From:	Jonathon Thompson
To:	Philip Nevill
Cc:	Ellie Evans; Rob Morris; Gabrielle Allan; Gen Lucas
Subject:	RE: New Cobar Complex Project SSD-10419 - Request for Additional Information
Date:	Thursday, 18 November 2021 1:23:00 PM
Attachments:	~WRD0977.jpg image001.jpg image004.jpg image005.jpg image006.png New Cobar Complex Project - Advice re Unused Rail Corridor(517112074.1).pdf J190278_Cobar_RTS_GWmemo_addendum_v1.pdf J190278 New Cobar Complex - response to NSW Health_v1.pdf

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Hi Philip,

Thank you for your email and our discussion via phone on 17 November 2021. This email is in response to the letter from Gabrielle Allan dated 18 October 2021 and additional correspondence received from Gen Lucas on 9 November 2021. The Letter and additional correspondence included additional requests for information from the EPA, TfNSW, DPIE Water and NSW Health.

In response to the correspondence, please find attached:

- A Letter from Allens Linklaters (18 November 2021) addressing the matters relating to the disused rail corridor raised by TfNSW. We note that TfNSW have not provided any additional correspondence relating to the extent of the disused rail corridor. We have been unable to verify the extent of the disused rail corridor through our investigation of publicly available documents;
- A memo from EMM (dated 17 November 2021) addressing the matters raised by DPIE Water and NRAR;
- A memo from EMM (dated 15 November 2021) addressing the matters raised by NSW Health.

Additional Comments to the EPA Submission

I note upon review of the submissions, EPA have reviewed our submission submitted in August 2021 (and included as an appendix to the NSW Health Memo attached to this email) and determined that it adequately addresses the EPA's submission dated 17 March 2021. However, we also note that EPA have raised matters and suggested consent and licence conditions. The matters raised if the proposal is approved are:

1. The Environmental Protection Licence (Licence) 20179 will require variation to account for any potential expansion of the premises footprint.
2. Change the weak acid cyanide discharge limit into the approved tailings storage facility.
3. To permit the receipt, storage and disposal of waste rock from the Peak Site and Federation Deposit at the premises.
4. The Licence will require the addition of conditions targeted at noise and air management.

Regarding Point 1 and 4, this is noted. Matters relating to Point 2 do not relate to this development application and therefore we are of the opinion it should not be considered further as part of this proposal. If the EPA have concerns relating to other projects operated by Aurelia Metals Ltd or their subsidiaries (Hera Resources Pty Ltd or Peak Gold Mines Pty Ltd) (Aurelia), they should raise these separately with Aurelia. Therefore, Point 2 has not been considered

further as part of this response. Regarding Point 3, we note that the EPA have suggested the New Cobar Complex will be receiving waste rock from the Federation Project. This is not proposed under this Project or the Federation Project.

Additional Comments to the TfNSW Submission

The TfNSW response has raised Road Matters and TfNSW have indicated they do not object to the proposal subject to a number of conditions. A couple of these conditions are of note. These include:

1. Upgrades to the construction access and Kidway Way intersection prior to construction works commencing.
2. Upgrades to the Kidman Way and Peak Way access prior to the commencement of the development.

Regarding Point 1, PGM notes an assessment of construction traffic was included in our Response to Submissions (RTS) dated August 2021. The RTS included an assessment of the construction access which was summarised in Section 4.10.4. The proposed construction access is an existing access, located on a straight section of road and has a sufficiently wide geometry to accommodate the construction vehicles. Construction is expected to take no more than six months, and construction traffic will not be greater than five light vehicle trips and three heavy vehicle trips per day. This section of Kidman Way typically experiences low levels of existing traffic, and is located less than 350 m south of the 50 kph speed limit for the Cobar urban area. Therefore, construction traffic is unlikely to have a significant impact on safety or cause delays to road traffic on Kidman Way and we are of the opinion that the assessment has demonstrated that no upgrade to this intersection is required. We propose to manage the potential impacts of construction traffic through the preparation of a temporary traffic management plan and traffic control plan, which will be prepared by appropriately accredited personnel. In addition, the low levels of construction traffic proposed and the short-term duration of the works do not necessitate the sealing of the access road; a water truck will be used for dust suppression.

Point 2 does not relate to this proposal. TfNSW have correctly identified that the upgrade required on the Peak Way access relates to projects MP10_0191_MOD-6 and Cobar local consent DA2020/LD-029. Both of these projects require heavy vehicles travelling from the south of the Peak Way access and turning left into the intersection. This proposal has all heavy vehicles travelling from the north and turning right into the Peak Way access. This activity already takes place under existing approvals on a regular basis as we are currently hauling ore and waste rock from the New Cobar Complex to the Peak Complex. The traffic assessment completed as part of the EIS determined that no upgrades were required on the Peak Way access for heavy vehicles conducting a right hand turn into the intersection. The traffic assessment has determined that no upgrades are required as part of the proposal. MP10_0191_MOD-6 and DA2020/LD-029 have both been assessed and approved by the relevant consent authority.

If you have any questions, please do not hesitate to contact me.

Regards,

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Allens › ‹ Linklaters

18 November 2021

Jonathan Thompson
Peak Gold Mines Pty Ltd
Level 17
144 Edward Street
Brisbane City QLD 4000

By Email

Dear Jonathan

New Cobar Complex Project (SSD 10419)
Advice in relation to Unused Rail Corridor Land

1 Background and Instructions

1.1 Peak Gold Mines Pty Ltd (***Peak***) lodged State Significant Development Application No. 10419 (***SSDA***) in early 2021.

1.2 The SSDA seeks consent for, amongst other things:

(a) consolidation of existing development consents issued by Cobar Shire Council for underground mining of the Chesney and Jubilee deposits and associated infrastructure, including Development Consent No. 2019/LD-004 for the Great Cobar Pipeline Project (***Pipeline Consent***); and

(b) new underground workings of the Great Cobar and Gladstone deposits, referred to as the New Cobar Complex Project.

1.3 The SSDA is currently undetermined. Peak submitted a Response to Submissions Report in August. The Department of Planning, Industry and Environment issued requests for additional information on 20 August and 18 October 2021, including a request for Peak to respond to a submission by Transport for NSW (***TfNSW***) dated 11 October 2021 (***TfNSW Submission***).

1.4 The TfNSW Submission indicates that there is a non-operational rail corridor (***Rail Corridor Land***) within the area of land subject to the SSDA. The TfNSW Submission recommends that conditions be imposed on the approval of the SSDA in relation to the Rail Corridor Land.

1.5 You have asked us to advise on the following matters:

(a) whether there is Rail Corridor Land in the location identified in the TfNSW Submission and if so, who owns the Rail Corridor Land; and

(b) whether the conditions of consent recommended in the TfNSW Submission could be validly imposed, including conditions in relation to:

(i) the proposed mining activities within the Great Cobar Deposit;

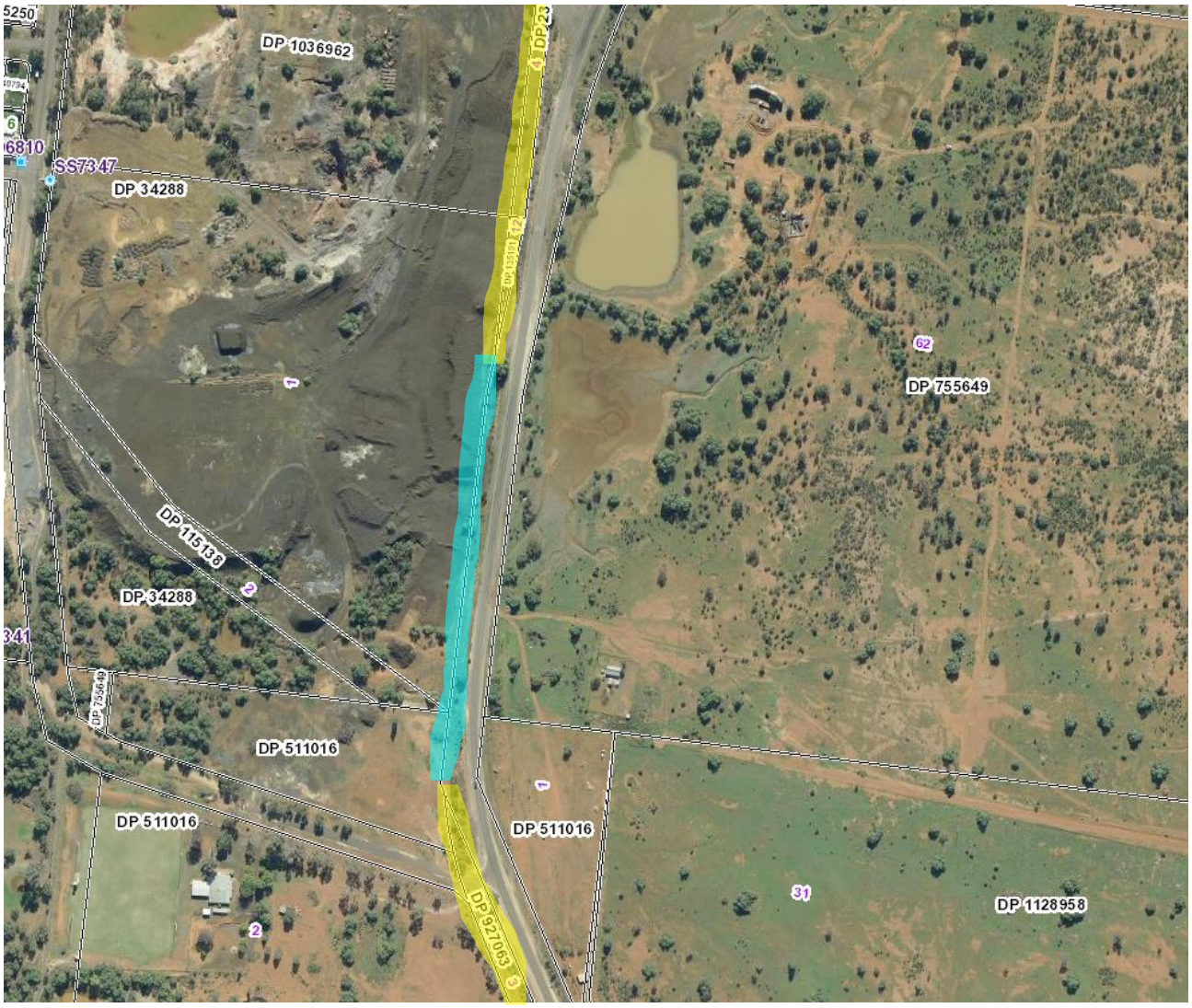
(ii) the Great Cobar Pipeline Project; and

(iii) the Great Cobar Exploration Decline.

Location of the Rail Corridor Land

1.6 We have searched the land identified as the rail corridor by John Holland and have identified portions of Rail Corridor Land along the western boundary of the Kidman Way (to the north and south of Lot 1 in DP 34288), which are freehold land in Auto Consol 1617-78, comprising the parcels of land in folio identifiers 12/135101, 4/234069, 7/234069, 1/927063, 3-4/927063.

1.7 Those parcels of land in the relevant area are shown highlighted yellow in the map below:



1.8 We have not identified, after several hours of searches, any separate parcels of land reserved for rail purposes in the area between the southern portion of Lot 1 in DP 34288 and the Kidman Way (area highlighted in blue on the above map). This does not mean that there is no Rail Corridor Land in that location. However, the information provided by John Holland and the details contained in Government Gazette 821 of 1.10.1901 Folio 7568 and Government Gazette 995 of 26.11.1209 Folio 9123, which John Holland has indicated created the Rail Corridor Land, are insufficient to confirm whether the Rail Corridor Land includes the blue portion of land above.

1.9 We understand that Peak has requested further evidence from John Holland that the Rail Corridor Land includes the land highlighted blue above.

1.10 As the extent of the Rail Corridor Land does not affect our advice on the validity of the conditions proposed by TfNSW, for the purpose of this advice we have assumed that the Rail Corridor Land continues along the full length of the eastern boundary of Lot 1 in DP 34288.

Ownership of Rail Corridor Land

1.11 The registered proprietor of the lots comprising the Rail Corridor Land (highlighted yellow above) is the State Rail Authority of New South Wales (***SRA***), the former statutory authority responsible for the operation and maintenance of railways until 2003, when RailCorp was formed and took over the former SRA assets. In 2020, RailCorp was converted to a State owned corporation and renamed Transport Asset Holding Entity of New South Wales (***TAHE***). It is not entirely clear whether the Rail Corridor Land is therefore now held by TAHE or by the Residual Transport Corporation (which holds assets not suitable for TAHE ownership).

1.12 In any event, the Rail Corridor Land is not owned by John Holland, but is owned by a State owned corporation. This is relevant to our analysis below in relation to the reasonableness of the conditions proposed in the TfNSW Submission.

1.13 We understand that John Holland Group operates and maintains the Country Regional Network (***CRN***) under contract from TfNSW until 2022, and that the contract was awarded to UGL for the next 10 years[1]. We have not investigated this further and we cannot confirm that the Rail Corridor Land is included in the CRN contract, but again for the purposes of this advice have assumed that it is. Historically, we are aware that John Holland Group was appointed as TfNSW's agent to manage the CRN as a rail infrastructure manager.

