

**BHP Billiton Mitsubishi Alliance**

28 October 2015

Manager (Assessment)  
Coal and Central Queensland Compliance  
Department of Environment and Heritage Protection  
99 Hospital Road  
**EMERALD QLD 4720**

Attention: Ms Juliana McCosker

Dear Ms McCosker

**Goonyella Riverside and Broadmeadow Mines  
Environmental Authority Amendment Application**

Please find enclosed an application for amendment of Environmental Authority (EA) for Goonyella Riverside and Broadmeadow Mines.

The proposed amendment is to authorise subsidence of the Isaac River to sustain the operation of the Broadmeadow Mine longwall.

This submission follows the pre-lodgement session on the proposed amendment on 22 April 2015, and submission of draft documentation for the Department's review on 16 June 2015 and second drafts on 8 October 2015. Included in the application documentation is a revised Subsidence Management Plan for Broadmeadow Mine and a supporting information document which draws all relevant information together to allow clear review by the Department. Also included is a draft EA with proposed amended conditions.

The proposed amendment and supporting information is centered around the revised Subsidence Management Plan. This Plan has been updated, based on the existing version currently in place at the mine as required by the current EA conditions.

The proposed amendment, including the scope of the revised Subsidence Management Plan, has been updated in line with the following key aspects:

- Restriction has been removed from the revised Plan and EA conditions for subsidence only up to and including Panel 110;
- The ongoing commitment from BMA to not deploy top coal caving under the Isaac River; and
- Outcomes (where relevant) of the Isaac River Cumulative Impact Assessment have been considered and included in the Subsidence Management Plan and the adaptive management approach which underpins the management of impacts.

BMA confirms this amendment application relates to watercourse subsidence authorised under the Goonyella Riverside and Broadmeadow EA only. Watercourse subsidence conditions for other BMA projects are included in independent Environmental Authorities held by BMA.

The application documentation addresses the requirements of an amendment application as per section 226 of the *Environmental Protection Act 1994*. The application has been submitted, as a minor amendment of the EA, in accordance with definition of a minor amendment in section 223 of the *Environmental Protection Act 1994*.

The supporting information document clearly links the relevant information for the proposed amendment to the abovementioned requirements of the Act. In summary:

- An impact and risk assessment of subsidence impacts on the Isaac River is included in the revised Subsidence Management Plan;
- Impacts on environmental values as a result of the proposed amendment are minor and impacts are primarily attributed to physical affects (direct physical and geomorphic responses) as a result of subsidence;
- Mitigation actions, including short and long term, are included with options for each feature or potential impact. The residual risk has been assessed as low for the Isaac River and Diversion, post the implementation of mitigation actions;
- Rehabilitation strategies are ongoing and and plans for rehabilitation of the mine and Isaac River and Diversion do not change and currently include the extent of subsidence for the mine plan as in the proposed amendment; and
- Wastes or waste products are not generated by the proposed activities.

BMA has framed the application as a minor amendment of the EA. This is supported by:

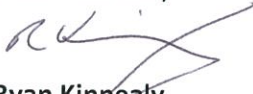
- The impacts of subsidence at Broadmeadow are manageable under the risk based, adaptive management approach as currently implemented;
- This amendment does not significantly increase the level or risk of environmental harm associated with environmental values from progression of the mine to that currently authorised by the existing EA;
- The implementation of the existing Subsidence Management Plan will continue as a live document and will be reviewed and updated subject to any changes in the mine plan;
- The amendment to the EA conditions to authorise the activity are wholly administrative to remove prescription and allow BMA to move to focusing on the best environmental outcome for the Isaac River;
- The proposed amendment does not alter the rehabilitation objectives for the mine, which include subsided areas and affected domains, under the Goonyella Riverside and Broadmeadow Mine Rehabilitation Management Plan and Mine Closure Plan;
- The application for the amendment does not pose an increase in the scale or intensity of the mine, from what is authorised under the existing EA and granted mining leases;
- The application does not relate to a new resource tenure; and
- The continued operation of the longwall and subsidence of the Isaac River is wholly contained within areas currently authorised under the EA and granted mining leases, therefore does not increase the existing surface area (of more than 10%); and
- The application does not in any way relate to a petroleum activity.

This amendment approach is consistent with the application to amend the BMA Gregory Crinum EA for watercourse subsidence in 2013 where the assessment level decision made by the Department was “a significant increase in environmental harm unlikely’ as impacts on local environmental values were assessed as being negligible.

The fee for the EA amendment application will be processed electronically.

We look forward to your prompt consideration and assessment of this application. Please do not hesitate to contact me directly on 0427176239 or (07) 33292969 if you have any further queries.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Ryan Kinnealy', written over a white rectangular area.

**Ryan Kinnealy**  
Principal Environment  
**BHP Billiton Mitsubishi Alliance**