



OUT21/8970

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Dear Ms Cole

**Mount Pleasant Optimisation Project (SSD-10418) –  
Response to Submissions (RtS)**

I refer to your email of 5 July 2021 to the Department of Planning, Industry and Environment (DPIE) Water and the Natural Resources Access Regulator (NRAR) about the above matter.

The Mount Pleasant Optimisation Project proposes to increase open cut extraction within Mount Pleasant Operation mining leases which includes: a staged increase of coal up to 21 million tonnes per annum; an extension to the time limit on mining operations from 22 December 2026 to 22 December 2048; and all associated infrastructure, plant, equipment, and activities.

Several recommendations regarding water licencing and groundwater management (Potential Acid Forming material) are provided in **Attachment A**.

Any further referrals to DPIE Water and NRAR can be sent by email to [landuse.enquiries@dpie.nsw.gov.au](mailto:landuse.enquiries@dpie.nsw.gov.au), or to the following coordinating officer within DPIE Water:

Simon Francis – Senior Project Officer  
E: [simon.francis@dpie.nsw.gov.au](mailto:simon.francis@dpie.nsw.gov.au)  
M: 0428 926 117

Yours sincerely

A handwritten signature in blue ink that reads 'Liz Rogers'.

Liz Rogers  
Manager, Assessments, Knowledge Division  
**Department of Planning, Industry and Environment: Water**  
15 July 2021

## Attachment A

### Detailed advice to DPIE Planning & Assessment regarding the Mount Pleasant Optimisation Project (SSD-10418) – Response to Submissions (RtS)

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DPIE – Water and NRAR provide the following recommendations.

#### 1.0 Water Licensing

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##### 1 Post Approval Recommendations:

- a. The proponent should ensure that prior to water take, sufficient water entitlements are held under approved Water Access Licences (WAL) for all predicted water take. This includes the 13 ML/year of predicted take from the Dart Brook Water Source.
- b. The existing Water Management Plan (WMP) should be revised to reflect all WALs held by the project and their conditions of approval.

##### Explanation

The proponent has detailed in the EIS that it holds sufficient licences to account for the take from each water source, with the exception of 13 ML/year of predicted take from the Dart Brook Water Source, which is regulated under the Water Sharing Plan for the Hunter Unregulated and Alluvial Water Sources, 2009. The proponent believes they would be readily able to acquire this entitlement given:

- The modest licence deficit of 13 ML/year represents a very small fraction of the overall entitlement available in the Dart Brook Water Source (approximately 30,000 units).
- WALs in the Dart Brook Water Source are actively traded, with 2,697 units permanently transferred in the 2019-2020 water year.

Although the proponent agrees with the recommendation that they should ensure licences are held before any water take, it does not specifically address take from the Dart Brook Water Source in which they hold no current unit shares.

Therefore, when WAL(s) are obtained, the WMP (including the Groundwater Management Plan and the Surface and Ground Water Response Plan) should be updated to include details on all WALs for the project, and any associated requirements of these water licences (subject to the conditions of any Development Consent for the Project).

#### 2.0 Groundwater

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##### 2 Pre-approval Recommendation:

The proponent should provide additional details regarding the proposed management and monitoring of Potential Acid Forming (PAF) material, including but not limited to: a site map showing, handling and storage/containment location(s), handling protocols, emplacement plan and procedures, monitoring and mitigation of potential impacts.

##### Explanation

DPIE-Water acknowledges that the existing approval includes out-of-pit emplacement of PAF material, however, measures for mitigation and monitoring of potential groundwater impacts of the emplacement of any additional PAF material, which would be mined under the approval being sought, has not been sufficiently detailed by the proponent in the EIS or RtS.

DPIE-Water reiterates this recommendation which was provided at the EIS stage (submission letter OUT/21/1273, dated 12/03/2021). That is, that the proponent provide sufficient detail of the proposed activities to give DPIE-Water confidence that the activities proposed do not include the potential for additional impacts to groundwater. Additionally DPIE Water further notes that emplacement of fines should be managed (as per Schedule 3, 52(d) of the Condition of Consent) ‘...with a view to emplacing fines within active mining areas’.