



**NSW
Resources
Regulator**

COMPLIANCE AUDIT PROGRAM

EL6243 - NARRABRI SOUTH EXPLORATION PROGRAM

Narrabri Coal Pty Ltd

Document control

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Contents

Introduction	5
Background	5
Audit objectives	5
Audit scope.....	6
Audit criteria	6
Audit team.....	Error! Bookmark not defined.
Audit methods	8
Preliminary document review.....	8
Opening meeting.....	8
Site interviews and inspections	9
Data collection and verification	9
Site inspections.....	9
Closing meeting.....	9
Compliance assessment definitions.....	9
Reporting.....	11
Audit findings.....	12
Previous compliance history	12
Environmental management	12
Risk assessment.....	12
Use of chemicals, fuels and lubricants	12
Vegetation clearing and surface disturbance	13
Roads and tracks	15
Weeds, pest animals and disease	16
Cultural heritage.....	16
Rehabilitation	16
Core and sample storage	17
Records management	19

Titleholder response to draft audit findings19

Audit conclusions.....20

Appendix 124

Titleholder response to draft audit findings24

Introduction

Background

Exploration Licence 6243 (EL6243) is 25 to 50 kilometres south of the town of Narrabri and is mainly on farm land and state forest, west of the Kamilaroi Highway, between Turrawan and Baan Baa. The licence comprises three separate areas adjacent to the Narrabri coal mine (Mining Lease 1609 (ML609)).

EL6243 and the adjacent Narrabri Mine are operated by Narrabri Coal Operations Pty Ltd, which is a joint venture between Narrabri Coal Pty Ltd, (70%), Upper Horn Investments (Australia) Pty Ltd (7.5%), J-Power Australia Pty Limited (7.5%), EDF Trading Australia Pty Limited (7.5%) and Daewoo International Narrabri Investment Pty Limited & Kores Narrabri Pty Limited (7.5%). Narrabri Coal Operations Pty Ltd is a 100% owned subsidiary company of Whitehaven Coal Mining Limited, a publicly listed company with several mining interests in the Gunnedah-Narrabri region of NSW.

EL6243 was granted in May 2004 over an area of about 113 km². Subsequent renewals (including the most recent one in February 2015) have reduced the area to 6942 hectares. Exploration activities have included drilling of 130 boreholes and undertaking 30 line kilometres of seismic testing.

Narrabri Coal applied to conduct exploration activities (Form ESF4) accompanied by a review of environmental factors for the Narrabri South Exploration Project 2018-2019 in July 2018. The exploration program comprises the drilling of 50 boreholes and seismic testing along three seismic lines. Approval for the exploration activities was granted on 15 November 2018.

As part of the compliance audit program being undertaken, an audit of the exploration activities associated with the Narrabri South Exploration Program was undertaken on 5 March 2019.

Audit objectives

The objectives of the audit were to:

- undertake a compliance audit of the Narrabri Coal Pty Ltd exploration activities against the requirements of the *Mining Act 1992* and the conditions of the exploration licence issued pursuant to that Act.
- assess the operational performance of the Narrabri Coal exploration activities and the ability of the titleholder to implement management systems and controls to provide for sustainable management of the exploration activities.

Audit scope

The scope of the audit included:

- the exploration activities undertaken within EL6243 by NCOPL associated with the Narrabri South Exploration Project 2018-2019 including:
 - exploration activities within EL6243 including a selection of exploration drill holes listed in Table 1
 - borehole sealing and rehabilitation activities for the drilling activities undertaken since November 2018.
- a review of documents and records pertaining to the exploration activities
- the assessment of compliance for the period between 15 November 2018 and 1 March 2019.

