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21 August 2023

Dr. Allison Cummings  
Manager, Environmental Services and Regulation  
Coal and Central Queensland Compliance  
Department of Environment and Science  
PO Box 3028  
Emerald, QLD 4720

Dear Allison,

**Sonoma Coal Mine (EPML00707713) EA Amendment Application Request for Further Information**

QCoal Sonoma Pty Ltd (QCoal Sonoma) applied for an amendment to EA EPML00707713 for the Sonoma Coal Mine (SCM) to include a new proposed tenure (ML700075) on 1 December 2022. The Assessment Level Decision was made on 17 January 2023, and it was determined that the EA amendment would constitute a major amendment due to the inclusion of a new mining lease.

A request for information (RFI) relating to the SCM EA amendment application was received from DES on 20 February 2023, with a due date of 21 August 2023. The content of the RFI and QCoal Sonoma's responses have been provided below.

**ITEM 1**

**DES Comment**

*The current amendment proposes a change to the activities planned on ML 10327 (refer to Figure 1-3 in Attachment 1 for information provided previously by applicant on mining activities proposed on ML10327).*

*The amendment application is also not clear on the total area (ha) of disturbance proposed on MLA 700075. Note, the supporting material refers to the area of MLA 700075 being 73.7 ha. As per GeoRes Globe the tenure area of MLA700075 is 73.8 ha.*

**DES Information Request**

Provide –

- (a) *Further information on the scale of increase in area of disturbance associated with the pit (previously proposed as two separate, smaller pits), levee, diversion drains, additional dam to the east of the waste rock dump, the retention basin and the new proposed topsoil stockpile on ML 10327.*

- (b) *Clarification on the purpose of the 'retention basin' (further information on the retention basin will link into item 3 and 12).*
- (c) *Detail of the impact of the proposed increase in disturbance footprint on ML 10327 and MLA 700075 to the life of mine and annual extraction rate for the Sonoma Coal Mine.*
- (d) *Any impacts to the water pipeline that passes through ML 10327 and MLA 700075 and how these will be managed.*
- (e) *Total area (ha) of disturbance proposed on MLA 700075.*

### **QCoal Sonoma Response**

All proposed disturbance on ML 10327 as described in the EA amendment application, is in areas that have previously been assessed and approved in the current Sonoma EA (please refer to EA Figure 1 – Site map, domains and groundwater monitoring locations). For clarity, the proposed amendment does not include any proposed disturbance outside of what is already approved for disturbance on ML 10327 and QCoal therefore considers that any re-litigation of existing approved disturbance on ML 10327 would be outside the scope of this application. As such, the focus of the assessment undertaken for the EA Amendment application, and QCoal Sonoma's responses to the requests for information will relate to proposed works to be undertaken on the new proposed tenure (MLA 700075) only.

- (a) The two separate pits were originally proposed due to the requirement to maintain an arm of Two Mile Creek between the two. However, with the addition of MLA 700075 and the proposed water management, this arm becomes obsolete and a single pit becomes the more efficient and feasible option. The EA conditioning for Sonoma East pit/s relates only to the allowable residual void area and the overall residual void size within the Sonoma East Complex is not proposed to change as part of the operation.
- (b) The retention basin is part of the new water management infrastructure design with the inclusion of MLA 700075. It relates to the management of flows through the culverts underlying the Bowen Developmental Road such that there is no modelled impact to those structures.
- (c) As detailed in Section 2 of the EA Amendment supporting document, there will be no changes to the life of mine or annual extraction rate for the Sonoma Coal Mine based on the inclusion of MLA 700075.
- (d) No impacts to the water pipeline are proposed as part of works on the Sonoma East 2 complex. For reference, these areas are Category C areas in the existing and proposed ABC map, which limits the activities that can be undertaken on them, and the proposed layout was formulated in consideration of these restrictions. Any works overlying or interfering with the water pipeline would be subject to agreement with the pipeline owner as required by the *Mineral Resources Act 1989*.

