

13 June 2019

Mining and Petroleum Operations
 Department of Natural Resources and Mines
 Building E, 25 Yeppoon Road, Parkhurst QLD 4702

RE: Whitehaven WS Pty Ltd (ACN 625 165 004) – Winchester South Mining Lease Applications – CSG Assessment Criteria

The CSG assessment criteria for the Winchester South Mining Lease Applications can be found in the table below.

CSG assessment criteria		
Section MR Act	Content requirement	Response
318AP(2)(a)	The initial development plan requirements	These requirements are addressed in the Initial Development Plan for the Project.
318AP(2)(b)	The legitimate business interests of the applicant and the authority to prospect holder (the parties)	<p>The applicant is well progressed in its mine planning for an open cut coal mine operating at up to 15Mtpa, and is ready to commence construction immediately upon grant of the mining leases. It has engaged experts in every relevant field to have the project approved and to have the mine plan developed in a way that optimises the resource extraction. The applicant has met and consulted with all relevant stakeholders, and is committed to strong community and Government relationships throughout the Project development. At full capacity, current estimates indicate that the mine will employ up to 680 full time equivalent employees.</p> <p>The applicant is not aware of any current business interest held by CH4 Pty Ltd in the area of the Project.</p>
318AP(2)(c)	<p>The effect of the proposed mining lease on the future development of petroleum resources in the land, including for example, each of the following:</p> <ul style="list-style-type: none"> the proposed timing and rate of coal or oil shale mining and the development of petroleum from the land; the potential for the parties to make a coordination arrangement about: <ul style="list-style-type: none"> coal or oil shale mining and any incidental coal seam gas mining under the proposed mining lease; and petroleum production under any future petroleum lease over the land; the economic and technical viability of the concurrent or coordinated coal or oil shale mining and the development of any petroleum from the land; 	<p>The proposed timing and rate of coal extraction is set out elsewhere in this IDP. There is no known proposed timing of any coal seam gas extraction in the Project area.</p> <p>Pleasingly, the Winchester South Project is not expected to give rise to any impact on coal seam gas resource within their area, or on the future development of that resource by a petroleum production company.</p> <p>The Winchester South Project is targeting the Vermont Upper, Vermont Lower and Leichardt coal measures. These coal measures are relatively near-surface.</p> <p>The Moranbah coal measures are approximately 400m deeper than the deepest of the open cut target measures (the Vermont Lower measures). The Winchester South Project will have no impact on any coal seam gas resource that may be found in the Moranbah measures, which would be open for further exploration and development by the overlying coal seam gas authority to prospect holder (CH4 Pty Ltd). Should any coal seam gas resource exist in the shallower measures, the Winchester South Project would have only localised impact as a result of the proposed coal extraction.</p>

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Section MR Act	Content requirement	Response
	the extent, nature and value of coal or oil shale mining and the development of any petroleum in the land	<p>The applicant has made contact on a number of occasions with CH4 Pty Ltd, which has expressed limited interest in the open cut target coal measures. As far as the proponent is aware, CH4 Pty Ltd has no objection to the MLAs proceeding.</p> <p>The applicant has entered a Joint Interaction Management Plan with CH4 Pty Ltd for exploration purposes. It is open to negotiate the terms of a JIMP for production purposes, and can see no reason why production of the coal seam gas resource should be impeded by the presence of the Winchester South Project.</p>
318AP(2)(d)	The public interest in coal or oil shale mining and petroleum production from the land, having regard to the public interest	There is a known valuable coal resource in the Project area. There is no known coal seam gas resource in the Project area. It is clearly in the Public interest to have the valuable coal resources mined and to have the Project proceed.

Yours Sincerely,



Todd Harrington

Project Director, Whitehaven Coal Limited