Table 1 Details of selected boreholes

HOLE NAME	DATE DRILLED	EASTING	NORTHING	BOREHOLE SEALING
EL6243				
NC795/E327	2019	775361	6615354	2019
NC798/FY18_C8/E295	2019	775145	6615340	2019
NC799/FY18_C11/E296	2019	775145	6614940	2019
NC804/E329	2019	775333	6614815	2019

Audit criteria

The audit criteria against which compliance was assessed included:

- *Mining Act 1992*, specifically, Sections 5, 6, 23A, 30, 31, 113 to 119, 140, 163C to 163E, 163G, 292E, and 292I
- Mining Regulation 2016, specifically clauses 35, and 59 to 68

- conditions attached to EL6243 (granted 21/5/2004 and last renewed 18/2/2015)
- notification of grant of activity approval for the Narrabri South Exploration Program, issued by the Regulator and dated 15 November 2018
- commitments made in Review of Environmental Factors: Narrabri South Exploration Project 2018-2019, prepared by EcoLogical Australia and dated October 2018
- *Exploration code of practice: Environmental management* (version 2, April 2017)
- *Exploration code of practice: Rehabilitation* (version 2, April 2017)
- *Exploration code of practice: Community consultation* (version 1.1, May 2016)
- *Exploration code of practice: Produced water management, storage and transfer* (version 2, April 2017)

Publishing and disclosure of information

This audit report will be published on the NSW Resources Regulator's website consistent with Section 365 of the *Mining Act 1992*.

This audit report may be publicly disclosed consistent with the *Government Information (Public Access) Act 2009*.

Audit methods

The audit process involved the interview of site personnel, a review of documentation and samples of records provided by the titleholder and/or operator and a site inspection of the operations to determine the level of compliance of the operations and assess the status of the project's operational performance. The audit process and methodology are described in more detail in the sections below.

Preliminary document review

Before the audit, documents associated with the mining and exploration activities at the Narrabri Coal Mine were reviewed by the auditor. This involved a review of the following documentation:

- Form ESF4 Application to conduct exploration activities, submitted on 6 July 2018 and amended on 3 August 2018
- Review of Environmental factors: Narrabri South Exploration Project 2018-2019, October 2018, prepared by Eco Logical Australia for Narrabri Coal Operations Pty Ltd
- Notice of grant of activity approval, EL6243 Narrabri South Exploration Program 2018-2019, letter sent on 15 November 2018
- EL6243 (granted on 21 May 2004 and last renewed on 18 February 2015).

Opening meeting

The opening meeting was held onsite at Narrabri Coal Mine site office at 8.30am on 5 March 2019.

The audit team was introduced and the scope of their responsibilities was conveyed to the auditees. The objectives and scope of the audit were outlined. The methods to be used by the team to conduct the audit were explained.

It was stated that the audit team would interview personnel, review documentation, examine records and conduct a site inspection to assess specific compliance requirements.

Site interviews and inspections

Data collection and verification

Where possible, documents and data collected during the audit process were reviewed on site. Several documents were unable to be reviewed on site and were provided following the site visit.

All information obtained during the audit process was verified by the audit team where possible. For example, statements made by site personnel were verified by viewing documentation and/or site inspections where possible. Where suitable verification could not be provided, this was identified in the audit findings as not determined.

Site inspections

A site inspection was undertaken comprising the following elements of the Narrabri South exploration program:

- Core and chip sample storage in shipping containers
- NC795 – sited in a cleared paddock – rehabilitated
- NC798 – on a side of track in cleared paddock – rehabilitated
- NC799 – on a fenceline in cleared paddock – rehabilitated
- NC804 – near a fenceline in cleared paddock - rehabilitated

Closing meeting

The closing meeting was held onsite at Narrabri Coal Mine site office, at 3pm on 5 March 2019. The objectives of this meeting were to discuss any outstanding matters, present preliminary findings and outline the process for finalising the audit report.

Compliance assessment definitions

The reporting of results from the compliance audit was determined based on the definitions presented in Table 2.

