

METROPOLITAN COAL LONGWALL 304

EXTRACTION PLAN



ATTACHMENT 2

RELEVANT CONSULTATION RECORDS



**Planning &
Environment**

**Planning Services
Resource Assessments**
Contact: Jack Murphy
Phone: 8217 2016
Email: jack.murphy@planning.nsw.gov.au

Mr Jon Degotardi
Technical Service Manager
Metropolitan Collieries Pty Ltd
PO Box 402
Helensburgh NSW 2508

Dear Mr Degotardi,

**Metropolitan Coal Project (PA 08_0149)
Appointment of Suitably Qualified and Experience Person**

I refer to your email dated 26 October 2018 requesting the Secretary's endorsement of suitably qualified and experienced experts to prepare the Extraction Plan for the Metropolitan Coal Project (PA 08_0149).

The Department has reviewed the proposed team and agrees that they are suitably qualified experts. In accordance with condition 6 of Schedule 3 of PA 08_0149, the Secretary endorses Metropolitan Collieries Pty Ltd proposed team to prepare the above document.

If you wish to discuss this matter further, please contact Jack Murphy at the details listed above.

Yours sincerely

J Evans 16/11/18

Jessie Evans
A/Director
Resource Assessments
as the Secretary's nominee



Mr Micheal Alexander
Director Projects and Portfolio Management (NSW)
Peabody Energy - Metropolitan Collieries Pty Ltd
PO Box 402
HELENSBURGH NSW 2508


Dear Mr Alexander

**Independent Expert Panel for Mining in the Catchment
Advice regarding lineaments**


I refer to correspondence to the Department from the Independent Expert Panel for Mining in the Catchment (the Panel) dated 8 February 2019. The Panel has advised the Department that mine operators in the Southern Coalfield should have "*specific regard to the potential impacts on surface water features, including swamps and waterfalls, of mining near and under lineaments.*"

The Department recognises that Metropolitan Coal will be submitting several upcoming applications to the Department for secondary extraction. As such the Department requests that the issues identified in the Panel's letter are thoroughly considered in such applications.

I have attached a copy of the correspondence in full for your convenience.

If you require any further information, please contact Jessie Evans on the details above.

Yours sincerely


Howard Reed
Director
Resource Assessments

19.2.19

Mr Marcus Ray
Deputy Secretary
Planning Services
NSW Department of Planning and Environment
320 Pitt Street
SYDNEY NSW 2000

**Re: IEPMC advice to Department of Planning and Environment
Emerging knowledge regarding lineaments**

Dear Mr Ray

An emerging issue for the Independent Expert Panel for Mining in the Catchment is the potential for longwall mining near or under lineaments that results in reduced surface water flows well outside traditionally recognised limits of mining impacts. This has arisen from observations in the Western Coalfield of NSW.

The Panel is aware that both Dendrobium Mine and Metropolitan Mine intend to seek approval from the Department in the near future for longwall workings that could mine near or under lineaments in the Special Areas of the Catchment. Accordingly, the Panel advises that it would be judicious for the Department to inform these and other mine operators in the Southern Coalfield that future mining applications should have specific regard to the potential impacts on surface water features, including swamps and waterfalls, of mining near and under lineaments.

Should you have any questions regarding this advice, please contact Jaclyn Aldenhoven from the secretariat, who can be reached at jaclyn.aldenhoven@chiefscientist.nsw.gov.au or 9338 6638.

Yours sincerely



Emeritus Professor Jim Galvin
Chair
Independent Expert Panel for Mining in the Catchment
8 February 2019

cc. Mr David Kitto, Executive Director, Resource Assessments & Business Systems
Mr Howard Reed, Director Resource Assessment
Mr Clay Preshaw, Director Resource and Energy Assessments



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20 February 2019

Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

**Attention: Mr Howard Reed, Director, Resource Assessments
Ms Jessie Evans, Team Leader, Resource Assessments**

Also by email: Howard.Reed@planning.nsw.gov.au, Jessie.Evans@planning.nsw.gov.au

Dear Howard/Jessie,

RE: METROPOLITAN COAL LONGWALL 304 HERITAGE MANAGEMENT PLAN

Metropolitan Coal Pty Ltd (Metropolitan Coal) is wholly owned by Peabody Energy Australia Pty Ltd, and is located adjacent to the township of Helensburgh and approximately 30 kilometres north of Wollongong in New South Wales (NSW). Metropolitan Coal was granted Project Approval (08_0149) for the Metropolitan Coal Project (the Project) on 22 June 2009 by the NSW Minister for Planning under section 75J of the NSW *Environmental Planning and Assessment Act, 1979*.

Condition 6(f), Schedule 3 of the Project Approval requires Metropolitan Coal to prepare a Heritage Management Plan in consultation with the NSW Office of Environment and Heritage (OEH) and relevant Aboriginal groups to manage the potential environmental consequences of the Longwall 304 Extraction Plan on Aboriginal heritage sites or values.

Heritage Management Plans were prepared for the Longwalls 20-22, 23-27 and 301-303 mining domains in consultation with the abovementioned stakeholders. The draft Longwall 304 Heritage Management Plan includes post mining monitoring and management of Aboriginal heritage sites subject to the previously approved Metropolitan Coal Heritage Management Plans.

Please find enclosed for the DP&E's review and comment, a copy of the draft Metropolitan Coal Longwall 304 Heritage Management Plan. Please note that Appendix 1 of the draft Longwall 304 Heritage Management Plan is a considerably large document, and as such will be provided on CD. A hard copy can be provided if required. Table 1 of this letter provides a summary of the key amendments made to the Longwall 304 Heritage Management Plan since the recent updates to the Longwalls 301-303 Heritage Management Plan (September 2018).

Please note we have also sent a copy of the draft Metropolitan Coal Longwall 304 Heritage Management Plan to the OEH (South East Branch Regional Operations Division) and relevant Aboriginal groups and have requested they provide comments on the draft Longwall 304 Heritage Management Plan by 6 March 2019.

For your information, Aboriginal groups that have been sent a copy of the draft Longwall 304 Heritage Management Plan for review and comment include:

- Cubbitch Barta Native Title Claimants.
- Illawarra Local Aboriginal Land Council.
- Korewal Elouera Jerrungurah Tribal Elders Corporation.
- Mr Gary Caines.
- La Perouse Botany Bay Aboriginal Corporation.
- Woronora Plateau Gundungara Elders Councils.
- Northern Illawarra Aboriginal Collective (including representatives from Wadi Wadi Coomaditchie Aboriginal Corporation).
- Tharawal Local Aboriginal Land Council.
- Wodi Wodi Elders Corporation.

It would be appreciated if you would kindly provide any comments to the undersigned by 6 March 2019. Metropolitan Coal looks forward to your input and invites you to contact us with any queries.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Jon Degotardi', is positioned above the printed name.

JON DEGOTARDI
Technical Services Manager

Table 1
Metropolitan Coal Longwall 304 Heritage Management Plan (Version A)

HMP Section	Description
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Section 4.4	<ul style="list-style-type: none"> • Provides a description of the Aboriginal cultural values (cultural significance) that are broader than the archaeological record. • Presents the revised subsidence predictions for Longwall 304 Aboriginal heritage sites. • Details the Aboriginal heritage sites located within the 35° angle of draw and/or predicted 20 mm subsidence contour for Longwall 304.
Section 7 and Appendix 1	Describes the baseline recording that has been undertaken for Aboriginal heritage sites within 600 m of Longwalls 304-306.
Section 9	Describes the monitoring and Trigger Action Response Plan (TARP) to be implemented in relation to Aboriginal heritage sites following the completion of Longwall 303.
Section 12	Describes the collection of baseline data for future Extraction Plans.
Section 17	List of references.



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20 February 2019

Office of Environment & Heritage
PO Box 513
WOLLONGONG NSW 2520

**Attention: Ms Rose O'Sullivan, A/Team Leader Aboriginal Heritage, South East Branch,
Regional Operations Division**

Also by email: Rose.OSullivan@environment.nsw.gov.au;
rog.illawarra@environment.nsw.gov.au

Dear Rose,

RE: METROPOLITAN COAL LONGWALL 304 HERITAGE MANAGEMENT PLAN

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Please find enclosed for the OEH's review and comment, a copy of the draft Metropolitan Coal Longwall 304 Heritage Management Plan. Please note that Appendix 1 of the draft Longwall 304 Heritage Management Plan is a considerably large document, and as such will be provided on CD. A hard copy can be provided if required. Table 1 of this letter provides a summary of the key amendments made to the Longwall 304 Heritage Management Plan since the recent updates to the Longwalls 301-303 Heritage Management Plan (September 2018).

Please note we have also sent a copy of the draft Metropolitan Coal Longwall 304 Heritage Management Plan to the relevant Aboriginal groups and have requested they provide comments on the draft Longwall 304 Heritage Management Plan by 6 March 2019.

