for these irregular movements cannot be discounted.

It is recommended that strategies are developed, in consultation with TransGrid, to manage the potential for nonconventional movements at the transmission tower locations. The strategies should consider the magnitudes and rates of development of strain in locations of known geological structures adjacent to previous longwall mining. The observation at a low angled thrust fault in Appin Area 4 (refer to Figure 4 and Figure 5) is an extreme case and greater than other known and measured cases in the Southern Coalfield. This case is likely to provide a conservative indication of potential non-conventional movements at surface expressions of geological structures outside of mining.

The management strategies should include monitoring of the transmission towers during active subsidence to identify the early development of non-conventional ground movements. It is understood that survey marks have been installed on each of the transmission tower legs and in the ground.

It is recommended that a Trigger Action Response Plan (TARP) is developed outlining the actions required if nonconventional movements were identified at the transmission tower locations. The triggers and actions should be developed and agreed between TransGrid and Peabody Energy.

It is also recommended that preventive measures are developed in case non-conventional movements are identified. The preventive measures could include: installation of timber poles to support the existing tower and/or



the conductors; installation of additional bracing and/or strengthening members to the existing frame; or installation of a prefabricated steel frame to support the tower base.

The appropriate monitoring, management, preventive and remedial measures should be developed in consultation between TransGrid and Peabody Energy.

Summary

The 330 kV transmission line is located to the east of the proposed Longwalls 301 to 303. The transmission towers are located at distances between 50 metres and 310 metres from the longwalls. At these distances, the transmission towers are predicted to experience low levels of vertical subsidence up to 125 mm. The predicted conventional tilts and differential horizontal movements between the towers are very small and unlikely to result in adverse impacts.

However, it is possible that the transmission towers could experience localised and elevated compressive strains due to the presence of geological structures (known or unknown), if the surface expressions of these features are coincident with them. It is recommended that monitoring, management, preventive and remedial measures are developed, in consultation between TransGrid and Peabody Energy, to manage the potential for these irregular movements.