Table 2 Audit assessment categories

ASSESSMENT	CRITERIA
Compliance	Sufficient and appropriate evidence is available to demonstrate the particular requirement has been complied with.
Non-compliance	<p>Clear evidence has been collected to demonstrate the particular requirement has not been complied with. There are three subcategories of non-compliance reflecting the severity and level of risk associated with the non-compliance:</p> <p>NC1 – the absence of planning or implementation of a required operational element which has the potential to result in a significant risk</p> <p>NC2 – an isolated lapse or absence of control in the implementation of an operational element which is unlikely to result in a significant risk</p> <p>NC3 – an administrative or reporting non-compliance which does not have a direct environmental or safety significance</p> <p>Note: The identification of a non-compliance in this audit may or may not constitute a breach of the <i>Mining Act 1992</i>. Non-compliances identified in this audit report may be further investigated by the NSW Resources Regulator.</p>
Observation of concern	<p>Where an auditee may be compliant at the time of the audit but there are issues that exist that could result in the potential for future non-compliance if not addressed.</p> <p>Observation of concern was also used where an issue may not have particular compliance requirements, but which was not conducive to good management or best practice.</p>
Suggestion for improvement	Where changes in processes or activities inspected or evaluated at the time of the audit could deliver improvement in relation to risk minimisation, sustainable outcomes and management practices.
Not determined	<p>The necessary evidence has not been collected to enable an assessment of compliance to be made within the scope of the audit.</p> <p>Reasons why the audit team could not collect the required information include:</p> <ul style="list-style-type: none"> ■ insufficient information on the file relating to the period covered by the audit or insufficient evidence collected to reach a conclusion

ASSESSMENT	CRITERIA
	<ul style="list-style-type: none"> ■ the wording on the criteria (approval condition) meant that no evidence could be gathered, or it was too difficult to gather the evidence. <p>A 'not determined' assessment was also made where the condition was outside of the scope of the audit.</p>
<p>Not applicable</p>	<p>The circumstances of the authorisation or titleholder changed and were no longer relevant, e.g. no longer mining, mining equipment and plant has been removed, etc.</p> <p>An invoking element in the criteria was not activated within the scope of the audit.</p>

Reporting

Following completion of the site audit, the audit checklists were completed and audit notes were reviewed to compile a list of outstanding matters to be noted in the audit report. This report was prepared to provide an overview of the operational performance of the site in relation to the exploration activities and identify any non-compliances or observations of concern noted by the auditors during the site inspections and interviews.

The draft audit findings were forwarded to Narrabri Coal for comment. Consideration was given to the representations made during the finalisation of the audit report.

Audit findings

Previous compliance history

An audit of the Narrabri exploration activities was undertaken in May 2018. Four non-compliances, four observations of concern and two suggestions for improvement were identified. The non-compliances identified in the 2018 audit were generally addressed by Narrabri Coal, and it was noted by the audit team that the management of rehabilitation requirements had improved since the last audit. However, issues with the management of the exploration process were still evident, as discussed in this report.

Environmental management

Environmental management obligations are contained in the *Exploration code of practice: Environmental management* and also in the activity approval application and *Review of environmental factors* submitted by Narrabri Coal, describing how the exploration activities would be carried out. An assessment of compliance against the code of practice and the activity approval documentation was undertaken during the audit. Key findings from this assessment are below.

Risk assessment

An environmental risk assessment was included in the REF prepared for the Narrabri South Exploration Program in October 2018. Risk controls were proposed in both the REF and the ESF4 application form for exploration activities. No drilling was in progress at the time of the audit, therefore many of the environmental management requirements could not be verified.

Use of chemicals, fuels and lubricants

Narrabri Coal reported that above ground sumps were used for the containment of drilling fluids, but none were on site at the time of the audit, as no drilling was in progress.

There were no chemicals, fuels or oils on any of the sites inspected. One very minor spill of hydrocarbon material was observed at site NC795 (refer to figure 1) but this would not have been reportable to either the Environment Protection Authority (EPA) or the Regulator, as there was no significant risk of environmental harm.