- (e) The layout within MLA700075 proposed in the EA amendment application covers 25.52 ha.

## **ITEM 2**

### **DES Comment**

*The supporting document lacks information on changes in impacts to surface water due to the changes in disturbance on the Sonoma East Complex. As per the Environmental Protection Regulations 2019 (EP Reg), the Project must continue to implement effective environmental strategies with regard to Water, including all the following performance outcomes:*

- a) the storage and handling of contaminants will include effective means of secondary containment to prevent or minimise releases to the environment from spillage or leaks;*
- b) contingency measures will prevent or minimise adverse effects on the environment due to unplanned releases or discharges of contaminants to water;*
- c) the activity will be managed so that stormwater contaminated by the activity that may cause an adverse effect on an environmental value will not leave the site without prior treatment;*
- d) the disturbance of any acid sulfate soil, or potential acid sulfate soil, will be managed to prevent or minimise adverse effects on environmental values;*
- e) acid producing rock will be managed to ensure that the production and release of acidic waste is prevented or minimised, including impacts during operation and after the environmental authority has been surrendered;*
- f) any discharge to water or a watercourse or wetland will be managed so that there will be no adverse effects due to the altering of existing flow regimes for water or a watercourse or wetland;*
- g) for a petroleum activity, the activity will be managed in a way that is consistent with the coal seam gas water management policy, including the prioritisation hierarchy for managing and using coal seam gas water and the prioritisation hierarchy for managing saline waters;*
- h) the activity will be managed so that adverse effects on environmental values are prevented or minimised.*

*Management actions proposed as per the supporting document are the current Water Management Plan, Erosion and Sediment Control Plan (ESC) Plan, and REMP. However, it is not proposed to update these plans until the new MLA 700075 is granted.*

### **DES Information Request**

*The supporting information does not confirm that the existing mitigation and management measures can achieve the performance outcomes for water as per the EP Reg. The department request details of what additional and/or modified mitigation and management measure may need to be implemented to meet these performance outcomes. The response should include an updated:*

- (a) water management plan, including water balance model;*
- (b) ESC Plan (also refer item 12 below); and*
- (c) REMP.*

### **QCoal Sonoma Response**

The activities, layout and water management for Sonoma East including the proposed ML 700075 (as described in the application documentation), have been designed such that no specific additional water mitigation measures are required to achieve the requirements of the Environmental Authority.

The QCoal Northern Hub Water Management Plan and Erosion and Sediment Control Plan are conditioned in the EA as an operational document that is reviewed and updated annually. The content of the QNH WMP/ESCP is not intended or required to be an impact assessment document or be a life-of-mine document which addresses all potential future activities. Rather, the QNH WMP/ESCP is required for the operational management of water during the term of the plan only, pursuant to activities undertaken during that term.

The inclusion of specific measures in the QNH WMP/ESCP would require the actual detailed design of disturbance and infrastructure to be finalised, as well as the timing of the planned activities (which informs the numerical water balance model and water accumulation which is driven by number of wet seasons). Activities proposed on MLA 700075 have not gone through detailed design and the timing for commencement cannot be finalised until approval is secured (and as such the number of wet seasons is unknown for the water accumulation modelling).

As such the updating of the WMP/ESCPs would be completed once detailed designs are approved and timing is known, but is required ahead of works commencing. This is normal practice and has been utilised for the incorporation of activities relating to numerous EA amendments by QCoal (and others).

Regarding the REMP, existing REMP monitoring locations are sited both upstream and downstream of the activities undertaken on MLA 700075, within Two Mile Creek. Therefore, the existing REMP will capture any receiving environment impacts from activities on the new ML and as such no changes to the REMP Design Plan will be required.

