

SUBMISSION ON BEHALF OF THE BELUBULA HEADWATERS PROTECTION GROUP

I am writing in response to the Lachlan Water Sharing Strategy and raise concerns regarding the proposed McPhillamys Gold Project at Kings Plains at Blayney, and the effect on river water, underground water and surface water it will have to the immediate area and also the Lachlan catchment.

Regis Resources is a mining company, from Western Australia, and have recently bought over 6000 acres of prime agricultural grazing land 7km north east of Blayney, between Bathurst and Orange. They are planning to mine gold at their McPhillamys Mine, using the cyanide extraction method, and then store the toxic tailings waste in a new tailings storage facility (TSF) they plan on building directly on top of the Belubula River.

The Belubula river is the main catchment for Carcoar Dam, which flows directly into the Lachlan River and contributes to the Murray Darling system.

The tailing storage facility, will be over 600 acres in surface area. The wall will be 50 metres high and will be approx. 1.5 kms long, and will hold 50,000 megalitre of tailings. The TSF will also lie directly over more than 12 springs, which naturally feed the river. There is major concern, not only that the damming of the Belubula river will effect the flow of the river, but the possibility of the contamination of the river due to the springs below, and proposed inadequate lining of the facility will pollute and destroy not only the Belubula, but also downstream into the Carcoar Dam and the Lachlan River also.

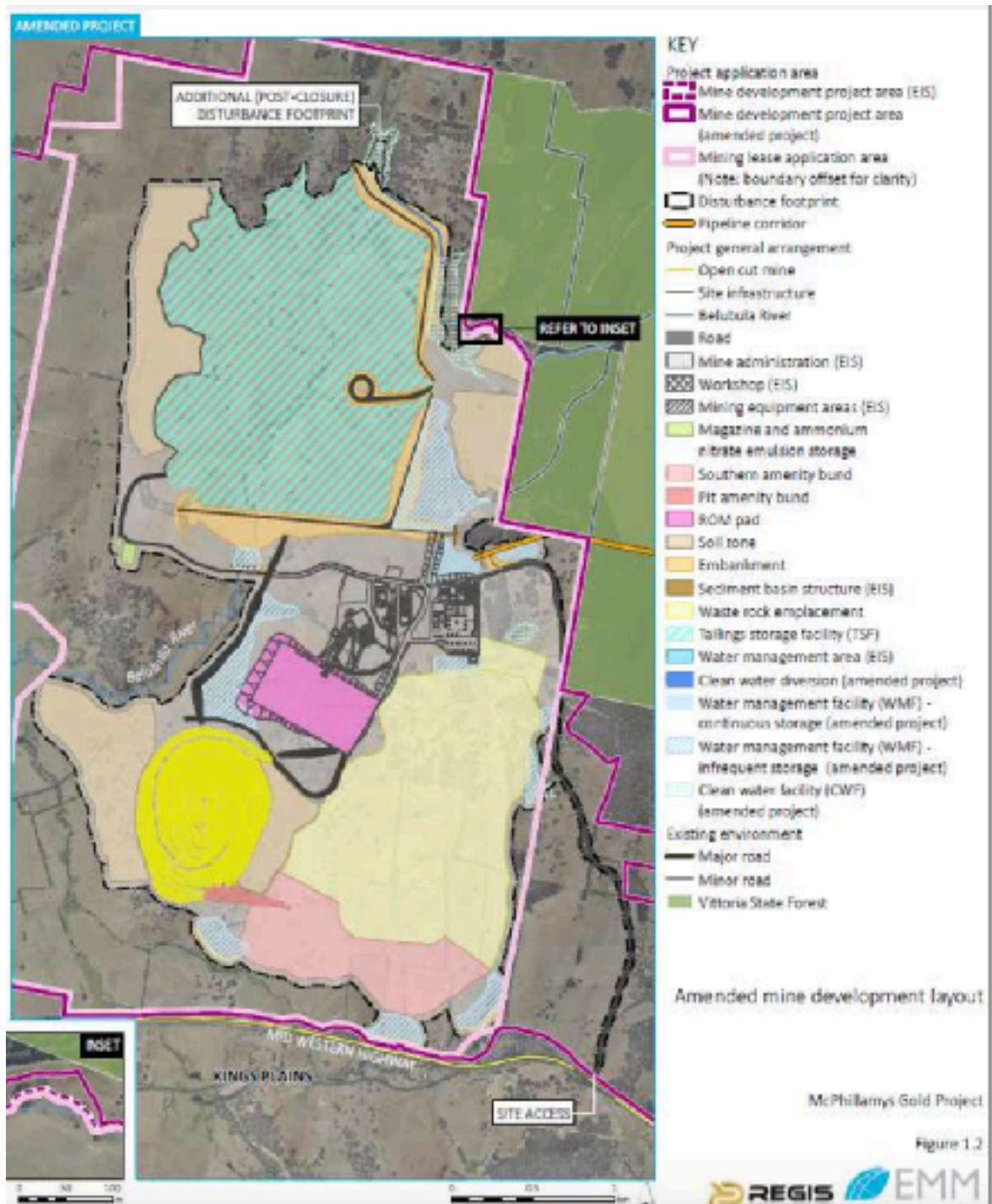
The proposed structure of the TSF is the most economically efficient for the company due to the need for only one wall across the valley, and the intermittent lining and clay based lining is proof that this company is only trying to achieve the cheapest construction methods possible, and not the safest.

