



Department of Primary Industries

OUT17/9859

Ms Elle Donnelley
Resource Assessments
NSW Department of Planning and Environment
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Dear Ms Donnelley

Broken Hill North Mine Recommencement Project (SSD 7538) Comment on the Environmental Impact Statement (EIS)

I refer to your email of 2 February 2017 to the Department of Primary Industries (DPI) in respect to the above matter. Comment has been sought from relevant divisions of DPI. Views were also sought from NSW Department of Industry - Lands that are now a division of the broader Department and no longer within NSW DPI. I am advised that Lands have responded directly to DPE in response to this matter.

Any further referrals to DPI can be sent by email to landuse.enquiries@dpi.nsw.gov.au.

DPI has reviewed the EIS and provides the following comments and recommendations:

- Additional information is required on the design of the evaporation ponds, the monitoring of their integrity, and of potential additional monitoring methods to ensure that perching does not occur within the old workings and to accurately monitor the area and rate of dewatering.
- The proponent has indicated sufficient water entitlement is held in Water Access Licence 40959 to account for the dewatering to remove existing water in the underground and for continued dewatering during operations. DPI Water advises WAL40959 also accounts for water take at other sites. The proponent should ensure sufficient entitlement is available to account for water take at all relevant sites during the project and during filling of the underground workings on mine completion.
- DPI Water supports the proposed management and mitigation measures to address surface water management issues during the project but the proponent should also undertake maintenance of the clean water diversions to ensure ongoing stability and functioning in accordance with DPI Water's [Guidelines for Controlled Activities on Waterfront Land](#).
- Prior to project approval, the proponent should provide clarification on the potential use/disposal of produced water in the southern operations and any treatment requirements or additional impacts. The proponent should also provide details on the likely split in volumes of produced water between the southern operations and the evaporation ponds, and the capacity of either option.

- The proponent should commit to establish a water supply options strategy, which maximises the use of water sources on site and minimises the use of town water supply.
- The proponent should provide evidence of the construction, integrity or adequacy of existing mine water settling pond to be used as an evaporation pond for the produced water.
- The proponent should provide additional information on the proposed HDPE liner and its suitability to be exposed to UV for the life of the operations.
- The proponent should develop a strategy to monitor the effectiveness of the rate of dewatering, which is in addition to measuring the standing water level in the No.3 shaft. Consideration should be given to assess other potential measurement or monitoring techniques to support the monitoring of the groundwater levels in the No. 3 shaft.
- The groundwater monitoring program should include clear measurement methodology (including metering where feasible) of all groundwater take from the project which is to include the initial dewatering, the future groundwater inflows during mining and the removal of water in mined material.
- The monitoring program should include assessment of the observed to predicted evaporation within the evaporation ponds to identify if there is potential leakage from these ponds.
- The following should be included as Conditions of Consent if the project is approved:
 - The proponent must prepare a Surface Water, Sediment and Erosion Control Plan in consultation with DPI Water.
 - The proponent must prepare a Groundwater Management Plan in consultation with DPI Water.

Yours sincerely



Mitchell Isaacs
Director, Planning Policy & Assessment Advice
 7 March 2017

DPI appreciates your help to improve our advice to you. Please complete this three minute survey about the advice we have provided to you, here:

<https://goo.gl/o8TXWz>