



Bengalla Mining Company Pty Limited

Environmental Management Strategy

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1.0 INTRODUCTION

1.1 Background

Bengalla Mining Company Pty Limited (BMC) operates the Bengalla Mine (Bengalla), which is located approximately 4 km west of Muswellbrook in the Upper Hunter Valley, New South Wales (NSW) (see **Figure 1**).

BMC was granted Development Consent for State Significant Development (SSD) 5170 on 3 March 2015 by the Secretary of the Department of Planning and Environment (DP&E) for the Continuation of Bengalla. BMC commenced under SSD-5170 on 1 October 2015.

This Environmental Management Strategy (EMS) has been developed in accordance with the requirements of Schedule 5, Condition 1 of SSD-5170 (as modified) to provide a framework for environmental management at Bengalla.

1.2 History of Operations

1.2.1 Introduction

BMC was originally granted Development Consent (DA 211/93) in 1996 to construct and operate an open cut coal mine and associated. Mining operations at Bengalla commenced in 1998. DA211/93 was surrendered on 22 December 2016.

SSD-5170 (as modified) is now the applicable development consent for Bengalla.

1.2.2 State Significant Development 5170

In September 2013, BMC sought a new development consent under Division 4.1 of Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) to enable mining operations to continue at Bengalla. The application was supported by the '*Continuation of Bengalla Mine Environmental Impact Statement*' (Bengalla EIS) (Hansen Bailey, 2013) as modified by the '*Continuation of Bengalla Mine Response to Submissions*' (RTS) (Hansen Bailey, 2014).

- SSD-5170 provides approval for development including but not limited to the following: Open cut mining towards the west at a rate of up to 15 Million tonnes per annual (Mtpa) Run of Mine (ROM) coal for 24 years to a total of 316 Mt;
- Continued use of the existing dragline, truck fleet and excavators fleet (with progressive replacement or substitution with equivalent);
- Continued use, extension or relocation to existing and new infrastructure, including administration and parking facilities, in-mining area facilities (including dragline shut down and erection pad), helipad, tyre laydown area, explosives and reload storage facility, core shed workshop, roads, reject bin, ROM hopper, stockpiles, conveyors, water management

infrastructure, bioremediation area, supporting power infrastructure, rail and rail loading infrastructure and ancillary infrastructure;

- Construction and use of various items of new infrastructure (including radio tower, extensions to the Mine Infrastructure Area (MIA), additional raw coal stockpile and upgrade to the ROM coal stockpile (along with associated conveyor network) generally as shown on the infrastructure plans and construction of the Mount Pleasant Staged Discharge Dam and associated water reticulation infrastructure;
- Processing, handling and transportation of coal via the (upgraded) Coal Handling and Preparation Plant (CHPP) and rail loop for export and domestic sale;
- Continued rejects and tailings co-disposal in the Main OEA and in the temporary in-mining area reject emplacement;
- Relocation of a 6 km section of Bengalla Link Road at approximately Year 15 near the existing mine access road to facilitate coal extraction;
- The diversion of Dry Creek via dams and pipe work with a later permanent alignment of Dry Creek through rehabilitation areas when emplacement areas are suitably advanced;
- Relocation of water storage infrastructure as mining progresses through existing dams (including the Staged Discharge Dam (SDD) and raw water dam); and
- A workforce of up to 900 full time equivalent personnel (plus contractors) at peak production.

1.2.3 Bengalla Development Consent – Modification 1

SSD-5170 was modified on 16 December 2015 by the Executive Director – Resource Assessments and Compliance for the DP&E (as delegate of the Minister for Planning) for the activities largely described in the '*Bengalla Mine Development Consent Modification Statement of Environmental Effects*' (Hansen Bailey, 2015a) as modified by the '*Bengalla Mine Development Consent Modification Response to Submissions*' (Hansen Bailey, 2015b) (MOD 1 SEE). The MOD 1 SEE provides approval for the following:

- Alterations to various water management infrastructure components including:
 - Utilisation of the Satellite Pit as a temporary mine water catchment dam;
 - Relocation of the Staged Discharge Dam and the Hunter River Salinity Trading Scheme staged discharge release point;
 - Construction of clean water diversion levees in locations other than those already approved; and
 - Revised locations for the proposed relocation of the Hunter River Raw Water Dam and Washery Dam;
- Additional locations for the siting of the Explosives Storage Facility; and

- Placement of fill from the excavation of the Dry Creek Clean Water Dam (CW1) adjacent to it.