### **ITEM 3**

#### **DES Comment**

*The supporting material states 'SE2ML does not represent any change to the Sonoma East Pits which would require any specific impact assessment, groundwater monitoring or management'.*

*It could reasonably be expected that drawdown of groundwater would occur while active mining is occurring within the Sonoma East pit.*

*The application proposes an increase in the size of the Sonoma East pit, and it is not clear if all the Sonoma East pit is now proposed to be backfilled or just the portion on the new MLA 700075.*

#### **DES Information Request**

*Provide:*

- (a) Evidence that supports no change in impact to groundwater quality or groundwater level will result from the proposed amendment.*
- (b) Justification that the current groundwater network is adequate to detect a change in groundwater quality and/or levels.*
- (c) Monitoring data and trigger levels for groundwater quality and levels to be included in the Sonoma environmental authority.*

#### **QCoal Sonoma Response**

- (a) No activities that could potentially impact groundwater quality or groundwater level are proposed to be undertaken on MLA 700075, which is the subject of the EA amendment and impact assessment. The small portion of the Sonoma East 2 pit that may temporarily extend into the MLA represents the upper portion of the pit end-wall which will not intersect groundwater and no part of the void will remain on SE2ML at the completion of mining.
- (b) No additional pits are proposed and as such no changes to potential groundwater impacts are associated with the proposed EA amendment, therefore no changes to the monitoring network will be required.
- (c) MLA 700075 will remain subject to the groundwater conditions of the current Sonoma EA, which include specific trigger levels for groundwater quality and levels. Changes to the conditioning of groundwater in association with this EA amendment are not considered to be warranted.

## **ITEM 4**

### **DES Comment**

*The supporting material states 'The addition of the SE2ML does not represent an increase to previously approved potential dust impacts associated with SCM operations that are not otherwise addressed by existing dust management strategies in place, because:*

- the extraction rate (intensity) of mining remains unchanged, does not require an increase in the number or type of plant, and does not involve a change to mining methods (refer to the IDP), and as such, the rate of dust generation from SCM remains unchanged;
- no new sensitive receptors are introduced by the inclusion of the SE2ML, and potential impacts to those receptors have already been assessed, managed and approved.'

*Since the completion of the Sonoma EIS in 2006, mining has commenced on Jax, Drake and Cows coal mine. The cumulative impact of the QCoal Northern Hub operations on the environmental values of air could reasonably be expected to have changed.*

### **DES Information Request**

*Provide modelling of impacts to air that considers the cumulative impacts from the QCoal Northern Hub operations and the additional disturbance proposed as part of this amendment.*

*If a change in impact to sensitive receptors is determined, provide information on how potential emissions will be managed to prevent or minimise adverse effects on environmental values.*

### **QCoal Sonoma Response**

The disturbance on ML10327 is already approved under the existing conditions and ABC mapping in the SCM EA, therefore any changes to impacts to sensitive receptors related to this amendment relate only to activities on ML 700075. Activities on ML 700075:

- do not include additional pits, waste rock dumps, or other infrastructure, and do not constitute a change to the scale or intensity of the activities at the SCM (i.e. would not generate dust at a higher rate than would otherwise be generated on ML 10327); and
- do not introduce any new sensitive receptors, or activities any closer to sensitive receptors than what has already been approved,

As such it is not considered that the potential impact will be materially different from what is already approved.

## **ITEM 5**

### **DES Comment**

*The supporting material states 'The addition of the SE2ML does not represent an increase to previously approved potential noise impacts associated with SCM operations which are not otherwise addressed by existing noise management strategies in place for the SCM, because the SE2ML:*

- does not include construction of processing facilities;
- does not increase the extraction rate (intensity) of mining, does not require an increase in the number or type of plant, and does not involve a change to mining method (refer to the IDP), and as such frequency and decibel level of noise at the source remains unchanged; and
- is a minor southern extension of ML 10327, and contains minimal activities with high potential for noise generation'.