Figure 1 Site NC795 showing rehabilitation and small area of hydrocarbon spillage



Vegetation clearing and surface disturbance

Although the audit was undertaken during the approved clearing window, no clearing activities were in progress at the time of the audit, so the implementation of the clearing controls could not be verified.

No evidence of erosion and sediment control was observed on any of the four sites inspected. However, it was also noted that these sites were on relatively flat grades, where specific erosion and sediment controls may not have been required (refer to figure 2).

An erosion and sediment control plan was attached as an Appendix to the REF. While this document provides general principles for erosion and sediment control, it does not provide specific guidance on when controls need to be implemented. The REF also included a commitment to *'prepare an erosion and sediment control plan to minimise soil disturbance during clearing and accessing the drill pads and incorporate appropriate erosion and sediment control as necessary'*.

Figure 2 Site NC798 – rehabilitated flat paddock



A review of examples of drill plans provided, with the permits to work, did not show any specific erosion and sediment controls on the plans for any of the sites. No evidence was sighted to indicate that erosion and sediment control plans were prepared for each drill site (or group of drill sites) as part of the site planning process. This is raised as an **observation of concern No. 1**.

Although no clearing activities were in progress at the time of the audit, evidence was available to demonstrate that ecologists were involved in the clearing activities. For example, a pre-clearing report dated 22 February 2019, prepared by EcoLogical, was sighted by the audit team.

A habitat tree was observed at site NC799 on the edge of the drill site. The tree was marked with flagging tape and had not been disturbed during the drilling activities (refer to figure 3).

Topsoil was not stripped or stockpiled on the four sites inspected during the audit, although these sites were in cleared, previously disturbed paddocks. Each of the sites inspected was capped and rehabilitated. Given that the sites had only recently been drilled and rehabilitated, no follow-up inspections were undertaken thus far.

Figure 3 Site NC799 showing marked habitat tree



Roads and tracks

No new roads or tracks were required to access any of the four drill sites inspected during the audit. Existing roads and tracks used during the audit site inspection were noted to be generally maintained in a serviceable condition.

The REF did identify the potential for new tracks to be required, but none had been constructed or formed at the time of the audit.

During the audit site inspection, it was observed that significant clearing of vegetation had occurred along Scratch Road, a road used during the seismic program. It was confirmed with NSW Forests that this clearing was undertaken by NSW Forests as part of a fire trail maintenance program for Cat 1 vehicles and was unrelated to the seismic survey or any other of Narrabri's exploration activities.

Weeds, pest animals and disease

In managing the ecological impacts of the drilling program, the REF included commitments that *'All machinery should be washed down prior to entering site. Equipment to be cleaned includes light vehicles, tractors, slashers and drill rigs.'* and *'Vehicles and mobile plant will be washed down prior to mobilisation to the exploration area to ensure that noxious weeds are prevented from being taken to the sites.'* Narrabri Coal could not provide any evidence or records to indicate that the drill rig and other vehicles were washed down before entering sites for the four holes that were drilled. It was also noted that the drilling co-ordinator was not aware of this commitment. This is raised as **non-compliance No. 1** and is ranked NC2. Failure to undertake the exploration activities in accordance with the approval is a breach of Condition 3 of the title and Section 23A(7) of the Mining Act, and as such, could be considered an offence against S378D of the Act.

Cultural heritage

No drilling was in progress at the time of the audit. As a result, the specific heritage controls outlined in the REF could not be verified.

The REF included a commitment that *'Cultural heritage monitors will be present on site once disturbance commences in vegetated areas and for the duration of the disturbance activities.'* Evidence of the use of cultural heritage monitors was sighted with the cultural heritage monitors signing off on the permit to work for each site (or group of sites) to indicate their participation in the clearing and ground disturbance activities.

Rehabilitation

EL6243 is an older title, so rehabilitation objectives and completion criteria were not specifically required. It was noted that the REF that accompanied the non-CEA application for exploration activities provided very minimal information on rehabilitation strategies and no information on rehabilitation monitoring or completion criteria. This is raised as **observation of concern No. 2**.

