

Cadia Valley Operations MOD 15 – Submission by Bruce Reynolds

Please find below my submission on Modification 15 for Cadia Valley Operations.

I have raised several issues which I do not believe have been adequately answered in the application by Cadia Valley operations- Newmont.

I have concerns about the Northern Tailings Dam. In this modification there are indications of the wall being raised and further lifts to take place. It is concerning that the company still does not have a publicly available engineering solution to the current wall failure. A concern is if they build the new wall on top of existing Southern Dam tailings it will not be an adequate foundation. This modification indicates a number of lifts commencing in 2028 on the northern wall. Given the previous failure, there are concerns any wall can not take the weight of any further lifts in the northern tailings dam. A closure plan should be provided for the northern dam at the existing height and no further increases, which could potentially create further risk of tailings dam wall failure.

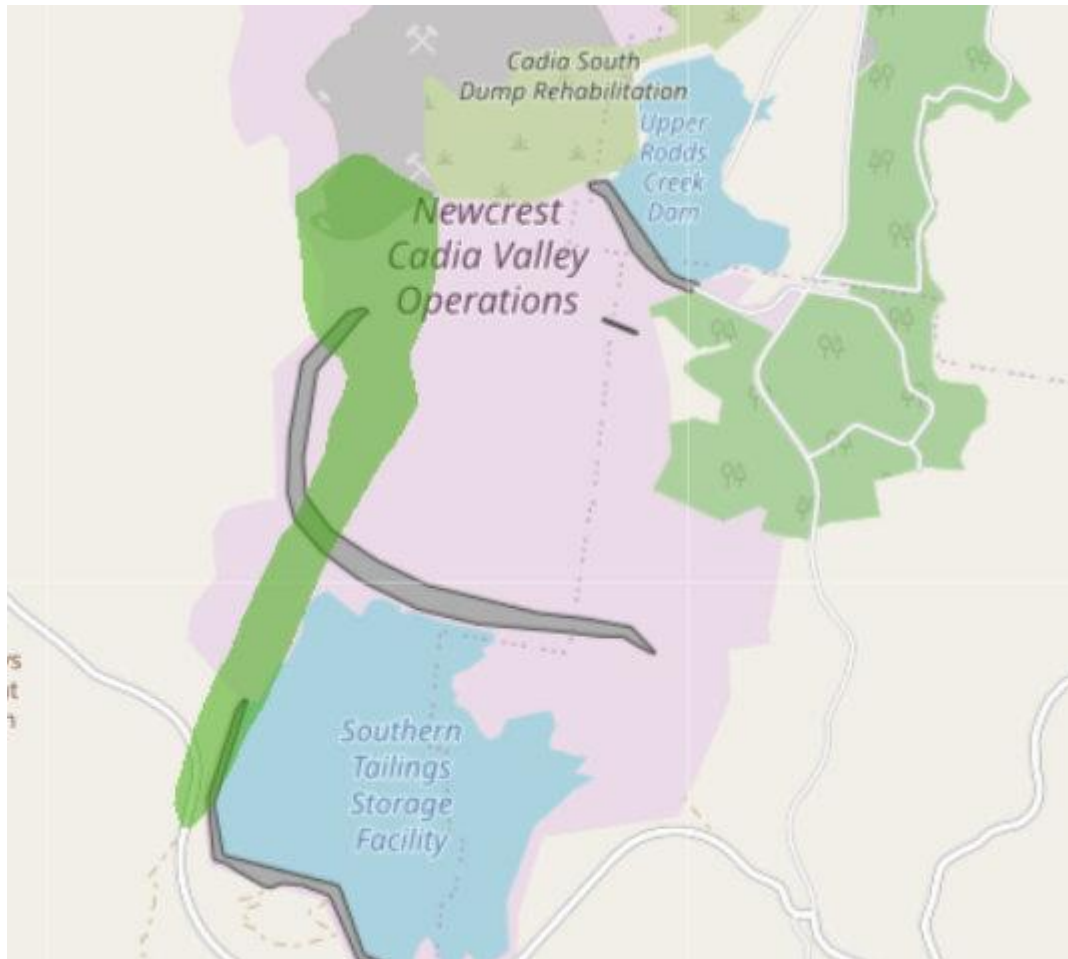
This modification indicates there will be two new air vents created near the crushing plant. These vents will be operated with surface fans which will have scrubbers below ground to remove dust particles and blow onto a water pond before being introduced into the atmosphere. These two vent shafts need to be constructed to the current regulations on emissions and not to the required standard at the time of approval of the current mine licence. This standard should be 20mg/ cubic metre maximum. It is also important the vent shaft 8 be brought up to the same standards for emissions, given what appears to be a lack of approval of the current ventilation system. There is also the issue of noise emission from the extra two surface fans. Currently the existing above ground fan motor can be heard from our place which is nine kilometres from the mine. There is a concern that adding two more motor, will substantially increase the noise emitted from the site, with a constant industrial hum across the local landscape. The regulator is requested to ensure noise buffering around these two new fans.