1.14 Accordingly, we have assumed that John Holland's interest in the Rail Corridor Land is that of a maintenance contractor and operator (as TfNSW's agent) although we do not know the terms of that contract. We can assume that John Holland's interest is that of TfNSW (or TAHE as owner of the asset), to manage access to the Rail Corridor Land.

Notation on title of Rail Corridor Land

1.15 The Rail Corridor Land has a notation on title, as follows:

```
FIRST SCHEDULE
--------------
STATE RAIL AUTHORITY OF NEW SOUTH WALES                  (AP AA444051)

SECOND SCHEDULE (2 NOTIFICATIONS)
---------------
1   RESERVATIONS AND CONDITIONS IN THE CROWN GRANT(S)
* 2   269138    LAND EXCLUDES MINERALS AND IS SUBJECT TO RIGHTS TO
               MINE AS REGARDS LOT 1 IN DP927063
```

1.16 We have obtained a copy of dealing 269138. The dealing was a transfer of the land and it reserved rights to the transferor over the land, to enable mining and access on and over the land. The Rail Corridor Land is subject to that reservation, but it is in favour of the original transferor, and their successors and assigns.

[1] UGL wins $1.5b country rail contract with TfNSW - Government News

1.17 We have not been able, for the purposes of this advice, to undertake the searches which would be necessary to attempt to track down who now has the benefit of that reservation, but it is clear that the Rail Corridor Land is subject to that reservation.

2 Mining of Great Cobar Deposit

Access to Rail Corridor Land

2.1 The TfNSW Submission states that in order for Peak to access the Rail Corridor Land to undertake mining activities, it must obtain approval from TfNSW and that Peak should be conditioned to contact John Holland Rail's (***JHR***) Third-Party Works Team to discuss the execution of a licence prior to commencing mining activities.

2.2 Peak holds Consolidated Mining Lease No. 6 over the area where mining activities are proposed to be undertaken under the SSDA. Section 73 of the *Mining Act 1992* (NSW) (***Mining Act***) provides that the holder of a mining lease granted in respect of a mineral may, in accordance with the conditions of the lease, mine on that land and carry out on that land any ancillary mining activity.

2.3 Peak therefore has a right to access the Rail Corridor Land to carry out mining activities pursuant to Consolidated Mining Lease No. 6. No other form of licence or right of access is required.

2.4 The condition of consent recommended in the TfNSW Submission would effectively impose on Peak an obligation to enter into a licence with JHR, in circumstances where JHR is not the owner of the Rail Corridor Land and Peak does not legally require a licence to access the land, given it already has a lawful right of access as the holder of a mining lease over the land.

2.5 Even if Peak did require a licence from TfNSW or JHR to access the Rail Corridor Land to undertake mining activities (which it does not), in our view the condition proposed in the TfNSW Submission is still not a valid condition of consent.

2.6 Section 4.17 of the *Environmental Planning and Assessment Act 1979* (NSW) (***EP&A Act***) provides a consent authority with power to impose conditions on a development consent. In addition to having to fall within the power to impose conditions under section 4.17, the courts have held that in order to be valid, a condition of consent must:

(a) be imposed for a planning purpose;

(b) fairly and reasonably relate to the development that is the subject of the development application; and

(c) not be so unreasonable that no planning authority would have imposed it.[2]

2.7 The first limb of this test requires a condition to be for a proper planning purpose. The courts have held that a planning purpose is 'one that implements a planning policy whose scope is ascertained by reference to the legislation that confers planning functions on the authority.'[3] In NSW, that is the EP&A Act.

2.8 A condition requiring the proponent of a development to enter into an access licence with a third party (whether that party is a private entity or public authority) is not in our view a condition that serves any relevant planning purpose, by reference to the considerations that the consent authority must take into account under section 4.15 of the EP&A Act when determining a development application.

[2] *Newbury District Council v Secretary of State for Environment* [1981] AC 578.
[3] *Western Australia Planning Commission v Temwood Holdings Pty Ltd* [2004] HCA 63.

2.9 The requirement to enter into a licence in order to lawfully access land (where a right of access does not already exist under statute or some other instrument, such as a mining lease) arises under property law, not planning law. Whether or not that requirement has been satisfied at the time the consent authority is being asked to grant consent is not a relevant planning consideration and is therefore in our view not a matter in relation to which a condition of consent can validly be imposed.

Excavation and blasting in proximity to Rail Corridor Land

2.10 The TfNSW Submission recommends the imposition of the following conditions:

> In the event of the non-operational rail corridor become [sic] operational during construction and operation of the Great Cobar Deposit, the applicant is required to develop a plan for track monitoring and a subsequent repair of the track and have the plan agreed by JHR's Principal Track and Civil Engineer.
>
> Prior to commencing any blasting operation that is to be occurred [sic] within 600m from the rail corridor, the applicant is required to consult and obtain approval from JHR who manages the CRN assets and infrastructure.

2.11 We understand it is unlikely the proposed underground mine workings would have any impact on any future rail infrastructure constructed within the Rail Corridor Land. Nevertheless, we are instructed that Peak does not oppose the imposition of a condition requiring it to develop a plan for track monitoring and repair of any track in the event the non-operational rail corridor becomes operational during the construction and operation of the mine.

2.12 However, in our view, the condition proposed by TfNSW ought be amended to remove reference to JHR and instead refer to TfNSW or 'the entity responsible for the maintenance and operation of the CRN'. As noted in section 1 above, JHR operates and maintains the CRN under contract from TfNSW. It is therefore possible that at the point in time when the Rail Corridor Land becomes operational (if ever), JHR may not be the relevant entity responsible for operation and maintenance of the Rail Corridor Land. In fact, our enquiries suggest that JHR's contract with TfNSW for the CRN expires in 2022 and that UGL has been awarded the contract to manage the CRN for the next 10 years.

2.13 In our view, there are a number of issues with the second condition extracted above, concerning blasting within 600 metres of the Rail Corridor Land, including:

(a) the condition requires consultation with and approval from JHR who, as noted above, is unlikely to remain the operator of the CRN indefinitely;

(b) the condition appears to apply whether or not the non-operational rail corridor becomes operational in the future. The TfNSW Submission indicates that the purpose of the proposed condition is to ensure that blasting does not have any 'long-term detrimental impacts on the assets, as well as the future rail operations and safety'. As the rail corridor is currently not operational and there is currently no physical rail infrastructure constructed within the Rail Corridor Land, we consider it would be reasonable to limit the condition's application to circumstances where the rail corridor becomes operational and rail infrastructure is developed within the Rail Corridor Land; and

(c) the condition requires approval for every blasting operation within 600m of the Rail Corridor Land, whether or not the blasting is likely to have any impact on infrastructure within the Rail Corridor Land. Peak's current environment protection licence (EPL 3596) provides that ground vibration peak particle velocity from blasting operations must not exceed 10mm/second at any time at any residence or noise sensitive location that is not owned by the licensee. While this limit applies only the sensitive receivers, we are instructed that Peak would be amenable to the imposition of a condition of development consent requiring

vibrations from blasting not to exceed 10mm/second at any location within the Rail Corridor Land, should the rail corridor become operational in future. We understand that vibrations equal to or less than 10mm/second are well below the level that would cause any damage to infrastructure, being a level generally imposed to protect amenity.

3 Great Cobar Pipeline Project

3.1 The TfNSW Submission recommends the imposition of the following condition of consent:

> Prior to commencing of the [sic] mining activities proposed in the Great Cobar Deposit, the applicant must satisfy the requirements by JHR and TfNSW including but not limited to the execution of a licence in respect of the Great Cobar Pipeline and the Great Cobar Decline area respectively.

3.2 To the extent this condition again seeks to require Peak to enter into a licence for access, for the reasons set out in paragraphs 2.6 to 2.9 above this condition does not satisfy the first limb of the *Newbury* test in order to be a valid condition of development consent.

3.3 In addition, the Great Cobar Pipeline has already been constructed. It forms part of the development the subject of the SSDA only to the extent that the SSDA seeks to consolidate the Pipeline Consent with the new consent for mining within the Great Cobar deposit and some other existing Council-issued consents.

3.4 We are instructed that Peak is proposing to surrender the Pipeline Consent following the grant of development consent for the SSDA, and will invite the imposition of a condition of consent requiring surrender of the Pipeline Consent.

3.5 Section 4.63 of the *Environmental Planning and Assessment Act 1979* (NSW) (***EP&A Act***) provides that if a development consent is to be surrendered as a condition of a new development consent and the development to be authorised by that new development consent includes the continuation of any of the development authorised by the consent to be surrendered, the consent authority is not required to re-assess the likely impact of the continued development or re-determine whether to authorise that continued development. The consent authority may modify the manner in which the continued development is to be carried out for the purpose of the consolidation of the development consents applying to the land concerned.

3.6 Accordingly, when assessing and determining the SSDA, the Minister for Planning and Public Spaces (or his delegate) is not required to re-assess the impacts of the Great Cobar Pipeline Project or to reconsider whether to authorise that aspect of the development subject of the SSDA. As the pipeline has already been constructed, it is also not practical to modify the manner in which the Great Cobar Pipeline Project is to be carried out by way of imposition of conditions.

3.7 While we have assumed for the purpose of this advice that there is Rail Corridor Land in the location marked blue on the figure in paragraph 1.7, being the location where we understand the Great Cobar Pipeline crosses between the Kidman Way and Lot 1 in DP 34288, it must also be noted that the existence of Rail Corridor Land in that location has not been established by JHR or TfNSW. As outlined above, our investigations were not able to confirm the existence of Rial Corridor Land in that location. A condition of consent requiring Peak to enter into a licence with JHR or TfNSW in respect of land that, at best, is owned by TAHE and at worst, is not in fact Rail Corridor Land is likely in our view to also be invalid for unreasonableness.

4 Great Cobar Exploration Decline

4.1 The condition extracted in paragraph 3.1 above is also proposed to apply to the Great Cobar Exploration Decline.

4.2 The Great Cobar Exploration Decline does not form part of the development the subject of the SSDA. The Great Cobar Exploration Decline has been separately approved by the Resources Regulator under an activity approval issued under section 23A of the Mining Act.

4.3 The proposed condition therefore also fails the second limb of the *Newbury* test set out in paragraph 2.6 above, in that it does not fairly and reasonably relate to the development the subject of the SSDA. The condition cannot therefore be validly imposed.

Yours sincerely

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Memorandum

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17 November 2021

To: Jonathon Thompson, Peak Gold Mines
From: Joel Georgiou and Tom Neill
Subject: New Cobar Complex addendum to the Groundwater Impact Assessment

Dear Jonathon,

Please find below an addendum to the Groundwater Impact Assessment.

1 Background

EMM Consulting Pty Ltd (EMM) was engaged by Peak Gold Mines Pty Ltd (PGM) to carry out numerical groundwater flow modelling to support the Environmental Impact Statement (EIS) (EMM 2021a) for the New Cobar Complex Project. The groundwater model (named GC1.0) is documented in detail in the Groundwater Impact Assessment (GIA) (EMM 2021b) which supports the EIS.

In a separate, but parallel process to the EIS, PGM was granted a Water Supply Works Approval (85WA753861) on 2 December 2019, which allows PGM to pump groundwater from a shaft located within the historical Great Cobar underground mine workings into the Great Cobar pipeline. The approval is required to meet future mine site water demands.

Part A of Section DS6593-00001 of the approval states that an updated groundwater model must be included as part of a Groundwater Management Plan (GMP). The GMP must include:

- a conceptual groundwater model including a water balance;
- model calibration against observed heads; and
- sensitivity and/or uncertainty analysis.

EMM upgraded and refined the EIS model (GC1.0) to specifically address the following requirements attached to approval 85WA753861:

- additional refinement to simulate the historic Great Cobar underground workings, including the vertical shaft, at a finer resolution;
- modelling of additional predictive scenarios to simulate the estimated water requirements and effect on groundwater pressure; and
- additional predictive uncertainty analysis on these scenarios.

2 Response to submissions

The New Cobar Complex Project EIS was publicly exhibited from 25 February 2021 to 24 March 2021, and DPIE wrote to PGM on 31 March 2021 requesting responses to the matters raised by NSW Government agencies, local government authorities and the community that were received during public exhibition of the EIS.

DPIE Water and the Natural Resources Access Regulator (NRAR) made a submission on the project, which noted that:

- the numerical model had been prepared in accordance with the Australian Groundwater Modelling Guidelines to a standard suitable for the scale of activity and the relatively low-risk of groundwater impacts in the area. However, the model was not independently peer reviewed as required by the Aquifer Interference Policy (AIP); and
- a basic landholder rights (BLR) bore (85WA752553) had been overlooked in the original GIA.

DPIE Water and NRAR recommended that prior to approval:

- an independent peer review of the numerical groundwater model be undertaken; and
- that the GIA be updated to include BLR bore 85WA752553, and address whether mitigation under the AIP was required.

A memo was prepared addressing these two recommendations (EMM 2021c) and submitted as part of the Response to Submissions (RTS). DPIE Water and NRAR reviewed the RTS and advised that the BLR bore 85WA752553 had been incorrectly identified in the RTS, and that the monitoring bore is located approximately 9 km southwest of the New Cobar Complex development footprint. Additional commentary was also requested regarding long-term final void water levels in the New Cobar Open Cut pit and potential hydrochemical processes that may affect the pit void lakes. This memo presents modelled groundwater impacts at the updated monitoring location and additional information on modelled long-term groundwater conditions.

