

13 January 2022

E brett.easton@nt.gov.au

Ms Kylie Fitzpatrick
Manager Environmental Assessment
Department of Environment, Parks and Water Security
GPO Box 3675
DARWIN NT 0801

T 08 8999 5190

File reference
2019/0182

Via email: eia.ntepa@nt.gov.au

Dear Ms Fitzpatrick

Re: Invite to comment - Rustlers Roost and Quest 29 Open-Cut Draft EIS

Thank you for the opportunity to comment on Primary Gold's draft environmental impact statement (EIS) for their Rustlers Roost and Quest 29 Open-Cut Mine Redevelopment.

A number of divisions within the Department of Industry, Tourism and Trade have reviewed the documents. The Mineral Titles, Energy Titles and Agriculture divisions have no comments to make. Comments from the Mining Operations division are provided at Attachment A.

Please contact Roslyn Vulcano, Director Mining Operations on (08) 8999 5029 or via email at roslyn.vulcano@nt.gov.au if you require any further information.

Yours sincerely



BRETT EASTON
Director, Resource Policy and Reform

Attachment A - Submission on the draft EIS

Primary Gold Pty Ltd – Rustlers Roost and Quest 29 Open-cut Mine Redevelopment

This submission is made under Regulation 134 of the Environment Protection Regulations 2020

NT EPA reference number: EP 2021/005

Government authority: Department of Industry Tourism and Trade (DITT) – Mining Operations Division

Summary: DITT has reviewed the Draft EIS for the Rustlers Roost and Quest 29 Open-Cut Mine Redevelopment and considers that both the previous comments on the EIS referral (EP2021/005), and the comments on the Notice of Significant Variation (under Section 51 of the *Environment Protection Act 2019*) are still relevant. The below comments are also provided to clarify.

Section of Referral	Theme or issue	Comment
Appendix H – Water Balance and Groundwater Modelling Report And Appendix I – Water Management Plan	Water considerations	<p>The site water balance does not account for the considerable increase in the footprint of the proposed tailings storage facility (TSF); consequently, Primary Gold has not demonstrated an understanding of water management needs across the site, which makes potential impacts on and off site difficult to assess.</p> <p>It is recommended that the water balance and resulting water management plan updated to enable a thorough understanding of the future proposed water balance and to identify that potential impacts can be managed. In addition, it would be appropriate that the groundwater modelling (and management) should be updated to inform assessment of the potential migration of contamination from the mining structures.</p>
Appendix B – Risk Assessment Register	Seepage risk and controls for the TSF	<p>The proposed expansion of the TSF will encompass Annie’s Dam, various drainage lines, the heap leach pad and heap leach ponds. Annie’s Dam in particular is a potential groundwater source for the identified downstream groundwater fed riparian vegetation site (see RP6-US site in Appendix M), which may make this a likely vector for seepage from the expanded TSF footprint.</p> <p>Primary Gold has not demonstrated an adequate analysis of environmental risks, or developed the necessary mitigating management actions associated with construction of the expanded TSF, making potential impacts difficult to ascertain.</p>
Appendix J – Mine Closure Plan	Information gap	<p>A substantial amount of material of suitable quality will be required to cap the expanded TSF footprint (~240ha) and WRD (~92ha) footprints which will exceed the expected volume of non-acid forming (NAF) material to be removed from the pits. This presents a risk of water infiltration and potential acid metalliferous drainage (AMD) issues. It is not clear from the information provided whether these risks can be appropriately managed to avoid impacts to the environment.</p> <p>It is recommended that Primary Gold be required to demonstrate that sufficient suitable material is available or, alternatively, present other methods for the rehabilitation of high risk structures.</p>

Environmental impact assessment under *the Environment Protection Act 2019*

Appendix L – Erosion and Sediment Control Plan	Erosion and sediment controls	<p>It appears that some structures e.g. erosion and sediment controls, Annie Oakley pit, northern WRD and TSF walls are very close to, or outside, the current mining lease boundaries. This present a risk for impacts to areas outside of the mining lease. This is mpt permitted under the <i>Mining Management Act 2001</i>.</p> <p>DITT recommends that Primary Gold re-design the site to ensure sufficient room to manage infrastructure within the mining lease, or apply for additional mining leases to cover the affected areas.</p>
Appendix U – Commitments Register	Information gap	<p>There are a number of consultant recommendations, proposed research, trials, and studies described in the EIS that Primary Gold have not committed to undertaking in the commitments register, or provided reasons for actions not being required. This presents a risk that Primary Gold may not have an adequate understanding of the site for the appropriate long-term management of potentially significant environmental impacts.</p> <p>It is recommended that Primary Gold be required to commit to undertaking these studies, or demonstrate that they are not required.</p>