

18 October 2019



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Dear Campbell,

Request for Further Information and additional resource consents

Record Number/s: CRC184166, CRC201366, CRC201367, CRC201368
Applicant Name: Bathurst Coal Ltd
Activity Description: Various consents to undertake mining activities at the Canterbury Coal Mine

Overview

As you are aware, Adele Dawson has been processing your consent application. So we can progress your application, we are asking for at least one additional resource consent application and some further information.

Section 91 of the Resource Management Act 1991 allows the consent authority to defer the notification or hearing of an application for a resource consent if other consents under the Act will also be required. At least one additional resource consent has been identified as being necessary.

In addition, some further information under Section 92 of the Resource Management Act 1991 (RMA) is also required.

In relation to the request for further information, the options available to you are detailed below under '**Response options.**' Please complete one of these options by 11 November 2019. We need this information so we can understand any potential effects from your application. Without this further information, your application may have to be notified or declined.

Notification means that potentially affected parties and/or the general public are given the opportunity to raise their concerns or support for your proposal. Notification does not guarantee your application will be granted – there is the possibility it could be declined. For more information about notification, please go to <https://ecan.govt.nz/do-it-online/resource-consents/notifications-and-submissions/>.

Additional consent required

A review of current active consents authorising activities at the site has been undertaken to determine the consented baseline for discharges to land and water from the site. The consented baseline informs what additional activities require authorisation and the assessment of effects required. A copy of this review is attached as Appendix 1 to this letter. In summary, it is Environment Canterbury's view that discharges into the Tara catchment are only authorised from the area identified as the 4 pits and 'current area' on Figure 1 and 3 of the attached memorandum. This is on the basis that CRC170541 was a replacement consent and only sought to update the Acid Mine Drainage (AMD) treatment strategy. With regards to the disposal of Coal Combustion Residuals (CCR), it is Environment Canterbury's view that only disposal within the area identified on Figure 2 is authorised, again this is due to CRC170540 simply being a replacement of the previous consent but updating the AMD treatment strategy.

Consent for discharges of mine affected water, drainage water, residual contaminants from the treatment of water

On the basis of the consented baseline prepared, the scope of the current discharge permit for discharges into the Tara Stream does not cover all of the proposed Mine Operations Area (MOA) beyond the areas currently authorised. It is therefore requested that a new application or amended application is lodged for discharges from this expanded area. The rules of the Canterbury Land and Water Regional Plan (CLWRP) triggered are as follows:

- Discharge of stormwater: Discretionary activity under Rule 5.97.
- Discharge of drainage water: Discretionary activity under Rule 5.78
- Discharge of residual contaminants from the treatment of water: Discretionary activity under Rule 5.100.

Potential effects on wetlands

A review of the ecology assessments provided with the application and further information in response to the request from Selwyn District Council has been undertaken. It has been identified that there are likely to be seepages that meet the CLWRP definition of a wetland that have been removed or are within the MOA and could be affected. These were/are located on the north-west slopes of the site. There are also seepages or wetland areas located outside of the MOA (north-west slopes and the south-east gullies) but within the zone of influence of activities that could also be impacted.¹

In order to understand the potential effects on seepages/wetland areas please provide the following:

¹ Spring and seeps identified as *Gully seepages and wetlands (outside of Mine Operations Area)* in Boffa Miskell 'Canterbury Coal Mine- RFI response: ecological impact assessment report.' Potential seeps/wetland areas also evident in south-east gullies adjoining Tara Stream from aerial photographs.

1. A map identifying all individual seepages/wetlands located inside the MOA and within the zone of influence. This map should include the seep/wetland boundary and identify the location of seeps/wetlands that may have already been removed from any location within the MOA.
2. Using the map and information in response to question 10, an assessment of the potential ecological effects on seeps/wetlands and a description of any measures to avoid, remedy, mitigate or offset adverse effects.

Please note, Rule 5.162 of the CLWRP manages reducing the area of a wetland. It appears that an additional consent is necessary for seepages/wetlands already impacted within the MOA and any future reductions in wetland area that may result from direct or indirect action unless additional information can be provided to demonstrate consent is not required. If it cannot be demonstrated that a consent is not required, please lodge an application for reducing the size of a wetland in order to continue progressing the application currently in process.

Potential effects of the disposal of CCR

The EMP describes the disposal of CCR as part of the site rehabilitation and the authorisation of this under CRC170540. As described above and in the appended memorandum, it is Environment Canterbury's view that CCR disposal can only occur within the area identified on Figure 2 in the Tara Stream catchment.² If CCR disposal has already occurred beyond this area and is proposed to occur on the wider site, a new consent is necessary to authorise the discharge to land. Please provide the following:

3. Confirmation whether CCR disposal has occurred beyond the area identified on Figure 2 and if it will be part of the wider site rehabilitation.
4. If necessary, a new resource consent application seeking to authorise the disposal of CCR to land.

Potential effects on slope stability

The application and technical information supplied has been reviewed by Don Macfarlane, AECOM Technical Director – Engineering Geology. In order to understand the potential risks to slope stability, Mr Macfarlane has highlighted the following matters where further information is necessary to understand the potential effects on slope stability. Please provide the following:

5. Please clarify that if ex-pit ELF's are required for some reason, that they will be a temporary landform and the material will subsequently be relocated to an in-pit ELF.