3 GIA update

3.1 Numerical groundwater model

A numerical groundwater flow model has been developed for the GIA in accordance with the Australian Groundwater Modelling Guidelines (Barnett, et al. 2012). The model is further described in Section 8 of the GIA (EMM 2021b).

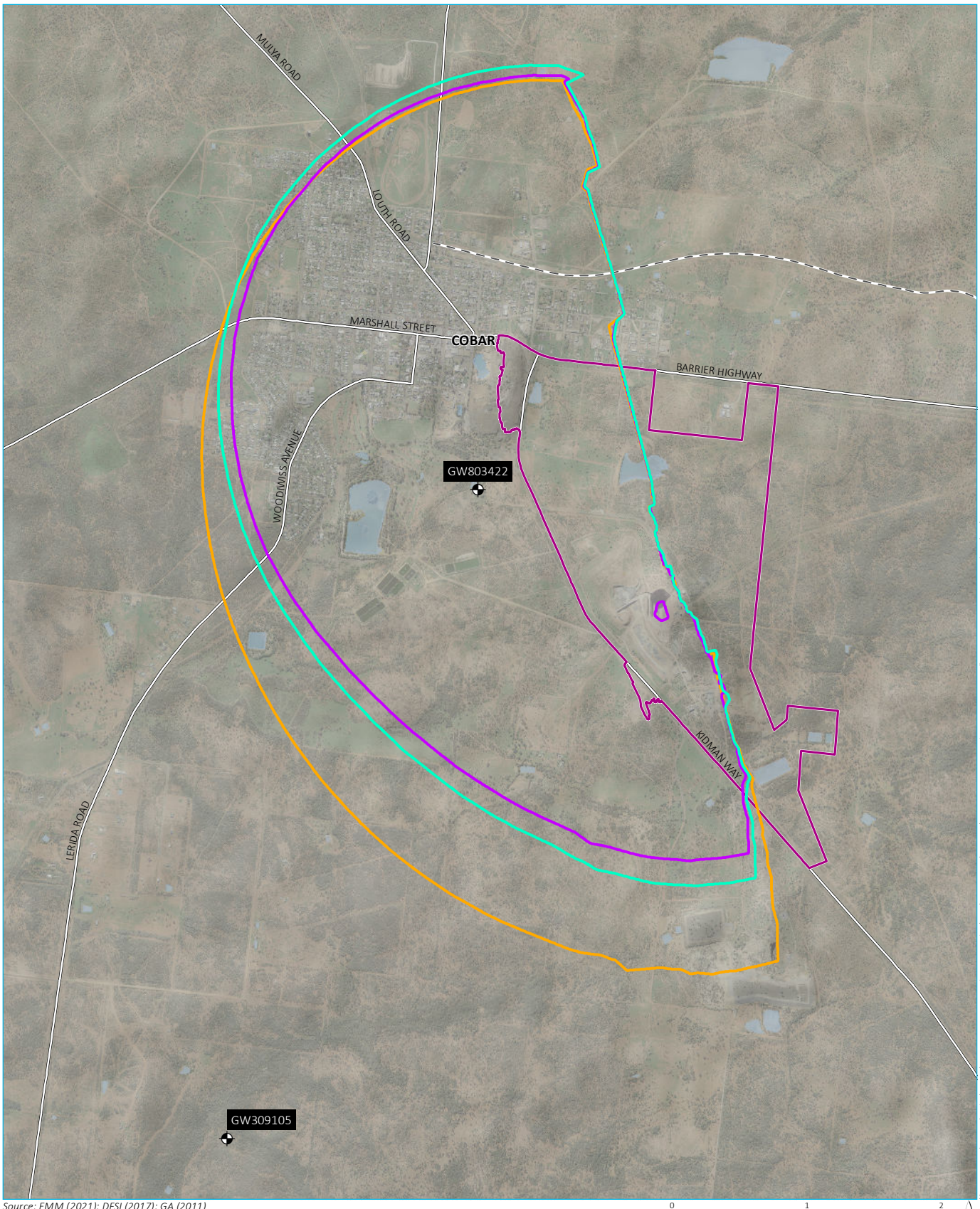
The predictive model scenarios presented in this memo are:

- GC_tpred1: active mine dewatering for the base case using aquifer parameters obtained from history-match assessment (GIA Section 8.4);
- GC_tpred2: active mine dewatering for the base case, plus additional water supply from the Great Cobar shaft;
- GC_tpred3: active mine dewatering for low mine inflow aquifer properties, plus additional water supply from the Great Cobar shaft; and
- GC_tpred4: active mine dewatering for high mine inflow aquifer properties, plus additional water supply from the Great Cobar shaft.

3.2 Additional groundwater modelling

Following submission of the RTS, the groundwater bore analysed by EMM (2021c) was determined to have been derived from an incorrect location. The bore (85WA752553, also known as GW309105) is located approximately 9 km to the southwest of Cobar, as shown in Figure 3.1. The bore lies outside of the modelled induced 2.0 m drawdown contour for all four prediction scenarios, caused by the combined water take (pit dewatering and all water supply activities) concerned with the New Cobar Complex project. This was originally presented by EMM (2021b), and as such the planned mining is not expected to induce a significant impact on this bore.

Modelled hydrographs at this location were exported from the model for each of the predictive scenarios to assess the potential impacts of dewatering associated with the New Cobar Complex Project. Results are further discussed below.



Source: EMM (2021); DFSI (2017); GA (2011)

0 1 2 km

GDA 1994 MGA Zone 55

N

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KEY

- Groundwater bore
- Base case additional project water take modelled drawdown (GC_tpred2 2 m contour)
- Low inflow additional project water take modelled drawdown (GC_tpred3 2 m contour)
- High inflow additional project water take modelled drawdown (GC_tpred4 2 m contour)
- Project area
- Rail line
- Major road
- Waterbody

Groundwater bore locations and maximum additional drawdown extents caused by all Project water take

Peak Gold Mines
New Cobar Complex Project
Great Cobar shaft water supply modelling
Figure 3.1

EMM
creating opportunities

3.3 Modelled hydrograph results

Modelled groundwater hydrographs for the predictive scenarios and uncertainty runs are presented for the water supply work (GW309105) located to the southwest of Cobar in Figure 3.2 and Figure 3.3.

Figure 3.2 shows modelled hydrographs at GW309105 for the base case predictive model scenarios, showing modelled induced drawdown and recovery following mine dewatering.

The base case model (GC_tpred1) with no additional shaft water supply, results in a minimum groundwater elevation of approximately 202.1 mAHD. Shaft water supply extraction (GC_tpred2) results in minimal additional drawdown at this location, with GC_tpred2 modelled hydrographs largely overlying the GC_tpred1 scenario. Additional drawdown caused by shaft pumping reaches a maximum of 0.1 m at the end of the 1,000 year post-mining period.

The scenarios show modelled absolute drawdown at GW309105 of greater than 2 m relative to pre-1990 levels, increasing at the end of the 1,000-year post-mining period. This is likely associated with ongoing groundwater discharge at the New Cobar open cut pit (caused by evapotranspiration), in addition to the impacts already caused by the historical Peak operations. Impacts associated with historical mine activities are not assessable in this case.

Figure 3.1 shows the bore in relation to the modelled additional drawdown contours as per EMM (2021b), caused by all combined water take associated with the New Cobar Complex Project. Only minor impacts are predicted to occur at GW309105, as it lies outside of the 2 m drawdown contour for all four scenarios.

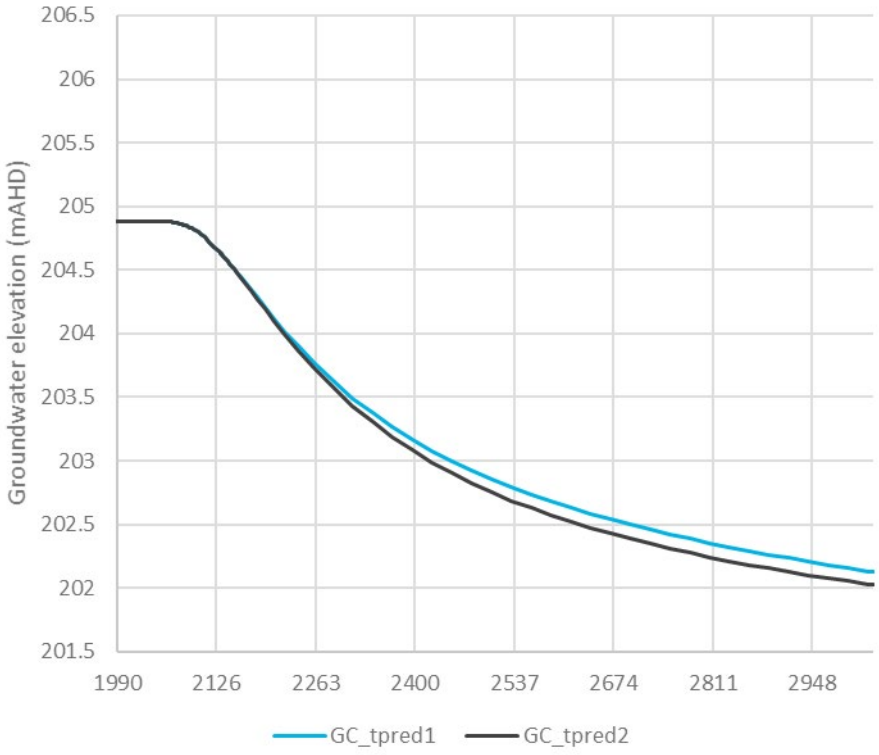

Figure 3.2 Modelled groundwater elevation hydrographs at water supply work GW309105

Modelled groundwater hydrographs at GW309105 for GC_tpred2 and the void properties uncertainty runs are presented in Figure 3.3. As with the maximum spatial extent of drawdown, the void geometry and adopted parameters have very little influence on regional drawdown effects, including at GW309105.

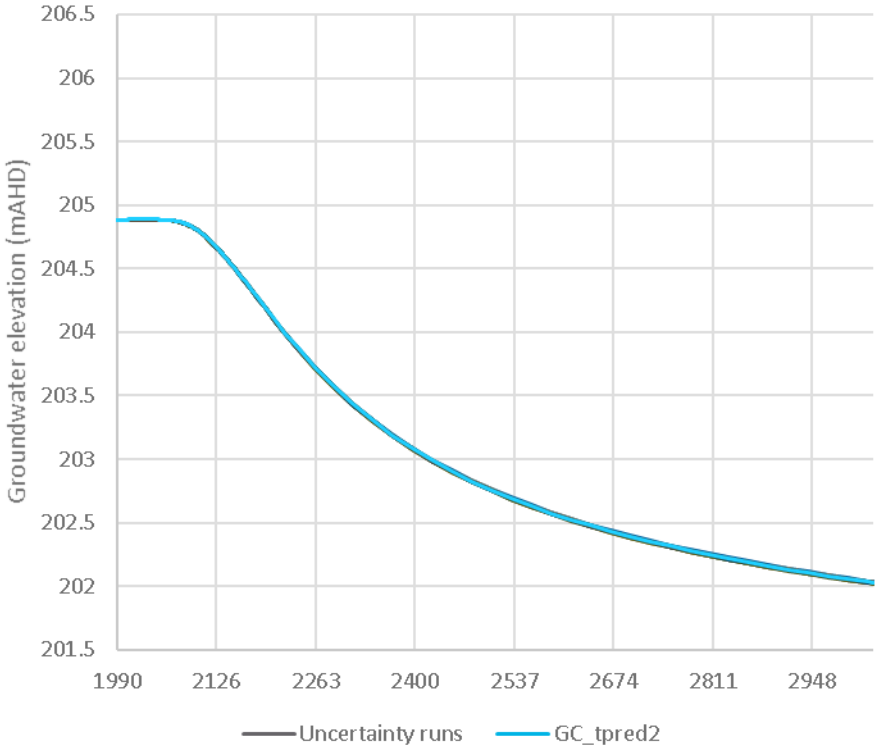

Figure 3.3 Modelled mine void uncertainty analysis groundwater elevation hydrographs at water supply work GW309105

3.4 Minimal impact consideration

The AIP outlines minimal impact considerations for assessing potential groundwater impacts in NSW. The minimal impact considerations are a series of thresholds that define minimal impacts from aquifer interference activities. There are two levels of minimal impact considerations, being Level 1 and Level 2. If the predicted impacts are less than the threshold level specified by the Level 1, then these impacts are acceptable under the AIP. Where the predicted impacts at a water supply work are greater than the Level 1 minimal impact considerations, then 'make good' provisions should apply. Based on the NSW Government's mapped areas of groundwater productivity in NSW (DPI 2012), the Project is within the 'less productive' fractured rock source of the Lachlan Fold Belt Murray-Darling Basin. Therefore, the relevant Level 1 impact consideration threshold is no more than 2 m decline in water table at any water supply works.