*In relation to vibration, the supporting document goes on to state 'This is not a consideration for the addition of the SE2ML as blasting has already been considered for the Sonoma East 2 Pit and rail transport will remain unchanged from those activities already approved and undertaken on the SCM'.*

*Since the completion of the Sonoma EIS in 2006, mining has commenced on Jax, Drake and Cows coal mine. The cumulative impact of the QCoal Northern Hub operations on the environmental values of the acoustic environment could reasonably be expected to have changed, in addition to the change of disturbance now proposed on ML 10327.*

### **DES Information Request**

*Provide modelling of impacts to noise and vibration that considers the cumulative impacts from the QCoal Northern Hub operations and the additional disturbance proposed as part of this amendment.*

*If a change in impact to sensitive receptors is determined, provide information on how potential release of sound will be managed to prevent or minimise adverse effects on environmental values.*

### **QCoal Sonoma Response**

The disturbance on ML10327 is already approved under the existing conditions and ABC mapping in the SCM EA, therefore any changes to impacts to sensitive receptors related to this amendment relate only to activities on ML 700075. Activities on ML 700075:

- do not include additional pits, waste rock dumps, or other infrastructure, and do not constitute a change to the scale or intensity of the activities at the SCM (i.e. would not generate noise or vibration at a higher rate than would otherwise be generated on ML 10327); and

- do not introduce any new sensitive receptors, or activities any closer to sensitive receptors than what has already been approved,

As such it is not considered that the potential impact will be different from what is already approved.

## **ITEM 6**

### **DES Comment**

*The support material states 'The proposed post-mining land use (PMLU) for rehabilitated areas at the SCM is proposed to be grazing pasture in line with the pre-mining and adjacent land uses and in accordance with the existing SCM EA conditions and the QNH Rehabilitation Management Plan. Activities on SE2ML will also be required for inclusion in the SCM Progressive Rehabilitation and Closure Plan (PRCP).' No other information in relation to the proposed final landform, rehabilitation outcomes and criteria have been provided.*

*The transitional PRCP for Sonoma coal mine is currently under assessment with the department (refer Figure 4 of attachment 1). The draft PCRCP schedule does not consider the proposed changes in disturbance on ML 10327. No information on any changes to final landform and rehabilitation outcomes on ML 10327 have been provided with the amendment application.*

### **DES Information Request**

*More information on rehabilitation outcomes for the Sonoma East Complex is required including:*

- (a) Rehabilitation outcomes and completion criteria proposed for ML 10327 and MLA 700075.*
- (b) Figure(s) including map(s) depicting the amended final landform for Sonoma East Complex.*
- (c) Evidence that each rehabilitation objective for the Sonoma East Complex can be self-sustaining; non-polluting; safe and stable.*

### **QCoal Sonoma Response**

As stated in the response to Item 1, the EA amendment assessment should only be considering the proposed disturbance on ML 700075, as the disturbance on ML 10327 is already approved in the current SCM EA, and the ABC mapping. Therefore, this response will only relate to new disturbance approved by the inclusion of ML 700075.

- (a) The rehabilitation outcomes and completion criteria on ML 700075 are proposed to be as per the current approved QNH Rehabilitation Management Plan, and the current conditions of the SCM EA (namely conditions H1 and H5). The activities on MML 70075 do not involve any different materials or structure types and are



located immediately adjacent the activities approved on ML 10327. As such, the disturbance on ML 700075 is not novel disturbance requiring special consideration.

- (b) DES' RFI overlaps with the requirements for the SCM PRCP. Once the EA amendment has been approved, the proposed disturbance on ML 700075 will be integrated into the revised final landform mapping that will be provided with the PRCP resubmission associated with DES' Information Notice Request for that document (due date 10 February 2024).
- (c) No changes to rehabilitation objectives beyond what has already been approved in the QNH Rehabilitation Management Plan are required. The completion criteria provided in the application document meet the criteria as per Condition H1 of the currently approved SCM EA.