Preliminary work has already been undertaken by Regis with bores sunk and aquifers drained and stored in dams.

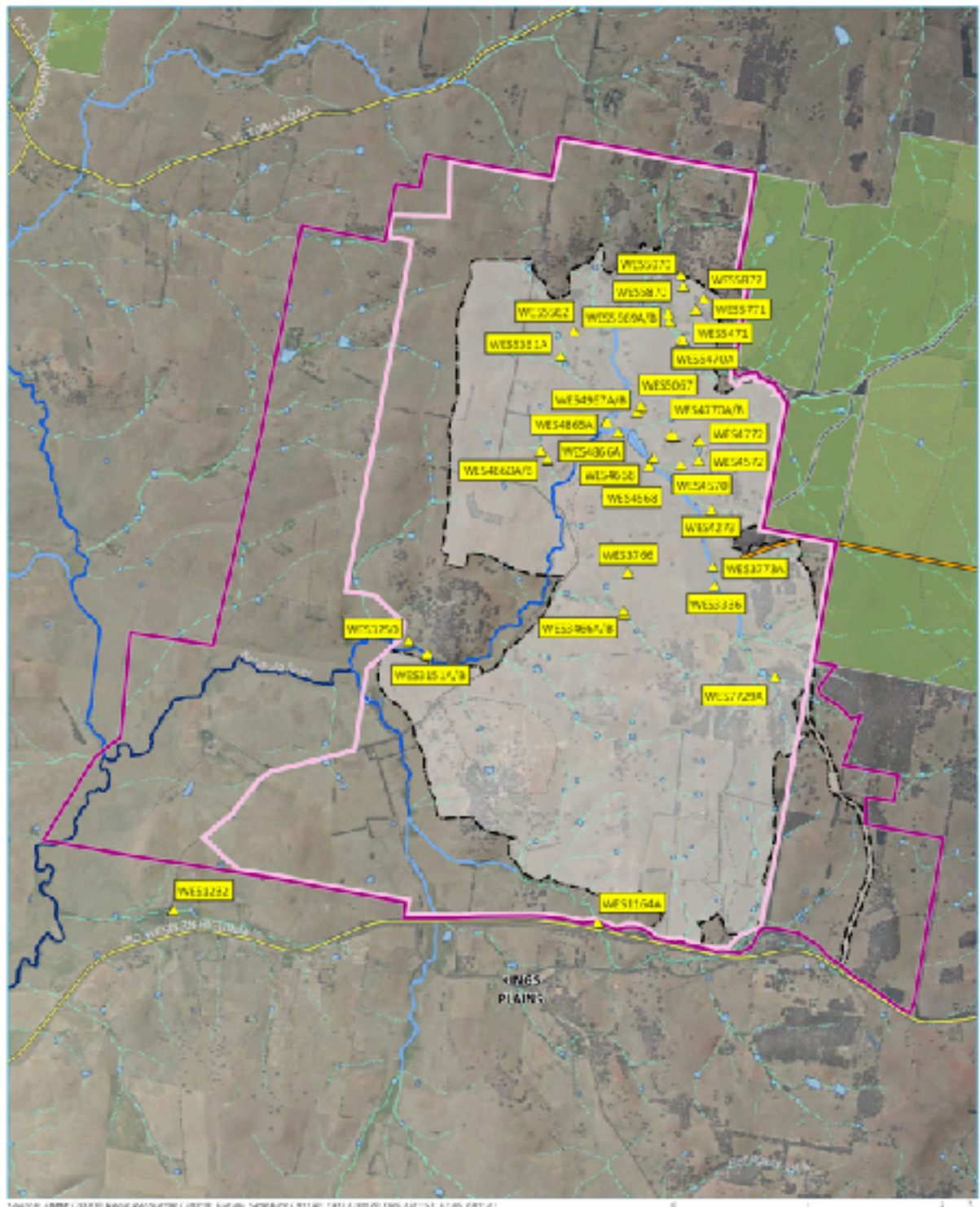
As stated in the Lachlan Unregulated and Alluvial Water Sources (DPI Water 20112c), *'Water sharing plans aim to achieve sustainable groundwater extraction by limiting extractions to a proportion of aquifer recharge. The remainder of recharge is reserved for the environment.'*