The maximum predicted drawdown at water supply work GW309105 caused by the project activities is less than 2 m, with the majority of drawdown being attributed to pre-existing mining activities rather than planned activities as per the GIA (EMM 2021b). Given the predicted drawdown is not expected to exceed Level 1 minimal impact considerations, it is unlikely that PGM will need to consider make-good measures under the AIP.

4 Response to independent peer review

Additional commentary in response to the independent peer review of the model (EMM 2021c) was requested by DPIE, particularly Sections 3.5 to 3.9 regarding post-closure groundwater conditions at the two open cut pits (Great and New Cobar). For reference, the way the open cut pit features are modelled is summarised in Table 4.1. The Great Cobar pit is a historical feature and is a known pit lake, whereas the New Cobar pit was developed during the history-matching period of the simulation and remains dry as of 2021. As such, simulation methods were different for each pit.

Table 4.1 Modelled open cut pit summary

Pit name	Detail	Simulation summary
Great Cobar	Historical workings at Cobar, existing current day as a permanent pit lake.	Void properties (specific yield 100%, hydraulic conductivity 1,000 m/day) and net surface water flux (incident rainfall minus pan evaporation) assigned to water in pit. No changes during model simulation.
New Cobar	Active mining between 2001 and 2004, current day dry pit used for access to New Cobar underground mine workings.	Drain boundary conditions activated from model stress period 13 (1 January 2001), left active following cessation of mining through 1,000 year recovery period. Post-mining outflows at these boundary cells compared against potential evaporation to estimate likelihood of pit lake formation.

Modelled hydrographs at the Great Cobar and New Cobar pits are presented in Figure 4.1. Changes in water level at New Cobar are caused by active dewatering during mining, and changes at Great Cobar occur in response to nearby mine activities. Following cessation of mining, partial recovery of watertable elevation is simulated to occur at both pits. The watertable level recovers to the base of the New Cobar pit within approximately 100 years. Water in the Great Cobar pit recovers more gradually, stabilising approximately 6.5 m below pre-1990 levels. Long-term, it is conceptualised that the New Cobar pit will remain dry or form a pit lake below regional groundwater levels, causing a permanent groundwater depression.

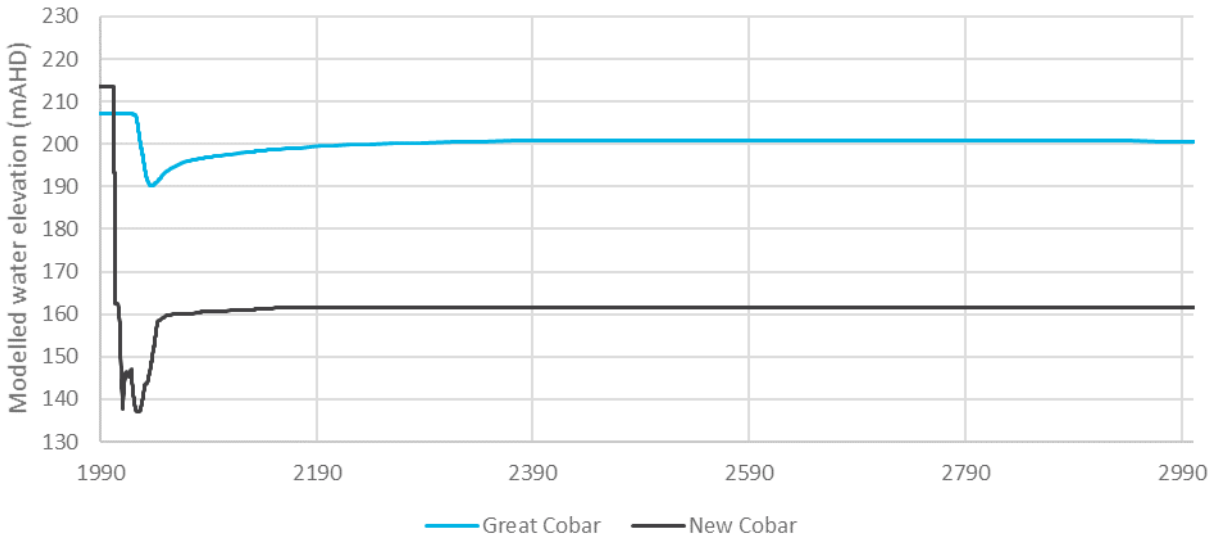

Figure 4.1 Modelled watertable elevation at open cut pits

4.1 New Cobar pit surface flux analysis

As shown in Table 4.1, the New Cobar pit was simulated with drain boundary conditions which were left active post-mining to simulate evaporation. This was considered appropriate to support a conservative impact assessment, with water levels not allowed to fully recover at this location. As noted by Middlemis (EMM 2021c) there was minimal consideration put towards potential development of a pit lake (EMM 2021b).

Modelled groundwater inflows to the New Cobar pit following mining are presented in Figure 4.2. Inflows increase over time as the groundwater level recovers around the pit, stabilising at approximately 45 kL/day. Other water fluxes to/from the pit include incident rainfall (300 mm/year) and pan evaporation (2,400 mm/year).

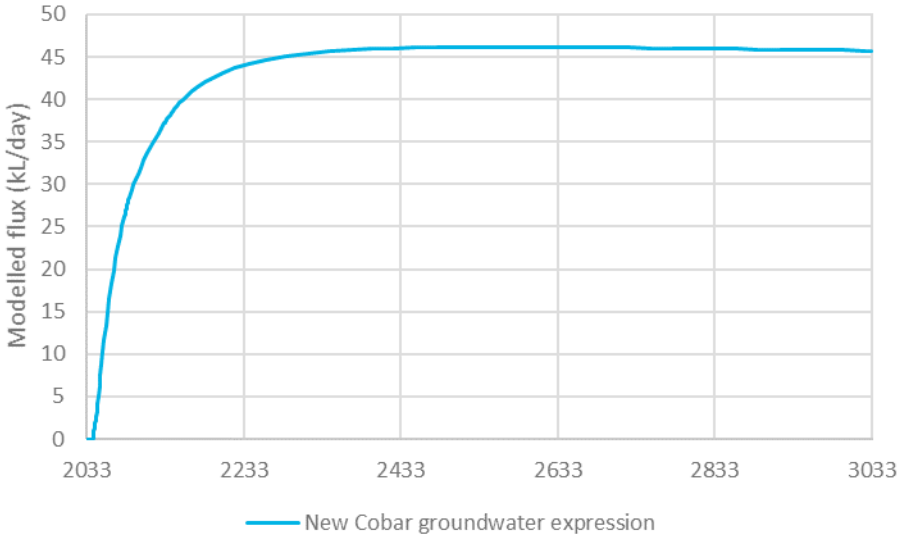

Figure 4.2 Modelled post-mining groundwater discharge to New Cobar open cut pit

The following assumptions are made with regard to potential pit lake surface fluxes:

- incident rainfall is consistent over the pit footprint at 300 mm/year, equating to approximately 49.7 kL/day;
- groundwater inflow is variable, driven by the hydraulic gradient between the pit and surrounding aquifer with an upper limit of 45 kL/day; and
- evaporation occurs at the maximum rate (2,400 mm/year) over the footprint of any standing water in the pit.

Potential net inflows to the pit are dependent on groundwater conditions, ranging from 49.7 kL/day (rainfall only) to 94.7 kL/day (rainfall plus maximum modelled groundwater inflow). For evaporation to balance this inflow, the resultant pit lake area (calculated as incoming water flux divided by 1-dimensional potential evaporation rate) is likely to be between 7,500 m^2 and 14,400 m^2. Analysing the geometry of the New Cobar pit shell, this suggests potential pit lake development with standing water level of 189 mAHD to 208 mAHD.

Measured groundwater salinity in the area has an average TDS of 4,825.6 mg/L (EMM 2021b). Assuming maximum groundwater inflow of 45 kL/day, this equates to a dissolved salt mass of 217.2 g/day entering the pit lake. Consistent groundwater inflow at this rate would result in a pit lake surface at 208 mAHD, with maximum water depth of 50 m and total standing water volume of 299,576 kL. Assuming that rainfall and evaporation contribute no salt flux, the simulated temporal progression of pit lake salinity is presented in Figure 4.3. With a starting salinity of 4,825.6 mg/L (assuming all initial incident rainfall is removed by evaporation), this suggests approximately 20 years of groundwater inflow would need to occur before the pit lake salinity doubles average groundwater values. It should be noted that this constitutes a conservative upper bound assessment based on the assumption that groundwater inflows do not reduce over this time.

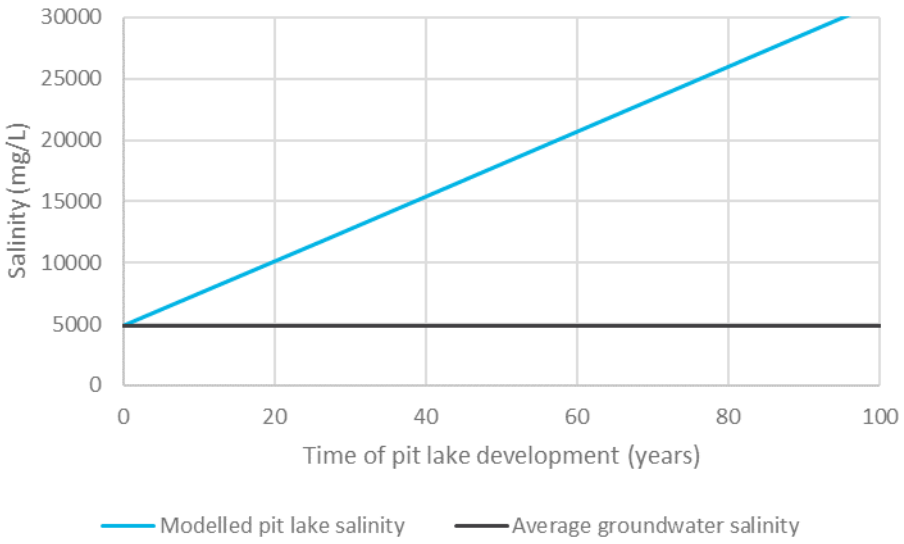

Figure 4.3 Simulated development of pit lake salinity

5 Summary

DPIE Water and NRAR recommended a reassessment of potential impacts at water supply work GW309105 due to incorrect placement in previous studies. The updated assessment suggests potential groundwater impacts will not exceed 2 m at this location, requiring no make good provisions under the AIP. Additional analysis at the New Cobar open cut pit was performed, suggesting potential development of a pit lake with maximum depth of 30 to 50 m.

Yours sincerely

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6 References

Barnett B, Townley L, Post V, Evans R, Hunt R, Peeters L, Richardson S, Werner A, Knapton A, Boronkay A (2012). Australian Groundwater Modelling Guidelines. National Water Commission. http://webarchive.nla.gov.au/gov/20130420190332/http://archive.nwc.gov.au/library/waterlines/82.

DPI 2012, *Groundwater Productivity in NSW.* Map, NSW Department of Primary Industries.

EMM 2021a, New Cobar Complex Project, State Significant Development (SSD10419) Environmental Impact Assessment. Prepared by EMM Consulting on behalf of Peak Gold Mines.

EMM 2021b, New Cobar Complex Project, State Significant Development (SSD10419) Groundwater Impact Assessment. Prepared by EMM Consulting on behalf of Peak Gold Mines.

EMM 2021c, Response to Submissions – New Cobar Complex addendum to the groundwater impact assessment. Prepared by EMM Consulting on behalf of Peak Gold Mines.

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15 November 2021

Jonathon Thompson
Group Manager - Environment
Aurelia Metals

Re: Response to NSW Health request for further information

Dear Jonathon,

1 Background

SLR Consulting (SLR) was engaged by Peak Gold Mines Pty Ltd (PGM) to undertake a human health risk assessment (HHRA) (SLR 2021) to support the Environmental Impact Statement (EIS) (EMM 2021a) prepared by EMM Consulting Pty Limited (EMM) for the New Cobar Complex Project (the Project). The HHRA was based on modelling undertaken for the air quality impact assessment (AQIA) (EMM 2021b) also submitted as part of the EIS.

The project EIS was publicly exhibited from 25 February to 24 March 2021, and the NSW Department of Planning, Industry and Environment (DPIE) wrote to PGM on 31 March 2021 requesting responses to the matters raised by NSW Government agencies, local government authorities and the community that were received during the public exhibition of the EIS.

No submission was received from NSW Health during exhibition period; however a letter of submission was received by DPIE on 13 September 2021 requesting clarification and further information. This memo has been prepared to address the issues raised in that letter.

2 NSW Health submission

2.1 Comment 1

The EPA makes comment from an Air Quality perspective that the Impact assessment does not include a detailed description of the activities undertaken at the Peak complex including the processing circuit and therefore it is unclear whether all relevant emission sources from this facility have been assessed.

When considering uncertainty factors highlighted in the HHRA with understanding Lead (Pb) concentrations data and potential health risk. The recommendation of the EPA in relation to cumulative impacts due to activities undertaken at both complexes, including the processing circuit could also be highlighted for guiding lead (Pb) risks.

2.2 Response 1

The Submissions Report (EMM 2021c) submitted to DPIE in August 2021 included an update to the AQIA which addressed EPA's concerns regarding activities undertaken at both Peak and New Cobar complexes, including the processing circuit.

