

18 March 2022

Mr Stephen O'Donoghue
Director Resource Assessments
Energy, Resources and Compliance
Department of Planning, Industry and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Email to: stephen.odonoghue@planning.nsw.gov.au
rose-anne.hawkeswood@planning.nsw.gov.au

Attention: Rose-Anne Hawkeswood

Dear Stephen

Re: Bowdens Silver Project (SSD 5765) – Request for Water Supply Amendment

I am writing to request the agreement of the Planning Secretary (or their delegate) to an amendment to the Bowdens Silver Project (the Project) in accordance with Clause 37 of the *Environmental Planning and Assessment Regulation 2021*. The proposed amendment involves:

- removal the previously proposed water supply pipeline as a Project component;
- amendment to the Mine Site layout to support the proposed integrated water management and supply strategy; and
- amendment to the alignment of the 500kV transmission power line to reduce the visual impact of the infrastructure.

Bowdens Silver Pty Limited (Bowdens Silver) is seeking approval to develop and operate an open cut mine 2km to 3km northeast of Lue and 26km east of Mudgee to extract almost 30 million tonnes (Mt) of ore from which silver, zinc and lead would be extracted and despatched as concentrates. R.W. Corkery & Co was commissioned by Bowdens Silver to prepare an Environmental Impact Statement (EIS) for the Project that was publicly exhibited between 2 June 2020 and 27 July 2020. Since that time, the Project has been amended to include the proposed realignment of the existing 500kV power transmission line that traverses the Mine Site.

A component of the Project presented in the EIS was a proposed 58.5km water supply pipeline that was to extend from the Mine Site to the Ulan coalfields and supply water to the Project. Commercial negotiations to secure the water supply have been ongoing during the EIS preparation, exhibition and submissions response periods. However, at this time Bowdens Silver has decided to defer the option to use a pipeline to supply water to the Mine Site. The Project will now proceed through the final stages of development assessment without this component. It is therefore proposed that the Project be amended to remove the proposed water supply pipeline.

It is acknowledged that this was one of three key components of the Project (the others being the Mine Site and relocated Maloneys Road) and that assessment was still occurring on environmental

risks and impacts. It is considered that this amendment would vastly simplify the Project for development assessment and for the community. This includes removing the necessary physical disturbance of land, possible disruption for construction and the need to establish an easement for the length of the pipeline on private and publicly owned land. For Bowdens Silver it removes the need for additional commercial arrangements as well as costs and time associated with developing the infrastructure including pumping stations and water treatment facilities.

Bowdens Silver has not reached this decision lightly and has been investigating alternate methods and strategies to optimise water use and management for the Project as well as alternate water sources. This has involved further data collection, assessment and technical advice. The proposed water supply and management strategy secures the needs of the Project without requiring the previously proposed water supply pipeline. The updated water supply and management strategy would require additional infrastructure within the Mine Site to support the optimisation of water demand and management. This would require additional land (and associated vegetation clearing) but it is noted that this is more than offset by the removal of the pipeline. Bowdens Silver holds the required water licence entitlements for the proposed water supply strategies. This will ensure that water sources are consistent with the Company's legal rights and would not significantly impact other water users including the natural environment.

The integrated water management and supply strategy requires the amendment of the Mine Site layout to incorporate infrastructure required to support the strategy. In addition, minor refinements to the Mine Site layout have been incorporated to provide a more compact Mine Site with infrastructure location selected to minimise indirect as well as direct impacts.

The principal issue raised in response to the Amendment Report and the proposed re-alignment of the 500kV power transmission line was the potential visual amenity impacts of the proposed alignment. Bowdens Silver commissioned GHD Pty Ltd (GHD) to review and undertake modelling of the alignment to assess if an alternative may provide a better outcome in terms of visual amenity for landholders to the west of the Mine Site, while ensuring there was suitable clearance from mining and that the terrain may support the infrastructure. An alternative alignment to the 500kV transmission power line is now proposed that mitigates the visual impacts of the re-alignment this is necessary for the development of the main open cut pit.

The amendment would be supported by an Amendment Report that has been prepared with regard to the *State significant development guidelines – preparing an amendment report – July 2021*. The report will present the amended Project and a review of the proposed water supply and management strategy including the following.

- a) Description of the proposed amendments to the Project.
- b) Description of the revised water supply and management strategy for the Project.
- c) Amended Project Description.
- d) Description of the strategic and statutory context for the proposed amendments.
- e) Assessment of the environmental impacts of the proposed amendments.
- f) Updated evaluation of the Project as a result of the amendments.