² CCR disposal is also authorised in the North ELF

6. The geotechnical update report refers to a document *'Tip, Dams and Voids Principal Hazard Management Plan (CAN-TEC-PHMP-003)*. Please provide a copy of this document.
7. The draft mine closure criteria and final mine closure criteria specify different maximum slope. The geotechnical report also cites different stable slope angles for ELF fills. Please provide a single maximum slope angle.
8. Please describe the stormwater runoff controls for runoff from internal access roads/haul roads.

Potential effects on localised drainage, sub-catchment and catchment hydrology

There are numerous aspects of the proposed activities that could influence surface flows in the Upper Selwyn and Waianiwaniwa Catchments including changes to the catchment boundaries, the take and storage of water and changes to the landform. In order to better understand the effects of these activities, please provide the following:

9. An assessment of the effects on surface water flows (7dMALF and mean flows) in the Waianiwaniwa catchment and Selwyn River catchment. This assessment should consider the natural and post-mining topography, runoff co-efficients and meteorological conditions of the site and the influence of the water treatment system and take of water for dust suppression.
10. Based on the assessment above and knowledge of the localised natural drainage of the site and surrounding area, please provide an assessment of potential effects of altering drainage patterns on any seepages or wetlands on the north-west slopes, the south-east gullies and Tara Stream and any subsequent changes in low flows to receiving waterbodies. This assessment should identify any retrospective effects and future effects and also effects both inside and outside of the MOA.
11. An assessment of the storage of water and the take of water for dust suppression on the allocation limits for the combined Selwyn-Waimakariri Allocation Zone and any subsequent effects on the Selwyn Te Waihora catchment.

Potential effects on water quality and ecology

A review of the proposed activities and water quality and ecology assessments has been completed and additional information is required to better understand the potential effects. Please provide the following:

12. In order to assess the proposed activities against the CLWRP, please provide map identifying all surface water bodies and other surface water features such as artificial drains and ponds, wetlands, springs and seeps in accordance with the definitions in the CLWRP. The map should include where possible the water quality management unit where mapped on the CLWRP Planning Maps. Please also identify any water features that may have been removed and their previous location.

13. Based on the map, please describe if works have or will be undertaken in riparian margins and if consent is necessary under Rule 5.169.

Rehabilitation

The rehabilitation of the site is critical to minimise the long-term future effects of the mining activities. Some further detail is necessary to understand the rehabilitation process and on-going responsibilities for the site. Please provide the following:

14. The final drainage patterns (infiltration and run-off) may have implications for significant habitat located outside of the MOA as a result of changing contributions of flow to the receiving environment. Changes in the catchment area have been discussed but not changes in the overall nature of drainage. Please provide further details regarding what the final drainage patterns will be, what the methodology is to determine those patterns (i.e as part of rehabilitation plan), any potential adverse effects arising from changing drainage patterns and any monitoring that may be required.
15. As the site is leased and once rehabilitated will be returned to the landowner, what is the procedure for removing land from management by Bathurst once mining is complete. Specifically, will any changes to the consents be necessary and what checks will be undertaken to ensure all consent conditions have been adhered to.
16. The application discusses the final land cover following rehabilitation is likely to be production forestry or pasture. Due to the disposal of CCR at the site and the methods undertaken to manage AMD by encapsulating acid forming rock, are there any measures proposed to ensure those risks of disturbance are minimised in the long-term. Please provide an assessment of any risks future land use activities pose and any mitigation necessary (for example: land covenants restricting certain land uses).
17. One of the objectives of the site rehabilitation is to leave the site in a manner which is non-polluting and which ensures groundwater and surface water quality is not compromised. During mining, a water treatment system is necessary to manage off-site discharges. While I understand mitigation measures are proposed in an effort to manage long-term risks to water quality, if unsuccessful and treatment is necessary, what is proposed to ensure the on-going operation and monitoring of treatment systems and the remediation of any issues once land is transferred back to the landowner.

Your options and response requirements

S91 request timeframes

Under Section 88E(2) of the Resource Management Act 1991 the period of time starting from the date of this letter and ending with the date of receipt of the further application(s) required under Section 91 will be excluded from the processing time for CRC184166, 201366, CRC201367 and CRC201368.

Appeal to the Environment Court

You have the right to apply to the Environment Court for an order directing that Environment Canterbury's decision under Section 91 of the Resource Management Act 1991 be revoked. If you do wish to lodge an appeal you are advised to seek legal advice before doing so.

Section 92 request response options

The options available to you are set in Section 92A(1) of the RMA. You must choose one of the following options.

A. *Supply the requested information* by 11 November 2019.

If the information can be easily collated and supplied by this date, please provide it in writing (via email is fine) to Adele Dawson.

B. *Agree in a written notice* by 11 November 2019 to supply the information requested.

Sometimes technical information will take some time to collate or key contacts may not be immediately available. If you need a longer period of time to supply the information requested, please contact Adele Dawson to advise a reasonable timeframe within which you can provide the information. You can do this via email or letter.