The AQIA prepared for the EIS included all relevant emissions sources from both complexes, therefore the modelling which underpinned the HHRA included cumulative emissions. The information submitted to EPA regarding their concerns is included in Appendix A.

2.3 Comment 2

It would be helpful to understand Health Risk using the above considerations rather than the existing concentrations of Pb in PM_{10} based on 2017 annual average measured data at a monitoring station at the Hera Mine (~80 km southeast of Cobar).

2.4 Response 2

2.4.1 Assumptions used in the HHRA

As set out in the EIS, blood lead modelling in the HHRA was based on a number of factors, including modelled air lead concentrations from EMM's AQIA. The lead concentrations used in EMM's AQIA modelling were based on high volume air samplers (HVAS) recording total suspended particles (TSP) and particulate matter less than 10 micrometres (PM_{10}) on a one-in-six-day routine.

The HVAS at Cobar was only installed in late 2019, therefore there were limited monitoring data that could be used to characterise existing particulate matter concentrations at the time of the AQIA and HHRA modelling (mid 2020). To supplement the data from Cobar, monitoring data recorded by HVAS from the Aurelia Metals Hera Mine (located approximately 80 km southeast of the New Cobar Complex near Nymagee) were used. While based on a limited set of data points, the AQIA found the distribution of concentrations recorded at the Cobar HVAS and Hera Mine HVAS to be closely aligned.

For the limited period of data available, the average lead concentrations in PM_{10} HVAS samples from Cobar was very low, in the order of 0.02-0.04%. For the period between 2017 to 2020, the average lead concentrations in PM_{10} HVAS samples from Hera was in the order of 0.03-0.04%. This percentage was used by EMM's AQIA to calculate an ambient background concentration of lead in PM_{10} which added a layer of conservatism to the HHRA.

2.4.2 Additional recent data

In response to the comment from NSW Health, PGM has provided additional data from February 2020 to September 2021 from both Cobar and Hera HVAS to confirm the assumptions that underpinned the AQIA and HHRA.

The data from the Hera HVAS is presented below in Figure 2.1, and demonstrates that the median lead concentrations in PM_{10} generated from operations at Hera during this time period is in the order of 0.04-0.05%. While this is a minor increase in the concentration used in the AQIA, the lead concentrations in ambient air remain very low and do not change the conclusions of the AQIA.

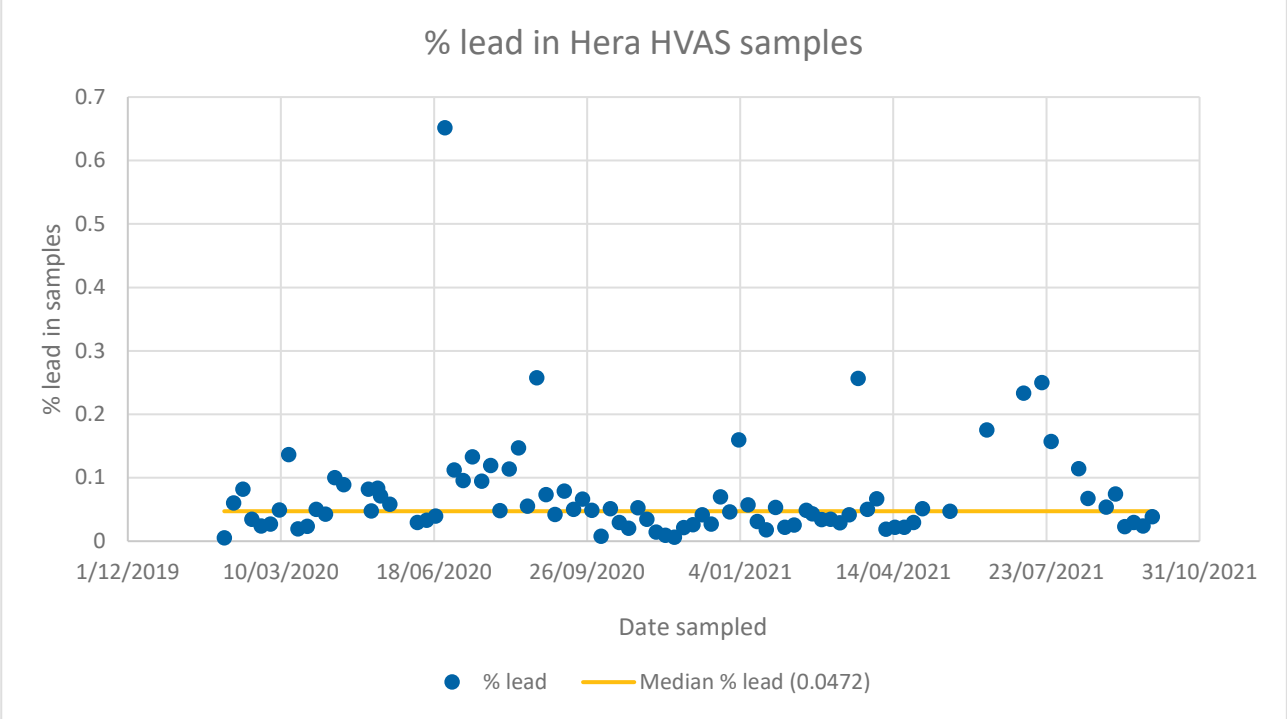

Figure 2.1 Percentage lead in Hera HVAS samples – Feb 2020 to Sep 2021

The data from the Cobar HVAS is presented below in Figure 2.2, and demonstrates that the median lead concentrations in PM_{10} generated from operations at Cobar during this time period is in the order of 0.01-0.03%. This is a decrease in the concentration used in the AQIA, and indicates the assumption used for the HHRA was appropriate, and provides a level of conservatism for the HHRA.

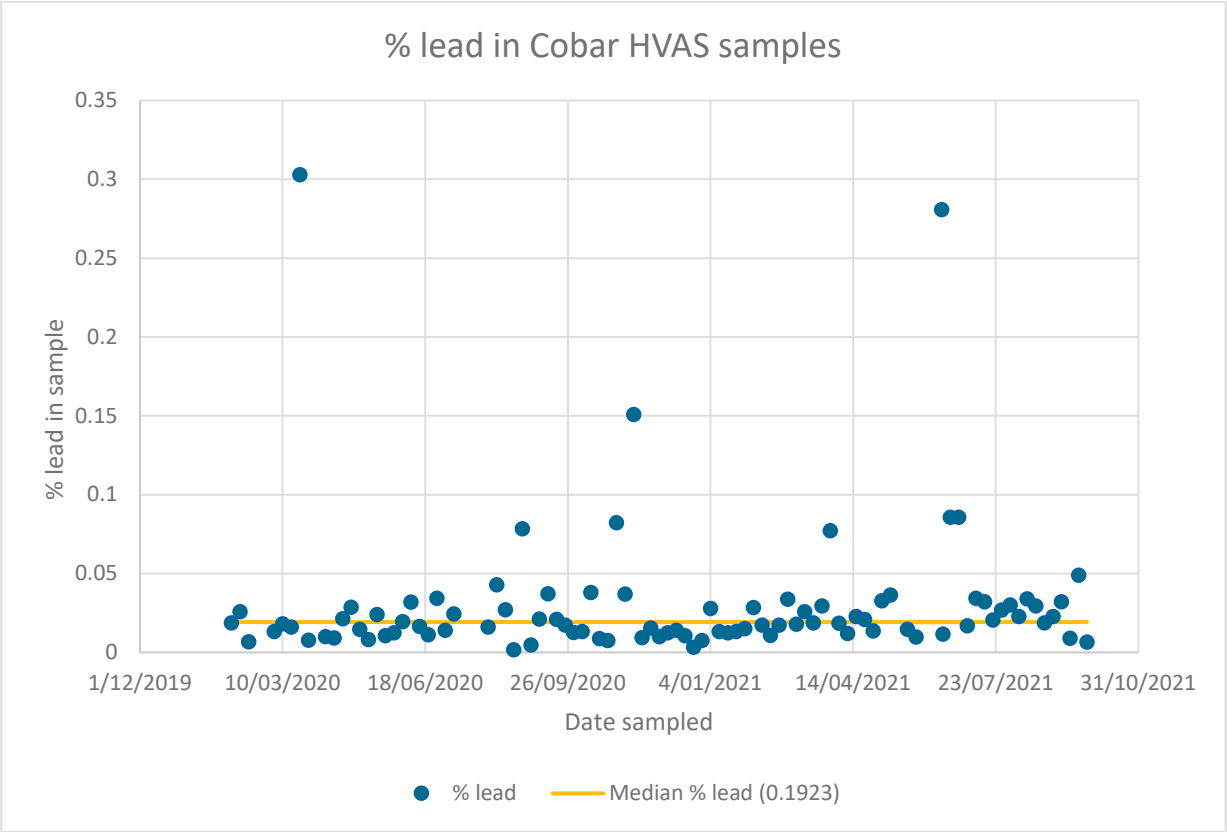

Figure 2.2 Percentage lead in Cobar HVAS samples – Feb 2020 to Sep 2021

Yours sincerely

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References

EMM 2021a, New Cobar Complex Project, State Significant Development (SSD10419) Environmental Impact Assessment. Prepared by EMM Consulting on behalf of Peak Gold Mines.

EMM 2021b, New Cobar Complex Project, State Significant Development (SSD10419) Air Quality Impact Assessment. Prepared by EMM Consulting on behalf of Peak Gold Mines.

EMM 2021c, New Cobar Complex Project, State Significant Development (SSD10419) Submissions Report. Prepared by EMM Consulting on behalf of Peak Gold Mines.

SLR 2021, New Cobar Complex Project, State Significant Development (SSD10419) Human Health Risk Assessment. Prepared by SLR Consulting on behalf of Peak Gold Mines.

Appendix A

Updated air quality information

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19 August 2021

Jonathon Thompson
Group Manager - Environment
Peak Gold Mines

Re: New Cobar Complex Project - Response to Submissions Air Quality Impact Assessment Update

1 Background

EMM Consulting Pty Ltd (EMM) was engaged by Peak Gold Mines Pty Ltd (PGM) to undertake an air quality impact assessment (AQIA) (EMM 2021a) to support the Environmental Impact Statement (EIS) (EMM 2021b) for the New Cobar Complex Project.

The New Cobar Complex Project EIS was publicly exhibited from 25 February 2021 to 24 March 2021, and DPIE wrote to PGM on 31 March 2021 requesting responses to the matters raised by NSW Government agencies, local government authorities and the community that were received during the public exhibition of the EIS.

The NSW Environmental Protection Agency (EPA) made a submission on the project, which requested further clarification on elements of the AQIA.

2 EPA submission request 3

2.1 EPA comment

The EPA requests that the Proponent provides additional information to describe the activities undertaken at both the New Cobar and Peak complexes, including the processing circuit, to demonstrate that the AQIA (EMM 2020b) has accounted for all significant emission sources.

The New Cobar and Peak complexes are inherently interlinked and are covered by one environment protection licence. While the AQIA states that the "processing of ore will only take place at the Peak Complex, therefore is outside the scope of this project", it is noted that the Proposal will produce ore within current development approvals in relation to the New Cobar and Peak complexes (800,000 tpa) and that the AQIA has assessed cumulative impacts due to activities undertaken at both complexes, including the processing circuit. However, the AQIA does not include a detailed description of the activities undertaken at the Peak complex including the processing circuit and therefore it is unclear whether all relevant emission sources from this facility have been assessed.

2.2 Response

2.2.1 Processing circuit – Peak Complex

The processing of run-of-mine (ROM) ore from the New Cobar and Peak complexes through the Peak Complex processing plant involves grinding, cyclone classification, gravity separation, flotation, concentrate filtration, carbon in leach (CIL), elution, carbon regeneration, electrowinning, and smelting. Feed to the plant is crushed underground; suitable for semi-autogenous grinding (SAG) mill feed.

SAG mill discharge feeds onto a double deck vibrating screen. Minus 2 mm material is pumped to three Knelson concentrators where a gold concentrate containing free coarse gold is recovered and sent to a Gekko intensive leach reactor (ILR). The gold rich eluate is then pumped to a dedicated electrowinning cell in the gold room.

The Knelson tail is combined with the -16 mm +2 mm material from the vibrating screen and pumped to a bank of hydrocyclones. Cyclone overflow with an approximate P80 75 µm reports to the flotation circuit. Flotation concentrate is thickened, filtered and discharged onto a concentrate storage pad. From there it is blended and loaded into shipping containers and trucked off site.

Flotation tails report to a thickener and are then fed to the CIP circuit. In the leach circuit, gold is dissolved and adsorbed onto activated carbon. The gold loaded carbon is sent to the elution circuit where it is recovered into a gold rich eluate and pumped to the gold room for electrowinning in a dedicated electrowinning cell. The stripped carbon is regenerated and returned to the leach circuit. The leach circuit tails are thickened to 60% density and pumped to the central discharge tailings storage facility.

2.2.2 Activities and dust emissions – Peak Complex

Section 7.2 of the AQIA details the activities and associated dust emission sources that were quantified for the Peak Complex.