The Amended Project Description includes updates to the majority of figures to reflect the changes to the Project. A change log (as required under Clause 37(6) of the *Environmental Planning and Assessment Regulation 2021* is attached to this letter that presents the name, number and date of any plans that have changed to ensure the consent authority can review changes compared to the Project Description submitted with the EIS.

The proposed amendments to the Project on balance reduce the environmental impacts of the Project and do not introduce any new land or environmental impacts. Bowdens Silver appreciates that this further amendment is a change to the Project as it was presented to the community. We are in the process of undertaking community consultation on the amendment through wide distribution of correspondence to registered community members and other stakeholders, a further Community Consultative Committee meeting and other consultation consistent with Bowdens Silver's open approach to the community regarding the development. We plan to use these forums to present the Project as it now stands and provide a complete picture of what is proposed.

Please don't hesitate to contact myself or Anthony McClure on this matter. We look forward to confirmation of agreement to proceed with the proposed amendment to the Project.

Yours sincerely



Nick Warren
Principal Environmental Consultant

Bowdens Silver Project Amended Project Description Figure Update Summary

EIS Figure Number	Amended Project Figure Number	Title	Date	Figure Amendments
Figure 2.1	Figure 2.1	Mine Site Layout	3 February 2022	Amended layout to reflect removed water supply pipeline, additional water management and supply infrastructure, power transmission line and supply infrastructure, soil stockpile locations and paste thickener plant.
Figure 2.2	Figure 2.2	Mine Life and Project Life	23 October 2019	No change
Figure 2.3	Figure 2.3	Regional Geological Setting	31 October 2019	No change
Figure 2.4	Figure 2.4	Mine Site Geology	20 January 2022	Layout updated as per Figure 2.1
Figure 2.5	Figure 2.5	Site Establishment and Construction Activities	23 February 2022	Layout updated as per Figure 2.1 Timing for additional activities added.
Figure 2.6	Figure 2.6	Open Cut Pit Layout and Cross-Sections	21 January 2022	Layout updated as per Figure 2.1
Figure 2.7	Figure 2.7	Mining Sequence	21 January 2022	Layout updated as per Figure 2.1
Figure 2.8	Figure 2.8	Waste Rock Emplacement Layout and Section	21 January 2022	Layout updated as per Figure 2.1
Figure 2.9	Figure 2.9	Waste Rock Emplacement Development Sequence	24 January 2022	Layout updated as per Figure 2.1
Figure 2.10	Figure 2.10	Southern Barrier	20 January 2022	Layout updated as per Figure 2.1
Figure 2.11	Figure 2.11	Low Grade Ore Stockpiles	21 January 2022	Layout updated as per Figure 2.1
Figure 2.12	Figure 2.12	Processing Plant Layout	17 December 2021	No change
Figure 2.13	Figure 2.13	Processing Plant Flowsheet	17 December 2021	No change
Figure 2.14	Figure 2.14	Processing Plant Perspective Sketch	24 January 2022	No change
Figure 2.15	Figure 2.15	Tailings Storage Facility Layout	25 February 2022	Amended to reflect, location of bituminous geomembrane liner, water management and supply structures and paste thickener plant.
Figure 2.16	Figure 2.16	Local Road Network	20 January 2022	Water supply pipeline removed
Figure 2.17	Figure 2.17	Relocated Maloneys Road	13 December 2019	No change
Figure 2.18	Figure 2.18	Road Intersections and Railway Crossing	13 December 2019	No change

EIS Figure Number	Amended Project Figure Number	Title	Date	Figure Amendments
Figure 2.19	Figure 2.19	Indicative Lawsons Creek Crossing	17 January 2022	Updated to reflect bridge location
Figure 2.20	Figure 2.20	Concentrate Transport Routes	17 December 2021	Updated to reflect alternat route towards Parkes
Figure 2.21	Figure 2.21	Heavy Vehicle Transport Routes through Mudgee	13 December 2019	No change
Figure 2.22	-	Water Supply Pipeline Corridor	-	Removed
	Figure 2.22	Mine Site Dams	18 February 2022	Added to present water management and supply infrastructure.
Figure 2.23	-	Typical Pipeline Cross-Section	-	Removed
Figure 2.24	-	Typical Section across Pipeline Corridor	-	Removed
Figure 2.25	Figure 2.23	Rehabilitation Domains	24 January 2022	Layout updated as per Figure 2.1
Figure 2.26	Figure 2.24	Mine Site Final Landform	24 January 2022	Layout updated as per Figure 2.1
Figure 2.27	Figure 2.25	Progressive Revegetation Sequence	24 January 2022	Layout updated as per Figure 2.1
Figure 2.28	Figure 2.26	Limit of Disturbance / Vegetation Clearing by Offset Stage	18 February 2022	Layout updated as per Figure 2.1 with associated changes to the staging of vegetation clearing.