### **ITEM 7**

#### **DES Comment**

*The EA amendment application does not appear to consider all MSES mapped on MLA 700075 as per Attachment 2 of this information request. In addition, there is a lack of clarity on the area of impact to MSES as a result of the proposed amendment to activities on ML 10327, and the new activities proposed on MLA 700075.*

#### **DES Information Request**

*Provide details on the proposed areas of impact to each MSES mapped on MLA 700075, and impacts to MSES on ML 10327 as a result of the change in disturbance.*

#### **QCoal Sonoma Response**

MSES mapped on ML 10327 was not considered as part of the assessment of the EA amendment and will not be considered in this response, as the disturbance is already authorised under the current SCM EA (including ABC mapping).

Field validation of vegetation and Matters of State Environmental Significance were undertaken by Terrestria Pty Ltd over April and May 2023. A number of changes to the mapped Regional Ecosystems (REs) were noted, including a determination that the endangered regional ecosystem mapped by the Herbarium historically was not in fact present in the area, and proposed disturbance on ML 700075 has been revised taking these into account. The Terrestria report has been provided as a separate attachment with this response. A further significant impact assessment was also undertaken and has also been provided.

## **ITEM 8**

### **DES Comment**

*The supporting material states 'The clearing of remnant RE 11.9.10 will be the primary impact with regard to terrestrial ecology. The actual presence and quality of the RE areas, and the need to mitigate impacts will be determined by a suitably qualified ecologist prior to undertaking any clearing activities on the SE2ML.'*

*As per section 1.3 of the statutory instrument – 'Queensland Environmental Offsets Policy' (Version 1.13) [EPP/2015/1658] all offsets must meet seven (7) offset principles. Principle 2 requires that "impacts must first be avoided, then mitigated, before considering the use of offsets for any remaining impact."*

### **DES Information Request**

*Following on from item 7 of this information request, and as per the requirements of the Queensland Environmental Offsets Policy:*

- (a) Justify how impacts to each MSES will be or have been avoided.*
- (b) Where impacts cannot be avoided, provide details of how impacts to each MSES will be mitigated – and why avoidance is not reasonable.*
- (c) Confirm the scale, intensity and duration of impacts to the identified MSES after the implementation of (a) and (b).*

### **QCoal Sonoma Response**

The changes to the vegetation mapping referenced in the response to Item 7 found that no RE 11.9.10 is present on MLA700075. The Significant Residual Impact assessment undertaken by Terrestria Pty Ltd identified limited impacts to MSES including:

- 0.8 ha of regulated vegetation intersecting a watercourse (RE11.9.9); and
- 15.1 ha of habitat for two (2) threatened species (Squatter pigeon (Southern) and Koala).

Further responses to the specific queries in Item 8 are provided below:

- (a) The updated disturbance footprint, as provided with this response, has been designed to avoid the Of Concern Regional Ecosystem 11.3.25 identified by Terrestria Pty Ltd. The impact to 0.8 ha of RE 11.9.9 (No Concern at Present) intersecting a watercourse is unavoidable but very limited, and the materiality of the disturbance is not considered significant considering that the works to be undertaken in the area primarily consist of water management infrastructure, which will support vegetation regeneration almost immediately following construction.

The three threatened species identified were not observed to currently utilise MLA

700075, which itself is located in an area that has been utilised heavily for grazing historically and currently. The MLA 700075 layout was designed to minimise the disturbance footprint to the extent necessary for infrastructure to support the development of the Sonoma East Complex. Further, the vegetation communities that contain the threatened species (RE11.9.9 and RE11.9.2) are common in the region, and are classified as No Concern at Present.

- (b) A fauna spotter catcher will be present during the clearing of any remnant vegetation on MLA 700075 in order to assure that no undue impacts to wildlife occurs during activities. During operations, speed limits will be enforced on haul roads and access tracks to limit potential impacts to threatened species.
- (c) The scale of the impact to the identified MSES is minimal, particularly with regard to the regulated vegetation intersecting a watercourse (being less than 1 ha). Impacts to the threatened species identified are also limited to 15.1 ha, which is 20% of the MLA 700075 area.