1.2.4 Bengalla Development Consent – Modification 2

SSD-5170 was modified on 1 July 2016 by the Director – Resource Assessments for the DP&E as delegate of the Minister for Planning for the activities largely described in the '*Bengalla Mine Development Consent Modification Statement of Environmental Effects*' (Hansen Bailey, 2016a) as modified by the '*Bengalla Mine Development Consent Modification 2 Response to Submissions*' (Hansen Bailey, 2016b) (MOD 2 SEE). The MOD 2 SEE provides approval for the following:

- Alterations to the approved height of the Main OEA to improve visual amenity from primary viewing locations in and surrounding the township of Muswellbrook and Denman Road, in two selected locations (Visual Relief Areas):
 - The Northern Relief Area constructed to a maximum height of Reduced Level (RL) 300; and
 - The Southern Relief Area constructed to a maximum height of RL 290.
- Establishment of a new gravel access road from Wybong Road to the Dry Creek Diversion Project Construction Site Office being a former homestead (Homestead Access).

1.2.5 Bengalla Development Consent – Modification 3

SSD-5170 was modified on 23 December 2016 (MOD 3) by the Director – Resource Assessments for the DP&E as delegate of the Minister for Planning for the activities largely described in the '*Bengalla Mine Development Consent Modification 3 Statement of Environmental Effects*' (Hansen Bailey, 2016c) as modified by the '*Bengalla Mine Development Consent Modification 3 Response to Submissions*' (Hansen Bailey, 2016d) (MOD 3 SEE). The MOD 3 SEE provides approval for the repositioning of the following approved activities:

- The construction and operation of an explosives facility and reload facility;
- The alignment of the Hunter River pipeline; and
- The emplacement and use of temporary topsoil stockpiles during the mining process.

1.2.6 Bengalla Development Consent – Modification 4

SSD-5170 was modified on 19 December 2018 (MOD 4) by the Director – Resource Assessments as delegate of the Minister for Planning for the activities described in the '*Bengalla Mine Development Consent Modification 4 Statement of Environmental Effects*' (Hansen Bailey, 2017) as modified by the '*Bengalla Mine Development Consent Modification 4 Response to Submissions*' (Hansen Bailey, 2018) and the '*Bengalla Mine Development Consent Modification 4 Residual Issues*' (Hansen Bailey, 2018b) (MOD 4 SEE). The MOD 4 SEE provides approval for the following:

- Changes to the approved water management system to reflect operations at Bengalla including proposed enlargement of the approved SDD (ED1), and construction and use of the Dry Creek East Dam;
- Temporary storage of approximately 2,500 m³ of excess materials from the construction of ED1;
- Increase in the capacity and additional locations of ROM coal stockpiles;
- Additional storage locations for temporary emplacement of coal processing reject material, prior to permanent emplacement; and
- Temporary clay emplacement within the Main OEA or to the west of this for later use in the reinstatement of Dry Creek.

The approved development layout is presented in **Figure 2**.





1.3 Document Purpose

This document has been prepared to satisfy Schedule 5, Condition 1 of SSD-5170 (as modified), which requires the preparation of an environmental management strategy. **Table 1** outlines the requirements under Schedule 5, Condition 1 of SSD-5170 (as modified) and described where these requirements are addressed in this document.

This document was provided to DP&E for review and approval. Approval was granted on XXXXXX and a copy of the correspondence is included in Appendix A.

BMC operates under the Bengalla Environmental Management System. This EMS describes how the Environmental Management System has been developed, implemented and maintained.

This EMS is a public document that provides information for BMC personnel, contractors, government stakeholders and the community. This document is made publicly available on the BMC website:

<http://www.bengalla.com.au/environment/environmental-management-plans/>

Table 1
Environmental Management Strategy Requirements

| Condition | Requirement | Relevant Sections |
|-------------------------|--|-----------------------------------|
| Schedule 5, Condition 1 | The Applicant must prepare and implement an Environmental Management Strategy for the development to the satisfaction of the Secretary. The strategy must: | This document |
| | a) Be submitted to the Secretary for approval within 6 months of the date of this consent; | Cover Page |
| | b) Provide the strategic framework for environmental management of the development | Section 2.0 |
| | c) Identify the statutory approvals that apply to the development | Section 2.3 |
| | d) Describe the role, responsibility, authority, and accountability of all key personnel involved in environmental management of the development | Section 4.1 |
| | e) Describe the procedures that would be implemented to: <ul style="list-style-type: none"> • Keep the local community and relevant agencies informed about the operation and environmental performance of the development • Receive, handle, respond to, and record complaints • Resolve any disputes that may arise during the course of the development • Respond to any non-compliance • Respond to emergencies | Section 4.0 |
| | f) Include: | Section 3.2 and Appendix B |

| Condition | Requirement | Relevant Sections |
|-----------|---|--|
| | <ul style="list-style-type: none">• References to any strategies, plans and programs approved under the conditions of this consent• A clear plan depicting all the monitoring, required to be carried out in relation to the development | |
| | The Applicant must implement the approved strategy as approved from time to time by the Secretary | BMC operates in accordance with its approved strategies and plans. |

