



OUT15/27788

Ms Rose-Anne Hawkeswood
Resource Assessments
NSW Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Roseanne.Hawkeswood@planning.nsw.gov.au

Dear Ms Hawkeswood,

**Hera Gold Mine Modification 3 (PA 10_0191 Mod 3)
Comment on the Response to Submissions Report**

I refer to your email dated 29 September 2015 to the Department of Primary Industries in respect to the above matter.

Comment by DPI Water

DPI Water has reviewed the Response to Submissions document in support of the proposed modification to the Hera Gold Project. The following comments are provided to assist in finalising the assessment of the project.

- The key concern is that the proponent does not have an appropriate Action and Response Plan to manage potential impacts to GW017386.
- Table 1 below provides the key comments from Aurelia Metals in the RTS document to DPI Water's comments at the EA stage. Further comments from DPI Water in response are also provided in the table and below.

Table 1

Aurelia Metal Response (RTS)	DPI comment (October 2015)
Recommitted to deepening and re-equipping or providing an alternative source of water for the owner of GW017386.	Satisfactory. However, it should be noted that deepening GW017386 is unlikely to increase yields due to the nature of the aquifer.
Measures are already in place to address anticipated impacts from groundwater drawdown.	The "Action and Response Plan" for groundwater level trigger exceedance as outlined in the Water Management Plan (page 73) is not considered to be appropriate.

- The Water Management Plan (February 2015) states that if the trigger level of 75 mbgl is exceeded in one or more observations bores WB4, WB7, WB15, WB18 and Harland Bore, the Action and Response Plan will be implemented. The 75 mbgl trigger level originates from a trigger level placed on monitoring bores close to the production bores such as Observation Bore 2 (which has been exceeded in the past).
- A 75m trigger level for Observation Bore 2 is considered appropriate as the monitoring bore is located 180m from the closest production bore WB8. To apply the same trigger level of 75m to WB18 (which is used to manage impacts to neighbouring stock and domestic bore GW017386) at a distance of 1500m from WB8 and 700 m from WB11 is not appropriate.
- DPI Water advises the trigger levels for WB4, WB7, WB15, WB18 and Harland bore requires revision upward to consider the distance from the nearest production bore and the water levels. A trigger level of 75 mbgl at WB18 to implement the Action and Response Plan would not mitigate impacts, as based on existing water levels in WB18 a drawdown of more than 2m (AI Policy Level 2 impact criteria) to neighbouring stock and domestic bore GW017386 would have already occurred. Consideration of viable make good provisions for trigger level exceedances is also required due to the proposal of deepening bores being unlikely to increase yields.

Recommendation

- A condition of consent be included which requires the proponent to update the Water Management Plan in consultation with DPI Water. This is to include revision of water management infrastructure, in addition to altered monitoring and mitigating requirements.

For further information please contact Tim Baker, A/Manager Strategic Stakeholder Liaison on 6841 7403 or at tim.baker@dpi.nsw.gov.au.

DPI Lands have no further comment.

Yours sincerely



Mitchell Isaacs
Director, Planning Policy & Assessment Advice