## **ITEM 9**

### **DES Comment**

#### ***Determining Significant Residual Impact***

*As per the guideline – ‘Significant Residual Impact Guideline’ (2014) (the SRI guideline), the department may only impose offsets where it is satisfied that the prescribed activity will or is likely to have a ‘significant residual impact’ (SRI) on an MSES.*

*SRI is only those impacts to MSES that—*

- (a) Remain despite the implementation of avoidance and mitigation measure; and*
- (b) Are ‘significant as guided by an SRI assessment under the SRI guideline.*

*The SRI guideline provides ‘significant impact criteria’ for identifying a ‘significant’ impact to MSES. An SRI assessment must be conducted for each MSES which will be impacted.*

*If the significant impact criteria are exceeded by an impact, then offsets may be considered – and if so, must be considered for the entirety of the impact – not just the component of impact which exceeded the criteria.*

*An SRI assessment must be completed for impacts that can’t be avoided or mitigated to MSES located on ML 10327 (in the updated disturbance footprint now proposed) and on MLA 700075.*

*Note:*

*When assessing Connectivity areas, the output of the Landscape Fragmentation Tool should be provided to the department as part of the SRI assessment.*

*Also note, if at the time of the application to DES a decision by the Commonwealth has not been made regarding impacts to overlapping Prescribed Environmental Matters, then DES is required to assess and if a SRI has been identified then impose offset conditions. The applicant can seek to remove the offset requirement from their state approval once a decision has been made at a federal level.*

### **DES Information Request**

*Complete an SRI assessment for remaining impacts to MSES and provide a report of said SRI assessment/s to the department.*

### **QCoal Sonoma Response**

As previously noted, MSES mapped on ML 10327 was not considered as part of the assessment of the EA amendment and will not be considered in this response, as the disturbance is already authorised under the current SCM EA (including ABC mapping).

An SRI assessment for potential impacts to MSES on ML700075 was undertaken by Terrestria Pty Ltd, which has been provided separately with this response.

### **ITEM 10**

#### **DES Comment**

##### ***Determining Offsets as a Suitable Outcome***

*As per section 3.6 of the 'General guide for the Queensland Environmental Offsets Framework' (V1.03) [EPP/2021/5541] the department must have a high level of confidence that a suitable offset can be selected, designed, and managed to achieve a conservation outcome and maintain the viability of the MSES to be offset.*

*Should a SRI remain for impacts to MSES that can't be avoided or mitigated, the applicant must successfully demonstrate that an offset is a 'suitable outcome'.*

#### **DES Information Request**

- (a) *Provide additional details of the availability and viability of land-based offsets for each impacted matter in order to deliver a conservation outcome.*

*Please note that an available offset area must demonstrate the known sightings of the species and that the landholder is willing and able to implement conservation management to improve the conservation outcome for the species population within the proposed offset area.*

- (b) *Pending the response to (a), provide an assessment of the area in hectares (ha) of each MSES which is available to be used as an offset in the bioregion and subregion.*

*Areas available for offsets include those which contain the MSES in question, are on freehold or leasehold land, are not already protected, are not at risk from competing land uses (e.g. mining, quarrying or forestry) and are not otherwise inappropriate for use as an offset area.*

*The assessment must include a spreadsheet and shapefiles of lot-on-plans identified as suitable for offsets and available to deliver a conservation outcome.*