1.4 Document Structure

Section 1.0 provides background information on BMC, describes the Bengalla Mine and the Development Consent under which it operates;

Section 2.0 outlines BMC's overarching strategy for environmental management and summarises the legislative requirements that apply to Bengalla;

Section 3.0 outlines the Bengalla Environmental Management System and its component documents;

Section 4.0 outlines the processes for implementation of the Bengalla Environmental Management System;

Section 5.0 defines the abbreviations and acronyms used in this document; and

Section 6.0 references the sources relied on in this document.

2.0 STRATEGIC CONTEXT

2.1 Mission Statement

BMC's mission is to produce safe, productive and profitable coal. BMC honours its commitment to manage health, safety and environmental risks and to work with the community to build enduring relationships.

2.2 Strategy

Environmental management is an integral part of BMC's overall business. BMC appropriately manages all activities that have the potential to impact upon the environment. These includes coal mining operations, coal handling and processing operations, construction works and all support services associated with the business.

The prevention and management of the potential and actual environmental impacts associated with BMC's operations can be achieved through:

- Taking a systematic approach;
- Taking preventive action in preference to reactive correction;
- Proactive attention to environmental issues by all people within the organisation; and
- Innovative changes to the way we work in order to continually improve our environmental performance.

This EMS aims to integrate environmental management planning into BMC's strategic and business planning cycle.

2.3 Regulatory Requirements

The objective of the Bengalla Environmental Management System is to achieve compliance with the relevant legislation as well as the authorisations granted under those Acts. The primary regulatory requirements that are relevant to Bengalla's operations are listed in **Table 2**.

Table 2
Relevant Legislation and Authorisations

| Primary Legislation | BMC's Authorisations |
|--|---|
| <i>Environmental Planning and Assessment Act 1979</i> | SSD-5170 (as modified) |
| <i>Environment Protection and Biodiversity Conservation Act 1999</i> (Commonwealth) | EPBC 2012/6378 |
| <i>Protection of the Environment Operations Act 1997</i> | EPL 6538 |
| <i>Water Management Act 2000</i> | Water Access Licences |
| <i>Water Act 1912</i> | Bore Licences |
| <i>Mining Act 1992</i> | ML 1397, ML 1450, ML 1469, ML 1711, ML 1728, ML 1729 |

Other Acts that may be relevant to environmental management at Bengalla include:

- *Heritage Act 1977*
- *National Parks and Wildlife Act 1974*
- *Native Vegetation Act 2003*
- *Noxious Weeds Act 1993*
- *Threatened Species Conservation Act 1995*
- *Contaminated Land Management Act 1997*
- *Waste Avoidance and Resources Recovery Act 2001*; and
- *Roads Act 1993*.

3.0 ENVIRONMENTAL MANAGEMENT SYSTEM

3.1 Overview

The Bengalla Environmental Management System has been designed to allow BMC to:

- Efficiently manage its environmental issues;
- Comply with regulatory requirements;
- Continually improve its environmental performance; and
- Satisfy the expectations of stakeholders and the local community.

The Environmental Management System is comprised of several management documents, including this EMS. **Table 3** lists the types of documents that form the Environmental Management System and describes their purposes.

All documents in the Environmental Management System are maintained on Lotus Notes (an internal database) to ensure that they are readily accessible to BMC's employees and contractors. Management strategies and plans are also made publicly available via the BMC website:

<http://www.bengalla.com.au/environment/environmental-management-plans/>

Table 3
Environmental Management System Documents

| Document Type | Purpose |
|-------------------------|--|
| Management Strategies | A strategy is a long term plan of action designed to achieve a particular goal, as differentiated from immediate actions with resources at hand. Its purpose is to achieve business objectives yet being flexible enough to accommodate changes. |
| Plans | Describes the objectives and how to achieve the desired outcomes. |
| Procedures | A sequence of activities, tasks, steps, decisions, calculations and processes, that when undertaken in the prescribed sequence, produces the described result, product or outcome. A procedure usually induces a change. |
| Monitoring Programs | Describes the types, locations and timing of monitoring activities and the relevant criteria that may apply. |
| Manuals | Reference books that may contain relevant information such as copies of Strategies, Plans, Programmes, Procedures or related instructions. |
| Other support documents | Provide additional tools for carrying out the system's requirements (e.g. forms, checklists, registers, work instructions) |

3.2 Environmental Management Plans

Management plans have been prepared in accordance with the relevant conditions of SSD-5170 (as modified). These plans are based on the results of environmental impact assessments. Management Plans outline the key strategies and operational control mechanisms which will be employed to maintain compliance with the relevant conditions of approval.

