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Hello Planning Dept

I am placing this submission in objection to the amendments presented by Bowdens Silver for the changes to the extraction of water for the Proposed Bowdens Silver Mine at Lue.

I believe that the figures and assumptions presented are flawed and the report has been skewed heavily in the mining companies favour to attempt to show that:

A. There is enough water on site to supply the mine and meet its need for the life of the mine.
B. The volume of water to be extracted, captured and recycled on site will have NO effect on our property located downstream on the Lawsons creek at Lue.

Water or lack of water is a hotly debated topic on the land. The quantity of water required by the mine for the extraction and processing of ore has always been high and when questioned, the company insisted that they would not affect the surrounding water table, creeks and downstream properties that access their water from the creek or from bores.

In the original EIS presented in May 2020 the company repeatedly confirmed that they were not going to use water bores for the extraction of water and would only use them for monitoring.

Water requirements, outside of their harvestable rights and water extracted from the pit itself, would come from a pipeline from the coal fields further to the north in the shire.

In August 2021 a newsletter was delivered to residents in the district that included a summary of changes to the TSF (Tailings Dam) bituminous liner.

Originally the liner was only designed to cover the dam wall and its base inside the dam.

Now it appear that the intention is to cover the whole of the tailings dam floor.

This would not only prevent seepage but would also assist with the recovery/recycling of water from the tailings dam. Expensive but if it works then this is a positive move.

At the SVL AGM on Nov 26th 2021 the company announced that they would be removing the pipeline from the mine proposal as it was no longer required as they now believed that there was enough water on site to sustain their requirements to mine.

As presented in the Water Pipeline Amendment Reports the pipeline has now been removed.

Water tables have been updated to explain/show where all the water is now coming from.

The bulk of the water is now being captured from run off although the “Harvestable Rights” of the company and its landholdings only allows for about 10% of their requirements.

The rest is coming from a mixture of:

Recycling Dirty Water from the TSF and other dams then pumping it into dams/turkeys nests.

Capturing water in the pit itself. (Effectively a dam)

Clean water harvesting. (Not quite sure what that is)

Water already in the ore itself when mined.

A paste thickener has been added to infrastructure to remove water from the tailings before they are sent to the tailings dam.

This, so the company say, will remove the need for 390 megs annually.

I have been a part of the current and previous Community Consultative Committee since it started.

We were told all along and are still being told that there will be “NO PRODUCTION BORES ONSITE”.

Well if dewatering bores producing “approximately 1 ML/day” are not production bores then really what are they?

The designs show bores reaching well below the final pit floor level draining water from the area around the pit. It does not show their locations or how many there will be however.

Combined with the harvestable rights of 10% of the whole area owned by the mine and 100% of all the water inside the dirty zone, the effect on the water table around the mine, the creeks and gullies downstream of the mine will be permanent and unquantifiable.

The pages attached show an increase in the drawdown of the water table from at the end of mining.

Doc A. EIS – Predicted Drawdown 15.5yrs.

(The modelling presented in the EIS).

Doc B. Amendment 2 – Predicted Drawdown 15.5yrs.

(The modelling now presented with the external water pipeline removed.)

Originally in Doc A. the water table drawdown of 1m (the outer line) presented in the EIS did not cross over the Lawson Creek therefore we were always told it would have little or no effect on the water levels in the creek thus

“No occupants of residences within Lue or its surrounds are predicted to:

- *Experience a reduction to supply of groundwater or surface water due to the project.” (Bowdens Silver – Response to Submissions August 2021)*

In Doc B. the outer line now crosses the Lawson Creek 10 times.

The Lawson creek is not a permanent flowing water source. It is generally a collection of water holes above the surface where water flows underground downstream.

Should the groundwater level be lowered even 1m under the creek there can't be any water in the water holes as most are not even that deep.

We now have:

"Predicted maximum drawdown beneath Lawson Creek is typically of the order of 1m or less"

(Jacobs – Specialist consultant studies Part 5 Groundwater Assessment – Updated 2022)

My family and I live on Bristowe Farm (Property 35 on the Land Ownership Map).

We run fat lambs and cattle and are currently having the designs and costings drawn up to repurpose the irrigation system already in place for our grape vineyard to allow us to irrigate pasture and crops to increase our farms productivity.

We have an irrigation water licence from the Lawson Creek of 85 ML.

We have had no documentation from the company showing any changes to the water table on our farm.

Our neighbour across the creek however has shared a map with us outlining where the water table drawdown will affect the level of water in the creek.

Doc C. Wyuna – Predicted Drawdown.

This map was produced in 2019 which was well before the external water pipeline was removed from the project. The area highlighted covers most of the creek where it runs through our property and right passed our pump site.

This map clearly shows then that there was problems with the modelling back then and with more water taken from the surrounding lands now the problem will be even worse.

In conclusion it appears that the assumptions used in the modelling (I say assumptions as there has been no flow measuring of the Lawson Creek to gain facts/figures for the modelling) have been skewed so low as to minimise the proposed effects of the removal of water from the creek and surrounding water table. On paper the modelling may pass review and but in reality the creek will be bone dry.

I request that the company and its consultants revisit their modelling to determine the realistic effects on the creek and water table and present them as facts not guesses.