With more than 12 springs in the river at this point where the TSF is proposed, there will be no fresh water being added to the system for flow downstream to recharge the river.

Below: an updated map of the mine site lay out. Te TSF is in the light green striped area, and the Headwaters of the Belubula River can be seen faintly below.



Below is the map taken from pg.32 Appendix C Surface Water - Groundwater Interaction Assessment in the Reply to Submission document, showing the Springs and Seeps located in the TSF perimeter (the upper half of the black dashed perimeter is the proposed TSF site).



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KEY	
Project application area	▲ Identified seep/spring
Mining development project area	Existing environment
Mining lease application area (Note: boundary offset for clarity)	Major road
Disturbance footprint	Minor road
Pipeline	Vehicle/truck
	Vitonia State Forest
	Waterbody
	Stream/stream order
	1st order
	2nd order
	3rd order
	4th order
	5th order
	6th order

Seep and spring locations

McMillans Gold Project
Surface water-groundwater interaction assessment
Figure 2.13



The open cut pit which is proposed to be approx 500m deep and over 1 km in diameter will also affect the water flow to the river and possibly the river itself. In the EIS Regis states that the pit will serve as a sink for approx 400 years, until reaching an equilibrium, draining surrounding water aquifers and changing the river flow. This will impact the water running into the Belubula River and affect flow, again for many hundreds of years. This will also affect the Lachlan catchment downstream.

Lastly, there is another threat to this water catchment area, with the proposed water pipeline from Mount Piper Power Plant at Lithgow. This 85km pipeline will pump the brine water from the power plant, (which test results show that the very saline water also has many heavy metals in the water) to the McPhillamy's Gold Mine to be used to process the ore. This brine will then be added to the tailings facility which will add to the already toxic water in the TSF. This adds to the toxic consistency of the talings water/sludge, potentially leaking into the Belubula River.

This proposal needs greater scrutiny before allowing a such a major development to go ahead, and if so will pose a massive threat to the important water sources and catchment in this area and beyond.



Belubula Headwater Protection Group