



Office of Water

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17 August 2010

Our ref: ER20127
Your ref:

Attention: Kane Winwood

Dear Kane

RASP PROJECT – MP07_0018 – EXHIBITION OF ENVIRONMENTAL ASSESSMENT

I refer to your letter of 29 June 2010 requesting a review of the exhibited environmental assessment for the Rasp Project located in Broken Hill. The NSW Office of Water appreciates the opportunity to comment and initially refers to previous correspondence issued by this Department dated 26 March 2010. On review of the exhibited EA NOW is able to support the proposal. Key issues are raised in detail in Attachment 1 which must be addressed through modifications to the draft statement of commitments identified in Attachment 2 and the inclusion of specific recommended conditions shown in Attachment 3. The key issues include:

- Requirement for water licensing under the *Water Act 1912* for groundwater interception and/or extraction.
- Uncertainty in the modelled seepage rates and patterns from the Tailing Storage Facility and inadequate proposed monitoring.

Should further information be required in relation to this response I have arranged for Mr Tim Baker to assist you. Mr Baker may be contacted at the NSW Office of Water's Dubbo Office on telephone number (02) 6841 7403.

Yours sincerely

Mark Mignanelli
Manager Major Projects and Assessments

ATTACHMENT 1

Specific Comments – Water Resources and Water Licensing

- The dewatering requirements of the proposed deepening at the site have been estimated based on existing pumping requirements at Shaft No.7 with no use of modelling based on site specific parameters. There is therefore considerable uncertainty in the applicability and associated accuracy of these figures. The proponent will be required to ensure appropriate licensing under the *Water Act 1912* is obtained for all groundwater interception and/or extraction activities for the life of the mine and for post mining life if required.
- The seepage rates anticipated within the tailing storage facility (TSF) and the underlying material are based on estimated permeability factors and observations rather than measured factors. There are also considerable assumptions in regard to the composition and structure of the existing tailing storage facility. NOW therefore considers there is a significant level of uncertainty in the predicted seepage patterns within the existing TSF and therefore the potential for mounding beneath the TSF and lateral seepage movement. A comprehensive monitoring program of toe drain function, groundwater mounding and seepage points is critical to understand and enable effective management of this issue.

**End Attachment 1
17 August 2010**

ATTACHMENT 2

Amendments to Statement of Commitments

Water Resources

- A new SOC be included to monitor the quality and quantity of water captured by the toe drains on the Tailing Storage Facility.
- A new SOC be included to monitor the movement of seepage sourced from the tailing storage facility and to monitor the quality of the local groundwater system.

**End Attachment 2
17 August 2010**

ATTACHMENT 3

Recommended Conditions of Approval

- The proponent must ensure that it has sufficient water for all stages of the project to the satisfaction of the NSW Office of Water, and if necessary, adjust the scale of operations to match its licensed water entitlements.
- The proponent must prepare a Groundwater Management Plan to monitor seepage movement within and adjacent to the Tailings Storage Facility in consultation with and to the satisfaction of the NSW Office of Water prior to commencement of activities.
- The proponent must obtain relevant licences to the satisfaction of the NSW Office of Water under the *Water Act 1912* for all groundwater works (including bores and piezometers) within the proposed site prior to the commencement of activities.
- The proponent must obtain relevant licenses to the satisfaction of the NSW Office of Water under the *Water Act 1912* for all activities which intercept or extract groundwater prior to commencement of these activities.

End Attachment 3

17 August 2010