C. *Refuse in a written notice* by 11 November 2019 to supply the requested information.

If you chose Option C, section 95C of the RMA requires us to publicly notify your application. If you receive submissions on your application, then you can expect to go through a resource consent hearing process. The charges fact sheet at this link indicates likely costs for a resource consent hearing: <https://ecan.govt.nz/do-it-online/resource-consents/first-steps-and-costs/>. You should be aware that your application could be declined through this process.

If you chose not to respond to this letter, then the process for Option C. applies.

If you would like to discuss this request in more detail, please don't hesitate to contact Adele Dawson at adele@incite.co.nz or 027 861 8846.

Yours sincerely,



Catherine DeGraaff
Consents Planning Team Leader

cc:Kathryn Hooper

Landpro

Via email.

Appendix 1: Canterbury Coal Mine Consented Baseline

MEMORANDUM

Date: 14 October 2019

Reference: CRC184166, CRC201366, CRC201367, CRC201368

From: Adele Dawson, Consultant Consents Planner

To: Catherine DeGraaff, Team Leader Consents Planning

SUBJECT: Canterbury Coal Mine, Consented Baseline

Introduction

1. The purpose of this memorandum is to describe the 'consented baseline' to inform the recommendation and decision on applications made by Bathurst Coal Ltd (the applicant) for new resource consents for mining activities at the Canterbury Coal Mine (CCM). To establish the consented baseline it is necessary to review the original consents authorising open cast mining at CCM. A history of the consents relevant to the new applications has been provided below. This review is focused only on discharges to land and water as these are the activities of most relevance to the current applications.

Consent history

2. A summary of all discharge to land and water consents for mining activities at CCM is included in Table 1. A description of the activities each consent authorised follows.

Table 1: Discharge to land and water consents for CCM		
Consent number	When exercised	Description
CRC991437	23 March 2000 – 17 February 2009	Discharges of water and contaminants from coal mining and stockpiling operations into Bush Gully Stream and unnamed tributaries of Waireki Stream.
CRC991437.1	17 February 2009 – 12 February 2014	Discharges of water and contaminants from coal mining and stockpiling operations into Bush Gully Stream and unnamed tributaries of Waireki Stream.
CRC081869	17 February 2009 – 12 February 2014	Discharges of waste materials and operating materials onto land.
CRC151389	12 February 2014 – 24 February 2017	Transfer of CRC991437.1
CRC151391	12 February 2014 – 24 February 2017	Transfer of CRC081869

CRC170540	24 January 2017- Current	Discharge of coal ash, lime products and mussel shells to land.
CRC170541	24 January 2017 – Current	Discharge of treated mine water into Tara Stream.

3. CRC991437 is the original discharge to water consent granted for CCM. The consent conditions specified:
 - a) The discharge is limited to stormwater runoff from vegetated area, soil/overburden storage areas, stockpiles and mine areas as described in the consent application.
 - b) Runoff is to be treated via settling ponds as shown on Figure 1.
 - c) A trigger limit of pH <6.5 or turbidity greater than 50NTU, which if exceeded requires the consent holder to notify Environment Canterbury and take measures to address contaminant levels.

4. The application for CRC991437 included the following details regarding the scope of the proposal:
 - a) The mine was to include a total of four opencast pits and discharge treated stormwater from stockpile, overburden and topsoil areas adjacent to watercourses.³
 - b) The legal descriptions of the properties on which mining operations are proposed are Blocks IV, VII and VIII Hororata Survey District, Lots 4 and 5 and Parts of Lots 2 and 3 DP 6591.
 - c) The total coal resource was estimated at approximately 760,000 tonnes with the following quantities estimated from each of the four open cast pits:
 - i. Old Victory Underground Mine: 10,800 tonnes
 - ii. Y1 pit: 91,900 tonnes
 - iii. Y4 pit: 70,300 tonnes; and
 - iv. F pit: 80,300 tonnes.
 - d) The proposed mining rate was anticipated to be 12,000 tonnes per annum but it was noted that it could be up to 20,000 tonnes per year. It was also anticipated that 1ha of new land would be mined per year and that approximately the same area would be backfilled and revegetated every year.

5. The proposed mine pit areas are shown in Figure 1 below. The unnamed tributary identified is the Tara Stream.

³ Kingett Mitchell (1998) *Malvern Hills Coal Mine Assessment of Environmental Effects*. Page 1