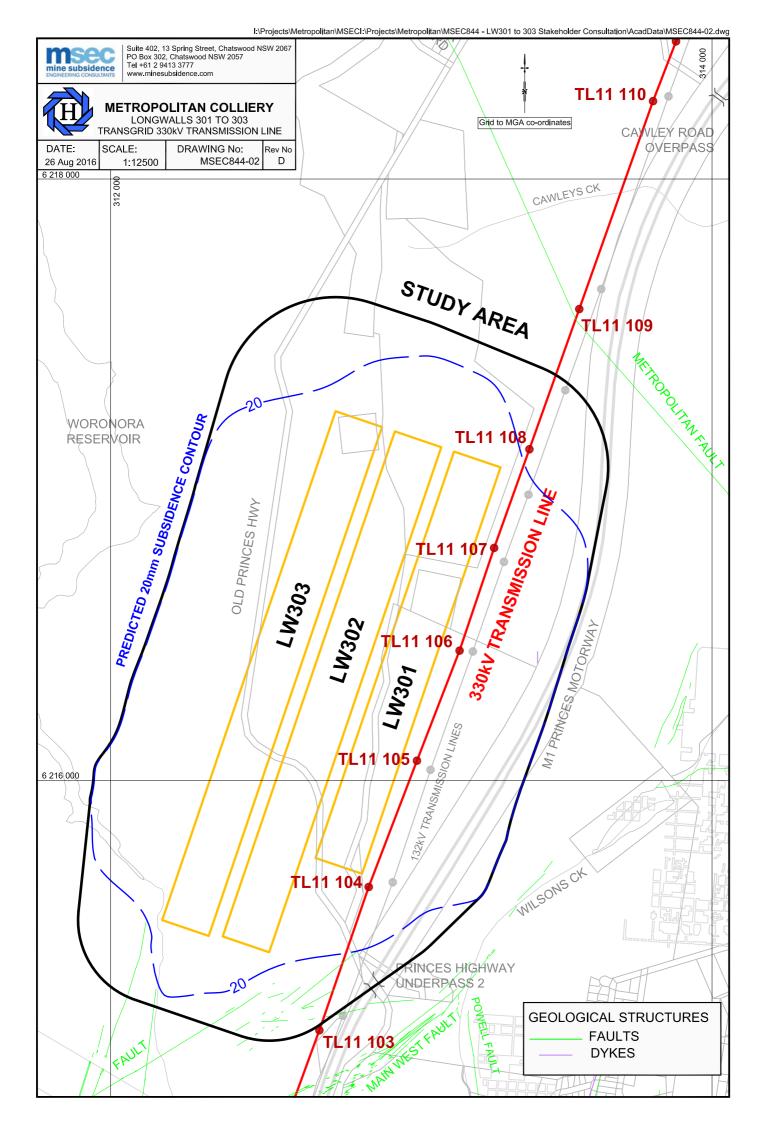
Yours sincerely

Peter DeBono Mine Subsidence Engineering Consultants

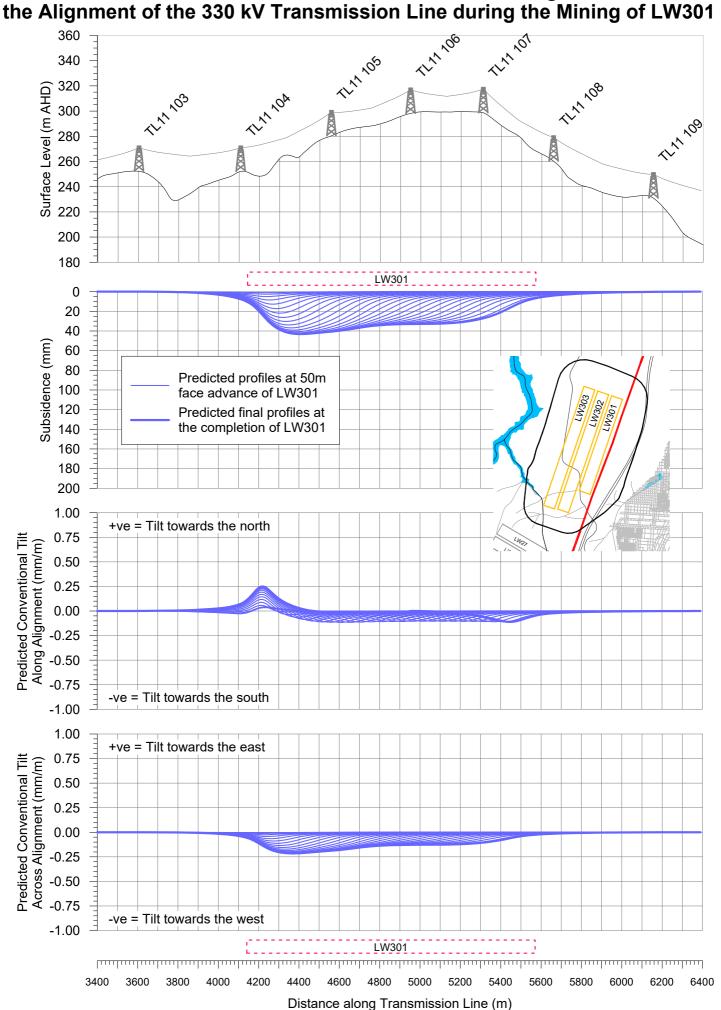
Attachments:

Drawing No. MSEC844-02 – Longwalls 301 to 303 – TransGrid 330 kV Transmission Line

- Fig. A.1 Predicted Profiles of Conventional Subsidence, Tilt Along and Tilt Across the Alignment of the 330 kV Transmission Line during the Mining of Longwall 301
- Fig. A.2 Predicted Profiles of Conventional Subsidence, Tilt Along and Tilt Across the Alignment of the 330 kV Transmission Line due to LW301 to LW303



