

**2016 Audit Review**

Condition/Plan	IEA Proposed Audit Action	IEA Action Plan Timing	Status Update
<i>Minister's Conditions of Approval DA 8-1-2005</i>			
3.3	Consider stabilising the gravel pit area until the Vickery Project commences and permanent soil stabilisation works are completed.	October 2019	<p>The gravel pit area consists of a disturbed and exposed areas where coarse sandy and rocky material has been quarried for use in construction. The area is non-contaminated and is only susceptible to very minor mobilisation of material from site through wind and water erosion.</p> <p>The area will be covered by the Vickery extension project that is currently going through the approval process. The gravel pits also a valuable resource for future planned Vickery project work.</p> <p>Interim stabilisation works will consist of placing a 400mm containment bund around the site in areas that may be susceptible to water runoff.</p>
3.20	Considered an ANC. Water balance to be reviewed annually or condition altered to reflect current state of the site.	Ongoing	<p>Water balance was undertaken in 2018 the form of water model for the void water use. No prior water balance has been undertaken as site was considered to have nil water usage. Two site bores have not been used since closure in 2009.</p> <p>The water model will continue to be updated and refined using the regularly surveyed water levels and installed flow meters as part of void water extraction.</p>
3.21	<b>Remains Non-compliant.</b> Erosion and sediment controls to be implemented, though the auditor notes that the pending approval of the Vickery Extension Project is a factor in the decision making process likely stalling the rectification works.	Delayed till Vickery extension project outcome. As contingency to project approval works will commence in Q1 2020 and be completed by September 2020.	<p>Gravel pit erosion is addressed in item 3.3 above.</p> <p>Erosion on inside walls of the void, has minimal environmental impact as any eroded material would be contained in the void. Previous erosion control works undertaken in the void have been unsuccessful in creating stable slopes at specific locations within the void. Local redesign of landform within the void is required. Works to fill the void or redesign the landform for portions of the void's internal batters will be undertaken after a decision on the Vickery extension project. Vickery project plan would see the area backfilled. Potential impact to the environment is considered very minimal.</p>

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5.10	<b>Considered an ANC.</b> WHC to ensure future ARs and updates to plans, strategies and monitoring programs are sent to the relevant agencies.	Ongoing	Due to the age of the approval conditions which were prior to electronic document access, conditions required hard copies of documents be submitted to various local Councils and State agencies. Documents are uploaded to Company web page. Recent discussion with local shire council indicate they don't want copies of the documents, but hyperlinks of where the document are stored on the Whitehaven Coal web server/s, can be emailed to them. Going forward links to the documents when uploaded will be emailed to all required agencies and councils.
<i>Mining Leases 1464 &amp; 1471</i>			
51	<b>Deemed an observation (non-compliant).</b> Evidence from Director General would clearly demonstrate compliance.	May 2019	Conformation of satisfaction with fulfilment of security obligations will be sought from the Director General.
<i>Water Access Licence 29458</i>			
MW0716-00001	Deemed as an observation (non-compliant) during this audit. To confirm that current take from the void (that has groundwater inflow) is in accordance with water sharing plan (and potentially the current water access licence)	June 2019	Specialist study on groundwater flow into the void and evaporative losses was completed in January 2019 (SLR 630.1295-R01). Report findings based on available information and modelling groundwater inflow into the void is between 0.4ML and 5.4ML per annum. As part of the Vickery extension project the void will be backfilled well above groundwater inflow levels. In the interim pit evaporation use will be applied to the existing groundwater licence (WAL). WAL is for 50ML and there is no current groundwater extraction – there is more than sufficient water use availability in the existing groundwater licence.
MW0717-00001	Deemed as an observation (non-compliant) during this audit. Current take from this void (and by proxy the aquifer), that is not from the existing bore, should be discussed with DPI-Water and confirm that utilisation of water within the ground water influenced void is authorised. It may be authorised under the		