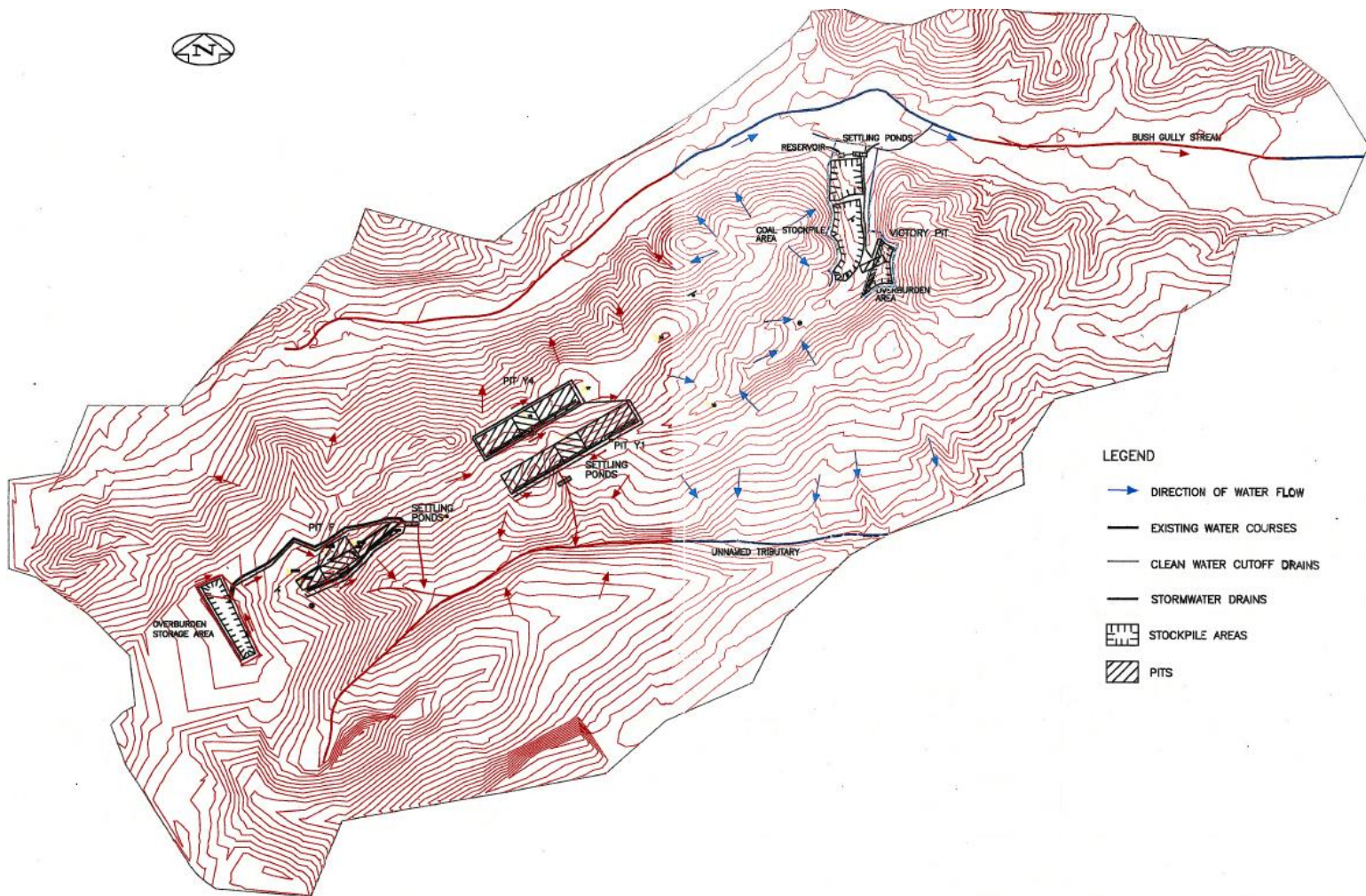
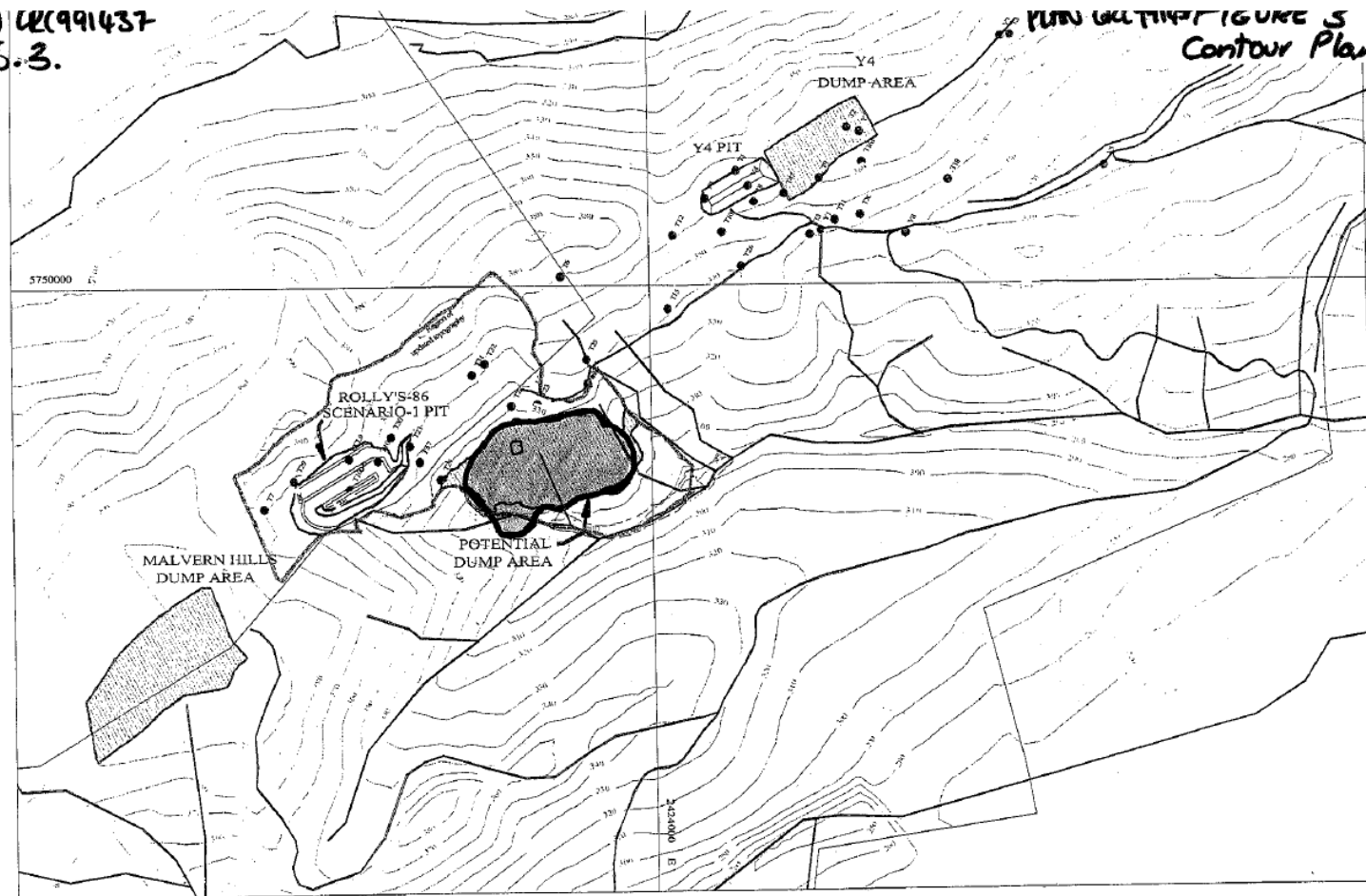