Management plans also include monitoring programs which outline the framework for measuring and monitoring environmental performance. BMC operates an extensive monitoring network which includes monitoring stations for various aspects of environmental management including air quality, noise, water and blasting. The locations of monitoring stations at Bengalla are shown in **Appendix B**.

The environmental management plans that are implemented at Bengalla are listed in **Table 4**.

Table 4
Environmental Management Plans

| Aspect | Management Plans |
|----------------|--|
| Air Quality | <ul style="list-style-type: none">• Air Quality Management Plan |
| Noise | <ul style="list-style-type: none">• Noise Management Plan |
| Water | <ul style="list-style-type: none">• Water Management Plan |
| Blasting | <ul style="list-style-type: none">• Blast Management Plan• Post Blast Fume Management Plan |
| Greenhouse Gas | <ul style="list-style-type: none">• Air Quality Management Plan |
| Biodiversity | <ul style="list-style-type: none">• Biodiversity Management Plan• Biodiversity Offset Management Plan |
| Rehabilitation | <ul style="list-style-type: none">• Rehabilitation Management Plan |
| Visual | <ul style="list-style-type: none">• Visual Impact Mitigation Plan• Landscape Management Plan |
| Heritage | <ul style="list-style-type: none">• Aboriginal Cultural Heritage Management Plan• Historic Heritage Management Plan |

3.3 Procedures

Procedures have been established, documented and maintained for mining related activities that may have a significant impact on the environment. BMC procedures can be accessed by employees and contractors via Lotus Notes (an internal database).

4.0 IMPLEMENTATION AND OPERATION

4.1 Organisational Structure and Responsibilities for the Environment

The typical structure of the Environment team at Bengalla is shown in **Figure 3**.

All employees and contractors working at Bengalla are accountable for:

- Complying with relevant legislation;
- Complying with the Environmental Management System to the extent that it applies to their work;
- Communicating any information that they become aware of in relation to environmental management; and
- Taking appropriate actions to mitigate environmental impacts, following consultation with relevant BMC environmental personnel.

Accountabilities for environmental management are defined in environmental management plans (see **Section 3.2**) to ensure that personnel at all levels are aware of their roles and responsibilities. Specific responsibilities are described in job descriptions and environmental procedures for Managers and personnel with environmental responsibilities.

4.2 Training and Competency

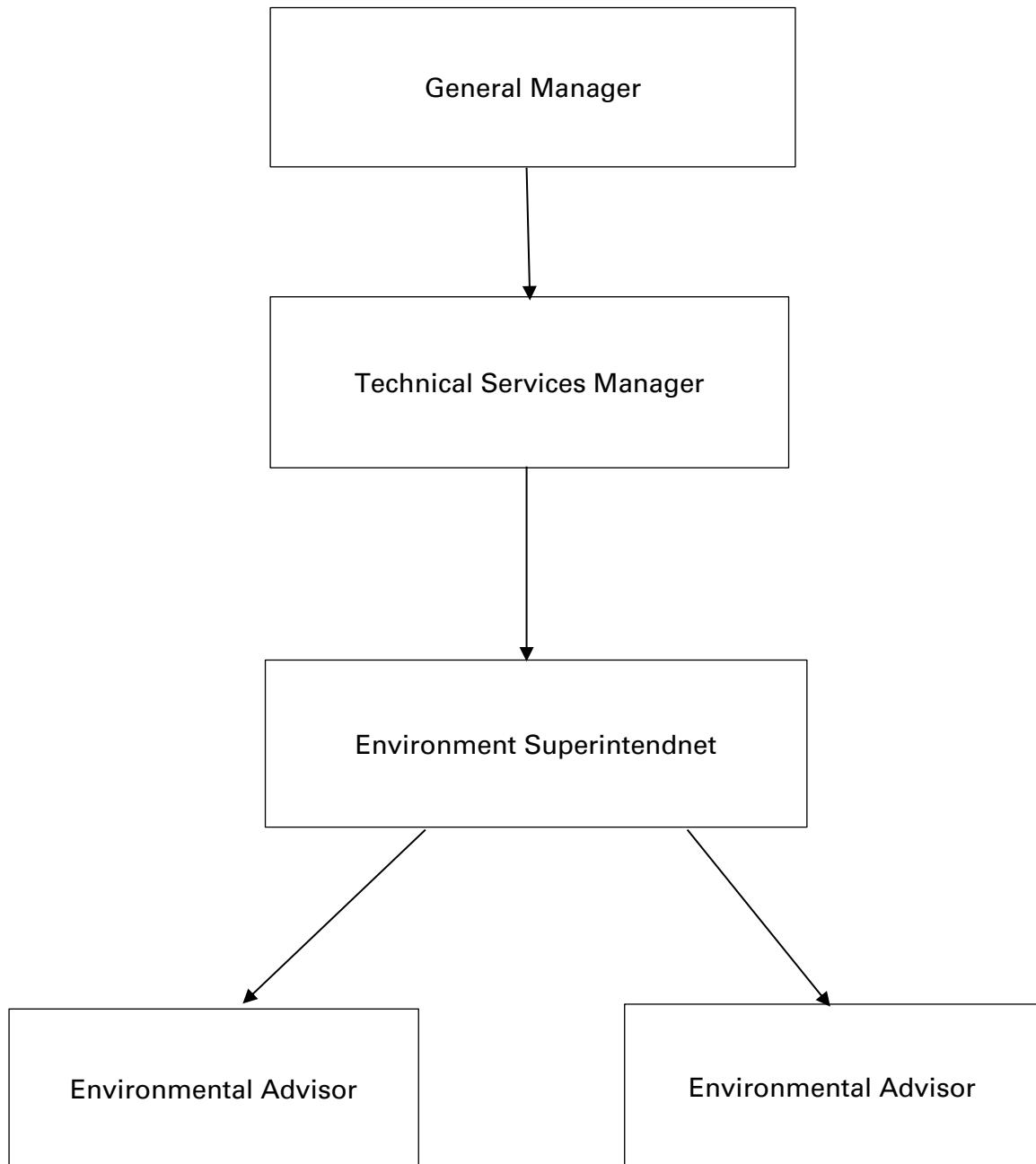
BMC provides environmental training regarding regulatory compliance, meeting community expectations and its objectives and targets in regard to environment management.