To summarise, the following activities occur at the Peak complex:

- conveying of ROM ore from the underground workings to ROM stockpile;
- haulage of ore and waste rock from underground workings to ROM pad or waste rock emplacement area (wheel-generated dust);
- haulage of New Cobar ore via road trucks (wheel-generated dust);
- unloading of ROM ore from road trucks to ROM stockpile;
- transfer of ROM ore to hopper by front end loader (FEL);
- a processing circuit, of which the sag mill, scalping screen, ball mill and trash screen are dust generating sources, while everything after is a wet process;
- wind erosion from stockpiles and exposed areas; and
- wind erosion from dried out tailings storage facility (TSF) – the inventory assumed that 25% of the total TSF has the potential to generate wind erosion.

There are also assorted existing ventilation outlets for underground operations associated with the Peak Complex that were included as sources of emissions in the AQIA emission inventory and dispersion modelling.

3 EPA submission request 4

3.1 EPA comment

The EPA requests that the Proponent confirms, or provides additional information, that the assumed throughputs outlined in the AQIA adequately represent a reasonable worst-case scenario with consideration given to any potential variations in annual operations and processing capacities at the New Cobar and Peak complexes.

The Environmental Impact Assessment states that current development approvals at the New Cobar and Peak complexes allow for the operations to process up to 800,000 tonnes per annum (tpa) of ore. It is also indicated that the Proposal will produce ore within the existing processing limits (800,000 tpa). However, the Environmental Impact Assessment does not include a breakdown of the proposed annual capacities at the New Cobar and Peak complexes. Table B.2 in the AQIA shows that the assumed ore throughputs are 200,000 tpa for the New Cobar complex and 600,000 tpa for the Peak complex. The EPA is seeking clarification, or further information on the extraction rates from the various mine areas. This should include, but need not be limited too, the following:

- Information on the potential for extraction rates to vary from those assessed in the AQIA; and
- Demonstration that the scenario assessed in the AQIA adequately represents a reasonable worst-case scenario, with consideration of any potential variations in annual operations and processing capacities through the different mine complexes.

3.2 Response

An initial indicative split of material movements at the New Cobar Complex was provided to EMM by PGM for the AQIA, presented in Table 3.1. This data was used to inform the AQIA included in the EIS. At the time of developing the AQIA, PGM was finalising the life-of-mine plan and did not have a detailed analysis of material movements.

Table 3.1 ROM and waste movement – AQIA assumptions – New Cobar Complex

Material	Annual throughput (tpa)
ROM ore from underground	200,000
Waste rock from underground	271,860
Waste rock return to underground	416,990
Total	**888,850**

Since submission of the EIS, a more detailed year by year breakdown of material movements at New Cobar was prepared after the completion of the AQIA modelling. The projected breakdown of material movement by mine year, along with the AQIA assumed material movement rate of 880,850 tpa, is shown in Figure 3.1.

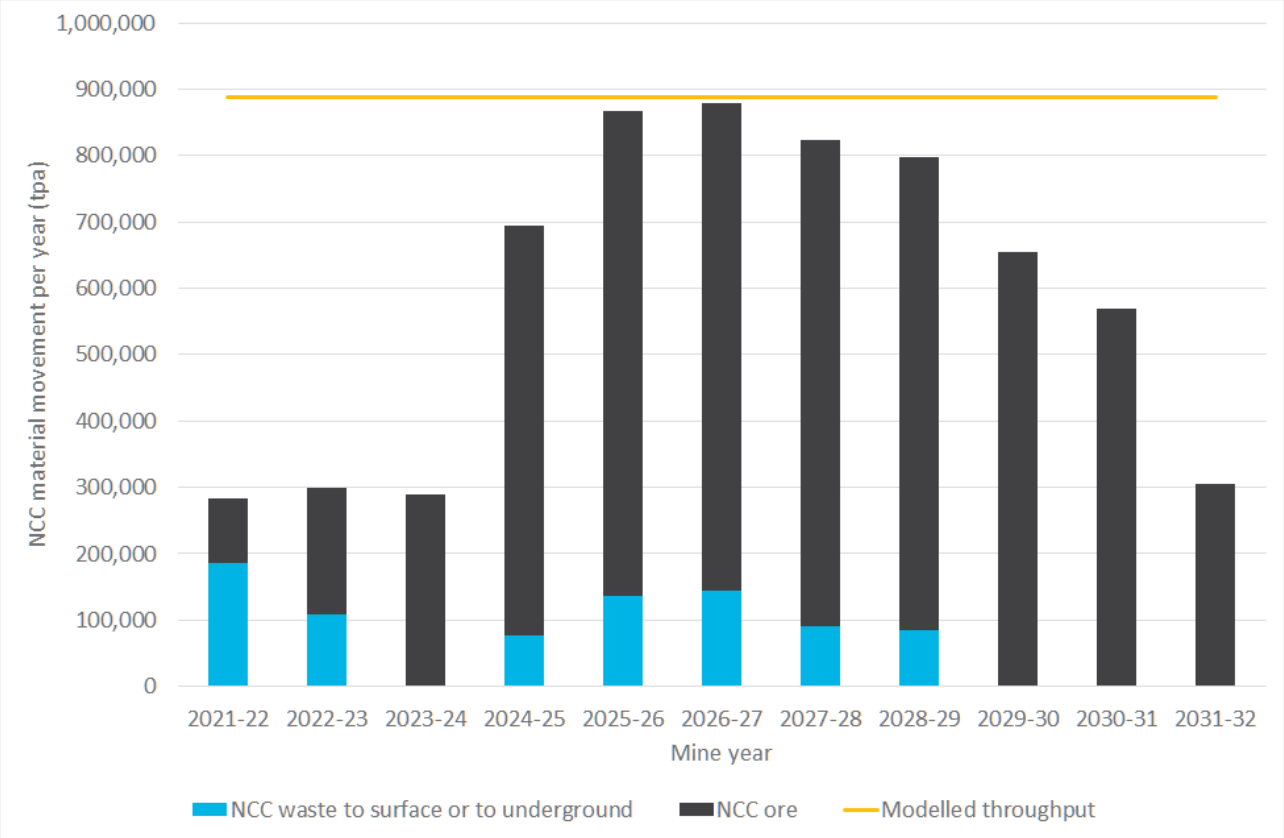

Figure 3.1 New Cobar Complex material movement annual variation

The future projections showed two things:

- the total amount of material (ore, waste from underground, waste to underground) assumed for New Cobar in the AQIA would not be exceeded in any year of the projection presented in Figure 3.1.the amount of waste rock exiting the New Cobar underground and/or returning from the surface waste rock emplacement to underground was overestimated in the AQIA;
- the ore exiting the New Cobar underground would be higher than assumed in the AQIA for several future years; and
- the proportion of ore and waste material exiting the New Cobar underground would vary notably year on year relative to the split adopted in the AQIA;

The financial year 2026-2027 shows the largest amount of material movement from the refined mining schedule. To understand the implications for air quality emissions from the refined material movement profile presented in Figure 3.1, the AQIA emissions inventory for New Cobar complex was revised to the material movement numbers for FY26-27 in the following ways:

- ore from underground to surface – increased from 200,000 tpa to 735,039 tpa;
- waste rock from underground to surface – decreased from 271,860 tpa to 6,449 tpa; and
- waste rock returned from surface to underground – decreased from 416,990 tpa to 136,913 tpa.

All other emission sources at New Cobar and Peak complexes, including the transportation of ore material between New Cobar and Peak, remain consistent with the AQIA emissions inventory.

The AQIA and revised emissions inventory totals are presented in Table 3.2.

Table 3.2 Calculated annual TSP, PM_{10} and $PM_{2.5}$ emissions – AQIA vs revised emissions inventory

Emissions inventory	Calculated annual emissions (tonnes/annum) by source category		
	TSP	PM_{10}	$PM_{2.5}$
AQIA emissions inventory	301.2	88.9	25.1
Revised emissions inventory	302.0	89.1	25.1

The emission totals presented in Table 3.2 show that the revision to ore and waste rock material amounts has resulted in a negligible difference in annual emissions from those assessed in the AQIA.

The dominant source of emissions from the New Cobar Complex, excluding the new or existing ventilation outlets, is the haulage of material (ore and waste) from and returning to the underground workings. Emissions from this source are linked to the amount of material transported on the road, rather than the split of ore and waste rock material. As shown in Figure 3.1, the amount of material transported at the New Cobar Complex in the AQIA (885,850 tpa) is roughly equivalent to the revised amount for FY26-27.

Regarding the spatial distribution of the quantified emissions at the New Cobar Complex, it is noted that waste rock emplacement is located to the northern end of the site, while the ore storage area is located to the south. Decreasing waste rock material handling and transportation would reduce emissions at the northern end of the site and thereby decrease the potential impacts predicted to the north of the New Cobar Complex.

Regarding emissions and impacts of metals and metalloids associated with particulate matter emissions. It is noted that the results of metals and metalloids presented in Table 8.4 of the AQIA are at least an order of magnitude lower than the applicable impact assessment criteria. A change in the balance of ore and waste rock material would not alter the conclusion of compliance with applicable impact assessment criteria.

On the basis of the above analysis, it is considered that the assessed scenario in the AQIA is appropriately conservative to represent potential air quality impacts from the project.

Regarding processing capacities through the different complexes, it is reiterated that all ROM ore processing will occur at the Peak Complex, as assessed in the AQIA.

4 EPA submission request 5

4.1 EPA comment

The EPA requests that the Proponent revises the AQIA to include a step by step detailed discussion regarding the methodology used to establish emission sources parameters.

Based on Figure B.1 in the AQIA, the EPA understands that a number of sources representative of different activities have been combined and modelled as one source. For instance, although it is not clear, it is likely that loading, unloading and wind erosion activities at the New Cobar complex were potentially modelled as either a combined area or a combined area line source. Whilst the EPA recognises the merits of the approach, detailed information is required to allow for a robust and transparent review. The EPA is seeking that the AQIA give consideration to, but need not be limited too, the following:

- providing a summary of individual modelled sources and their corresponding parameters (eg emission rates, initial vertical dimension -if used-, side length, aspect ratio, release heights, etc);
- in the case where various sources were combined into one modelled source, provide a segregated list of the activities included in the modelled source;

- in the case various sources were combined into one modelled source, provide detailed discussion on how the 'combined' total emission rate was estimated and how it accounts (where applicable) for any potential differences in times of the day each activity is proposed to be undertaken; and

- including any other relevant information that is not specified in points a -c above.

4.2 Response

A description of emission sources configured in the AERMOD dispersion modelling conducted for the AQIA is presented in Table 4.1.

Emissions were grouped if the type of activity, location of activity and emissions variability was similar. For example, FEL operations at the Peak Complex ROM stockpile and the unloading of ROM ore material from trucks to the stockpile were combined in the same model source. Emissions from these two activities utilise the same emission factor and have emissions variability driven by wind speed.

Further, line-volume sources were used where a spread of activities could occur over a broader area, for example FEL operations at the New Cobar waste material stockpile.

As a general note, EMM consider that, due to the separation distance between sensitive receptor locations and the modelled emission sources associated with surface activities at the New Cobar Complex and the Peak Complex, the grouping of emissions within model sources and the initial release parameters of model sources are unlikely to influence the resultant predicted concentrations.

Table 4.1 AERMOD dispersion model source configuration and emission allocation

Type	ID	Description	Release height (m)	Sigma Y (m)	Sigma Z (m)	Source side length (m)	Line-volume height (m)	Plume width (m)	Exit diameter (m)	Exit velocity (m/s)	Exit temperature (K)	Release type	Emissions associated
Point	Point 1	New vent	0	-	-	-	-	-	5.6	13.0	292	Vertical	Proposed vent shaft
	Point 2	Jubilee Vent	5	-	-	-	-	-	4.5	10.4	292	Vertical	Jubilee Vent
	Point 3	Peak vent shaft	5	-	-	-	-	-	4	12.1	292	Vertical	Peak vent shaft
	Point 4	Perseveranc e #2	2.5	-	-	-	-	-	4	14.2	292	Horizontal	Perseverance #2
	Point 5	Perseveranc e #3	2.5	-	-	-	-	-	4	14.2	292	Horizontal	Perseverance #3
	Point 6	Chesney vent stack	5	-	-	-	-	-	6	1.2	292	Vertical	Chesney vent stack
Volume	Volume 1	Peak ROM pile loading	5	1.16	1.16	5	-	-	-	-	-	-	ROM stockpile loading at Peak complex
Line-volume	Line 1	Peak Access Rd - existing	3.4	-	-	-	6.8	10	-	-	-	-	Peak complex access road - existing traffic
	Line 2	Peak Processing Plant	2.5	-	-	-	5	9	-	-	-	-	Assorted Peak processing plant emission sources
	Line 3	New Cobar pit haul	3.4	-	-	-	6.8	10	-	-	-	-	Trucks from underground and return trucks with waste to underground
	Line 4	New Cobar waste dump haul	3.4	-	-	-	6.8	10	-	-	-	-	Surface haulage of waste from New Cobar pit to waste emplacement
	Line 5	New Cobar ore haul	3.4	-	-	-	6.8	10	-	-	-	-	Surface haulage of ROM ore from New Cobar pit to ROM stockpile