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Yours sincerely,

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JON DEGOTARDI
Technical Services Manager

Table 1
Metropolitan Coal Longwall 304 Heritage Management Plan (Version A)

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Section 17	List of references.



Office of
Environment
& Heritage

Date: 5 March 2019
Your reference: MP08_0149
Our reference: DOC19/184210
Contact: Rose O'Sullivan
4224 4177

Jessie Evans
Team Leader, Resource Assessments
320 Pitt Street
GPO Box 39
SYDNEY NSW 2000

By email: jessie.evans@planning.nsw.gov.au

Dear Ms Evans

RE: Metropolitan Coal Longwall 304 Heritage Management Plan, MP08_0149

Thank you for consulting us regarding the draft Longwall 304 Aboriginal Heritage Management Plan (HMP) pursuant to Condition 6, Schedule 3 of the project approval.

The HMP proposes that six Aboriginal heritage sites will be monitored. One site (52-2-0887, FRC 76) is directly above Longwall 304. The project approval requires that less than 10% of Aboriginal heritage sites are affected by subsidence. However, we recommend Metropolitan Coal aim to avoid harm to all Aboriginal cultural heritage sites wherever possible.

The applicant is currently also consulting the Aboriginal community about this HMP. The results of the consultation must be incorporated into the final revision of the HMP.

In summary, we advise that:

- Subsidence is likely to harm Aboriginal heritage sites.
- Baseline recording has been completed for all sites within the predicted subsidence area.
- Comments from the Aboriginal community must be addressed before finalising the HMP.

Detailed comments are also attached for your consideration.

Please contact Rose O'Sullivan, Archaeologist (Illawarra) on 4224 4177 or at rose.o'sullivan@environment.nsw.gov.au if you have any further queries.

Yours sincerely

CHRIS PAGE
Senior Team Leader Planning
South East Branch (Illawarra)

Enclosure: Attachment 1: Detailed comments

Attachment 1: Detailed Comments

Aboriginal community consultation is currently occurring

Aboriginal community consultation is currently occurring. The HMP should not be finalised until the consultation process has been completed and responses addressed. Previous consultation summarised in the HMP emphasises the strong cultural values and continuing connection to the landscape for contemporary Aboriginal people (MC, 2019, p.16). Additional information may be obtained during the current consultation process (MC 2019, p.16).

Given the length of time since this Aboriginal heritage assessment started, Metropolitan Coal should ensure up to date contact details for the Aboriginal community representatives are kept so that effective consultation can occur.

Subsidence impacts

The predicted subsidence impacts show that subsidence is likely to harm Aboriginal heritage sites. Site 52-2-0887 (FRC 76) is above longwall 304 Secondary Extraction area (Figure 4, HMP). This site is assessed as having low archaeological significance. The Extraction Plan Layout has a predicted increase to 700mm of maximum subsidence at FRC 76. A further 18 sites are within the angle of draw.

There is an increase in the proposed maximum vertical subsidence and tilt at five sites in the Longwall 304 Extraction Plan layout (MC 2019, p.17). This includes site 52-2-0186 (52-2-0326, FRC 68) that is assessed as having high archaeological significance, but is outside the angle of draw. Predicted curvatures are similar to those predicted in the Preferred Project Layout (MC 2019, p.17). The maximum predicted tilt is increased for five sites under the Extraction Plan Layout, and decreases for two sites. The remaining sites are the same or very similar.

Some additional information would assist in considering the likely impacts. Table 3 (MC 2019, p.18) does not include all the sites within 600m of Longwall 304. We recommend Table 2 and Table 3 are consistent.

Proposed monitoring

The applicant proposes monitoring only those six sites within the 35 degree angle of draw that have predicted to have subsidence impacts above typical magnitudes (MC 2019, p.24). The remaining six sites within the angle of draw are proposed to be monitored under the next Extraction Plan HMP (MC 2019, p.24). We recommend the finalised HMP clarify when the remaining sites within 600m of the Longwall 304 Secondary Extraction Plan are proposed to be monitored.

Performance measures

The project approval performance measure is that less than 10% of Aboriginal heritage sites will be affected by subsidence impacts. However, we support using the HMP to aim to achieve well under this level of impact.

We recommend a clearer explanation of how the performance measures are calculated. This should explain which sites in each HMP are included when calculating the percentage of impacted sites. Metropolitan Coal (2019, pp.9, 11) argues that 2% of sites (reported as 2 of 52 sites) have been affected by mining induced subsidence to date. Clarification of these calculations is required.

We also request detail of the nature of the impacts that have previously occurred and how this affects the archaeological significance of the sites.

Baseline recording has occurred

We recommend the baseline recording sheets include the date of the most recent site recording (Niche 2018). For example, the recording sheet for site FRC 254 is dated 2005 although the sketch plans are dated 2018, (Niche 2018, p.88).

The baseline recording information does not include those sites proposed to be monitored under this HMP (Niche 2018). The detail should be included so that the HMP is a standalone document (see discussion in HMP, MC 2019, p.23 and Table 5).

We suggest that site 52-2-0828 (FRC 180) is removed from Table 5. Niche (2018, p.151) explains that site FRC 180 could not be relocated. That site therefore has not been subject to baseline recording. Site FRC180 appears to be along Longwall 306 and just outside the 600m radius from Longwall 304 (MC 2019, p.10).

Additional impact considerations

In the interests of continual improvement, Metropolitan Coal could include Aboriginal cultural values that are broader than the archaeological record in the HMP. This would require consultation with the Aboriginal community and could include how the Aboriginal cultural landscape is being managed in the context of the Metropolitan mine.

We note that the HMP does not consider impacts from vibration and dust. While these are not stipulated in the project approval, we suggest that heritage management outcomes could be improved by considering these impacts and any necessary mitigations.

Natural weathering processes are also causing harm to Aboriginal heritage sites (MC 2019, p.12). As these processes cannot be halted, it is imperative that controls of human induced changes such as mining are in place as the Aboriginal cultural heritage record is already under threat from natural processes.

Mitigation measures

We support the proposed monitoring if mitigation measures are implemented. The effectiveness of the mitigation measures must be appropriately documented. We recommend the requirement to update AHIMS site cards following any mitigation works and subsequent monitoring is included in the HMP.

It is unclear whether action has been taken on implementing recommendations for sites affected by Longwalls 23-27 (as per our comments on the Round 5 Monitoring, 21 February 2018). Cubbitch Barta Native Title Claimants requested artificial drip lines at site FRC 275 (52-2-3077) as reported by Niche (2017, p.24).

None of the proposed mitigation options involve changing the mining layout, shortening or realigning Longwalls. We suggest that this is an important option that should not be overlooked.

We also note that Table 9 appears to duplicate some but not all of the information in Table 8 (MC 2019, pp.28,30).

Supplementary field work

It is not clear whether there is any additional surface infrastructure required under the Longwall 304 Extraction Layout Plan (MC 2019, p.23). We recommend this is clarified in the HMP. A map showing the location of previous survey transects would assist.

AHIMS

Site update cards must be submitted to the AHIMS Registrar where changes that affect the sites are recorded. Further information is available on the OEH website:

<https://www.environment.nsw.gov.au/licences/DECCAHIMSSiteRecordingForm.htm>.

Summary of recommendations

We recommend that:

- The HMP should not be finalised until the consultation process has been completed and responses addressed.

- Baseline recording information include those sites proposed to be monitored under this HMP (Niche 2018).
- Baseline recording sheets (Niche 2018) include the date of the most recent site recording.
- Consider impacts from dust and vibration.
- Table 3 (MC 2019, p.18) should be consistent with Table 2 and include all sites within 600m of Longwall 304.
- Aboriginal cultural values (broader than the archaeological record) are considered in the HMP.
- Clarification is sought on when the remaining sites within 600m of the Longwall 304 Secondary Extraction Plan will be monitored.
- A clearer explanation is sought of how the performance measures are calculated.
- Detail of the nature of the impacts that have previously occurred and how this affects the archaeological significance of the sites is provided.
- Clarification is sought on whether any mitigation measures have been implemented, as per previous OEH advice.
- A map showing the location of previous survey transects is provided and any additional surface infrastructure required is explained in the HMP.
- The requirement to update AHIMS site cards following any mitigation works and subsequent monitoring is included in the HMP.
- The HMP include that site update cards must be submitted to the AHIMS Registrar where changes that affect the sites are recorded.

References

- Metropolitan Coal 2019. Longwall 304 Heritage Management Plan, dated February 2019.
- Niche Environment and Heritage 2018. Longwalls 304 to 306 Metropolitan Colliery: Baseline recording. Prepared for Metropolitan Coal Pty Ltd, dated December 2018.
- Niche Environment and Heritage. 2017, Metropolitan Coal Longwalls 23-27 Round 5 Monitoring of Aboriginal Heritage Sites, dated November 2017.