Fig. 2.4: Water management plan.

Figure 1: Proposed mine pits under CRC991437

6. CRC991437 was then varied to enable a separate water treatment system for overburden storage area 1 and to amend the water quality sampling requirements. The trigger limit for pH and timeframe for providing monitoring results was also changed.
7. At this time a new application was lodged for the discharge of contaminants to land. CRC081869 is the original discharge permit for the discharge of contaminants to land. The consent conditions specified:
 - a) The discharge shall only be waste materials including CCR and coal wash debris and operating materials comprising of crushed concrete, limestone chip and hydrated lime/quick lime.
 - b) The discharge shall only occur on Pt Lot 2 and 3 DP 6591.
 - c) The quantity of CCR disposed shall not exceed 2,500 tonnes.
 - d) Water from the CCR disposal area shall be diverted to the settling pond.
 - e) Water from the settling pond shall be sampled at least two times per year for total boron and total mercury and compared to the following trigger values:
 - i. 680 micrograms per litre total boron; and
 - ii. 1.9 micrograms per litre total mercury.
 - f) Coal wash debris and coal fines shall be returned to pits where excavated or encapsulated in the overburden dump.
 - g) Crushed concrete shall be discharged onto ground only in the construction of roads and culverts.
 - h) Limestone chips shall be discharged to land in drains for AMD reduction.
 - i) Hydrated lime and quick lime shall be discharges to the settling pond.
8. The plan attached to the consent documents shows the dump area just below the Pit F excavation area (see Figure 1 and 2).
9. CRC991437.1 and CRC081869 were exercised by the previous mine owner until the purchase of CCM by the applicant. The consents were then transferred to the applicant and issued new consent numbers, CRC151389 and CRC151391. No changes to the conditions were made when the consents were transferred.

LAN 020991437
FIG. 3.



MDS
Mine Design Systems Ltd

Catchment Contour Plan
01.09.03

Canterbury Coal Ltd
Coalgate Coal Prospect

Figure 2: CCR Disposal Area – CRC081869

10. The applicant then lodged applications for CRC170540 and CRC170541. These applications were made on the basis of replacing CRC151389 and CRC151391 and to revise the Acid Mine Drainage (AMD) treatment at the site as this was identified by the applicant as an issue.⁴
11. The application for CRC170540 and CRC170541 did not include any maps identifying the mine operations area or boundaries of mine pits. It did include a list of the land parcels the applicant considered they had land use consent to mine from SDC.⁵ The application also described that the mine area was 25ha and that up to 170,000 tonnes of coal per annum could be extracted within the current pit and a proposed southern extension.⁶ There is no further description of an extension to the consented mining area in the application.
12. Other changes proposed in the application for CRC170540 and CRC170541 included:
 - a) The quantity of coal ash was proposed to increase from 2,500 tonnes to 30,000 tonnes dry ash equivalent. The applicant describes the disposal of coal ash as being beneficial for the treatment of AMD by forming alkaline covers and reducing net infiltration.
 - b) The limit for boron was 0.68 mg/L and the applicant sought to increase this to 5.4mg/L but following the receipt of further information the applicant proposed a limit of 1.5mg/L for 18 months and to undertake a site-specific study to determine a location specific limit. If the study was not completed, the boron limit would reduce to 0.83mg/L.
 - c) Mussel shells were proposed to be used in a bioreactor to treat AMD flows prior to discharge via the settling pond.
 - d) Lime products are to be discharged land or into artificial drains to treat AMD.
13. The consent conditions of CRC170540 authorises the following:
 - a) The discharge of contaminants to land specifically coal combustion residuals, lime products and mussel shells where contaminants may enter water.
 - b) The discharge shall only occur on Part Lot 2-3 DP 6591 (CB24B/403), Part Lot 2-3 DP 6591 (CB651/33) and Part Lot 1 DP 18018 (CB2D/1450).
 - c) Coal combustion residuals (CCR) discharged to land shall not exceed 30,000 dry ash equivalent tonnes per year.
14. The consent conditions of CRC170541 authorises the following:
 - a) The discharge of stormwater, mine affected water, treated mine water, residual contaminants from the treatment of water and water discharges from engineered landforms into Tara Stream.