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	existing water licence as water take is occurring from the aquifer associated with the WAL but not specifically from the existing bore - clarity should be sought		
MW0635-00001 MW0633-00001 MW0632-00001 MW0831-00001	Consider developing a logbook for the pumps to record extraction volumes.  Consider notifying the Minister for DPI (Water) regarding the non-maintenance of a logbook for the pumping wells with an estimated timeframe when the condition can be met.	Ongoing	Electronic log books has been developed to record any pumping from groundwater bores. Since cessation of mining operations in 2009 bores have not been used, hence no recording has been made. Flow meters reading have been added to the sites monthly inspection and recorded.
<b>Closure Mining Operations Plan</b>			
3.2.3	Erosion and sedimentation impacts are managed in accordance with the Erosion and Sediment Control Plan, included in the Water Management Plan.	Delayed till Vickery extension project outcome. As contingency to project approval works will commence in Q1 2020 and be completed by September 2020.	AS per item 3.2.1 above in <i>Minister's Conditions of Approval DA 8-1-2005</i>
3.2.7	Consider either stabilising or installing additional controls to prevent erosion and sediment run from gravel pit area	October 2019	AS per item 3.3 above in <i>Minister's Conditions of Approval DA 8-1-2005</i>
<b>Rehabilitation Monitoring Program</b>			
5.4.1	Consider completing LiDAR assessment as detailed in the Rehabilitation Monitoring Plan	Next MOP amendment	Data from LiDAR is utilised to remotely measure percentage foliage Cover (PFC) and Canopy Height Model (CHM). Annual vegetation monitoring

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			collects and reports on PFC and CHM during field survey. WHC captured Lidar data on the 29 <sup>th</sup> march 2019, this data will be utilised in conjunction with the field data and documented in the 2019 Rehabilitation Monitoring report.
5.6	Deemed as non-compliant during this audit. Whitehaven to provide explanation as to why Woodland zone one has two survey sites. Perhaps consider merging with adjacent area to avoid compliance issues.	Next MOP amendment	Monitoring program has been reviewed and updated as per site requirements. Monitoring programming and methodology will be updated for approval in the next MOP update.
6.0	Deemed as <b>non-compliant</b> during this audit. Undertake three-year review and workshop with key stakeholders.	Next MOP amendment	Review and acceptance of monitoring methodology will be laid out and documented for discussion and approval in the next MOP amendment as significant changes have occurred in rehabilitation methodologies and practices since 2009 closure of the site. Current approach is using industry standards. Whitehaven Coal is also in the process of standardising rehabilitation monitoring for consistency across the region.

### 2019 Audit Findings

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<i>Minister's Conditions of Approval DA 8-1-2005</i>			
Sch3. C3	The gravel pit area is no longer used and is not stabilised, hence it may generate dust. As the site is not currently used and is a source of	October 2019	The gravel pit area consists of a disturbed and exposed areas where coarse sandy and rocky material has been quarried for use in construction. The area is non-contaminated and is only susceptible to very minor mobilisation of material from site through wind and water erosion.

2019 Audit Findings			
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	windborne dust, stabilisation should be prioritised.		The area will be covered by the Vickery extension project that is currently going through the approval process. The gravel pits are also a valuable resource for future planned Vickery project work. Interim stabilisation works will consist of placing a 400mm containment bund around the site in areas that may be susceptible to water runoff.
Sch3. C20	Review water balance annually to ensure compliance with this condition or request alteration to condition.	Ongoing	Water balance was undertaken in 2018 the form of water model for the void water use. No prior water balance has been undertaken as site was considered to have nil water usage. Two site bores have not been used since closure in 2009. The water model will continue to be update and refined using the regularly surveyed water levels and installed flow meters as part of void water extraction.
Sch5 C10	<b>Considered an ANC.</b> WHC to ensure future ARs and updates to plans, strategies and monitoring programs are sent to the relevant agencies.	Ongoing	Due to the age of the approval conditions which were prior to electronic document access, conditions required hard copies of documents be submitted to various local Councils and State agencies. Documents are uploaded to Company web page. Recent discussion with local shire council indicate they don't want copies of the documents, but hyperlinks of where the document are stored on the Whitehaven Coal web server/s, can be emailed to them. Going forward links to the documents when uploaded will be emailed to all required agencies and councils.
<b>Mining Leases 1464 &amp; 1471</b>			
15 & 47	Although WHC responded to DRG's request to maintain identified erosion of void batters, ongoing maintenance is required for this recurring erosion impact.	Delayed till Vickery extension project outcome. As contingency to project approval works will commence in Q1 2020	Erosion on inside walls of the void, has minimal environmental impact as any eroded material would be contained in the void. Previous erosion control works undertaken in the void have been unsuccessful in creating stable slopes at specific locations within the void. Local redesign of landform within the void is required. Works to fill the void or redesign the landform of portions of the void's internal batters will be undertaken after