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20 February 2019

Cubbitch Barta Native Title Claimants
Mrs Glenda Chalker
55 Nightingale Road
PHEASANTS NEST NSW 2574

Dear Glenda,

RE: METROPOLITAN COAL LONGWALL 304 HERITAGE MANAGEMENT PLAN

Metropolitan Coal Pty Ltd (Metropolitan Coal) is wholly owned by Peabody Energy Australia Pty Ltd, and is located adjacent to the township of Helensburgh and approximately 30 kilometres north of Wollongong in New South Wales (NSW). Metropolitan Coal was granted Project Approval (08_0149) for the Metropolitan Coal Project (the Project) on 22 June 2009 by the NSW Minister for Planning under section 75J of the NSW *Environmental Planning and Assessment Act, 1979*.

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Heritage Management Plans were prepared for the Longwalls 20-22, 23-27 and 301-303 mining domains which were provided to the Cubbitch Barta Native Title Claimants for consultation in 2010, 2013 and 2016 respectively. The draft Longwall 304 Heritage Management Plan includes post mining monitoring and management of Aboriginal heritage sites or values subject to the previously approved Metropolitan Coal Heritage Management Plans.

Please find enclosed for your review and comment, a copy of the draft Metropolitan Coal Longwall 304 Heritage Management Plan. Please note that Appendix 1 of the draft Longwall 304 Heritage Management Plan is a considerably large document, and as such has been provided on the enclosed CD. A hard copy can be provided if required. Table 1 of this letter provides a summary of the key amendments made to the Longwall 304 Heritage Management Plan since the recent updates to the Longwalls 301-303 Heritage Management Plan (September 2018).

It would be appreciated if you would kindly provide any comments on the draft Metropolitan Coal Longwall 304 Heritage Management Plan to the undersigned by 6 March 2019. Metropolitan Coal looks forward to your input and invites you to contact us with any queries.

Yours sincerely,

JON DEGOTARDI
Technical Services Manager

Table 1
Metropolitan Coal Longwall 304 Heritage Management Plan (Version A)

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20 February 2019

Mr Gary Caines
28 Gowan Brae Road
MOUNT OUSLEY NSW 2519

Dear Gary,

RE: METROPOLITAN COAL LONGWALL 304 HERITAGE MANAGEMENT PLAN

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Metropolitan Coal Longwall 304 Heritage Management Plan (Version A)

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20 February 2019

Illawarra Local Aboriginal Land Council
Chief Executive Officer
Mr Paul Knight
3 Ellen Street
WOLLONGONG NSW 2500

Dear Paul,

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20 February 2019

Korewal Elouera Jerrungurah Tribal Elders Corporation
Mr Reuben Brown
86 Hertford St
BERKELEY NSW 2506

Dear Reuben,

RE: METROPOLITAN COAL LONGWALL 304 HERITAGE MANAGEMENT PLAN

Metropolitan Coal Pty Ltd (Metropolitan Coal) is wholly owned by Peabody Energy Australia Pty Ltd, and is located adjacent to the township of Helensburgh and approximately 30 kilometres north of Wollongong in New South Wales (NSW). Metropolitan Coal was granted Project Approval (08_0149) for the Metropolitan Coal Project (the Project) on 22 June 2009 by the NSW Minister for Planning under section 75J of the NSW *Environmental Planning and Assessment Act, 1979*.

Condition 6(f), Schedule 3 of the Project Approval requires Metropolitan Coal to prepare a Heritage Management Plan in consultation with the NSW Office of Environment and Heritage and relevant Aboriginal groups to manage the potential environmental consequences of the Longwall 304 Extraction Plan on Aboriginal heritage sites or values.

Heritage Management Plans were prepared for the Longwalls 20-22, 23-27 and 301-303 mining domains which were provided to the Korewal Elouera Jerrungurah Tribal Elders Corporation for consultation in 2010, 2013 and 2016 respectively. The draft Longwall 304 Heritage Management Plan includes post mining monitoring and management of Aboriginal heritage sites or values subject to the previously approved Metropolitan Coal Heritage Management Plans.

Please find enclosed for your review and comment, a copy of the draft Metropolitan Coal Longwall 304 Heritage Management Plan. Please note that Appendix 1 of the draft Longwall 304 Heritage Management Plan is a considerably large document, and as such has been provided on the enclosed CD. A hard copy can be provided if required. Table 1 of this letter provides a summary of the key amendments made to the Longwall 304 Heritage Management Plan since the recent updates to the Longwalls 301-303 Heritage Management Plan (September 2018).

It would be appreciated if you would kindly provide any comments on the draft Metropolitan Coal Longwall 304 Heritage Management Plan to the undersigned by 6 March 2019. Metropolitan Coal looks forward to your input and invites you to contact us with any queries.

Yours sincerely,

JON DEGOTARDI
Technical Services Manager

Table 1
Metropolitan Coal Longwall 304 Heritage Management Plan (Version A)

HMP Section	Description
All/Figures	Longwall 304 Heritage Management Plan (HMP) text and figures show Longwall 303 and Longwall 304 panel void lengths of 1,325 m and 1,285 m, respectively.
All	Longwall 304 text reflects status at the time of HMP development.
Section 3.3	List of legislation to reflect current legislation.
Section 4.3	Details the Longwall 304 Environmental Risk Assessment conducted in relation to the HMP.
Section 4.4	<ul style="list-style-type: none"> • Provides a description of the Aboriginal cultural values (cultural significance) that are broader than the archaeological record. • Presents the revised subsidence predictions for Longwall 304 Aboriginal heritage sites. • Details the Aboriginal heritage sites located within the 35° angle of draw and/or predicted 20 mm subsidence contour for Longwall 304.
Section 7 and Appendix 1	Describes the baseline recording that has been undertaken for Aboriginal heritage sites within 600 m of Longwalls 304-306.
Section 9	Describes the monitoring and Trigger Action Response Plan (TARP) to be implemented in relation to Aboriginal heritage sites following the completion of Longwall 303.
Section 12	Describes the collection of baseline data for future Extraction Plans.
Section 17	List of references.



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20 February 2019

La Perouse Botany Bay Aboriginal Corporation
Ms Yvonne Simms
10 Murrong Place
LA PEROUSE NSW 2306

Dear Yvonne,

RE: METROPOLITAN COAL LONGWALL 304 HERITAGE MANAGEMENT PLAN

Metropolitan Coal Pty Ltd (Metropolitan Coal) is wholly owned by Peabody Energy Australia Pty Ltd, and is located adjacent to the township of Helensburgh and approximately 30 kilometres north of Wollongong in New South Wales (NSW). Metropolitan Coal was granted Project Approval (08_0149) for the Metropolitan Coal Project (the Project) on 22 June 2009 by the NSW Minister for Planning under section 75J of the NSW *Environmental Planning and Assessment Act, 1979*.

Condition 6(f), Schedule 3 of the Project Approval requires Metropolitan Coal to prepare a Heritage Management Plan in consultation with the NSW Office of Environment and Heritage and relevant Aboriginal groups to manage the potential environmental consequences of the Longwall 304 Extraction Plan on Aboriginal heritage sites or values.

Heritage Management Plans were prepared for the Longwalls 20-22, 23-27 and 301-303 mining domains which were provided to the La Perouse Botany Bay Aboriginal Corporation for consultation in 2010, 2013 and 2016 respectively. The draft Longwall 304 Heritage Management Plan includes post mining monitoring and management of Aboriginal heritage sites or values subject to the previously approved Metropolitan Coal Heritage Management Plans.

Please find enclosed for your review and comment, a copy of the draft Metropolitan Coal Longwall 304 Heritage Management Plan. Please note that Appendix 1 of the draft Longwall 304 Heritage Management Plan is a considerably large document, and as such has been provided on the enclosed CD. A hard copy can be provided if required. Table 1 of this letter provides a summary of the key amendments made to the Longwall 304 Heritage Management Plan since the recent updates to the Longwalls 301-303 Heritage Management Plan (September 2018).

It would be appreciated if you would kindly provide any comments on the draft Metropolitan Coal Longwall 304 Heritage Management Plan to the undersigned by 6 March 2019. Metropolitan Coal looks forward to your input and invites you to contact us with any queries.