⁴ Landpro Ltd (2016) *Bathurst Coal Limited: Resource Consent Application to Environment Canterbury*. Page 3.

⁵ Pt Lots 2 & 3 DP 6591 (CB24B/403), Pt Lots 2 & 3 DP 6591 (CB651/33), Pt Lot 3 DP 8898, Lot 1 DP 23595, Pt Lot 1 DP 18018, Lot 1 DP 70704, RS 32347.

⁶ Landpro Ltd (2016) *Bathurst Coal Limited: Resource Consent Application to Environment Canterbury*. Page 5.

- b) The discharge shall only occur on Part Lot 2-3 DP 6591 (CB24B/403), Part Lot 2-3 DP 6591 (CB651/33) and Part Lot 1 DP 18018 (CB2D/1450).
- c) The discharges shall not result in the production of oil or grease films, scums, foams, floatable or suspended materials, or any conspicuous change in colour in the Tara Stream at the end of the mixing zone.
- d) Water quality sampling is required, and water quality samples are to be compared to the following trigger values:

Contaminant	Trigger value
pH	Between 6-9
Turbidity	50 NTU
Boron*	1.5 mg/L – three month rolling median for 18 months
Manganese	1.9 mg/L
Nickel**	0.011 mg/L
Zinc**	0.008 mg/L
Iron	1 mg/L
Aluminium	0.055 mg/L

*unless modified in accordance with consent conditions to a site-specific value. Otherwise defaults to 0.83mg/L after 18months from commencement date.

** ANZECC 95% species protection modified for hardness

- e) Any exceedance of a trigger value results in a requirement to investigate the cause of the exceedance, identify the risk to the environment, undertake steps to minimise the risk of future exceedances and report the findings and mitigation measures to Environment Canterbury.

Evaluation of the consented baseline

15. The activities currently authorised by CRC170540 and CRC170541 are important for assessing the effects of the current consent applications as it forms the baseline against which the proposal is evaluated. The applicant states that the 'consented baseline' is not determined on the face of the consent conditions alone and that the original applications and planning assessments are also relevant. I agree with the applicant in this regard and have summarised the relevant consents above and reviewed the previous applications, s42A reports and other correspondence.
16. In Section 3.8 of the application for CRC201366-8 the applicant has provided a description of their view of the consented baseline formed by CRC170541. The applicant considers that there was an error made by Environment Canterbury and the applicant in developing and reviewing the draft conditions of CRC170541 by not including two land parcels (subject to this application). The applicant has therefore made the current applications on the basis of including these two land parcels⁷. It can then be taken from this that the applicant considers that discharges from all land parcels listed in CRC170541 and the two land parcels subject to the current applications.⁸

⁷ RS 32347 and Lot 3 DP 8898

⁸ Part Lot 2-3 DP 6591 (CB24B/403), Part Lot 2-3 DP 6591 (CB651/33) and Part Lot 1 DP 18018 (CB2D/1450), RS 32347 and Lot 3 DP 88898.

17. While the conditions of CRC170540 and CRC170541 refer to land parcels Part Lot 2-3 DP 6591 (CB24B/403), Part Lot 2-3 DP 6591 (CB651/33) and Part Lot 1 DP 18018 (CB2D/1450) which are also identified on Plan A of each consent document, I do not consider discharges can occur from the entirety of these land parcels. The application for CRC170540 and CRC170541 does not include a plan of the mine pit boundaries in the application documents or further information that could have been attached to the consent. The application was however made on the basis of replacing the previous consents which authorised activities almost unchanged from the original permits for open cast mining. I consider the consented baseline is based on the original permits and variation as updated by CRC170540 and CRC170541.
18. I have included a summary of the key details of the consented baseline and the relevant consent which provides that baseline in Table 2.

Table 2 – Summary of consented baseline		
	Consented Baseline	Relevant Consent
Mine location	The four pits identified in Figure 1.	CRC991437
Extraction rate	Discharges are associated with the extraction of up to 170,000 tonnes of coal and >850,000 BCM of waste rock per annum.	CRC170540 and CRC170541 (in application)
Discharge quality	pH – Between 6-9 Turbidity – 50 NTU Boron – 0.83 mg/L Manganese – 1.9 mg/L Nickel – 0.011 mg/L Zinc – 0.008 mg/L Iron – 1 mg/L Aluminium – 0.055 mg/L	CRC170541
CCR disposal volume	30,000 tonnes dry ash equivalent	CRC170540

19. This view is supported by the applicant agreeing to draft conditions as confirmed on 19 January 2017⁹. In addition, correspondence between myself and the applicant's agent in 2017 in providing pre-application advice also confirms this position.

