

2 October 2015

Department of Conservation
Private Bag 701
Hokitika 7842

our ref: S12073

Attn: Judi Brennan

Dear Judi,

RE: Rangitira Developments Limited – Comments on Draft Access Arrangement Significance Report and Summary Document

In reference to your correspondence dated 3 June 2015, please find outlined below a summary of the comments from Rangitira Developments Limited (RDL) on the *Draft Access Arrangement Significance Report* and the *Summary Document*. These comments have been made in table format on the attached table, and are based on ongoing consultation with the Department of Conservation (DOC) and your various experts. Where it has been highlighted that further information is required, this has been prepared and is attached to this response, or in the case of additional field work, has been scheduled to be undertaken in the next few weeks.

Since having received the Draft Access Arrangement Significance Report and Summary Document, a number of changes have been made to the scope of the project including;

- **Updated Mine Footprint** – The total area of disturbance has increased from 85.97 hectares to 109.2 hectares. The original mine plan as submitted did not make provision for water management drains, and these have now been added to the mine plan, contributing to the increased area of disturbance by approximately 16.6 hectares. In addition area has been added to the topsoil stockpile (additional 4 hectares) and the dump area has been extended to account for the new tarn (additional 3 hectares).
 - *Revised Mine Plans Dated 4 September 2015 – Rev 7 – Palaris Consulting Ltd*
- **Removal of the Tarn** – The revised mine footprint has resulted in an amended proposal to remove this tarn and replace it with a new tarn. The existing tarn was likely to be significantly compromised by retaining it and having it surrounded by overburden dump, therefore based on the advice of our experts it is proposed to remove this tarn completely and put in a new tarn. The location of the proposed new tarn is shown on the revised mine plans.

Mitchell Partnerships Ltd (2013, p 93) recommended that where a choice existed as to where stockpiles and moveable infrastructure be located at the proposed mine site, they should always be located on



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the lowest value ecosystems, or those which are easiest to rehabilitate. The location of the “high value ecosystems” was also mapped (Mitchell Partnerships Ltd 2013, p 94). Locating the proposed overburden stockpile in the area of the large tarn was chosen because:

- i) Locating the stockpile there minimises the effects on high value ecosystems overall.
- ii) The vegetation within the tarn is almost exclusively an exotic rush (*Juncus bulbosus*). This is one of only two (small) areas with non-native plant species.
- iii) Removal of the tarn reduces the amount of edge habitat created and the overall mine footprint by allowing a greater volume of overburden to be stored in a smaller area (the backfill landform is more efficient). As a result vegetation removal overall is reduced by including the tarn area.
- iv) The experts advising the applicant consider that given changes to hydrology / catchment if the tarn was retained between overburden dumps, the long-term resilience of the tarn would be uncertain.
- v) Experience suggests rehabilitation creation of tarns can be effective.
- vi) The experts advising the applicant consider that the successful relocation of koura within the tarn to sites nearby is achievable.

It is intended to collect data to test the effectiveness of tarn creation as habitat during the upcoming field season.

➤ *Revised Mine Plans Dated 4 September 2015 – Rev 7 – Palaris Consulting Ltd*

- **Geology Brunner Coal Measures**

A number of comments have been received regarding the Brunner Coal Measures (BCM). The work undertaken by CRL Energy on behalf of RDL has provided greater certainty around the location of BCM's as shown on the map referenced below.

➤ *CRL Energy Te Kuha Regional Geology Map – dated 7 July 2015*

- **Geotechnical Stability Assessment**

Based on comments from Mark Smith around needing more information to assess the geotechnical stability of the pit, further work has been undertaken, and is detailed in the report referenced below.

➤ *Te Kuha Mining Operation Geotechnical Concept Study - dated 15 September 2015 – Landpro Limited*

- **Additional Work Program** – Based on the advice received during consultation with DOC, further field work has been scheduled to understand certain aspects of the project, and to address matters raised by DOC in the draft Access Arrangement Significance Report and Summary Document, including in the supporting reports prepared by DOC's experts. A copy of the proposed work plan is attached.

➤ *Additional Work Program – September 2015 – Mitchell Partnerships & Boffa Miskell*

The additional work program is scheduled to be undertaken in early October, following which further information will be provided to the Department.

Having reviewed the various aspects of the application, RDL seek to formally place the application for the easement concession for the access road on hold, pending the investigation of alternative options, however we request that the application for an access agreement for the mine itself continues to progress towards public notification.

If you have any questions regarding the further information provided, please do not hesitate to contact myself or Anne Brewster at any time.

Yours sincerely,

A handwritten signature in blue ink that reads "Kate Scott". The signature is written in a cursive style with a large initial 'K'.

Kate Scott