BMC requires employees and contractors to have the appropriate environmental training and awareness, so that they understand their environmental responsibilities and can work in a manner that appropriately manages impacts on the environment. All employees and contractors are required to undertake an induction, which provides general environmental training prior to commencing work on site.

Environmental awareness is revisited during toolbox sessions, which equips personnel to:

- Effectively undertake their tasks in accordance with the relevant environmental procedures in order to prevent or minimise environmental impacts; and
- Recognise the environmental hazards associated with their specific work tasks, through a risk based assessment process.

Figure 3
BMC Environmental Personnel



4.3 Communication and Consultation

4.3.1 Internal Communication

Environmental communication includes:

- This EMS;
- Strategies, Plans, Procedures and Programs detailing objectives, management and monitoring measures;
- Environmental toolbox training; and
- Information about incidents.

4.3.2 External Communication

Bengalla aims to maintain good relationships with government agencies, other stakeholders and the local community. BMC's community liaison objectives are:

- Ensure that Bengalla consistently builds upon its credibility within the region through a process of engagement and transparency within the neighbouring communities;
- Be proactive rather than reactive;
- Build awareness and provide information on current and future plans;
- Keep stakeholders well informed;
- Establish working relationships with stakeholders;
- Address concerns held by residents and other stakeholders; and
- Minimise potential disruptions and inconvenience to residents and operations.

The regular processes for external communication between Bengalla and its stakeholders is summarised in **Table 5**.

Table 5
Processes for External Communication

| Method of Communication | Frequency | Objectives |
|--|---|--|
| Contact with immediate neighbours – General Manager (or designated representative), Community Relations personnel and Environmental representatives | Regularly | To notify neighbours on appropriate aspects of the operations, including new proposals and provide a mechanism for any concerns to be raised directly with mine personnel. |
| Near neighbour newsletter | Quarterly | To provide information on special interest topics and environmental programs. |
| Community Consultative Committee (constituted by members representing government, community and BMC) | As required under Schedule 5, Condition 6 of SSD-5170 | To present information on site operations, initiatives and environmental performance, provide members with opportunity to request information from BMC and exchange of |

| Method of Communication | Frequency | Objectives |
|---------------------------------------|--------------|---|
| | | information on topical issues and matters of interest, including guest speakers. |
| Community open days | Periodically | To provide an opportunity for members of the community to see and experience a working coal mining operation, ask questions and be informed about BMC's operations. |
| 24-hour Environmental Complaints Line | Ongoing | Receipt of community concerns. |
| Bengalla website | Ongoing | To enable the community to readily access information on Bengalla and its performance |
| Annual Review | Annually | To provide regulatory authorities and the community with information on BMC's activities and environmental performance during the previous year. |

4.3.3 Community Complaints

BMC will keep a record of all community complaints and subsequent actions. The following details will be recorded (as a minimum):

- The nature of the complaint;
- How the complaint was made;
- Actions (if appropriate); and
- Consultation undertaken.