⁹ HPRM C17C/17045

20. Following the granting of CRC170541 the applicant provided a proposed mine staging plan (see Figure 3) and sought pre-application advice for regarding consents necessary to expand the mine.¹⁰
21. A pre-application meeting was held on the 7 June 2017. An email summary of this meeting was sent to Landpro on 8 June 2017 seeking confirmation of the future activities proposed and the advice that was to be provided.¹¹ Importantly, this email summarised the proposed future activities as operations moving to the south and north concurrently from the 'current mining area' into the areas identified as WT/WP_EXT) and NO1-NO5 as shown on the staging plan (see Figure 3).
22. Advice was provided to Landpro on 28 of June 2017 regarding the consent requirements for the mine expansion and related to the retrospective consent for earthworks in the high soil erosion risk area.¹² In my view the applications currently being considered (CRC184166 and CRC200366-8) are the applications resulting from the discussions with Landpro in 2017 and therefore at the time CRC170540 and CRC170541 were granted, the applicant's agent was of the understanding consent was necessary for mining activity beyond the area identified as the 'current pit'.

¹⁰ The staging plan is also included in the application for CRC184166.

¹¹ HPRM C17C/94032

¹² HPRM C17C/137371

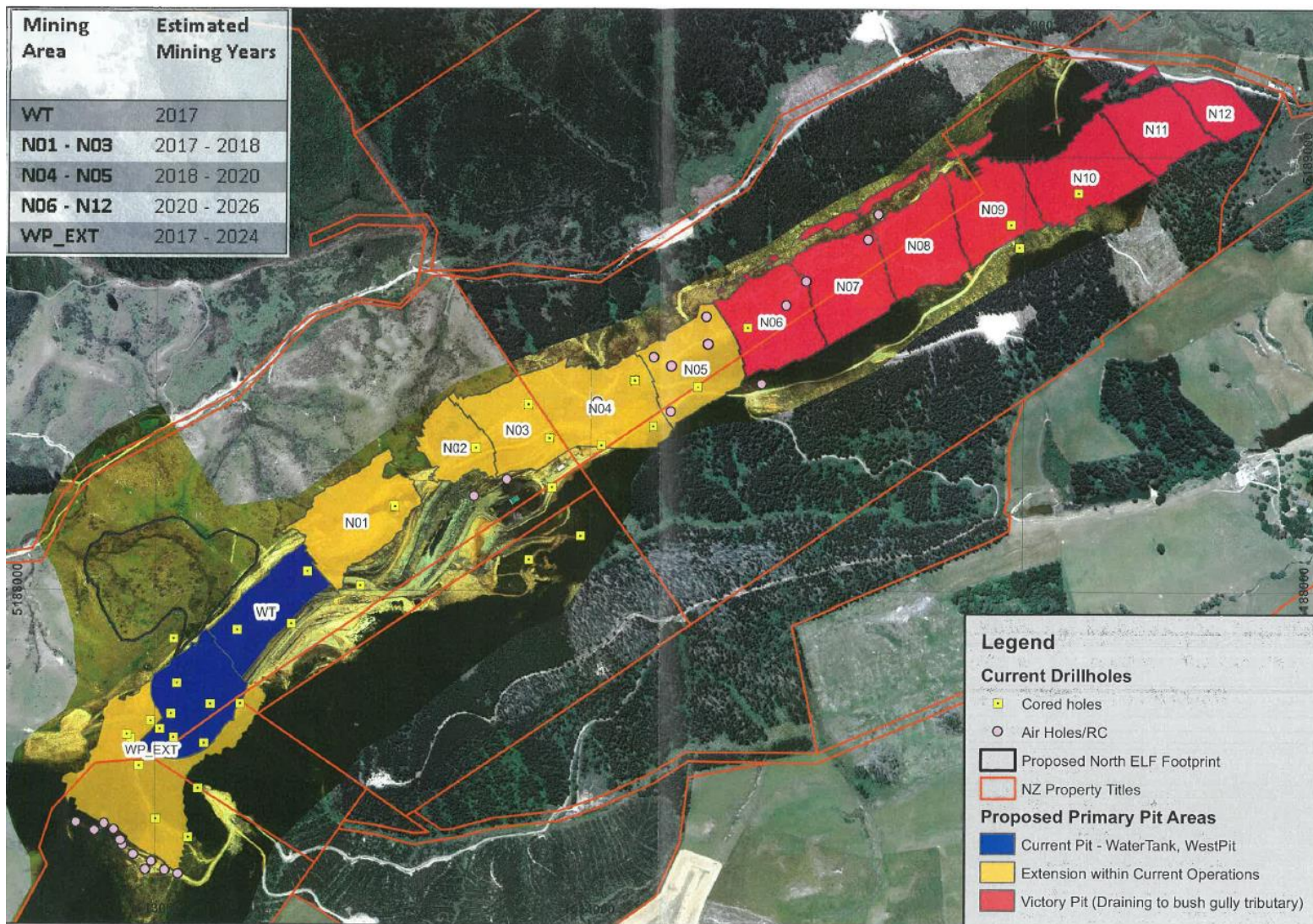