Yours sincerely,

JON DEGOTARDI
Technical Services Manager

Table 1
Metropolitan Coal Longwall 304 Heritage Management Plan (Version A)

HMP Section	Description
All/Figures	Longwall 304 Heritage Management Plan (HMP) text and figures show Longwall 303 and Longwall 304 panel void lengths of 1,325 m and 1,285 m, respectively.
All	Longwall 304 text reflects status at the time of HMP development.
Section 3.3	List of legislation to reflect current legislation.
Section 4.3	Details the Longwall 304 Environmental Risk Assessment conducted in relation to the HMP.
Section 4.4	<ul style="list-style-type: none"> • Provides a description of the Aboriginal cultural values (cultural significance) that are broader than the archaeological record. • Presents the revised subsidence predictions for Longwall 304 Aboriginal heritage sites. • Details the Aboriginal heritage sites located within the 35° angle of draw and/or predicted 20 mm subsidence contour for Longwall 304.
Section 7 and Appendix 1	Describes the baseline recording that has been undertaken for Aboriginal heritage sites within 600 m of Longwalls 304-306.
Section 9	Describes the monitoring and Trigger Action Response Plan (TARP) to be implemented in relation to Aboriginal heritage sites following the completion of Longwall 303.
Section 12	Describes the collection of baseline data for future Extraction Plans.
Section 17	List of references.



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20 February 2019

Northern Illawarra Aboriginal Collective
Mr Chris Illert
PO Box 595
MOSS VALE NSW 2577

Dear Chris,

RE: METROPOLITAN COAL LONGWALL 304 HERITAGE MANAGEMENT PLAN

Metropolitan Coal Pty Ltd (Metropolitan Coal) is wholly owned by Peabody Energy Australia Pty Ltd, and is located adjacent to the township of Helensburgh and approximately 30 kilometres north of Wollongong in New South Wales (NSW). Metropolitan Coal was granted Project Approval (08_0149) for the Metropolitan Coal Project (the Project) on 22 June 2009 by the NSW Minister for Planning under section 75J of the NSW *Environmental Planning and Assessment Act, 1979*.

Condition 6(f), Schedule 3 of the Project Approval requires Metropolitan Coal to prepare a Heritage Management Plan in consultation with the NSW Office of Environment and Heritage and relevant Aboriginal groups to manage the potential environmental consequences of the Longwall 304 Extraction Plan on Aboriginal heritage sites or values.

Heritage Management Plans were prepared for the Longwalls 20-22, 23-27 and 301-303 mining domains which were provided to the Northern Illawarra Aboriginal Collective (including representatives from the Wadi Wadi Coomaditchie Aboriginal Corporation) for consultation in 2010, 2013 and 2016 respectively. The draft Longwall 304 Heritage Management Plan includes post mining monitoring and management of Aboriginal heritage sites or values subject to the previously approved Metropolitan Coal Heritage Management Plans.

Please find enclosed for your review and comment, a copy of the draft Metropolitan Coal Longwall 304 Heritage Management Plan. Please note that Appendix 1 of the draft Longwall 304 Heritage Management Plan is a considerably large document, and as such has been provided on the enclosed CD. A hard copy can be provided if required. Table 1 of this letter provides a summary of the key amendments made to the Longwall 304 Heritage Management Plan since the recent updates to the Longwalls 301-303 Heritage Management Plan (September 2018).

It would be appreciated if you would kindly provide any comments on the draft Metropolitan Coal Longwall 304 Heritage Management Plan to the undersigned by 6 March 2019. Metropolitan Coal looks forward to your input and invites you to contact us with any queries.

Yours sincerely,

JON DEGOTARDI
Technical Services Manager

Table 1
Metropolitan Coal Longwall 304 Heritage Management Plan (Version A)

HMP Section	Description
All/Figures	Longwall 304 Heritage Management Plan (HMP) text and figures show Longwall 303 and Longwall 304 panel void lengths of 1,325 m and 1,285 m, respectively.
All	Longwall 304 text reflects status at the time of HMP development.
Section 3.3	List of legislation to reflect current legislation.
Section 4.3	Details the Longwall 304 Environmental Risk Assessment conducted in relation to the HMP.
Section 4.4	<ul style="list-style-type: none"> • Provides a description of the Aboriginal cultural values (cultural significance) that are broader than the archaeological record. • Presents the revised subsidence predictions for Longwall 304 Aboriginal heritage sites. • Details the Aboriginal heritage sites located within the 35° angle of draw and/or predicted 20 mm subsidence contour for Longwall 304.
Section 7 and Appendix 1	Describes the baseline recording that has been undertaken for Aboriginal heritage sites within 600 m of Longwalls 304-306.
Section 9	Describes the monitoring and Trigger Action Response Plan (TARP) to be implemented in relation to Aboriginal heritage sites following the completion of Longwall 303.
Section 12	Describes the collection of baseline data for future Extraction Plans.
Section 17	List of references.



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20 February 2019

Tharawal Local Aboriginal Land Council
Ms Rebecca Ede
PO Box 245
THIRLMERE NSW 2572

Dear Rebecca,

RE: METROPOLITAN COAL LONGWALL 304 HERITAGE MANAGEMENT PLAN

Metropolitan Coal Pty Ltd (Metropolitan Coal) is wholly owned by Peabody Energy Australia Pty Ltd, and is located adjacent to the township of Helensburgh and approximately 30 kilometres north of Wollongong in New South Wales (NSW). Metropolitan Coal was granted Project Approval (08_0149) for the Metropolitan Coal Project (the Project) on 22 June 2009 by the NSW Minister for Planning under section 75J of the NSW *Environmental Planning and Assessment Act, 1979*.

Condition 6(f), Schedule 3 of the Project Approval requires Metropolitan Coal to prepare a Heritage Management Plan in consultation with the NSW Office of Environment and Heritage and relevant Aboriginal groups to manage the potential environmental consequences of the Longwall 304 Extraction Plan on Aboriginal heritage sites or values.

Heritage Management Plans were prepared for the Longwalls 20-22, 23-27 and 301-303 mining domains which were provided to the Tharawal Local Aboriginal Land Council for consultation in 2010, 2013 and 2016 respectively. The draft Longwall 304 Heritage Management Plan includes post mining monitoring and management of Aboriginal heritage sites or values subject to the previously approved Metropolitan Coal Heritage Management Plans.

Please find enclosed for your review and comment, a copy of the draft Metropolitan Coal Longwall 304 Heritage Management Plan. Please note that Appendix 1 of the draft Longwall 304 Heritage Management Plan is a considerably large document, and as such has been provided on the enclosed CD. A hard copy can be provided if required. Table 1 of this letter provides a summary of the key amendments made to the Longwall 304 Heritage Management Plan since the recent updates to the Longwalls 301-303 Heritage Management Plan (September 2018).

It would be appreciated if you would kindly provide any comments on the draft Metropolitan Coal Longwall 304 Heritage Management Plan to the undersigned by 6 March 2019. Metropolitan Coal looks forward to your input and invites you to contact us with any queries.

Yours sincerely,

JON DEGOTARDI
Technical Services Manager

Table 1
Metropolitan Coal Longwall 304 Heritage Management Plan (Version A)

HMP Section	Description
All/Figures	Longwall 304 Heritage Management Plan (HMP) text and figures show Longwall 303 and Longwall 304 panel void lengths of 1,325 m and 1,285 m, respectively.
All	Longwall 304 text reflects status at the time of HMP development.
Section 3.3	List of legislation to reflect current legislation.
Section 4.3	Details the Longwall 304 Environmental Risk Assessment conducted in relation to the HMP.
Section 4.4	<ul style="list-style-type: none"> • Provides a description of the Aboriginal cultural values (cultural significance) that are broader than the archaeological record. • Presents the revised subsidence predictions for Longwall 304 Aboriginal heritage sites. • Details the Aboriginal heritage sites located within the 35° angle of draw and/or predicted 20 mm subsidence contour for Longwall 304.
Section 7 and Appendix 1	Describes the baseline recording that has been undertaken for Aboriginal heritage sites within 600 m of Longwalls 304-306.
Section 9	Describes the monitoring and Trigger Action Response Plan (TARP) to be implemented in relation to Aboriginal heritage sites following the completion of Longwall 303.
Section 12	Describes the collection of baseline data for future Extraction Plans.
Section 17	List of references.



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20 February 2019

Wodi Wodi Elders Corporation
Mr James Davis
2 Poplar Avenue
UNANDERRA NSW 2526

Dear James,

RE: METROPOLITAN COAL LONGWALL 304 HERITAGE MANAGEMENT PLAN

Metropolitan Coal Pty Ltd (Metropolitan Coal) is wholly owned by Peabody Energy Australia Pty Ltd, and is located adjacent to the township of Helensburgh and approximately 30 kilometres north of Wollongong in New South Wales (NSW). Metropolitan Coal was granted Project Approval (08_0149) for the Metropolitan Coal Project (the Project) on 22 June 2009 by the NSW Minister for Planning under section 75J of the NSW *Environmental Planning and Assessment Act, 1979*.

Condition 6(f), Schedule 3 of the Project Approval requires Metropolitan Coal to prepare a Heritage Management Plan in consultation with the NSW Office of Environment and Heritage and relevant Aboriginal groups to manage the potential environmental consequences of the Longwall 304 Extraction Plan on Aboriginal heritage sites or values.