In managing ecological impacts, the REF included a commitment to *'Prepare a site rehabilitation plan for the impacted areas.'* A further commitment included a requirement to *'Prepare a detailed biodiversity management plan including monitoring for vegetation condition, edge effects and threatened species populations.'* There was no evidence sighted during the audit to indicate that either document has been prepared for the drilling program. This is raised as **non-compliance No. 2** and is ranked NC3. Failure to undertake the exploration activities in accordance with the approval is a breach of Condition 3 of the title and Section 23A(7) of the Mining Act, and as such, could be considered an offence against S378D of the Act.

It was noted that the civil works group undertake the rehabilitation of sites, but it is not known what information they are given on the rehabilitation requirements for each site. A representative of the civil works group was not available at the time of the audit.

Four rehabilitated drill sites were inspected by the auditors. No specific issues were identified but it was noted that all four holes were drilled in open cleared paddocks that were previously cultivated. None of the planned drill holes within the Pilliga State Forest had commenced at the time of the audit.

One seismic line along Scratch Road was inspected during the audit. No specific issues of concern were identified, with no rehabilitation being required. Seismic testing was undertaken using a vibroseis truck with generally minimal impact.

The submission of a non-CEA exploration activity approval application in November 2018 triggered a review of security. As a result, the security was increased by \$250,000 to \$1,373,000. The increase in security was received by way of banker's certificate on 18 January 2019.

Core and sample storage

Section 163G of the Mining Act and Clause 65 of the Mining Regulation prescribe the requirements for the collection, retention and preservation of cores and samples from exploration activities.

The four holes drilled to date, under the existing approval, were non-cored holes. Chip samples were collected from each hole. These samples were stored in modular plastic chip trays, labelled with tray number, hole number, start and finish depths (refer to figure 4). The chip trays were observed to be stored in metal-framed pods within a shipping container (refer to figure 5) in a hard stand area on site. While the integrity of the samples is generally being maintained, there does not appear to be much organisation to the samples. Locating a particular sample may not be an easy process, as there is no record of which samples are stored in which pod or shipping container. As **suggestion for improvement No. 1**, Narrabri Coal should consider the development of a core and sample storage register to record the storage location for each group of cores and samples.

Figure 4 Modular plastic chip trays – ends labelled with hole number and depth



Figure 5 Chip sample trays in a metal framed pod within a shipping container



Records management

General requirements for record keeping are identified in Sections 163D and 163E of the Mining Act and Condition 8 of the conditions of title. Specific requirements for the types of records to be maintained are detailed in condition 8 of the conditions of title and the mandatory requirements of the *Exploration code of practice: Environmental management*.

Records management does not appear to be very well managed overall. The exploration process appears to be disjointed with each section maintaining their own records. There was no overall collation of records for each hole. Given the segregated nature of the process and the apparent lack of a formal handover process between the various sections, it is possible for issues to be missed. This is raised as **observation of concern No. 3**. Narrabri Coal should consider developing a more formal handover process between the sections involved in the exploration process, including requirements for updating the rehabilitation tracker spreadsheet.

For example, the rehabilitation tracker spreadsheet is not updated, despite being accessible by each section in the exploration process. It was noted that drill hole NC804 had been drilled, sealed and rehabilitated, but it did not appear in the list of holes in the rehabilitation tracker spreadsheet.

It was also noted that there were several holes where rehabilitation was inspected in March 2018, with a note included in the spreadsheet to indicate that it was due to be reinspected in six months. There was no evidence to verify that those reinspections were undertaken. Given the issues associated with exploration record management, this could be due to the spreadsheet not being updated rather than inspections not being done, but this could not be confirmed.

Titleholder response to draft audit findings

Narrabri Coal was provided with a copy of the draft audit report and invited to submit a response to the draft audit findings. The response is in Appendix 1.