Figure 3: Canterbury Coal Mine Staging Plan

Summary

23. It is my view that only discharges from part of N01, N02-N03 extension, N04 and N05 are currently consented. This is on the basis that some of these areas align with Pit F and Pits Y1 and Y4 authorised under CRC991437, CRC991437.1 and CRC151389 (see Figure 4)¹³. This area also partially corresponds with the pit shown on Figure 2 identifying the Rolly's scenario 1 pit which was being excavated in 2008.
24. Discharges from the 'current pit' as identified on Figure 3 may also be consented as this was what was being excavated at the time CRC170540 and CRC170541 were lodged. However, as no plan was provided as part of the application, only site visits undertaken at the time informed the consent process therefore this is uncertain. For the purposes of this assessment, this area has been included as part of the consented baseline.
25. With regards to the disposal of CCR, mussel shells and lime products, I consider that discharges only within the area identified on Figure 2 are authorised but up to 30,000 tonnes dry ash equivalent can be disposed.

¹³ Note that Figure 4 does not show the extension area to N02 and N03 as now included within the proposed Mine Operations Area which would also be partially consented.

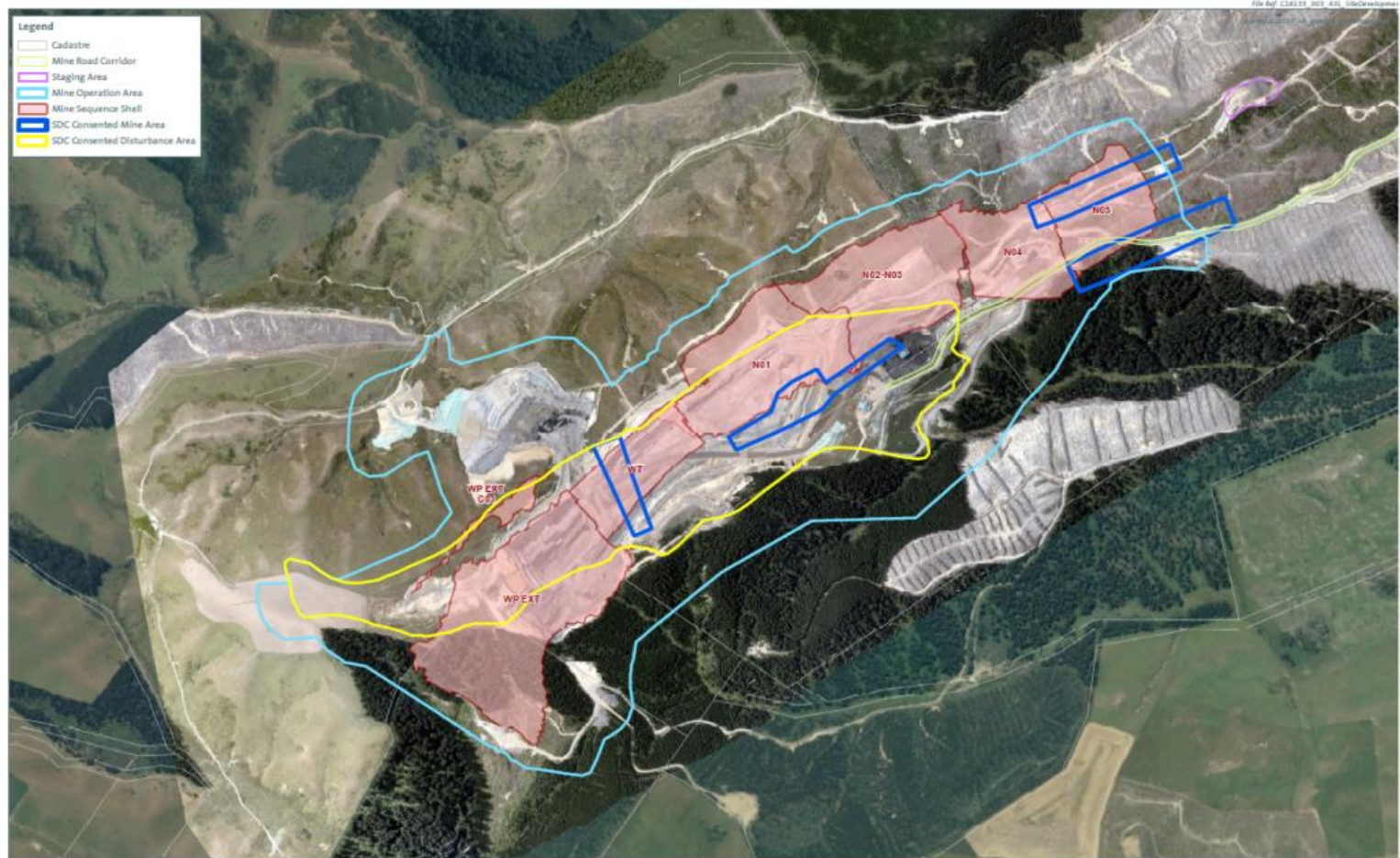


Figure 4: Comparison of Proposed Mine Operations Area and Pit F, Y 1 and Y4