Heritage Management Plans were prepared for the Longwalls 20-22, 23-27 and 301-303 mining domains which were provided to the Wodi Wodi Elders Corporation for consultation in 2010, 2013 and 2016 respectively. The draft Longwall 304 Heritage Management Plan includes post mining monitoring and management of Aboriginal heritage sites or values subject to the previously approved Metropolitan Coal Heritage Management Plans.

Please find enclosed for your review and comment, a copy of the draft Metropolitan Coal Longwall 304 Heritage Management Plan. Please note that Appendix 1 of the draft Longwall 304 Heritage Management Plan is a considerably large document, and as such has been provided on the enclosed CD. A hard copy can be provided if required. Table 1 of this letter provides a summary of the key amendments made to the Longwall 304 Heritage Management Plan since the recent updates to the Longwalls 301-303 Heritage Management Plan (September 2018).

It would be appreciated if you would kindly provide any comments on the draft Metropolitan Coal Longwall 304 Heritage Management Plan to the undersigned by 6 March 2019. Metropolitan Coal looks forward to your input and invites you to contact us with any queries.

Yours sincerely,

JON DEGOTARDI
Technical Services Manager

Table 1
Metropolitan Coal Longwall 304 Heritage Management Plan (Version A)

HMP Section	Description
All/Figures	Longwall 304 Heritage Management Plan (HMP) text and figures show Longwall 303 and Longwall 304 panel void lengths of 1,325 m and 1,285 m, respectively.
All	Longwall 304 text reflects status at the time of HMP development.
Section 3.3	List of legislation to reflect current legislation.
Section 4.3	Details the Longwall 304 Environmental Risk Assessment conducted in relation to the HMP.
Section 4.4	<ul style="list-style-type: none"> • Provides a description of the Aboriginal cultural values (cultural significance) that are broader than the archaeological record. • Presents the revised subsidence predictions for Longwall 304 Aboriginal heritage sites. • Details the Aboriginal heritage sites located within the 35° angle of draw and/or predicted 20 mm subsidence contour for Longwall 304.
Section 7 and Appendix 1	Describes the baseline recording that has been undertaken for Aboriginal heritage sites within 600 m of Longwalls 304-306.
Section 9	Describes the monitoring and Trigger Action Response Plan (TARP) to be implemented in relation to Aboriginal heritage sites following the completion of Longwall 303.
Section 12	Describes the collection of baseline data for future Extraction Plans.
Section 17	List of references.



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20 February 2019

Woronora Plateau Gundungara Elders Councils
Mrs Kayla Williamson
11 Garnett Grove
FLINDERS NSW 2529

Dear Kayla,

RE: METROPOLITAN COAL LONGWALL 304 HERITAGE MANAGEMENT PLAN

Metropolitan Coal Pty Ltd (Metropolitan Coal) is wholly owned by Peabody Energy Australia Pty Ltd, and is located adjacent to the township of Helensburgh and approximately 30 kilometres north of Wollongong in New South Wales (NSW). Metropolitan Coal was granted Project Approval (08_0149) for the Metropolitan Coal Project (the Project) on 22 June 2009 by the NSW Minister for Planning under section 75J of the NSW *Environmental Planning and Assessment Act, 1979*.

Condition 6(f), Schedule 3 of the Project Approval requires Metropolitan Coal to prepare a Heritage Management Plan in consultation with the NSW Office of Environment and Heritage and relevant Aboriginal groups to manage the potential environmental consequences of the Longwall 304 Extraction Plan on Aboriginal heritage sites or values.

Heritage Management Plans were prepared for the Longwalls 20-22, 23-27 and 301-303 mining domains which were provided to the Woronora Plateau Gundungara Elders Councils for consultation in 2010, 2013 and 2016 respectively. The draft Longwall 304 Heritage Management Plan includes post mining monitoring and management of Aboriginal heritage sites or values subject to the previously approved Metropolitan Coal Heritage Management Plans.

Please find enclosed for your review and comment, a copy of the draft Metropolitan Coal Longwall 304 Heritage Management Plan. Please note that Appendix 1 of the draft Longwall 304 Heritage Management Plan is a considerably large document, and as such has been provided on the enclosed CD. A hard copy can be provided if required. Table 1 of this letter provides a summary of the key amendments made to the Longwall 304 Heritage Management Plan since the recent updates to the Longwalls 301-303 Heritage Management Plan (September 2018).

It would be appreciated if you would kindly provide any comments on the draft Metropolitan Coal Longwall 304 Heritage Management Plan to the undersigned by 6 March 2019. Metropolitan Coal looks forward to your input and invites you to contact us with any queries.

Yours sincerely,

JON DEGOTARDI
Technical Services Manager

Table 1
Metropolitan Coal Longwall 304 Heritage Management Plan (Version A)

HMP Section	Description
All/Figures	Longwall 304 Heritage Management Plan (HMP) text and figures show Longwall 303 and Longwall 304 panel void lengths of 1,325 m and 1,285 m, respectively.
All	Longwall 304 text reflects status at the time of HMP development.
Section 3.3	List of legislation to reflect current legislation.
Section 4.3	Details the Longwall 304 Environmental Risk Assessment conducted in relation to the HMP.
Section 4.4	<ul style="list-style-type: none"> • Provides a description of the Aboriginal cultural values (cultural significance) that are broader than the archaeological record. • Presents the revised subsidence predictions for Longwall 304 Aboriginal heritage sites. • Details the Aboriginal heritage sites located within the 35° angle of draw and/or predicted 20 mm subsidence contour for Longwall 304.
Section 7 and Appendix 1	Describes the baseline recording that has been undertaken for Aboriginal heritage sites within 600 m of Longwalls 304-306.
Section 9	Describes the monitoring and Trigger Action Response Plan (TARP) to be implemented in relation to Aboriginal heritage sites following the completion of Longwall 303.
Section 12	Describes the collection of baseline data for future Extraction Plans.
Section 17	List of references.

6 March 2019

Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

**Attention: Mr Howard Reed, Director, Resource Assessments
Ms Jessie Evans, Team Leader, Resource Assessments**

By email: Howard.Reed@planning.nsw.gov.au, Jessie.Evans@planning.nsw.gov.au

Dear Howard and Jessie,

RE: METROPOLITAN COAL LONGWALL 304 LAND MANAGEMENT PLAN

Metropolitan Coal Pty Ltd (Metropolitan Coal) is wholly owned by Peabody Energy Australia Pty Ltd, and is located adjacent to the township of Helensburgh and approximately 30 kilometres north of Wollongong in New South Wales (NSW). Metropolitan Coal was granted Project Approval (08_0149) for the Metropolitan Coal Project (the Project) on 22 June 2009 by the NSW Minister for Planning under section 75J of the NSW *Environmental Planning and Assessment Act, 1979*.

Condition 6(f), Schedule 3 of the Project Approval requires Metropolitan Coal to prepare a Land Management Plan in consultation with the Sydney Catchment Authority (now WaterNSW) and to the satisfaction of the Director-General (now Secretary) of the NSW Department of Planning and Environment (DP&E) to manage the potential environmental consequences of the Longwall 304 Extraction Plan on cliffs and overhangs, steep slopes and land in general.

Land Management Plans were prepared for the Longwalls 20-22, 23-27 and 301-303 mining domains in consultation with WaterNSW and the DP&E. The draft Longwall 304 Land Management Plan includes post mining monitoring and management of cliffs and overhangs, steep slopes and land in general subject to the previously approved Metropolitan Coal Land Management Plans.

Please find enclosed for the DP&E's review and comment, a copy of the draft Metropolitan Coal Longwall 304 Land Management Plan. Table 1 of this letter provides a summary of the key amendments made to the Longwall 304 Land Management Plan since the recent updates to the Longwalls 301-303 Land Management Plan (September 2018).

Please note we have also sent a copy of the draft Metropolitan Coal Longwall 304 Land Management Plan to WaterNSW and have requested they provide comments on the draft Longwall 304 Land Management Plan by 20 March 2019.

It would be appreciated if you would kindly provide any comments to the undersigned by 20 March 2019.

Metropolitan Coal looks forward to your input and invites you to contact us with any queries.

Yours sincerely,



JON DEGOTARDI
Technical Services Manager

Table 1
Metropolitan Coal Longwall 304 Land Management Plan (Version A)

LMP Section	Description
All/Figures	Longwall 304 Land Management Plan (LMP) text and figures based on Longwall 303 and Longwall 304 panel void lengths of 1,325 m and 1,285 m, respectively.
All	Text updated to reflect current status (e.g. status of longwall mining).
Section 3.3	List of legislation to reflect current legislation.
Section 4.3	Details the Longwall 304 Environmental Risk Assessment conducted in relation to the LMP.
Sections 4.4, 4.5 and 4.6	Presents the revised subsidence predictions and assessment of potential subsidence impacts and environmental consequences for Longwall 304 for cliffs and overhangs, steep slopes and land in general.
Section 5	Details the performance measures and indicators. Table 5 updated to include estimated cliff and overhang lengths of COH11, COH12, COH13 and COH17 following detailed baseline mapping.
Section 6 and Appendix 1	Details the baseline data and information available in relation to cliffs and overhangs, steep slopes and land in general. Appendix 1 has been revised to include the detailed baseline mapping and photographic record of cliffs COH11, COH12, COH13 and COH17.
Section 7	Describes the monitoring and Trigger Action Response Plan (TARP) to be implemented in relation to cliff and overhang sites, steep slopes and land in general following the completion of Longwall 303.
Section 10	Describes the collection of baseline data for the next Extraction Plan.
Section 15	List of references.
Appendix 2	Footnote 5 of the LMP – Subsidence Impact Register revised in response to additional baseline mapping.