Table 4.1 AERMOD dispersion model source configuration and emission allocation

Type	ID	Description	Release height (m)	Sigma Y (m)	Sigma Z (m)	Source side length (m)	Line-volume height (m)	Plume width (m)	Exit diameter (m)	Exit velocity (m/s)	Exit temperature (K)	Release type	Emissions associated
	Line 6	New Cobar Haul - existing	3.4	-	-	-	6.8	10	-	-	-	-	New Cobar ROM unsealed road - existing traffic
	Line 7	Peak rom haul unsealed - existing	3.4	-	-	-	6.8	10	-	-	-	-	Peak complex unsealed road - existing traffic
	Line 8	Peak ROM FEL	3.4	-	-	-	6.8	10	-	-	-	-	Unloading ROM ore at stockpile and ROM ore handling by FEL
	Line 9	Peak UG haulage	2.6	-	-	-	5.1	9	-	-	-	-	Haulage from Peak Underground portal to ROM pile
	Line 10	New Cobar Waste Dump ops	1	-	-	-	2	26	-	-	-	-	Unloading of ROM from underground and loading of road trucks for transportation to Peak Complex
	Line 11	New Cobar ROM Pile FEL	1.5	-	-	-	3	31	-	-	-	-	Unloading of waste trucks from underground and loading of waste to trucks for return to underground
	Line 12	New Cobar waste haul to pit	3.4	-	-	-	6.8	10	-	-	-	-	Surface haulage waste to underground
	Line 13	New Cobar Product Haul - increased	3.4	-	-	-	6.8	10	-	-	-	-	Ore haulage to exit - proposed increased
	Line 14	Peak Access Rd - increased	3.4	-	-	-	6.8	10	-	-	-	-	Peak Complex access road - increased traffic

Table 4.1 AERMOD dispersion model source configuration and emission allocation

Type	ID	Description	Release height (m)	Sigma Y (m)	Sigma Z (m)	Source side length (m)	Line-volume height (m)	Plume width (m)	Exit diameter (m)	Exit velocity (m/s)	Exit temperature (K)	Release type	Emissions associated
	Line 15	Peak ROM haul unsealed - increased	3.4	-	-	-	6.8	10	-	-	-	-	Peak Complex ROM unsealed road - existing traffic
Area polygon	Area 1	TSF Peak	0	-	0	-	-	-	-	-	-	-	Wind erosion - Peak Complex TSF
	Area 2	Peak ROM pad WE	2	-	0	-	-	-	-	-	-	-	Wind erosion - Peak Complex ROM pad
	Area 3	Peak Exposed Areas WE	0	-	0	-	-	-	-	-	-	-	Wind erosion - Peak Complex exposed areas
	Area 4	New Cobar Pit WE	0	-	0	-	-	-	-	-	-	-	Wind erosion - New Cobar pit
	Area 5	New Cobar waste dump WE	2	-	0	-	-	-	-	-	-	-	Wind erosion - New Cobar waste emplacement
	Area 6	New Cobar ROM stockpile WE	2	-	0	-	-	-	-	-	-	-	Wind erosion - New Cobar ROM stockpile

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5.1 EPA comment

The EPA requests that the Proponent revises the AQIA to benchmark the proposed mitigation measures against best practice dust control measures.

It is noted that the AQIA does not predict additional exceedances at any of the identified privately-owned receptor locations and that it includes mitigation measures primarily through the use of water for dust suppression. Nonetheless, considering the proximity to Cobar, a detailed review of best practice dust control measures is necessary to demonstrate that the proponent has evaluated and/or committed to all reasonable and feasible mitigation measures to prevent and minimise air pollution. Particular emphasis should be given to the largest emissions sources such as the proposed ventilation shaft, the existing ventilation shafts, and activities related to hauling and wind erosion. The EPA is seeking that the AQIA give consideration to, but need not be limited too, the following:

- any measures to minimise emissions from the ventilation shafts, including those that can be implemented when undertaking underground works;
- the use of chemical suppressants to reduce emissions from haulage on unpaved roads; and
- the use of alternative methods (ie conveyors, subsurface transportation) to transport ore from the proposed New Cobar complex to the peak complex.

5.2 Response

Section 7.3 of the AQIA details the emissions inventory for the project and emission sources associated with the Peak Complex. The contribution to project (ie related to the New Cobar Complex) particulate matter emissions by source category and particle size fraction is presented in Figure 5.1. The rank of contribution by source type to total annual emissions is presented in Table 5.1.

Table 5.1 Rank of source contribution to total project emissions – New Cobar Complex project only

Source type	Rank of source contribution to total emissions		
	TSP	PM_{10}	$PM_{2.5}$
Unpaved haulage	1	1	2
Material handling	4	4	4
Wind erosion	3	3	3
Ventilation outlets	2	2	1

It can be seen from Figure 5.1 and Table 5.1 that the emissions from unpaved haulage and the proposed new ventilation outlet are the most significant contributors to total project emissions across all particle size fractions. It is highlighted that the emission calculations for ventilation outlet emissions are considered highly conservative due to the application of the maximum recorded in-stack particulate matter concentration from existing ventilation outlets at the site.

Emissions from wind erosion are also reasonably significant contributors to all size fractions. Material handling emissions are relatively minor contributors to annual project emissions.

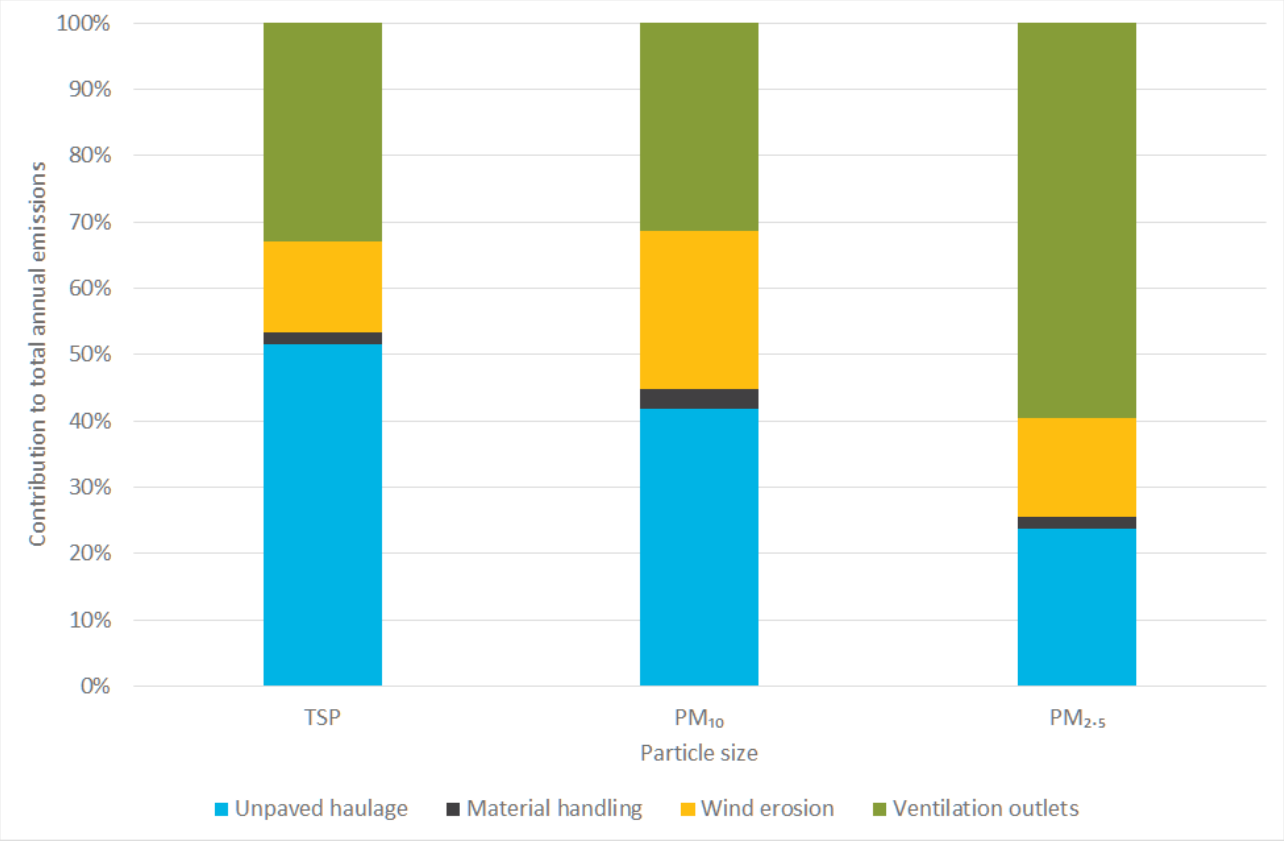

Figure 5.1 Contribution to annual emissions by emissions source type and particle size – New Cobar project emission sources

The permanent mitigation measures implemented across all of Peak Gold Mine surface operations (New Cobar and Peak complexes) include:

- watering of active operational areas and haul roads subsequent to frequent vehicle movements;
- watering of conveyor belts and feeder chutes within the Peak Complex processing plant;
- watering of all material stockpiles;
- earthworks are undertaken when there is sufficient moisture content in the soil and low wind speed;
- sealing of all major access roads;
- areas of disturbance are minimised by restricting vegetation clearance ahead of construction and exploration activities;
- all equipment utilised on site is maintained in an efficient and effective manner;
- implementing progressive rehabilitation to all disturbed land; and
- rotating tailings discharge on the TSF.

In addition, high-pressure sprays and a street sweeper are used to clean sealed roads within the complexes. Concrete walls around the concentrate pad also reduce the amount of dust generated from the stockpiles. All haul trucks travelling between the New Cobar and Peak Mining complexes cover their loads to reduce dust generation during transportation.

In November 2011, the OEH published the guideline *Coal Mine Particulate Matter Control Best Practice Site-specific determination* (OEH, 2011). This guideline document provides detail of the process to follow when conducting a site-specific determination of best practice measures to reduce emissions of particulate matter from coal mining activities. While not specifically related to the project, a comparison of the proposed dust control measures at the project with best practice dust management techniques, consistent with this guideline, has been undertaken. For the purpose of this report, best practice dust control measures have been collated from the following document:

- *NSW Coal Mining Benchmarking Study: International Best Practice Measures to Prevent and/or Minimise Emissions of Particulate Matter from Coal Mining* (Katestone, 2011).

The review of proposed dust control measures for the project with best practice measures is presented in Table 5.2. Across the range of particulate matter emission sources listed, the associated control measures proposed for the project are generally consistent with best practice measures wherever practicable taking the specifics of the project into consideration.

Table 5.2 Best practice particulate matter control measures review

Emissions source category	Best practice control measures (Katestone, 2011)	Proposed for implementation at project	Comments
Unpaved haul roads	Surface treatment - chemical suppressants	No	Chemical dust suppression is not implemented at the project as water suppression is considered sufficient. This is supported by historical air quality monitoring records.
	Surface treatment - watering	Yes	All unpaved haul routes are controlled through water suppression
	Surface improvements - low silt aggregate	Yes	Site roads are constructed with road base and maintained regularly. Fines become an issue with use and are managed accordingly.
	Surface improvements - pave the surface	Yes where practical	The main access road to the Peak Complex and first 50 m of the New Cobar entrance roads are sealed. Not practicable for other roads at either site to be sealed.
	Reduction in vehicle travel speed	Yes	Speed limit within the site is generally 20 km/hr, and ranges between 40 km/hr and 10 km/hr depending on the level of vehicle/pedestrian traffic.
	Use larger vehicles rather than smaller vehicles to minimise number of trips	Yes	Haul trucks from underground are optimised to balance size constraints and load size
	Use conveyors in place of haul roads	No	Not practicable to replace haul trucks from underground or between New Cobar and Peak Complex with conveyors
Wind erosion - exposed areas and overburden emplacements	Avoidance - Minimise pre-strip areas	Yes	Minimal new surface disturbance is associated with the project
	Surface stabilisation - Watering	Partial	Surface areas of active work are serviced by a water cart for wet suppression purposes
	Surface stabilisation - Chemical suppressants	No	Not practical or necessary for New Cobar Complex waste rock emplacement (WRE). This is supported by historical air quality monitoring records
	Surface stabilisation - Paving and cleaning	No	Not necessary for New Cobar Complex WRE. This is supported by historical air quality monitoring records
	Surface stabilisation - armour with gravel	No	Not necessary for New Cobar Complex WRE. This is supported by historical air quality monitoring records

Table 5.2 Best practice particulate matter control measures review

Emissions source category	Best practice control measures (Katestone, 2011)	Proposed for implementation at project	Comments
	Surface stabilisation - Rehabilitation	Yes	Progressive rehabilitation of exposed surfaces, topsoil stockpiles and WRE will provide vegetative cover for exposed areas
	Wind speed reduction - fencing, bunding, shelterbelts or in-pit dumps	Partial	New Cobar Complex is surrounded by bunding and fencing.
	Wind speed reduction - vegetative ground cover	Yes	Progressive rehabilitation of exposed surfaces, topsoil stockpiles and WRE will provide vegetative cover for exposed areas
Wind erosion from ore material stockpiles	Avoidance - bypassing stockpiles	No	Ore material stockpiles are a necessary component of the project
	Surface stabilisation - watering	Yes	Material stockpiles are serviced by water sprays and / or water carts for dust suppression
	Surface stabilisation - chemical suppressants and crusting agents	No	Not practicable given stockpiles are continually accessed
	Surface stabilisation - carry over from wetting from load in	Yes	Material stockpiles are serviced by water sprays and / or water carts for dust suppression
	Enclosure - silo with baghouse	No	ROM stockpile at New Cobar is continually accessed, and enclosure is not practicable
	Enclosure - cover storage pile with tarp during high winds	No	ROM stockpile at New Cobar is continually accessed, and tarping is not practicable
	Wind speed reduction - vegetative wind breaks	Yes	New Cobar Comp;ex site features an established vegetation tree barrier between ROM stockpile area and Kidman Way
	Wind speed reduction - reduced pile height	Yes	ROM stockpile is accessed by truck dumping and FEL, therefore stockpile heights are limited
	Wind speed reduction - wind screens/wind fences	Yes	New Cobar Complex is surrounded by bunding and fencing.
	Wind speed reduction - pile shaping/orientation	No	ROM material stockpiling occurs over a broad area rather than a fixed point. Therefore, traditional pile shaping and

