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30 September 2025

Business Centre Coal
Department of the Environment, Tourism, Science and Innovation
PO Box 3028
Emerald Queensland 4720

Attention: Forough Ghasemi

Dear Forough,

Re: YARRABEE COAL MINE PROGRESSIVE REHABILITATION AND CLOSURE PLAN – RESPONSE TO *NOTICE – NOT PROPERLY MADE APPLICATION*

On 20 December 2021, the then Queensland (QLD) Department of Environment and Science (now QLD Department of the Environment, Tourism, Science and Innovation [DETSI]), pursuant to section 754 of the QLD *Environmental Protection Act 1994* (the EP Act), issued Yarrabee Coal Company Pty Ltd (YCC) a Progressive Rehabilitation and Closure Plan (PRCP) Transition Notice. The PRCP Transition Notice required the preparation of a PRCP for the Yarrabee Coal Mine that satisfies the requirements of sections 126C and 126D of the EP Act, to be submitted by 2 December 2024.

YCC submitted a PRCP to DETSI on 28 November 2024 and were subsequently issued a *Notice – Not Properly Made Application* (*the Notice*) on 12 December 2024. *The Notice* required a response to be submitted to DETSI by 12 September 2025. This was later extended to 3 October 2025. YCC have now completed the works required to address the six reasons detailed in *the Notice.* Table 1 below details the actions undertaken by YCC to respond to the Reasons listed in *the Notice*

Please do not hesitate to contact me on 0407 776 780 or Justin.Vohland@yancoal.com.au if any further information or require any clarification.

Yours sincerely,

Justin Vohland
HST Environment & Community Manager
Yarrabee Coal Mine

Table 1 – Responses to *Notice – Not Properly Made Application*

Reason	Required Actions	Action Undertaken to Address Reason
1 - Non-Use Management Area (NUMA) Extents	**Action 1** With consideration of all matters of the PRC plan including the appendices and the proposed landform design, review the extent of all NUMAs proposed for the Yarrabee Coal Mine based on the proposed landform design. This extent must be consistent with the outcomes of relevant studies that described the characteristics of the final landform form i.e. must be consistent with the expected extent of the water body contained within the residual voids, at equilibrium, where the water body will not be able to provide a PMLU. Ensure that all proposed PMLUs will achieve and can be demonstrated to achieve stable condition as per section 3.2 of the PRCP guideline. Where an area is expected to retain or be covered in water, the proposed land outcome must be sufficiently described to allow for the administering authority to make a decision on the PRCP Schedule – being that it must demonstrate the relevant requirement of section 176A of the EP Act has been met. Section 176A of the EP Act requires that all land the subject of the schedule to be— a) rehabilitated to a stable condition; or b) managed as a non-use management area in a way that achieves best practice management of the area and minimises risks to the environment. The proposed land outcome must also consider the matters discussed in Section 6.4 of the PRCP guideline particularly Step 2, where the proposed land outcome aligns with the land outcome presented in a land outcome document. Should the location of any NUMA be varied to extend over the area of the relevant predicted equilibrium waterbody, the NUMA location would not align with the pre-approved outcome for the land depicted in the Yarrabee EA EPML00844613. Subsequently, as per section 754(4) of the EP Act the requirements of section 126C(1)(g) and (h) and section 126D(2) and (3) of the EP Act along with the requirements of the Environmental Protection Regulation 2019 Schedule 8A - Table 1 will need to be addressed to make the response to the notice a properly made PRCP application. Consideration will also need to be made of the requirements of section 755 of the EP Act along with the relevant NUMA section of the PRCP guideline. Where the outcomes of other supporting reports or assessments required by the PRCP Guideline may be varied as a result of a response to this notice, such assessments and reports will need to be updated accordingly and re-submitted with the PRCP application.	A recent Minor EA Amendment has been approved to revise the location and dimensions of the NUMAs based on contemporary modelling to encompass the associated equilibrated void water bodies (defined through the PRCP Residual Void Water Balance prepared by Engeny Australia Pty Ltd, Appendix P). Additionally, the Amendment updated the Post Mining Land Use (PMLU) distribution to reflect the revised residual void locations, better align with Attachment 1: Rehabilitation Objectives of the EA, improve post-mining landform connectivity and environmental outcomes. The Yarrabee PRCP has been amended to reflect the updated PMLU and NUMA distribution as per the Minor EA Amendment approved on 19 September 2025.