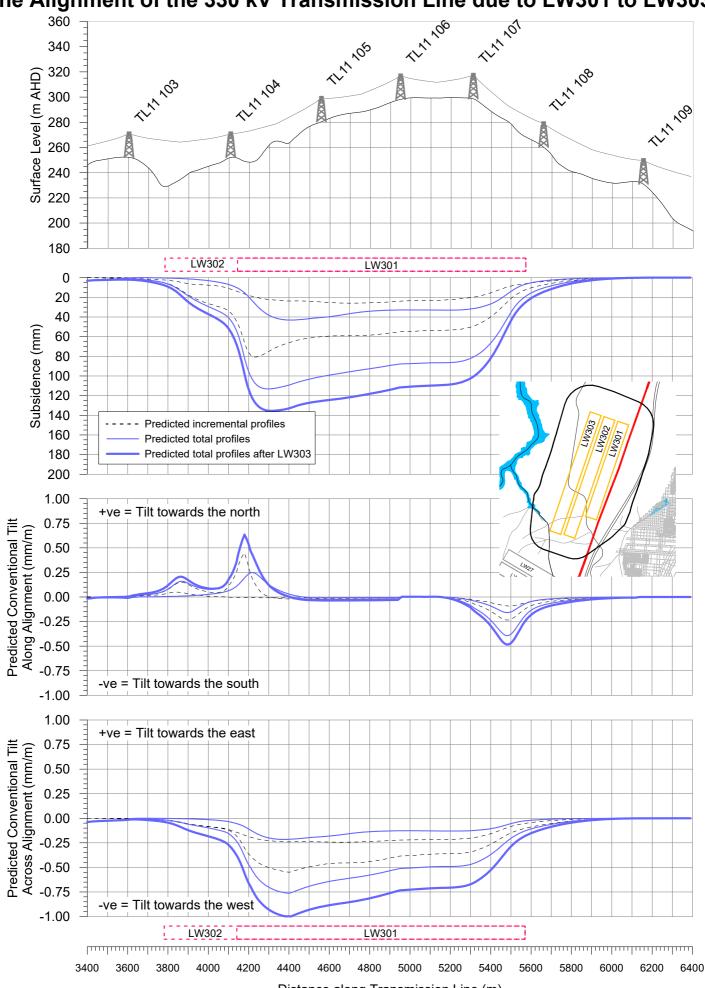




I:\Projects\Metropolitan\MSEC844 - LW301 to 303 Stakeholder Consultation\Subsdata\Impacts\330 kV Transmission Line\Fig A.1 - 330 kV Transmission Line.grf....07-Sep-16

Predicted Profiles of Conventional Subsidence, Tilt Along and Tilt Across

Predicted Profiles of Conventional Subsidence, Tilt Along and Tilt Across the Alignment of the 330 kV Transmission Line due to LW301 to LW303





Distance along Transmission Line (m)

Fig. A.2

APPENDIX 2

BUILT FEATURES MANAGEMENT PLAN – SUBSIDENCE IMPACT REGISTER

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Impact Register Number ¹	Built Feature ²	Impact Description	Does Impact Exceed the Built Feature Performance Measure/Indicators? (Yes/No)	Management Measures Implemented	Were Management Measures Effective? (Yes/No)

Built Features Management Plan - Subsidence Impact Register

Notes:

1: Fill out all details in the Assessment Form and record the register number here.

2: Built feature (e.g. transmission line, tower, etc.).

3: Impacts to access roads/tracks to be included in the Land Management Plan – Subsidence Impact Register.

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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 tower, 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:		
	[

Management or Contingency Measures Implemented:

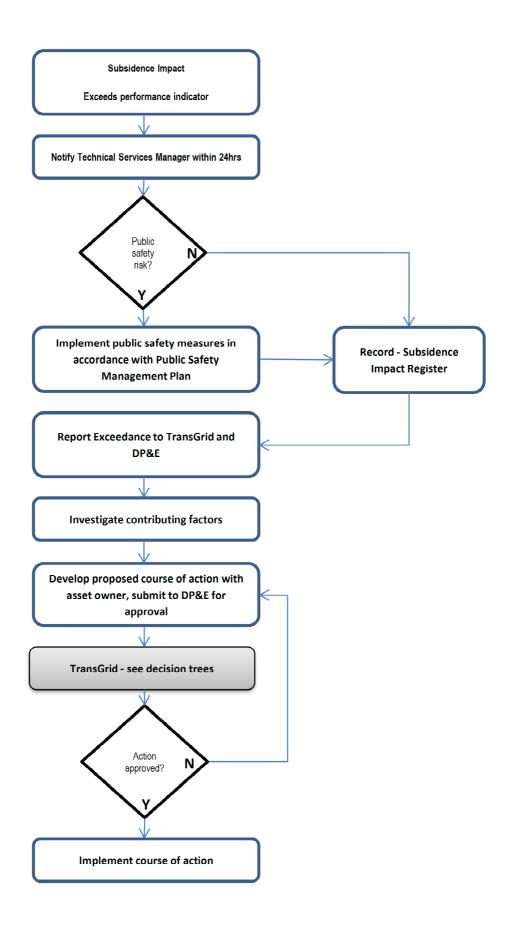
Effectiveness of Management or Contingency Measures:

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APPENDIX 3

CONTINGENCY PLAN PROCEDURE AND DECISION TREE

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