The response from Narrabri Coal stated that they were satisfied that the draft audit report reasonably reflected the information discussed and provided during the audit. No changes to the draft audit report were made because of the response from Narrabri Coal.

The response also included proposed corrective actions to address the three non-compliances raised during the audit. The actions proposed were appropriate to address the issues raised and will be followed up during future inspections.

Audit conclusions

From the evidence reviewed during the audit and observations made on site during the audit site inspections, it was concluded that Narrabri Coal has achieved a moderate level of compliance with the requirements of its exploration activity approval in relation to exploration activities undertaken. While Narrabri Coal has established some systems and processes to address its exploration compliance requirements, further development of these systems would be beneficial in increasing the level of compliance and providing for sustainable and safe management of the exploration operations at the site.

One non-compliance ranked NC2, one non-compliance ranked NC3, three observations of concern, and one suggestion for improvement were noted by the auditor as summarised in Table 4 and Table 5 below.

Table 3 Summary of non-compliances

NON-COMPLIANCE NO.	DESCRIPTION OF ISSUE	RECOMMENDATION
<p>1 (NC2)</p>	<p>In managing the ecological impacts of the drilling program, the REF included commitments that ‘All machinery should be washed down prior to entering site. Equipment to be cleaned includes light vehicles, tractors, slashers and drill rigs.’ and ‘Vehicles and mobile plant will be washed down prior to mobilisation to the exploration area to ensure that noxious weeds are prevented from being taken to the sites.’ Narrabri Coal could not provide any evidence or records to indicate that the drill rig and other vehicles were washed down prior to entering site for the four holes that have been drilled. Failure to undertake the exploration activities in accordance with the approval is a breach of Condition 3 of the title and Section 23A(7) of the Mining Act and as such could be considered an offence against S378D of the Act.</p>	<p>Narrabri Coal should ensure that all vehicles are washed down before entering the site as stated in the commitment.</p>
<p>2 (NC3)</p>	<p>In managing ecological impacts, the REF included a commitment to ‘Prepare a site rehabilitation plan for the impacted areas.’ A further commitment included a requirement to ‘Prepare a detailed biodiversity management plan including monitoring for vegetation condition, edge effects and threatened species populations.’ There was no evidence sighted during the audit to indicate that either document has been prepared for the drilling program. Failure to undertake the exploration activities in accordance with the approval is a breach of Condition 3 of the title and Section 23A(7) of the Mining Act and as such could be considered an offence against S378D of the Act.</p>	<p>Narrabri Coal should prepare a site rehabilitation strategy and a detailed biodiversity management plan as stated in the commitments.</p>

Table 4 Summary of observations of concern

OBSERVATION OF CONCERN NO.	DESCRIPTION OF ISSUE	RECOMMENDATION
1	<p>The REF included a commitment to ‘prepare an erosion and sediment control plan to minimise soil disturbance during clearing and accessing the drill pads and incorporate appropriate erosion and sediment control as necessary’. A review of examples of drill plans provided with the permits to work, did not show any specific erosion and sediment controls on the plans for any of the sites. No evidence was sighted to indicate that erosion and sediment control plans are prepared for each drill site (or group of drill sites) as part of the site planning process.</p>	<p>Narrabri Coal should prepare erosion and sediment control plans for each drill site.</p>
2	<p>It was noted that the REF that accompanied the non-CEA application for exploration activities provided very minimal information on rehabilitation strategies and no information on rehabilitation monitoring or completion criteria.</p>	<p>Narrabri Coal should ensure that details of rehabilitation requirements are included in future REFs.</p>
3	<p>Records management does not appear to be very well managed overall. The exploration process appears to be disjointed with each section maintaining their own records. There was no overall collation of records for each hole. Given the segregated nature of the process, and the apparent lack of a formal handover process between the various sections, it is possible for issues to be missed.</p>	<p>Narrabri Coal should consider developing a more formal handover process between the sections involved in the exploration process, including requirements for updating the rehabilitation tracker spreadsheet.</p>

