

Our ref: OUT22/15978

Brittany Golding

Planning and Assessment Group
NSW Department of Planning and Environment

Email:

17 October 2022

Subject: Cowal Gold Underground MOD 1 – Optimisation modification (SSD-10367-Mod-1)(Bland Shire)

Dear Brittany Golding

I refer to your request for advice sent on 15 September 2022 to the Department of Planning and Environment (DPE) Water about the above matter.

This modification to the underground workings of Cowal Gold Mine is to:

- change the surface access
- change the location of the underground stope access tunnel, and
- Increase annual production rate from 1.8 million tonnes per annum (Mtpa) to 2.6 Mtpa.

DPE Water requires clarification on the project's water requirements and groundwater take and additional advice on how the proponent can account for all water take.

Should you have any further queries in relation to this submission please do not hesitate to contact DPE Water Assessments water.assessments@dpie.nsw.gov.au, or the following coordinating officer within DPE Water:

Liz Rogers – Manager Assessments

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Yours sincerely

A handwritten signature in black ink, appearing to read "S. Francis".

Simon Francis
Senior Project Officer, Assessments, Knowledge Division

Attachment A

Detailed advice to DPE Planning & Assessment regarding the Cowal Gold Underground Mod 1 – Optimisation Modification (SSD-10367-Mod-1)

1.0 Water requirements, take and licensing

1.1 Recommendation – Prior to Determination

That the proponent:

- confirm water requirements for the project including the modification. This should include groundwater inflows and any water take to meet site water demand.
- provide a volumetric comparison of maximum approved annual project external groundwater demands with those required for the modification (modification demand).
- explain the predicted increase in predicted maximum inflow by 148 ML/year in the Lachlan Fold Belt MDB due to the modification (Mod. 1)
- clarify that all equivalent annual take from mine inflow, Bland Creek Paleochannel bores, saline and eastern saline bore volumes presented in Section 6.4 & 6.5 and Appendix D matches with those presented elsewhere in the report, for example Appendix C, Site Water Balance (Table 2).
- demonstrate entitlements can be held to account for all water take or note which take is sourced from a third party.

1.2 Recommendation – Post Approval

The proponent must ensure sufficient water entitlement is held in a water access licence/s to account for the maximum predicted take for each water source prior to take occurring.

1.3 Explanation

There is some uncertainty between the site water balance and licensable take tables provided. Table 3.2 Groundwater Licensing requirement summary included in Appendix D Groundwater Impact Assessment notes there will be 256ML/year extraction with the saline bores within ML1535 but the Site Water Balance (Table 2 of Appendix C Surface Water Impact Assessment) notes 41ML. There is also no explanation of how water will be accounted for by the other listed bores in the Water Balance.

Annual take volumes from mine inflow, Bland Creek Paleochannel bores, saline and eastern saline bore volumes presented in Section 6.5 and Appendix D do not currently equal those presented elsewhere in the report, for example Appendix C, Site Water Balance (Table 2).

Neither the Modification Report Section 6.5 or Appendix D include a volumetric comparison between the modification and the approved project maximum groundwater demand from external sources.

Section 6.4.3 in the Modification Report (Surface water impact assessment) includes the modification and approved project average groundwater demand from external sources (including Eastern Saline, Bland Creek Paleochannel borefields and Lachlan River), however it does not include maximum demand. It is also unclear why this is included in the surface water impact assessment.

Table 3.2 (Appendix D) summarises the predicted groundwater inflow take from the approved project and the proposed modification (Mod 1) separated by water source, i.e. Lachlan Alluvium and Lachlan Fold Belt. The proposed modification inflow will be approximately 8 ML/year (based on max. demand) less from the Lachlan alluvium than the approved project. Inflow will be approximately 148 ML/year more from Lachlan Fold Belt MDB than the approved project. The report text does not explain why an increase of 148 ML/year inflow from Lachlan Fold Belt will occur given that the mining extent has not changed.

The Conclusion (Section 6.5.5) includes a statement that 'there will be minor changes to the amount of water requiring licensing under the relevant water sharing plans'. The proponent should specify the volumes and the applicable water sources and confirm how this water will be accounted for.

End Attachment A