Complaints and enquiries regarding environmental matters should be directed to the 24 hour complaints hotline: 1800 178 984. A register of complaints will be published monthly on BMC's website in accordance with Schedule 5, Condition 11 of SSD-5170 (as modified).

4.3.4 Conflict Resolution

Conflicts between BMC and other stakeholders (if they arise) will be resolved in accordance with the conditions of SSD-5170 (as modified). In general, disputes with external stakeholders, which cannot be resolved by BMC, are referred to the Secretary of DP&E for resolution.

Schedule 3, Condition 35 of SSD-5170 (as modified) states that if there is a dispute between BMC and Muswellbrook Shire Council and/or Roads and Maritime Services regarding contributions to road upgrades and maintenance (other than Department of Planning and Environment), the dispute shall be referred to the Secretary of DP&E.

Schedule 4, Condition 4 of SSD-5170 (as modified) provides that if an owner of privately-owned land considers Bengalla to be exceeding the relevant performance criteria in the Development Consent, they may ask the Secretary of DP&E in writing for an independent review of the impacts of the

development on their land. If such a review is requested, BMC will progress this review in accordance with Schedule 4, Condition 4 of SSD-5170 (as modified).

In accordance with Schedule 3, Condition 12 of SSD-5170 (as modified), BMC will commission a property investigation within 2 months of any claim from a property owner that blasting has resulted in damage to structures on their property.

4.3.5 Incidents and Non-compliances

Schedule 5, Condition 7 of SSD-5170 (as modified) requires BMC to immediately notify the DP&E of any incident (defined in SSD-5170 as "an occurrence or set of circumstances causing or threatening to cause material harm to the environment"). The notification must be in writing and identify the development and set out the location and nature of the incident.

Where the EPA is a relevant agency, EPL 6538 Schedule 6 Condition R2.2 requires BMC to provide written details of the notification to the EPA within 7 days of the date on which the incident occurred.

Within seven days of becoming aware of a non-compliance (defined in SSD-5170 as "an occurrence, set of circumstances or development that is a breach of the consent"), BMC must notify the DP&E of the non-compliance. The notification must be in writing and must identify the development (including the development application number and name), set out the condition of this consent that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.

A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.

4.3.6 Response to Emergencies

Bengalla has an Emergency Response Team which is trained to respond to emergencies. Emergency exercises are conducted at least annually in order to measure and improve the effectiveness of emergency management.

Where risk assessments have identified potential emergency situations, specific documented procedures for dealing with those emergency situations are in place.

The Bengalla environmental emergency procedure includes the following information:

- Initial and ongoing emergency notification to internal and external resources;
- Events and communication log;
- Documented accountabilities;
- Evacuation;
- Specific emergency situations;

-
- Critical incident stress management; and
 - De-briefs to take place after any emergency situation and include relevant persons and action plans prepared to correct deficiencies.

The emergency procedures include accountabilities for dealing with other matters such as using outside assistance, dealing with media, counselling and community relations.

5.0 ABBREVIATIONS

| Term | Definition |
|----------|---|
| Bengalla | Bengalla Mine |
| BMC | Bengalla Mining Company |
| CHPP | Coal Handling and Preparation Plant |
| DP&E | Department of Planning and Environment |
| EIS | Environmental Impact Statement |
| EMS | Environmental Management Strategy |
| EP&A Act | <i>Environmental Planning and Assessment Act 1979</i> |
| EPA | Environmental Protection Authority |
| EPL | Environmental Protection Licence |
| MIL | Mining Lease |
| Mtpa | Million tonnes per annum |
| NSW | New South Wales |
| OEA | Overburden Emplacement Area |
| RL | Reduced Level |
| ROM | Run of Mine |
| RTS | Response to Submissions |
| SSD | State Significant Development |

6.0 REFERENCES

Hansen Bailey (2013), *Continuation of Bengalla Mine Environmental Impact Statement*.

Hansen Bailey (2014), *Continuation of Bengalla Mine Response to Submissions*.

Hansen Bailey (2015a), Bengalla Mine Development Consent Modification 1 Statement of Environmental Effects.

Hansen Bailey (2015b), Bengalla Mine Development Consent Modification 1 Response to Submissions.

Hansen Bailey (2016a), Bengalla Mine Development Consent Modification 2 Statement of Environmental Effects.

