



Rivers SOS

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Major Development Assessment,
Department of Planning
GPO BOX 39, SYDNEY NSW 2001

28 April 2009

**Re: Objection to Moolarben CM Stage 2 - No: 08_0135
& Modification Stage 1 - No: 05_0117 MOD 3**

River SOS is an alliance of some forty environmental and community groups concerned with the damage to our water resources in New South Wales caused by mining operations.

The Moolarben Coal Mine Stages 1 & 2 should not be approved. It will cause irretrievable damage to the Goulburn River and connected groundwater resources as well as the tributaries, Moolarben, Murragamba and Eastern Creeks.

The further expansion of the existing coal mine operations in the area will result in significant cumulative damage to the catchment and water resources and places additional unacceptable pressure on a landscape and water system already stressed from past mining practices and facing catastrophic climate change.

The Moolarben Coal Mine (MCM) groundwater study does not adequately assess the long term effects of mining on this water system. Subsidence and dewatering of Underground Mine 4 has the potential to crack and depressurise aquifers connected to the Goulburn River and permanently alter the structure and connectivity of this water system.

Ulan Coal Mine (UCML) is already extracting an unsustainable level of ground water from its long wall mine (>13 ML/day). MCM plan an extensive production and dewatering bore field that brackets the Goulburn River Gorges. This degree of groundwater extraction is ecologically unsustainable.

The 100 year recovery period being considered is ecologically unacceptable and is commercial vandalism in a climatically uncertain future.

- **The government should commission an independent hydrologist to review the Moolarben CM proposal and investigate the cumulative and long term impacts of mining on the Goulburn River catchment and regional water resources.**
- **No production bore field should be permitted within a 2 km buffer zone from the Goulburn River Drip and Corner Gorges.**
- **There should be no mining where there is a potential for a loss in water quality and quantity or damage to due to the deterioration or cracking of groundwater resources.**
- **There should be no diversion of 3rd order or greater creeks or surface waters from mining operations including that caused by subsidence and or geological cracking.**
- **Mining should not occur where the alteration of hydrological regimes will adversely impact Groundwater Dependent Ecological Systems or threaten significant species habitat.**

The MCM plan to 'realign' 11kms of Murragamba and Eastern creeks should be rejected. It is highly unlikely that any proposed offset or restoration project would replace the loss of this 'chain of ponds' creek system that will be destroyed by open cut mining. White Mining (subs. of Felix Industries) is responsible for the Goulburn River diversion channel that remains an unstable, highly disturbed and eroding section of river. This company should not be given approval to wreck another water system.

Rivers SOS supports the addition of the culturally and scenically significant Goulburn River, Drip and Corner Gorges including the riparian corridor and adjacent escarpments into the Goulburn River National Park as the only way that this invaluable river landscape and water system can be protected for future generations.

Yours faithfully,
Julie Sheppard
Secretary



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Rivers SOS is an alliance of 42 groups across NSW who are all campaigning for the protection of the integrity of river systems and water sources against the impacts of mining.