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6 March 2019

WaterNSW
PO Box 398
PARRAMATTA NSW 2124

Attention: Mr Peter Dupen, Manager, Mining

By email: Peter.Dupen@watersw.com.au

Dear Peter,

RE: METROPOLITAN COAL LONGWALL 304 LAND MANAGEMENT PLAN

Metropolitan Coal Pty Ltd (Metropolitan Coal) is wholly owned by Peabody Energy Australia Pty Ltd, and is located adjacent to the township of Helensburgh and approximately 30 kilometres north of Wollongong in New South Wales (NSW). Metropolitan Coal was granted Project Approval (08_0149) for the Metropolitan Coal Project (the Project) on 22 June 2009 by the NSW Minister for Planning under section 75J of the NSW *Environmental Planning and Assessment Act, 1979*.

Condition 6(f), Schedule 3 of the Project Approval requires Metropolitan Coal to prepare a Land Management Plan in consultation with the Sydney Catchment Authority (now WaterNSW) to manage the potential environmental consequences of the Longwall 304 Extraction Plan on cliffs and overhangs, steep slopes and land in general.

Land Management Plans were prepared for the Longwalls 20-22, 23-27 and 301-303 mining domains in consultation with WaterNSW. This draft Longwall 304 Land Management Plan includes post mining monitoring and management of cliffs and overhangs, steep slopes and land in general subject to the previously approved Metropolitan Coal Land Management Plans.

Please find enclosed for WaterNSW's review and comment, a copy of the draft Metropolitan Coal Longwall 304 Land Management Plan. Table 1 of this letter provides a summary of the key amendments made to the Longwall 304 Land Management Plan since the recent updates to the Longwalls 301-303 Land Management Plan (September 2018).

It would be appreciated if you would kindly provide any comments to the undersigned by 20 March 2019.

Metropolitan Coal looks forward to your input and invites you to contact us with any queries.

Yours sincerely,

JON DEGOTARDI
Technical Services Manager

Table 1
Metropolitan Coal Longwall 304 Land Management Plan (Version A)

LMP Section	Description
All/Figures	Longwall 304 Land Management Plan (LMP) text and figures based on Longwall 303 and Longwall 304 panel void lengths of 1,325 m and 1,285 m, respectively.
All	Text updated to reflect current status (e.g. status of longwall mining).
Section 3.3	List of legislation to reflect current legislation.
Section 4.3	Details the Longwall 304 Environmental Risk Assessment conducted in relation to the LMP.
Sections 4.4, 4.5 and 4.6	Presents the revised subsidence predictions and assessment of potential subsidence impacts and environmental consequences for Longwall 304 for cliffs and overhangs, steep slopes and land in general.
Section 5	Details the performance measures and indicators. Table 5 updated to include estimated cliff and overhang lengths of COH11, COH12, COH13 and COH17 following detailed baseline mapping.
Section 6 and Appendix 1	Details the baseline data and information available in relation to cliffs and overhangs, steep slopes and land in general. Appendix 1 has been revised to include the detailed baseline mapping and photographic record of cliffs COH11, COH12, COH13 and COH17.
Section 7	Describes the monitoring and Trigger Action Response Plan (TARP) to be implemented in relation to cliff and overhang sites, steep slopes and land in general following the completion of Longwall 303.
Section 10	Describes the collection of baseline data for the next Extraction Plan.
Section 15	List of references.
Appendix 2	Footnote 5 of the LMP – Subsidence Impact Register revised in response to additional baseline mapping.

6 March 2019

Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

**Attention: Mr Howard Reed, Director, Resource Assessments
Ms Jessie Evans, Team Leader, Resource Assessments**

By email: Howard.Reed@planning.nsw.gov.au, Jessie.Evans@planning.nsw.gov.au

Dear Howard and Jessie,

RE: METROPOLITAN COAL LONGWALL 304 PUBLIC SAFETY MANAGEMENT PLAN

Metropolitan Coal Pty Ltd (Metropolitan Coal) is wholly owned by Peabody Energy Australia Pty Ltd, and is located adjacent to the township of Helensburgh and approximately 30 kilometres north of Wollongong in New South Wales (NSW). Metropolitan Coal was granted Project Approval (08_0149) for the Metropolitan Coal Project (the Project) on 22 June 2009 by the NSW Minister for Planning under section 75J of the NSW *Environmental Planning and Assessment Act, 1979*.

Condition 6(g), Schedule 3 of the Project Approval requires Metropolitan Coal to prepare a Public Safety Management Plan in consultation with the NSW Division of Resources and Energy (now the Division of Resources and Geoscience [DRG]) and the Dams Safety Committee (DSC), and to the satisfaction of the Director-General (now Secretary) of the NSW Department of Planning and Environment (DP&E) to ensure public safety within the mining area as part of the Longwall 304 Extraction Plan.

Public Safety Management Plans were prepared for the Longwalls 20-22, 23-27 and 301-303 mining domains. The draft Longwall 304 Public Safety Management Plan includes post mining monitoring and management of public safety aspects subject to the previously approved Metropolitan Coal Public Safety Management Plans.

Please find enclosed for the DP&E's review and comment, a copy of the draft Metropolitan Coal Longwall 304 Public Safety Management Plan.

Please note that we have also sent a copy of the draft Metropolitan Coal Longwall 304 Public Safety Management Plan to the DRG, DSC and WaterNSW, and have requested they provide comments on the draft Longwall 304 Public Safety Management Plan by 20 March 2019.

It would be appreciated if you would kindly provide any comments to the undersigned by 20 March 2019.

Metropolitan Coal looks forward to your input and invites you to contact us with any queries.

Yours sincerely,



JON DEGOTARDI
Technical Services Manager



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6 March 2019

Department of Planning & Environment
Division of Resources and Geoscience
GPO Box 5477
MAITLAND NSW 2320

Attention: Alex Love, Project Coordinator, Royalties and Advisory Services

By email: industry.coordination@industry.nsw.gov.au

Dear Alex,

RE: METROPOLITAN COAL LONGWALL 304 PUBLIC SAFETY MANAGEMENT PLAN

Metropolitan Coal Pty Ltd (Metropolitan Coal) is wholly owned by Peabody Energy Australia Pty Ltd, and is located adjacent to the township of Helensburgh and approximately 30 kilometres north of Wollongong in New South Wales (NSW). Metropolitan Coal was granted Project Approval (08_0149) for the Metropolitan Coal Project (the Project) on 22 June 2009 by the NSW Minister for Planning under section 75J of the NSW *Environmental Planning and Assessment Act, 1979*.

Condition 6(g), Schedule 3 of the Project Approval requires Metropolitan Coal to prepare a Public Safety Management Plan in consultation with the NSW Division of Resources and Energy (now the Division of Resources and Geoscience [DRG]) to ensure public safety within the mining area as part of the Longwall 304 Extraction Plan.

Public Safety Management Plans were prepared for the Longwalls 20-22, 23-27 and 301-303 mining domains in consultation with the DRG. The draft Longwall 304 Public Safety Management Plan includes post mining monitoring and management of public safety aspects subject to the previously approved Metropolitan Coal Public Safety Management Plans.

Please find enclosed for the DRG's review and comment, a copy of the draft Metropolitan Coal Longwall 304 Public Safety Management Plan.

It would be appreciated if you would kindly provide any comments to the undersigned by 20 March 2019.

Metropolitan Coal looks forward to your input and invites you to contact us with any queries.

Yours sincerely,

JON DEGOTARDI
Technical Services Manager



**METROPOLITAN
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Tel + 61 (0) 2 4294 7202
Fax + 61 (0) 2 4294 2064

6 March 2019

Dams Safety Committee
Locked Bag 5123
PARRAMATTA NSW 2124

Attention: Mr Bill Ziegler, Manager, Mining Projects

By email: Bill.Ziegler@damsafety.nsw.gov.au; dsc.mining@damsafety.nsw.gov.au

Dear Bill,

RE: METROPOLITAN COAL LONGWALL 304 PUBLIC SAFETY MANAGEMENT PLAN

Metropolitan Coal Pty Ltd (Metropolitan Coal) is wholly owned by Peabody Energy Australia Pty Ltd, and is located adjacent to the township of Helensburgh and approximately 30 kilometres north of Wollongong in New South Wales (NSW). Metropolitan Coal was granted Project Approval (08_0149) for the Metropolitan Coal Project (the Project) on 22 June 2009 by the NSW Minister for Planning under section 75J of the NSW *Environmental Planning and Assessment Act, 1979*.