Table 1 (Continued) – Responses to *Notice – Not Properly Made Application*

Reason	Required Actions	Action undertaken to address reason
2 - Hydrogeology: Inconsistent Hydrogeological and Water Balance Models	**Action 2** Provide the information required by section 3.6.1 and section 3.6.3 of the PRCP guideline that integrates the outcomes of the hydrogeological, water management and void closure plan to provide the administering authority with the information required to make a decision on the PRCP schedule. If updated appendices are provided in response to this notice, residual void geotechnical stability or other reports that are underpinned by the hydrogeological and geological factors may need to be varied.	Additional modelling has been undertaken by SLR and Engeny to converge the hydrogeology and residual void water balance models to ensure alignment on the final equilibrium water body levels. Both the Hydrogeology Assessment (SLR, 2025) (Appendix G) and the Residual Void Water Balance Assessment (Engeny, 2025) (Appendix P) have been amended to reflect this additional modelling. The convergence process is further described in Section 8.6 and Section 3.6 of these reports, respectively. Whilst the Hydrogeology Assessment (SLR, 2025) (Appendix G) and the Residual Void Water Balance Assessment (Engeny, 2025) (Appendix P) have been amended, it was not deemed necessary to amend the Residual Void Geotechnical Stability Assessment (ATC Williams, 2024) (Appendix N). This is due to the static nature of groundwater and no evidence of dynamic groundwater flows being identified during routine geotechnical inspections undertaken at Yarrabee.
3 - Hydrogeology: Groundwater Sampling	**Action 3** Provide the information required by section 3.6.1 the PRCP guideline to provide the administering authority with the information required for a decision on the PRCP schedule. This must include further sampling of groundwater bores to allow for the groundwater quality and groundwater extent to be sufficiently characterised (nominally minimum eight monthly sampling events) to underpin the rehabilitation and management methodologies and to support assessment of hydrogeology.	YCC undertake groundwater sampling approximately monthly of the YCM groundwater network, which was installed in mid-2024. The results of this monthly groundwater sampling are presented in Figure 4-3 and 4-4 of the Hydrogeology Assessment (SLR, 2025) (Appendix G). At the time of the PRCP submission in November 2024, the groundwater monitoring dataset for Yarrabee was limited due to the network having just been installed. The limited dataset was the only data available to calibrate groundwater levels across Yarrabee in the numerical groundwater model. Whilst a full year of groundwater monitoring is now available the groundwater levels have remained very consistent with no significant responses to active mining or recharge. Consequently, it was not considered necessary to recalibrate the numerical model as there are no strong signals or trends from mining or recharge in the dataset that would result in a significant change to the model calibration and therefore the groundwater characterisation that underpins this PRCP.

Table 1 (Continued) – Responses to *Notice – Not Properly Made Application*

Reason	Required Actions	Action undertaken to address reason
4 - Landform Design	**Action 4** Provide a final landform design which addresses all requirements of subheading 'landform design', Section 3.6.1 of the PRCP Guideline, inclusive of modelling predicting the long-term stability of the final landform design based on all proposed PMLUs and NUMAs of the Rehabilitation Planning Part.	Landloch Pty Ltd (Landloch) were engaged by YCC to undertake Landform Evolution Modelling (LEM) for the YCM final landform. Section 6.5 of the PRCP has been updated to include the outcomes of the LEM and a summary of the findings are detailed below. Landloch (Appendix M) undertook SIBERIA modelling on the YCM final landform to determine the landforms long-term stability over a 300 year period. The results of the SIBERIA modelling indicate that the YCM final landform is predicted to be erosionally stable in the long-term, provided that a suitable soil-waste mixture is achieved, and suitable levels of groundcover are achieved. To achieve stability, a soil-waste mixing ratio of between 1:1 and 1:2 (soil:waste) and a groundcover level of >40% is required. Gully erosion risk is predicted to be low, which much of the gully erosion shown resulting from artefacts in the DEM that will not be present when the landform design is implemented. The results from the erosion modelling and landform evolution modelling indicate that vegetated soil-waste mixtures (1:1 or 1:2 mixing ratio with >40% groundcover) can be used to create a rehabilitated landform that is erosionally stable in the long-term. These requirements were considered and incorporated into the development of the rehabilitation milestones.
5 - Land Stability	**Action 5** Provide a section in the PRC planning part that discusses pre-existing land degradation/erosion and predisposition to ongoing stability issues.	Section 2.9 has been updated to include a discussion of the following: • Pre-Mining Land Uses. • Pre-Mining Land Conditions. • Pre-Mining Overburden Conditions. • Pre-Mining Dispersion. • Pre-Mining Erodibility.
6 - Built Infrastructure	**Action 6** As required by Sections 3.2 and 3.6.5 of the PRCP Guideline, provide a revised PRC plan which describes: • identifies the ongoing maintenance requirements for the specific infrastructure that will remain post rehabilitation. • how the infrastructure will be safe, stable and not cause environmental harm.	Section 4.1 and 6.1 have been updated to identify ongoing maintenance requirements for retained infrastructure, along with how it will be safe, stable and not cause environmental harm.