Table 5 Summary of suggestions for improvement

SUGGESTION FOR IMPROVEMENT NO.	DESCRIPTION OF ISSUE	RECOMMENDATION
1	<p>While the integrity of the samples is generally being maintained, there does not appear to be much organisation to the samples. Locating a particular sample may not be an easy process, as there is no record of which samples are stored in which pod or shipping container.</p>	<p>Narrabri Coal should consider the development of a core and sample storage register to record the storage location for each group of cores and samples.</p>

Appendix 1

Titleholder response to draft audit findings

Jenny Ehmsen

From: Mark Vile <MVile@whitehavencoal.com.au>
Sent: Thursday, 2 May 2019 5:10 PM
To: Jenny Ehmsen
Cc: Brent Baker; Megan Hobbs; Bradley Elvy; Phillippa Aylett
Subject: RE: Compliance Audit: EL6243 exploration activities
Attachments: WHC-FRM-NAR-Permit to Work Surface Disturbance and Penetration Work-v7.pdf

Good evening Jenny.

Thank you for providing some additional time for us to review the Audit report.

We have now reviewed the audit report, and are satisfied that it reasonably reflects the information discussed and provided during the audit.

Following is our response to the non-compliances identified in the Audit report:

Non-compliance 1: Preparation of an erosion and sediment control plan – we have added the requirement to prepare an erosion and sediment control plan to our Permit to Work (PTW), meaning the plan would need to be provided prior to the Environment Superintendent signing off on disturbance in relation to activities on EL6243. A copy of the updated PTW has been attached for your information.

Non-compliance 2: Machinery washdown - we have added to our Permit to Work (PTW) the requirement to confirm machinery has been washed down prior to commencement of exploration works, meaning that the exploration team would need to confirm machinery washdown prior to the Environment Superintendent signing off on disturbance in relation to activities on EL6243. A copy of the updated PTW has been attached for your information.

Non-compliance 3: Rehabilitation Strategy and Biodiversity Management Plan – Narrabri Coal is currently preparing these documents and will commit to providing them no later than 31 May 2019.

Could you please direct further correspondence on this audit to Brent Baker (copied in to this email) who is taking over as Environment Superintendent.

Regards,

Mark Vile
Environmental Consultant

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From: Jenny Ehmsen [<mailto:jenny.ehmsen@planning.nsw.gov.au>]
Sent: Wednesday, April 10, 2019 5:27 AM
To: Mark Vile <MVile@whitehavencoal.com.au>
Subject: RE: Compliance Audit: EL6243 exploration activities

Hi Mark

This email is to confirm that the response date for comments on the draft audit report has been extended until Friday May 3 2019.

Regards

Jenny

Jenny Ehmsen
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From: Mark Vile <MVile@whitehavencoal.com.au>
Sent: Tuesday, 9 April 2019 3:03 PM
To: Jenny Ehmsen <jenny.ehmsen@planning.nsw.gov.au>
Cc: Megan Hobbs <megan.hobbs@planning.nsw.gov.au>
Subject: RE: Compliance Audit: EL6243 exploration activities

Good afternoon Jenny

Thank you for sending through this report as draft and the opportunity to provide further information prior to finalisation.

I believe the timeframe for a response is adequate, however I will be away from site from tomorrow until Wednesday 24 April, only a day before the response is requested.

I was wondering if there is scope to extend this response date to the following Friday 3 May?

Regards,

Mark Vile
Environmental Consultant

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From: Jenny Ehmsen [<mailto:jenny.ehmsen@planning.nsw.gov.au>]
Sent: Tuesday, 9 April 2019 10:32 AM
To: Mark Vile
Cc: Megan Hobbs
Subject: Compliance Audit: EL6243 exploration activities

Hi Mark

Following on from the recent audit of exploration activities at Narrabri, please find attached a covering letter and a copy of the draft audit report for your review.

Regards

Jenny

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