



Natural Resources Access Regulator

Contact: Tim Baker
Phone: 0428162097
Email : Tim.Baker@nrar.nsw.gov.au

Our ref: V15/3875-2#92
File No:
Your Ref:

29 November 2021

Bronwyn Flynn
Environmental Approvals Lead
Clean TeQ Sunrise
Clean TeQ Holdings Limited

email: bflynn@sunriseem.com

Dear Bronwyn

Re: Clean TeQ Sunrise Project – Revised Groundwater Management Plan

Thankyou for the opportunity to comment on the revised Groundwater Management Plan (GWMP) for the Sunrise Project. I understand this consultation is in accordance with Condition 30(c) in Schedule 3 of Development Consent 374-11-00. The revised plan has been reviewed by DPIE Water and NRAR with key comments and recommendations provided below.

Comments

- It is understood the revised plan is limited to considering the initial construction activities which are not to intercept groundwater such as minor earthworks and water management storages. The plan is to also include the installation and operation of the project water supply borefield, river pumping station and pipeline.
- DPIE Water/NRAR are keen to review the further updated GWMP that is to be prepared prior to commencement of the operations stage.
- The revisions made in the GWMP to address the recommendations made in NRAR's letter dated 26 September 2018 are satisfactory.

Recommendations

The GWMP is recommended to include the following for the construction phase:

- 1** Include commitment that if TDS exceeds category 'Marginal Potable' (GWMP Table 10) at any monitoring bore adjacent to the borefield for two successive monitoring rounds the results are required to be reported to DPIE Water.
- 2** Pumping/Monitoring site ISPB02 is required to be re-included into the baseline sampling programme.
- 3** A commitment that telemetered water level data in vicinity of the borefield be made available to the public via a website.

- 4 Ensure necessary dealing applications have been completed to ensure Water Access Licences with sufficient entitlement nominate the relevant works which take water.
- 5 Water metering will need to comply with the non-urban metering policy. Further information can be accessed at the following link:
<https://water.dpie.nsw.gov.au/nsw-non-urban-water-metering>

The GWMP is recommended to include the following for the operations phase:

- 1 Triggers for groundwater level fluctuation at the mine site and borefield, and water quality at the mine site. An explanation on how the trigger level for water quality was established and how it meets the AIP criterion will be required.
- 2 Include a plan to respond to any exceedances of the groundwater assessment criteria, and to mitigate any adverse impacts at the mine site or the borefield.
- 3 Include a program to monitor and report on groundwater take in the open cut pits.
- 4 Include a program to monitor and report on the seepage/leachate from the tailings storage facility and evaporation ponds.
- 5 Include a program to monitor and report on post mining groundwater recovery.
- 6 Ensure necessary dealing applications have been completed to ensure Water Access Licences with sufficient entitlement nominate the relevant works which take water.
- 7 The 'operational phase' GWMP is required to be submitted for review by DPIE Water.
- 8 A water balance to validate groundwater take from the pit. This will need to include accurate metering of water captured and pumped combined with modelled inputs and outputs where necessary.
- 9 Ensure necessary dealing applications have been completed to ensure Water Access Licences with sufficient entitlement nominate the relevant works which take water.
- 10 Water metering will need to comply with the non-urban metering policy.

For further information please contact Tim Baker on 0428162097 or e:
Tim.Baker@nrar.nsw.gov.au

Yours sincerely



Tim Baker
for
Jeremy Morice
A/Manager Licensing and Approvals - West
Natural Resources Access Regulator
Department of Planning, Industry and Environment