Condition 6(g), Schedule 3 of the Project Approval requires Metropolitan Coal to prepare a Public Safety Management Plan in consultation with the Dams Safety Committee (DSC) to ensure public safety within the mining area as part of the Longwall 304 Extraction Plan.

Public Safety Management Plans were prepared for the Longwalls 20-22, 23-27 and 301-303 mining domains in consultation with the DSC. The draft Longwall 304 Public Safety Management Plan includes post mining monitoring and management of public safety aspects subject to the previously approved Metropolitan Coal Public Safety Management Plans.

Please find enclosed for the DSC's review and comment, a copy of the draft Metropolitan Coal Longwall 304 Public Safety Management Plan.

It would be appreciated if you would kindly provide any comments to the undersigned by 20 March 2019.

Metropolitan Coal looks forward to your input and invites you to contact us with any queries.

Yours sincerely,

JON DEGOTARDI
Technical Services Manager



**METROPOLITAN
COLLIERIES PTY LTD**

ABN: 91 003 135 635

100 Melbourne Street
South Brisbane Qld 4101

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Helensburgh NSW 2508
Australia
Tel + 61 (0) 2 4294 7202
Fax + 61 (0) 2 4294 2064

6 March 2019

WaterNSW
PO Box 398
PARRAMATTA NSW 2124

Attention: Mr Peter Dupen, Manager, Mining

By email: Peter.Dupen@waternsw.com.au

Dear Peter,

RE: METROPOLITAN COAL LONGWALL 304 PUBLIC SAFETY MANAGEMENT PLAN

Metropolitan Coal Pty Ltd (Metropolitan Coal) is wholly owned by Peabody Energy Australia Pty Ltd, and is located adjacent to the township of Helensburgh and approximately 30 kilometres north of Wollongong in New South Wales (NSW). Metropolitan Coal was granted Project Approval (08_0149) for the Metropolitan Coal Project (the Project) on 22 June 2009 by the NSW Minister for Planning under section 75J of the NSW *Environmental Planning and Assessment Act, 1979*.

Condition 6(g), Schedule 3 of the Project Approval requires Metropolitan Coal to prepare a Public Safety Management Plan to ensure public safety within the mining area as part of the Longwall 304 Extraction Plan.

Public Safety Management Plans were prepared for the Longwalls 20-22, 23-27 and 301-303 mining domains. The draft Longwall 304 Public Safety Management Plan includes post mining monitoring and management of public safety aspects subject to the previously approved Metropolitan Coal Public Safety Management Plans.

Please find enclosed for WaterNSW's review and comment, a copy of the draft Metropolitan Coal Longwall 304 Public Safety Management Plan.

It would be appreciated if you would kindly provide any comments to the undersigned by 20 March 2019.

Metropolitan Coal looks forward to your input and invites you to contact us with any queries.

Yours sincerely,

JON DEGOTARDI
Technical Services Manager



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7 March 2019

Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

**Attention: Mr Howard Reed, Director, Resource Assessments
Ms Jessie Evans, Team Leader, Resource Assessments**

By email: Howard.Reed@planning.nsw.gov.au, Jessie.Evans@planning.nsw.gov.au

Dear Howard and Jessie,

RE: METROPOLITAN COAL LONGWALL 304 BIODIVERSITY MANAGEMENT PLAN

Metropolitan Coal Pty Ltd (Metropolitan Coal) is wholly owned by Peabody Energy Australia Pty Ltd, and is located adjacent to the township of Helensburgh and approximately 30 kilometres north of Wollongong in New South Wales (NSW). Metropolitan Coal was granted Project Approval (08_0149) for the Metropolitan Coal Project (the Project) on 22 June 2009 by the NSW Minister for Planning under section 75J of the NSW *Environmental Planning and Assessment Act, 1979*.

Condition 6(f), Schedule 3 of the Project Approval requires Metropolitan Coal to prepare a Biodiversity Management Plan in consultation with the NSW Office of Environment and Heritage (OEH) and the NSW Division of Resources and Energy – Fisheries (now the Department of Primary Industries - Fisheries [DPI – Fisheries]), and to the satisfaction of the Director-General (now Secretary) of the NSW Department of Planning and Environment (DP&E) to manage the potential environmental consequences of the Longwall 304 Extraction Plan on aquatic and terrestrial flora and fauna, with a specific focus on swamps.

Biodiversity Management Plans were prepared for the Longwalls 20-22, 23-27 and 301-303 mining domains in consultation with the abovementioned departments. The draft Longwall 304 Biodiversity Management Plan includes post mining monitoring and management of aquatic and terrestrial flora and fauna subject to the previously approved Metropolitan Coal Biodiversity Management Plans.

Please find enclosed for the DP&E's review and comment, a copy of the draft Metropolitan Coal Longwall 304 Biodiversity Management Plan. Table 1 of this letter provides a summary of the key amendments made to the Longwall 304 Biodiversity Management Plan since the recent updates to the Longwalls 301-303 Biodiversity Management Plan (September 2018).

Please note that we have also sent a copy of the draft Metropolitan Coal Longwall 304 Biodiversity Management Plan to the OEH and DPI-Fisheries, and have requested they provide comments on the draft Longwall 304 Biodiversity Management Plan by 21 March 2019.

It would be appreciated if you would kindly provide any comments to the undersigned by 21 March 2019.

Metropolitan Coal looks forward to your input and invites you to contact us with any queries.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Jon Degotardi". The signature is fluid and cursive, with the first name "Jon" being more prominent than the last name "Degotardi".

JON DEGOTARDI
Technical Services Manager

Table 1
Metropolitan Coal Longwall 304 Biodiversity Management Plan (Version A)

BMP Section	Description
All/Figures	Longwall 304 Biodiversity Management Plan (BMP) text and figures based on Longwall 303 and Longwall 304 panel void lengths of 1,325 m and 1,285 m, respectively.
All	Text updated to reflect current status (e.g. status of longwall mining).
Section 3.3	List of legislation to reflect current legislation.
Section 4	Describes the relevant water, land and biodiversity information obtained since Project Approval.
Section 5.2	Details the Longwall 304 Environmental Risk Assessment conducted in relation to the BMP.
Sections 5.3, 5.4, 5.5 and 5.6	Presents the revised subsidence predictions and revised assessment of potential subsidence impacts and environmental consequences for Longwall 304 for upland swamps, riparian zones/aquatic biota and their habitats, slopes and ridgetops, and terrestrial fauna and their habitats.
Section 6	Details the performance measures and indicators that will be used to assess the Project.
Section 7, Appendices 2, 3 and 4	Details the baseline biodiversity information and data available for Longwall 304.
Section 8	Describes the monitoring and Trigger Action Response Plans (TARPs) to be implemented, including post mining monitoring of Longwalls 20-22, 23-27 and 301-303.
Sections 9.1 and 9.3	Describes the stream remediation activities to be implemented on the Waratah Rivulet and Eastern Tributary in accordance with the Metropolitan Coal Stream Remediation Plan.
Section 11	Describes the collection of baseline data for the next Extraction Plan.
Section 16	List of references.

7 March 2019

Department of Primary Industries - Fisheries
Locked Bag 1
NELSON BAY NSW 2315

Attention: Mr Scott Carter, Regional Manager, Central/Metro Aquatic Ecosystems

By email: Scott.Carter@dpi.nsw.gov.au

Dear Scott,

RE: METROPOLITAN COAL LONGWALL 304 BIODIVERSITY MANAGEMENT PLAN

Metropolitan Coal Pty Ltd (Metropolitan Coal) is wholly owned by Peabody Energy Australia Pty Ltd, and is located adjacent to the township of Helensburgh and approximately 30 kilometres north of Wollongong in New South Wales (NSW). Metropolitan Coal was granted Project Approval (08_0149) for the Metropolitan Coal Project (the Project) on 22 June 2009 by the NSW Minister for Planning under section 75J of the NSW *Environmental Planning and Assessment Act, 1979*.

Condition 6(f), Schedule 3 of the Project Approval requires Metropolitan Coal to prepare a Biodiversity Management Plan in consultation with the Division of Resources and Energy – Fisheries (now the Department of Primary Industries - Fisheries [DPI - Fisheries]) to manage the potential environmental consequences of the Longwall 304 Extraction Plan on aquatic and terrestrial flora and fauna, with a specific focus on swamps.