Table 5.2 Best practice particulate matter control measures review

Emissions source category	Best practice control measures (Katestone, 2011)	Proposed for implementation at project	Comments
			orientation with dominant wind directions is not practical for New Cobar ROM ore stockpile area
	Wind speed reduction - three-sided enclosure around storage piles	No	While ROM stockpile area is surrounded by earth bunds, a three sided enclosure is not practical for New Cobar ROM ore stockpile area
Loading and dumping waste rock	Excavator - minimise drop height	Yes	Wherever possible, material drop heights will be minimised when loading trucks at the WRE
	Truck dumping - minimise drop height	Yes	Wherever possible, material drop heights will be minimised when unloading trucks at the WRE
	Truck dumping - water application	No	Water carts will supply wet suppression to travel routes and working areas at the WRE; however, specific water application to unloading trucks is unlikely to be practical
	Truck dumping - modify activities in windy conditions	Yes	Dumping of material at the WRE will be conducted behind an existing earth bund.
Loading and dumping ROM ore	Avoidance - bypassing stockpiles	No	Not practicable given stockpiles are necessary for the project
	Truck dumping - minimise drop height	Yes	Wherever possible, material drop heights will be minimised when unloading trucks at the ROM stockpile area
	Truck dumping - water sprays at ROM pad	Yes	Water carts are used to control dust generation at to the ROM stockpile area
	Truck dumping - three sided enclosure at truck unloading ROM hopper	NA	No ROM hopper at the New Cobar Complex

The NSW EPA submission raised the following specific matters with regards to dust control measures:

- any measures to minimise emissions from the ventilation shafts, including those that can be implemented when undertaking underground works;8
- the use of chemical suppressants to reduce emissions from haulage on unpaved roads; and
- the use of alternative methods (i.e. conveyors, subsurface transportation) to transport ore from the proposed New Cobar Complex to the Peak Complex.

Regarding emissions from ventilation outlets, the following measures are currently implemented to control emissions from underground operations:

- sprinklers in the decline used as required;
- stand-off zones and times after firing stopes to ventilate the areas;
- washing down of faces, backs and walls as required; and
- drill rigs are connected to mains power during drilling.

Regarding the use of chemical suppressants, no chemical suppression methods are proposed by PGM. The predictions of air quality impacts from the surface operations at New Cobar Complex are low and historically have not been an issue for PGM with regards to community complaints or ongoing compliance monitoring. However, should dust emissions become an issue, PGM would investigate additional measures, such as chemical suppressants, necessary to increase controls.

Regarding the use of alternative methods for the transportation of extracted ROM ore material from New Cobar to the Peak Complex processing plant, there is no direct underground link between the two sites.

The distance between the two sites on the surface is approximately 6 km. PGM consider that the life of mine or the air quality emissions and impacts from road transportation would not justify the cost of an overland conveyor. The conveyor would require significant disturbance between the New Cobar and Peak complex and would require need to cross a major state-owned road (Kidman Way). PGM consider that road trucks are the only viable surface based option for implementation at the project.

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6.1 EPA comment

The EPA recommends that the Proponent nominates and commits to the implementation of mitigation measures during the construction phase of the Proposal, if approval is granted.

The AQIA indicates that the construction phase of the Proposal is expected to take six months and therefore the potential emissions will be minor and shorth term in nature. Nonetheless, considering the proximity of the proposed construction works to Cobar, the EPA considers that the Proponent must nominate and commit to specific mitigation measures to be undertaken during the construction works as required.

6.2 Response

The construction phase referenced in the AQIA was covered under a separate Review of Environment Factors for the Great Cobar Exploration Decline project (RW Corkery 2020), which was approved by the NSW Resources Regulator in May 2020. Particulate matter emissions from construction activities will be managed in accordance with routine air quality emission management practices currently implemented at site.

7 References

EMM 2021a, New Cobar Complex Project, State Significant Development (SSD10419) Environmental Impact Assessment. Prepared by EMM Consulting on behalf of Peak Gold Mines.

EMM 2021b, New Cobar Complex Project, State Significant Development (SSD10419) Groundwater Impact Assessment. Prepared by EMM Consulting on behalf of Peak Gold Mines.

Katestone 2011, *NSW Coal Mining Benchmarking Study: International Best Practice Measures to Prevent and/or Minimise Emissions of Particulate Matter from Coal Mining*

RW Corkery 2020, *Great Cobar Exploration Decline Review of Environmental Factors Revised Underground and Surface Infrastructure*

Yours sincerely

Scott Fishwick
National Technical Lead - Air Quality

sfishwick@emmconsulting.com.au

From: Jonathon Thompson
To: Alejandro Vesga
Cc: Matthew Corradin; Philip Nevill; Ellie Evans; Rob Morris
Subject: RE: Expected waste production for the New Cobar Complex and Peak Facility.
Date: Thursday, 7 October 2021 2:53:19 PM
Attachments: image001.png

Hi Alejandro,

It has taken me longer than expected to provide you a response. However, I wanted to ensure that my response was adequate and met your expectations so I wanted to confirm a couple of things with Scott Fishwick (EMM, air quality expert) prior to responding.

I have responded to your questions in green text below:

1. The reasons behind the significant changes in the assumed ore and waste quantities between the time the AQIA was prepared and the submission of the Response to Submissions report. For your reference, please see an extract from Appendix B in the Response to Submissions Report (EMM, 2021).

The mine planning information used to inform the EIS was developed in early 2019 when we commenced pulling the environmental impact statement (EIS) together. At the time, we had limited information available for the future plan for the Great Cobar and Gladstone deposits however, we knew we had a project and a basic mine plan. We redo our mine planning approximately twice per year using up dated ore reserves, assumptions and waste rock balances. As such, the model has been updated as time has passed. The key thing to note is, the total material movements is materially the same.

2. It was previously indicated in the EIS that waste from the Peak Facility will be transported into the New Cobar Complex. Can you provide some additional information that can transparently and robustly demonstrate the expected amount of waste to be transported from the Peak Facility to the New Cobar Complex has been adequately accounted for in the AQIA and/or the RtS.

We have confirmed that the total amount of material (waste rock and ore) transferred between the New Cobar Complex (NCC) and Peak Complex in any given year will not exceed 800,000 tonnes per annum (tpa). The reason we have certainty is, the Peak Complex processing plant is approved to process up to 800,000 tpa. This ore material is sourced from the New Cobar Complex underground mine and the Peak Complex underground mine. This is a key point as it will be the main driver for waste rock and ore movements between the New Cobar Complex and Peak Complex. To try and simplify and summarise this for you:

- Waste rock is required to fill empty voids underground once we remove the ore;
- In years when the mining rate at New Cobar Complex is high (e.g. in FY26 it is predicted that 735,039t of ore) the mining rate at the Peak Complex will be low. Waste rock will be required to fill the voids at the New Cobar Complex which can largely be sourced from the existing waste rock emplacement and new sources underground;
- in these years, predominately ore will be trucked between New Cobar Complex and Peak Complex but little waste rock movements will be required;

- Alternatively, in years when ore production is low at the New Cobar Complex, most of the ore feed for the processing plant will come from the Peak Complex;
- This means there will be fewer loads of ore between New Cobar Complex and Peak Complex but more waste rock movements will be required.

Ore and waste rock movements are interconnected between New Cobar and Peak. EMM have revised the assumptions in the RtS emissions inventory to reflect the highest waste/ore production year and to match the maximum processing rate at the Peak Complex process plant. All relevant assumptions in the model have been updated to reflect the maximum processing rate:

- **Ore loaded to trucks at New Cobar Complex to be transported to Peak Complex**- An increase in the amount of ore loaded to outgoing trucks at the New Cobar Complex to 735,039 tpa to match the maximum year in the mine plan.
- **Ore truck movements between New Cobar Complex and Peak Complex** - There is no change in the amount of truck movements per day as the EIS AQIA assumed 100 truck movements per day.
- **Ore processing at Peak Complex** - processing of ore by the Peak Complex processing plant is approved up to 800,000 tpa which is unchanged from existing consents, EIS AQIA and RtS letter.
- **Peak Complex Ore movements** - To match the ore processing limit of 800,000 tpa, the amount of ore coming from the Peak Complex underground mine was modelled to be the following:
    - Total ore material from Peak Complex underground mine = 64,961 tpa (800,000 tpa – 735,039 tpa (maximum predicted mine plan incoming ore from New Cobar Complex))
    - 2/3 of ore material from Peak Complex underground mine via mine shaft = 43,307 tpa
    - 1/3 of ore material from Peak Complex underground mine via underground trucks = 21,653 tpa
- **Ore unloaded from trucks (New Cobar Complex road trucks or Peak Complex underground trucks) at ROM stockpile** – 756,692 tpa (753,039 tpa + 21,653 tpa)
- **Waste rock transported from Peak Complex to New Cobar Complex** = 64,961 tpa (800,000 tpa – 735,039 tpa (NCC ore to Peak))
- **Waste rock unloaded at New Cobar Complex waste emplacement area** = 71,410 tpa (6,449 tpa (New Cobar Complex underground waste rock) + 64,961 tpa (Peak Complex waste rock)).
- **Unpaved haulage emissions associated with waste rock transportation at New Cobar Complex** = annual throughput increased to 71,410 tpa.

The result of the above changes to the assumptions associated with the emissions inventory returned the following annual emissions totals (along with the EIS AQIA and RtS letter emission inventory totals):

Emissions scenario	Annual emissions (tpa)		
	TSP	PM_{10}	$PM_{2.5}$
EIS AQIA	301.2	88.9	25.1
AQIA RtS letter (19 August 2021)	302.0	89.1	25.1
Modified inventory (this response)	301.8	89.4	25.2

As described above, the revised assumptions match the highest production year from New Cobar Complex and are therefore conservative and the change in assumptions will not significantly change the calculated emissions relative to the EIA AQIA or RtS emissions inventory totals that were previously provided.

If you have any additional comments, please do not hesitate to contact me.

Regards,

Jonathon Thompson
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From: Alejandro Vesga <Alejandro.Vesga@epa.nsw.gov.au>
Sent: Thursday, 30 September 2021 4:49 PM
To: Philip Nevill <Philip.Nevill@planning.nsw.gov.au>
Cc: Matthew Corradin <Matt.Corradin@epa.nsw.gov.au>; Jonathon Thompson <Jonathon.Thompson@aureliametals.com.au>
Subject: FW: Expected waste production for the New Cobar Complex and Peak Facility.

> You don't often get email from alejandro.vesga@epa.nsw.gov.au. Learn why this is important

Good afternoon Philip,

I apologise, I inadvertently did not copy you in the original email sent out to Jonathon.
Please see email below for your reference.

Regards,

From: Alejandro Vesga
Sent: Thursday, 30 September 2021 3:26 PM
To: jonathon.Thompson@aureliametals.com.au
Cc: Matthew Corradin <Matt.Corradin@epa.nsw.gov.au>; Rhys Watson <Rhys.Watson@epa.nsw.gov.au>
Subject: Expected waste production for the New Cobar Complex and Peak Facility.

Good afternoon Jonathon,

Thank you for your time today.

As discussed during today's meeting, the EPA is seeking to understand:

1. The reasons behind the significant changes in the assumed ore and waste quantities between the time the AQIA was prepared and the submission of the Response to Submissions report. For your reference, please see an extract from Appendix B in the Response to Submissions Report (EMM, 2021).

    - *ore from underground to surface – increased from 200,000 tpa to 735,039 tpa;*
    - *waste rock from underground to surface – decreased from 271,860 tpa to 6,449 tpa; and*
    - *waste rock returned from surface to underground – decreased from 416,990 tpa to 136,913 tpa*.

2. It was previously indicated in the EIS that waste from the Peak Facility will be transported into the New Cobar Complex. Can you provide some additional information that can transparently and robustly demonstrate the expected amount of waste to be transported from the Peak Facility to the New Cobar Complex has been adequately accounted for in the AQIA and/or the RtS.

Please note that the requested additional information will provide the EPA with confidence that the total material to be transported (to and from) and handled at the proposed New Cobar Project (ore and waste) has been accounted for.

Please let me know if you have any questions or comments.

Alejandro Vesga
Technical Advisor – Technical Advice - Air
Regulatory Practice & Environmental Solutions,
NSW Environment Protection Authority
D 02 9995 6074

www.epa.nsw.gov.au @NSW_EPA

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