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	Maintain waste documentation for removal of waste from site.	and be completed by September 2020.	<p>a decision on the Vickery extension project. In the interim harm to the environment is considered very minimal.</p> <p>Workshop and offices were rented out to Hitachi, who were working under an approval from Gunnedah shire Council. Hitachi have since vacated the premises (February 2019). A few laydown areas still remain, there is no activity or waste generation on the premises.</p>
17	The gravel pit area is no longer used and is not stabilised, hence it may generate dust. As the site is not currently used and is a source of windborne dust, stabilisation should be prioritised	October 2019	<p>The gravel pit area consists of a disturbed and exposed areas where coarse sandy and rocky material has been quarried for use in construction. The area is non-contaminated and is only susceptible to very minor mobilisation of material from site through wind and water erosion.</p> <p>The area will be covered by the Vickery extension project that is currently going through the approval process. The gravel pits also a valuable resource for future planned Vickery project work.</p> <p>Interim stabilisation works will consist of placing a 400mm containment bund around the site in areas that may be susceptible to water runoff.</p>
51	<b>Deemed an observation (non-compliant).</b> Evidence from Director General would clearly demonstrate compliance.	May 2019	Conformation of satisfaction with fulfilment of security obligations will be sought from the Director General.
<i>Water Access Licence 29458</i>			
MW0716-00001	Current take from this void (and by proxy the aquifer), that is not from the existing bore, should be discussed with DPI-Water and confirm that utilisation of water within the ground water influenced void is authorised. It may be authorised under the existing water licence as water take is occurring from the aquifer associated with the WAL but not	June 2009	<p>Specialist study on groundwater flow into the void and evaporative losses was completed in January 2019 (SLR 630.1295-R01). Report findings based on available information and modelling groundwater inflow into the void is between 0.4ML and 5.4ML per annum.</p> <p>As part of the Vickery extension project the void will be backfilled well above groundwater inflow levels.</p> <p>In the interim pit evaporation use will be applied to the existing groundwater licence (WAL). WAL is for 50ML and there is no current</p>

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	specifically from the existing bore - clarity should be sought.		groundwater extraction – there is more than sufficient water use availability in the existing groundwater licence.
MW0631-00001	To confirm that current take from the void (that has groundwater inflow) is in accordance with water sharing plan (and potentially the current water access licence)	June 2019	As above, no groundwater is taken from the void, there is a potential evaporation loss of between 0.4ML and 5.4ML per annum (Jan 2019 SLR). An application to add the potential evaporation loss as a water use to the existing WAL will be applied for.
MW0635-00001 MW0633-00001 MW0632-00001 MW0831-00001	<p>As above.</p> <p>Furthermore, to address this condition, formula could be inserted into tracking spreadsheet allowing for remaining volume to be calculated following the insertion of daily pumping rates"</p> <p>Ensure that all requirements to be present in the logbook are included.</p> <p>To confirm that current activity is not considered a breach of the conditions of water sharing plan or this WAL. Discussion and authorisation from NRAR with regard to the activity is required now that groundwater infiltration into the void is confirmed.</p>	Ongoing	Electronic log books has been developed to record any pumping from groundwater bores. Since cessation of mining operations in 2009 bores have not been used, hence no recording has been made. Flow meter readings have been added to the sites monthly inspection and recorded.
MW0717-00001	Current take from this void (and by proxy the aquifer), that is not from the existing bore, should be discussed with DPI-Water and confirm that utilisation of water within the ground water influenced void is authorised. It may be authorised under the existing water licence as water take is occurring from the	Ongoing	Majority of water entering the void is from surface runoff and not from groundwater. Groundwater modelling indicates a maximum of 5.4ML inflow per year. Current void volume surveyed on 4 <sup>th</sup> April 2019 gave a void water volume of 81.6ML. Water level in the void is above the elevation of groundwater inflow into the void.

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	aquifer associated with the WAL but not specifically from the existing bore - clarity should be sought.		