The company is also requesting the ability to restart Ridgeway mine. Any ventilation systems used on this underground mine should also meet the new standards of 20mg/ cubic metre maximum emissions. The company under no circumstances be allowed to increase production above 35 million tonnes annually.

The company has requested a realignment of Panuara road. While it says it is only a minor realignment, it is proposed for 3.5 kilometres. If this is approved, construction needs to start immediately do there is no disruption to Panuara Road. There should also be adequate compensation paid to Blayney Shire Council for the resumption of a community asset by this mining company. The company also needs to fully fund the replacement road to a better standard than the current road. This road is used by b-double trucks for agricultural purposes.

The extension of the southern tailings dam wall to the west will used some Strategic Agricultural Land- Biophysical (BSAL) as listed on the NSW Government SEED website. There

is no mention of this further loss of BASL land in the modification. Given how scarce this land is within NSW, there should be some form of assistance for neighbouring landholders to increase productivity. The mines tailings dams and operations have already consumed some BASL land. See figure 1.



Seed Figure 1. Green area in the bottom left of map is currently untouched BASL but will be consumed by the tailings dam wall.

While there is a notation about an increase in electricity consumption to 192 megawatts, and some associated use for electric vehicles, there is no indication of an electrification pathway for these vehicles. The company should outline its plan if is highlighting this process. The reason for concern is the level of emissions of diesel particulate matter being omitted via the exhaust fan network. The neighbouring community needs to see a clear pathway from the company for a reduction in pollution from this operation, given current diesel usage.

The continuation of the dam wall construction under this modification also raises some issue. The first being the increased construction truck movement on the hall roads. This creates noise and extra dust. There is also a proposal in this modification to increase work hour into the evening. Given this is hard rock material, the noise emitted when it is dumped will have an impact on neighbouring residents. Noise monitoring needs to be installed at close receptor sites on a real time basis and a stop work required if there are exceedances.

There also needs to be a management plan on the haul roads to greatly reduce dust emitting from the site. There should be a major improvement in real time dust monitoring.

There is also a proposal in this modification to greatly increase the production of hydro sands. There is however very little information on where the produced hydro sands will be deposited. There is concern that these sands will produce dust which may leave the site. There appears to be no dust management plan on how to handle and manage these hydro sands or where they will be deposited. Before any approval is provided, far more detail needs to be provided to the community for comment.

The modification suggests up to four hundred extra employees will be needed for the tailings dam construction and the potential reopening of the Ridgeway mine. Most of these people are expected to be drawn from Orange, Blayney Shire, Cabonne Shire and Bathurst LGA's and will lead to more vehicular movements on the daily basis on Cadia Road and Forest Reefs/Long Swamp/Woodville and Vittoria roads. As the mine traffic will be having a greater impact on these roads, it is suggested that Cadia Valley Operations provide additional funding to Orange, Blayney Shire and Cabonne Shire for access road maintenance under this modification. Local residents are the ones who suffer from mining impacts on their local road networks.

The irrigation of the northern tailings dam also features in the Modification. It appears only half the dam will be irrigated. Residents were initially informed it would be the majority of the dam and also the southern dam will be irrigated. There appears to be limited information on management of the irrigation system and how they will undertake dust suppression on the two dams. It is critical that dust suppression is maintained on both dams moving forward until final mine closure.

The company has reported in their material that "An Agricultural Resources Assessment was undertaken for the disturbance area of the Modification that is not covered by an existing mining lease. There would be a temporary removal of approximately 28.2 ha of agricultural land from service during the life of Cadia. Minimal disturbance would be associated with this land and approximately 26.2 ha would be returned to agricultural use, with no reductions in land and soil capability." The company has failed to take into account the modification request for a rerouting of Panuara Road for 3.5 kilometres, which is included in Modification 15. This would see approximately a further 5 hectares lost to agricultural production. There is also the further loss of BSAL land as previously mentioned.

The community consultation process on Modification 15 has been disappointing. Residents were told we were that a residents meeting would have the same opportunities as two drop-in sessions. The residents were divided and given around 20 minutes to discuss the whole of Modification 15 before they were moved to another session. This was totally inadequate given the magnitude of the modification.

Finally, I have concerns about Cadia Valley Operations Competency to Operate. There have been numerous charges laid by the regulator on the company, in the Land and Environment Court. Given the guilty pleas for a number of these charges, the regulator should consider imposing strict conditions on these modification requests, with severe consequences if there

are further breaches found. The company appears to be ignoring the physical and mental health of neighbouring residents within 15 kilometres of the mine. The mine should be required under the conditions of this modification to support the community as it tries to neighbour and live with this large mining operation.

Bruce Reynolds

Forest Reefs Resident