### **QCoal Sonoma Response**

- (a) There are no requirements for available offset areas to demonstrate known sightings of the species in question in accordance with the *General guide for the Queensland Environmental Offsets*. The areas in question only need to demonstrate that there is quality habitat for the species requiring offset. Further, QCoal Sonoma has not determined whether it will pursue a financial settlement offset or a land-based offset at this time. There is more than sufficient area for offset of the species in question present on the adjacent Birrale Station, or on Suttor North Station or Wollombi Station approximately 50km south which are owned by parties affiliated with QCoal. QCoal Pty Ltd has access to land on any of these properties for the purposes of offsets, and considering the scale of the impact and the quantity of offset required (likely around 70 ha), the availability of offset area is considered a negligible risk.
- (b) A request for information is not the appropriate place for this detail. The likely outcome of such an assessment is a condition within the EA which requires that an Offset Development Plan (ODP) or similar be developed for the impacts which will be identified in the SCM EA. As such, the ODP is the appropriate document for provision of the requested level of detail. QCoal Sonoma proposes that this ODP be developed and offsets implemented prior to any disturbance undertaken, with the wording of the conditions within the SCM EA reflecting that. This provides surety that impacts will be offset in an appropriate area prior to any disturbance being undertaken. This approach has been utilised successfully for numerous other QCoal EA amendment applications, and to QCoal's knowledge, is the standard approach for the scoping of offset requirements.

### **ITEM 11**

#### **DES Comment**

*A major amendment application under Chapter 5 of the EP Act for a project located in the Great Barrier Reef catchment waters or other coastal waters triggers the need to consider requirements under s41AA of the EP Regulation.*

*Whilst the amendment application does not propose a new release point for mine-affected water, the change in activities and additional activities could result in a change in the amount of fine sediment generated on site and the potential amount and frequency of releases to the environment.*

#### **DES Information Request**

Refer to 'Guideline - Environmental Protection Act 19 994 – Reef discharge standards for industrial activities' linked here: [Reef discharge standards for industrial activities \(des.qld.gov.au\)](#)

- (a) *Confirm potential sources of DIN for the proposed amendments.*
- (b) *Assessment of the additional sediment attributed to the amendments proposed in this application for Sonoma East Complex.*
- (c) *Volumes of additional mine-affected water generated by the amendments proposed in this application for Sonoma East Complex.*
- (d) *In relation to consideration of the fine sediment generated and ESC, the updated ESC Plan as required under item 2 must at a minimum include:*
  - (i) *an assessment of the size and characteristics of all catchment areas on the Sonoma East complex;*
  - (ii) *identification of receiving waters environmental values, water quality objectives and management intent;*
  - (iii) *specification of minimum design criteria for erosion and sediment control structures to achieve the management intent of receiving waters;*
  - (iv) *locations and descriptions of all erosion and sediment control measures;*  
*and*
  - (v) *an audit schedule to ensure erosion and sediment control measures are maintained.*

### **QCoal Sonoma Response**

As per the other items in this response, as activities on ML10327 are already approved under the existing SCM EA, these activities are not considered in this response.

- a) No additional potential sources of dissolved organic nitrogen will be associated with the proposed amendment. On the contrary, as cattle grazing will be excluded from the ML 700075 area during mining activities, there will be a local decrease in nutrients due to this exclusion. Effluent from the ablutions blocks associated with the MIA area in the south of ML 700075 will be removed by an operator that is appropriately registered and licenced for such work. No irrigation of treated effluent is proposed on ML 700075.
- b) Disturbance on ML 700075 is limited to an MIA, haul road, topsoil stockpile and water management infrastructure (drains and levees) which are relatively minor activities compared to existing activities authorised elsewhere at the SCM. As previously discussed, these will be subject to the existing Conditions of the SCM EA and integrated into the QNH Water Management Plan and Erosion and

Sediment Control Plan to ensure that additional undue sediment is not released to the receiving environment.

- c) Minimal mine-affected water will be generated by the operations on ML 700075 due to the nature of the disturbance (i.e. no waste rock dumps and only a small portion of pit end wall, etc.).
- d) As stated previously, prior to commencement of operations on the Sonoma East Complex, activities on ML 700075 will be integrated into both the QNH Water Management Plan and Erosion and Sediment Control Plan. Updating of either of these plans would be undertaken when final design of the infrastructure is available and timing is known, additionally there are adequate protections provided under the current EA conditions.

Please contact Ryan Pane on 0436 670 311 or email [rpane@qcoal.com.au](mailto:rpane@qcoal.com.au) with any queries.

Yours sincerely



Ryan Pane  
Senior Environmental Officer