Department of Planning and Environment

Our ref: OUT22/3668

Rose-anne Hawkeswood
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NSW Department of Planning and Environment

Email: rose-anne.hawkeswood@planning.nsw.gov.au

14 April 2022

Subject: **Bowdens Silver Project (SSD-5765) - second Amendment Report**

Dear Ms Hawkeswood

I refer to your email of 25 March 2022 to the Department of Planning and Environment (DPE) Water and the Natural Resources Access Regulator (NRAR) about the above matter.

Bowdens Silver Pty Ltd proposes to mine epithermal silver, lead and zinc deposits hosted in the Rylstone Volcanics. The proposed open mine is located approximately 2.5 km northeast of Lue and 26 km southeast of Mudgee, NSW.

DPE Water has reviewed the second Amendment Report and has a number of post approval recommendations to ensure any potential water impacts are appropriately monitored and managed.

Any further referrals to DPE Water and NRAR can be sent by email to water.assessments@dpie.nsw.gov.au. or to the following coordinating officer within DPE Water:

Alistair Drew – Project Officer
E: Alistair.drew@dpie.nsw.gov.au

Yours sincerely

Liz Rogers
Manager, Assessments, Knowledge Division
Department of Planning and Environment: Water

Attachment A

Detailed advice to DPE Planning & Assessment regarding the Bowdens Silver Project (SSD-5765) - second Amendment Report

1.0 Post Approval Recommendations

1.1 Recommendations – Post Approval

The proponent should:

- Develop a Water Management Plan (WMP) in consultation with DPE Water prior to commencement of mining, which details the proposed surface water and groundwater monitoring and reporting plan, and trigger action response plan including any mitigation measures such as 'make good provisions'.
- the Water Management Plan will need to reflect the modifications to water supply extraction, transfer and storage infrastructure. This includes proposed dewatering bores, water pipelines and storages. Additional monitoring, metering and management measures will need to be included to report on water take and potential impacts to water sources.
- develop a water balance to measure actual water take from surface and groundwater sources, and this should include accurate metering where possible. The water balance should be used in ongoing reviews of actual versus modelled water take and impact predictions. This will be a key component to confirm impact predictions, the adequacy of mitigating measures and compliance for water take.
- report on water take at the site each year (direct and indirect) in the Annual Review. This should include water take where a water licence is required and where an exemption applies. Where a water licence is required the water take needs to be reviewed against existing water licences.
- ensure that relevant nomination of work dealing applications for Water Access Licences proposed to account for water take by the project have been completed prior to the water take occurring.
- be aware of the rules of the relevant water sharing plans and how they may impact the project and ability to trade or take water.
- works within waterfront land need to be in accordance with the "Guidelines for Controlled Activities on Waterfront Land (NRAR 2018)". These can be found at: https://www.nrar.nsw.gov.au/how-to-apply/controlled-activities/guidelines-for-controlled-activities

1.2 Explanation

The proposed use of dewatering bores in addition to pit dewatering has revised the groundwater take at the site from a maximum of 1066ML/yr in the EIS to 1222ML/yr in Year 4 of the amended project. The proponent has obtained sufficient entitlement in the Lachlan Fold Belt Groundwater Source to account for water take and has a viable pathway to acquire the necessary entitlement in the Sydney Basin Groundwater Source. This is via a Controlled Allocation Order, and the proponent needs to complete the relevant payment and registration steps to obtain the Water Access Licence.

The proposed amendment has included a significant change to water supply measures with the removal of the pipeline from the Lithgow coalfields which was to provide a reliable water supply to the project. The amendment is now relying on on-site capture via surface water and groundwater to meet all water demands. The make-up water demands have reduced by 390ML/yr for the amended project with the introduction of a paste thickener and recycling options. Based on the proponents modelling the on-site supplies will be sufficient to meet the water demands of the project in low rainfall years. Access to groundwater and runoff capture

within disturbed areas is critical to this modelling and it needs to be recognised that a risk does exist in accessing sufficient water in all years. The proponent understands the production rate would need to be reduced should insufficient water supplies be available.

Installation and maintenance of clean water diversions throughout the project is critical to ensure the flow of the third order Blackmans Gully is not captured or stored and continues downstream to Hawkins Creek. This was not clearly reflected in some staged layout maps in Appendix 3 (Surface Water Assessment).

The modifications to the water supply, storage and transfer infrastructure will need to be included in the Water Management Plan for the project. This includes additional pipelines, bores, storage dams and harvestable right dams.

End Attachment A