



Mr Paul Freeman
Senior Planner
Resource Assessments
NSW Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Mr Freeman

Hear Gold Project PA 10_0191 MOD 3 -EA Exhibition

I refer to your email of 11 August 2015 regarding Hera Resources Pty Limited's lodgement of a development application for a modification to the Hera Gold Mine (the Project).

NSW Department of Industry, Division of Resources & Energy (the Division) has reviewed the *Environmental Assessment for Hera Mine Modification 3*, dated August 2015 and provides the following comments within its area of responsibility.

Environmental Risk

Whilst the Division did not request an analysis of environmental risk and risks to rehabilitation associated with the Modification, it will require that this be included in a new Mining Operations Plan, if approved.

Further requirements for Mining Operations Plans can be found within the Department guideline *ESG3: Mining Operations Plan (MOP) Guidelines, September 2013*.

Tailings Management

The EA does not address mineral processing and handling, rejects handling and disposal management; and a life of mine tailings management strategy, which details measures to be implemented to avoid the exposure of tailings material that may cause environmental risk, as well as promote geotechnical stability of the rehabilitated landform.

Further detail is required to assess the capacity of the existing Tailings Storage Facility (TSF) to accommodate the increased volumes of tailings resulting from the Modification. Any augmentation of the currently approved TSF, or requirement to construct a new TSF, and any related potential environmental impacts, should be addressed.

Waste Rock Management

The EA does not adequately address the requirement to provide a comprehensive description of the mine layout and scheduling, including maximising opportunities for progressive final rehabilitation;

Information is required on the staged development and decommissioning of the proposed Northern Waste Rock Emplacement, and further development and decommissioning of the

existing Temporary [Southern] Waste Rock Emplacement, which should include an indicative schedule for the progressive re-emplacement of stockpiled material underground.

In addition, the proponent is to also report on the current volume of material stockpiled in the Temporary Waste Rock Emplacement, and confirm that there is capacity to emplace all additional Potential Acid Forming material within the currently approved footprint and maximum height.

Final Landuse and Landform

The EA does not provide detail of the revised final landform figure and that there is no a definitive commitment to the remove of material stockpiled at the proposed Northern WRE.

The Division requires a figure that depicts the proposed final landform and land use(s) for the project area, and surrounding undisturbed environment. Include contours, vegetation types, drainage infrastructure and any other retained built infrastructure; and confirmation that there is no change to the current commitment to completely remove all stockpiled waste rock prior to closure as described in the 2011 EA.

RECOMMENDED CONDITIONS OF APPROVAL

The Division recommends that the following conditions be incorporated into the Project Approval, if granted:

Rehabilitation Objectives and Commitments

The Proponent shall rehabilitate the site to the satisfaction of the Secretary, Department of Industry.

Rehabilitation must be substantially consistent with the Rehabilitation Objectives described in the EA, and the following objectives in Table 1.

Table 1. Rehabilitation Objectives

Rehabilitation Feature	Objective
Mine site (as a whole of the disturbed land and water)	Safe, stable and non-polluting, fit for the purpose of the intended post-mining land use(s).
Rehabilitation materials	All suitable materials for rehabilitation (including seeds, vegetation, topsoils, subsoils and substrates at the disturbed areas) are identified, recovered, appropriately managed and used effectively as resources in the rehabilitation.
Landforms	<p>Final landforms sustain the intended land use for the post-mining domain(s).</p> <p>Final landforms are consistent with and complement the topography of the surrounding region to minimise the visual prominence of the final landforms in the post mining landscape.</p> <p>Final landforms incorporate design relief patterns and principles consistent with natural drainage.</p>

Water Quality	<p>Water retained on site is fit for the intended land use(s) for the post-mining domain(s).</p> <p>Water discharged from site is consistent with the baseline ecological, hydrological and geomorphic conditions of the watercourses prior to mining disturbance.</p> <p>Water management is consistent with the regional catchment management strategy.</p>
Native flora and fauna habitat and corridors	<p>Size, locations and species of native tree lots and corridors are established to sustain biodiversity habitats.</p> <p>Species are selected that re-establishes and complements regional and local biodiversity.</p>
Post-mining agricultural pursuits	<p>The land capability classification for the relevant nominated agricultural pursuit for each domain is established and self-sustaining within 5 years of land use establishment (first planting of vegetation.)</p>

Progressive Rehabilitation

The proponent shall carry out all surface disturbing activities (eg pre-stripping in advance of mining operations) in a manner that, as far is reasonably practicable, minimises potential for dust emissions and shall carry out rehabilitation of disturbed areas progressively, as soon as reasonably practicable, to the satisfaction of the Secretary, Department of Industry.

Rehabilitation Plan

1. The Proponent must prepare and implement a Rehabilitation Plan to the satisfaction of the Secretary, Department of Industry.
2. The Rehabilitation Plan must:
 - a. be submitted to and approved by the Secretary, Department of Industry prior to carrying out any surface disturbing activities of the development, unless otherwise agreed by the Director General;
 - b. be prepared in accordance with Division guidelines and in consultation with the Division, relevant agencies and stakeholders, including Office of Environment and Heritage, Environmental Protection Authority, Office of Water, Department of primary Industries, Crown Lands and Cobar Shire Council;
 - c. incorporate and be consistent with the rehabilitation objectives in the EA, the 2011 EA and statement of commitments, and Table 1;
 - d. integrate and build on, to the maximum extent practicable, the other management plans required under this approval; and,
 - e. address all aspects of mine closure and rehabilitation, including post mining land use domains, rehabilitation objectives, completion criteria and rehabilitation monitoring and management.
 - f. include an evaluation of end landuse options for the box cut;
 - g. describe how rehabilitation will be carried out progressively to the extent that it is practicable.

Note: The approved Mining Operation Plan, required as a condition of ML1659 issued in relation to this project, will satisfy the requirements of this condition for a Rehabilitation Plan.

On the basis that the above requirements are addressed the Division supports the proposed modifications to the Hera mine as a increased resource utilisation and increased production is likely to ensure that the operation remains financially robust.

Should you have any enquires regarding this matter please contact Steve Cozens, Senior Project Officer, Royalty & Advisory Services on 9842 8573.

Yours sincerely



Adrian Delany
A/Director Royalty & Advisory Services

10.9.15