Biodiversity Management Plans were prepared for the Longwalls 20-22, 23-27 and 301-303 mining domains. The draft Longwall 304 Biodiversity Management Plan includes post mining monitoring and management of aquatic and terrestrial flora and fauna subject to the previously approved Metropolitan Coal Biodiversity Management Plans.

Please find enclosed for the DPI - Fisheries review and comment, a copy of the draft Metropolitan Coal Longwall 304 Biodiversity Management Plan. Table 1 of this letter provides a summary of the key amendments made to the Longwall 304 Biodiversity Management Plan since the recent updates to the Longwalls 301-303 Biodiversity Management Plan (September 2018).

It would be appreciated if you would kindly provide any comments to the undersigned by 21 March 2019.

Metropolitan Coal looks forward to your input and invites you to contact us with any queries.

Yours sincerely,



JON DEGOTARDI
Technical Services Manager

Table 1
Metropolitan Coal Longwall 304 Biodiversity Management Plan (Version A)

BMP Section	Description
All/Figures	Longwall 304 Biodiversity Management Plan (BMP) text and figures based on Longwall 303 and Longwall 304 panel void lengths of 1,325 m and 1,285 m, respectively.
All	Text updated to reflect current status (e.g. status of longwall mining).
Section 3.3	List of legislation to reflect current legislation.
Section 4	Describes the relevant water, land and biodiversity information obtained since Project Approval.
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Sections 5.3, 5.4, 5.5 and 5.6	Presents the revised subsidence predictions and revised assessment of potential subsidence impacts and environmental consequences for Longwall 304 for upland swamps, riparian zones/aquatic biota and their habitats, slopes and ridgetops, and terrestrial fauna and their habitats.
Section 6	Details the performance measures and indicators that will be used to assess the Project.
Section 7, Appendices 2, 3 and 4	Details the baseline biodiversity information and data available for Longwall 304.
Section 8	Describes the monitoring and Trigger Action Response Plans (TARPs) to be implemented, including post mining monitoring of Longwalls 20-22, 23-27 and 301-303.
Sections 9.1 and 9.3	Describes the stream remediation activities to be implemented on the Waratah Rivulet and Eastern Tributary in accordance with the Metropolitan Coal Stream Remediation Plan.
Section 11	Describes the collection of baseline data for the next Extraction Plan.
Section 16	List of references.

7 March 2019

Office of Environment & Heritage
PO Box 513
WOLLONGONG NSW 2520

**Attention: Mr Michael Saxon, Director, South Branch
Mr James Dawson, Senior Team Leader, Ecosystems & Threatened Species**

By email: Michael.Saxon@environment.nsw.gov.au, James.Dawson@environment.nsw.gov.au

Dear Michael and James,

RE: METROPOLITAN COAL LONGWALL 304 BIODIVERSITY MANAGEMENT PLAN

Metropolitan Coal Pty Ltd (Metropolitan Coal) is wholly owned by Peabody Energy Australia Pty Ltd, and is located adjacent to the township of Helensburgh and approximately 30 kilometres north of Wollongong in New South Wales (NSW). Metropolitan Coal was granted Project Approval (08_0149) for the Metropolitan Coal Project (the Project) on 22 June 2009 by the NSW Minister for Planning under section 75J of the NSW *Environmental Planning and Assessment Act, 1979*.

Condition 6(f), Schedule 3 of the Project Approval requires Metropolitan Coal to prepare a Biodiversity Management Plan in consultation with the NSW Office of Environment and Heritage (OEH) to manage the potential environmental consequences of the Longwall 304 Extraction Plan on aquatic and terrestrial flora and fauna, with a specific focus on swamps.

Biodiversity Management Plans were prepared for the Longwalls 20-22, 23-27 and 301-303 mining domains. The draft Longwall 304 Biodiversity Management Plan includes post mining monitoring and management of aquatic and terrestrial flora and fauna subject to the previously approved Metropolitan Coal Biodiversity Management Plans.

Please find enclosed for the OEH's review and comment, a copy of the draft Metropolitan Coal Longwall 304 Biodiversity Management Plan. Table 1 of this letter provides a summary of the key amendments made to the Longwall 304 Biodiversity Management Plan since the recent updates to the Longwalls 301-303 Biodiversity Management Plan (September 2018).

It would be appreciated if you would kindly provide any comments to the undersigned by 21 March 2019.

Metropolitan Coal looks forward to your input and invites you to contact us with any queries.

Yours sincerely,



JON DEGOTARDI
Technical Services Manager

Table 1
Metropolitan Coal Longwall 304 Biodiversity Management Plan (Version A)

BMP Section	Description
All/Figures	Longwall 304 Biodiversity Management Plan (BMP) text and figures based on Longwall 303 and Longwall 304 panel void lengths of 1,325 m and 1,285 m, respectively.
All	Text updated to reflect current status (e.g. status of longwall mining).
Section 3.3	List of legislation to reflect current legislation.
Section 4	Describes the relevant water, land and biodiversity information obtained since Project Approval.
Section 5.2	Details the Longwall 304 Environmental Risk Assessment conducted in relation to the BMP.
Sections 5.3, 5.4, 5.5 and 5.6	Presents the revised subsidence predictions and revised assessment of potential subsidence impacts and environmental consequences for Longwall 304 for upland swamps, riparian zones/aquatic biota and their habitats, slopes and ridgetops, and terrestrial fauna and their habitats.
Section 6	Details the performance measures and indicators that will be used to assess the Project.
Section 7, Appendices 2, 3 and 4	Details the baseline biodiversity information and data available for Longwall 304.
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Sections 9.1 and 9.3	Describes the stream remediation activities to be implemented on the Waratah Rivulet and Eastern Tributary in accordance with the Metropolitan Coal Stream Remediation Plan.
Section 11	Describes the collection of baseline data for the next Extraction Plan.
Section 16	List of references.



DOC19/262162

Ms Jessie Evans
Team Leader - Resource Assessment
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Ms Evans,

Metropolitan LW 304 Biodiversity Management Plan

OEH has reviewed Metropolitan Coal's Biodiversity Management Plan for Longwall 304. Our comments are provided below.

Application of the Upland Swamp Offset Policy

The *Addendum for upland swamps impacted by longwall mining subsidence* (OEH 2016; "Upland Swamp Offset Policy") under the NSW Biodiversity Offsets Policy for Major Projects provides for the calculation and provision of biodiversity offsets for the subsidence impacts of longwall coal mining on upland swamps and associated threatened species. The Upland Swamp Offset Policy states that "Where projects have existing development consent for longwall mining that may cause subsidence impacts on upland swamps, the framework will be applied to all new extraction plans where reasonable and feasible". Given that mining of LW304 as proposed will undermine several upland swamps, including monitored swamps S50 and S51/S52, we believe that the Biodiversity Management Plan should show how subsidence predictions for all upland swamps within 400m are considered against the policy. If any upland swamps are predicted to have greater than negligible environmental consequences (as defined in the policy) because of mining, the proponent must demonstrate the legal ability to secure offsets for those swamps in that Extraction Plan.

As it is possible for the actual impacts of mining to be greater than the predicted impacts, Metropolitan Coal is required to monitor the shallow groundwater regime in the swamp sediments. If the actual impact is greater than predicted and exceeds the negligible environmental consequences definition of the Upland Swamp Offset Policy, the company must identify and retire an offset equivalent to the actual impact within six months. OEH requests that this be specified in the conditions of the Extraction Plan consent.

Primary monitoring of upland swamps under the Upland Swamp Offset Policy is focussed on shallow groundwater levels in swamp sediments using piezometers. A minimum of 2 years baseline data should be collected before mining commences for all swamps within 400m of proposed longwalls.

OEH requests provision of the raw monitoring data to assist in assessment and interpretation of mining impacts from swamps within, and to the north of, the LW304-306 series.

Presence of lineaments and interactions with subsidence

Figure 15 maps the presence of many lineaments in the vicinity of LW 303 and 304 and the Extraction Plan acknowledges that areas containing lineaments may experience greater subsidence. The Independent Expert Panel for Mining in the Catchment (2018) recommended that "*The potential impacts for water quantity of faulting, basal shear planes and lineaments need to be very carefully considered and risk assessed at all mining operations in the Catchment Special Areas*". OEH does not believe the Independent Expert Panel's recommendation has been addressed in relation to lineaments in the vicinity of the Eastern Tributary and upland swamps. We also note that these lineaments were not mapped or discussed in the LW301-303 Extraction Plans, despite being included in previous maps and reports by MSEC (2010). The potential for subsidence interactions with geological structures to lead to increased adverse consequences for swamps, streams, threatened species and the Woronora Reservoir is of concern to OEH.

Please contact James Dawson, Senior Team Leader, Ecosystems and Threatened Species at james.dawson@environment.nsw.gov.au or 4224 4125 if you require more information.

Yours sincerely,



MICHAEL SAXON
Director, South-East
Conservation and Regional Delivery Division