Hansen Bailey (2016b), Bengalla Mine Development Consent Modification 2 Response to Submissions.

Hansen Bailey (2016c), Bengalla Mine Development Consent Modification 3 Statement of Environmental Effects (SSD-5170 Modification 4).

Hansen Bailey (2016d), Bengalla Mine Development Consent Modification 3 Response to Submissions.

Hansen Bailey (2017), Bengalla Mine Development Consent Modification 4 Statement of Environmental Effects.

Hansen Bailey (2018), Bengalla Mine Development Consent Modification 4 Response to Submissions.

APPENDIX A
REGULATORY CORRESPONDENCE

NSW Major Projects

Bengalla Continuation Proj - Bengalla EMS More Information Required

Post Approval (SSD-ST07A-II) > Request for Information (RFI-3162)

Prepare RFI Response

Details of Request

Message:

Hi Craig
Could you please ensure that the EMS includes a figure showing the groundwater monitoring network.
Thanks,
Regards, Melanie

Attachments:

Upload Response

Attachments*

Attach Documents

Upload your response to the request. If you are submitting a revised document then you are required to upload a tracked changes version in addition to an unmarked version.

Add Attachment +

Summary

Current Stage: Initiate RFI

03-Apr-2020 Due Date: 5 Days Remaining

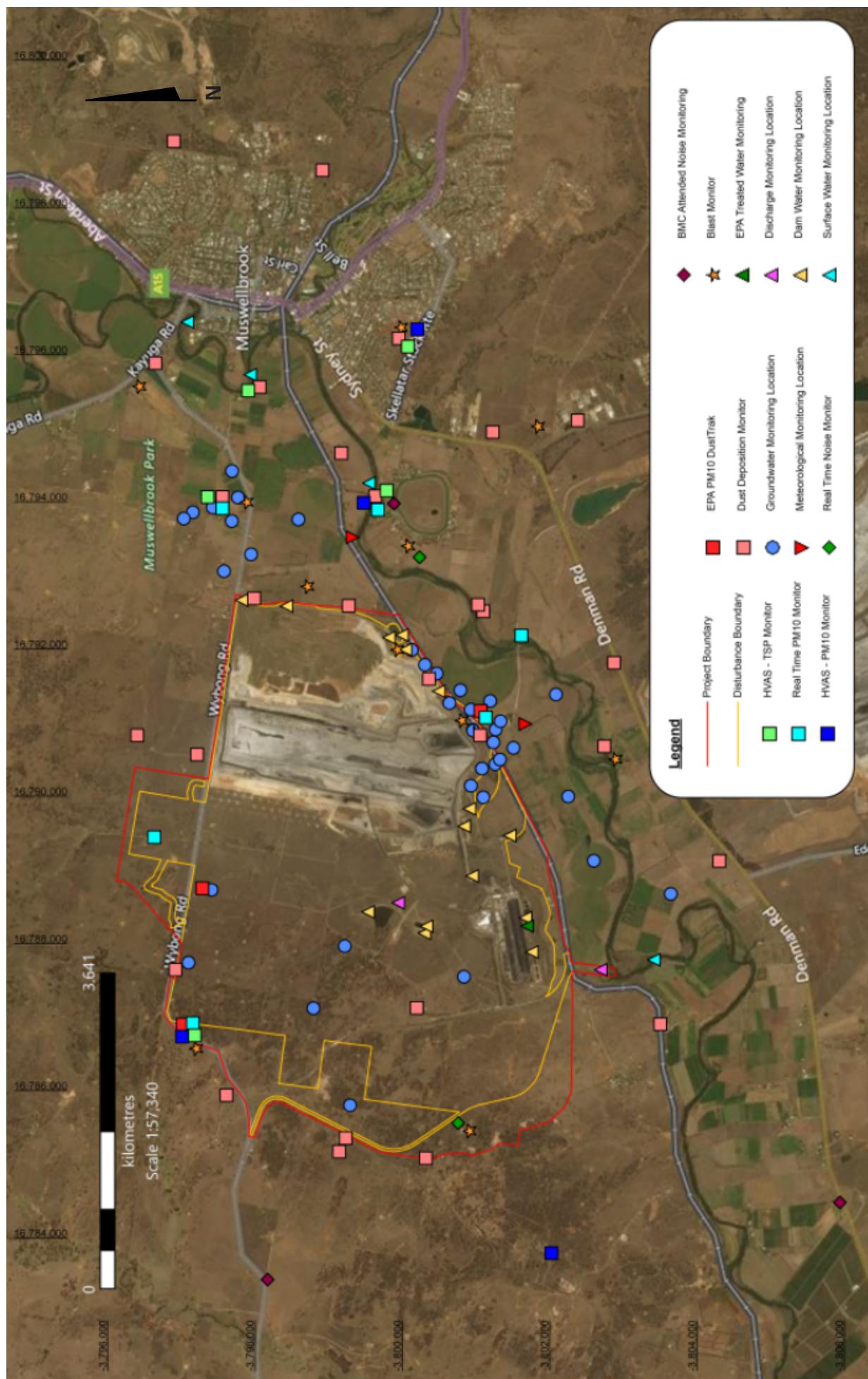
10 Urgency

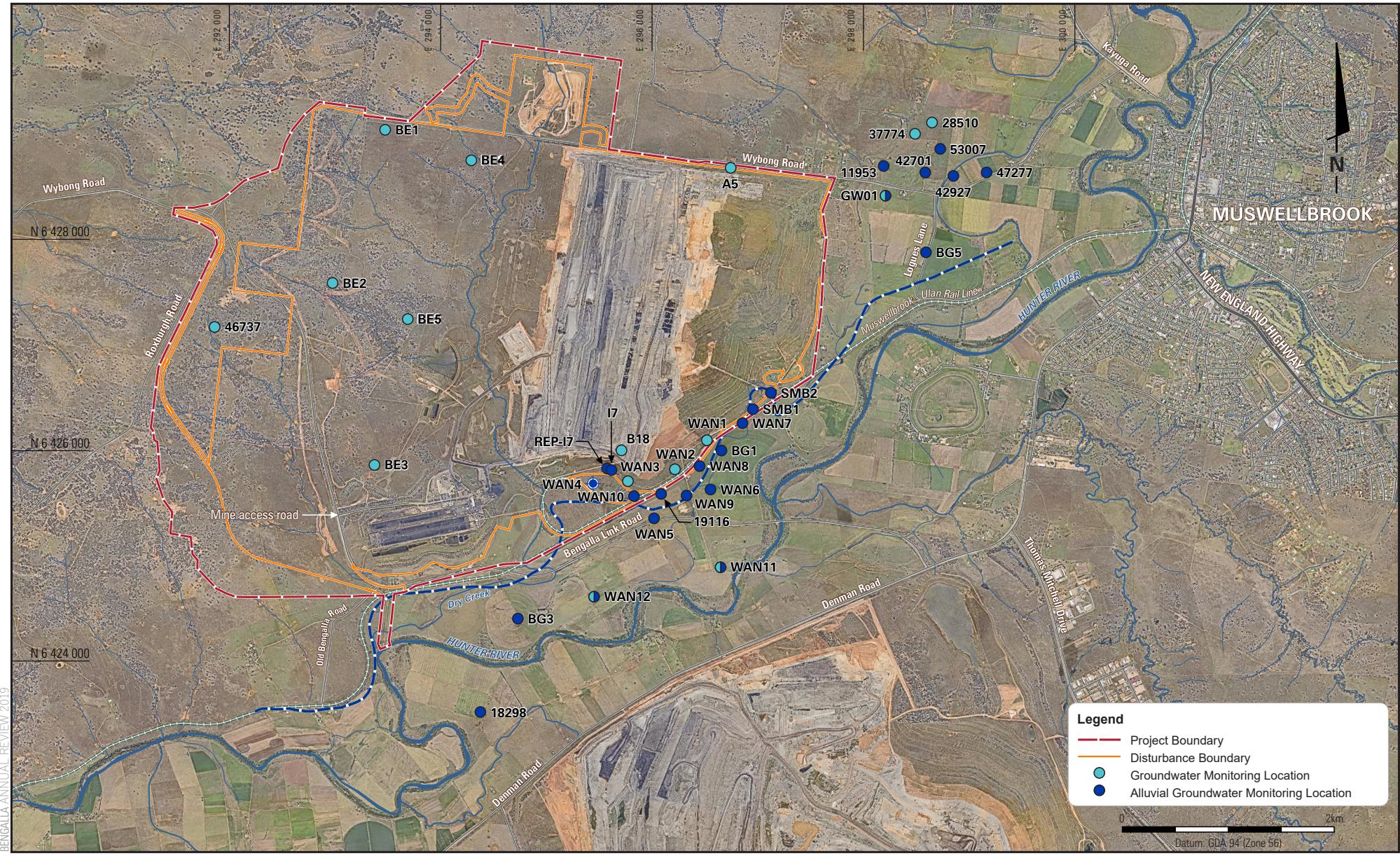
Details Resources

Actions

Related Projects

APPENDIX B
ENVIRONMENTAL MONITORING NETWORK





BENGALLA

Groundwater Monitoring Locations

FIGURE 10