BATHURST
RESOURCES LIMITED

Millerton Block Water and AMD Management Plan

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Glossary of Terms and Abbreviations

Term	Definition
ACML	Ancillary Coal Mining Licence
AEMR	Annual Environmental Monitoring Reports
Al	Aluminium
AMD	Acid and metalliferous drainage
AWP	Annual Work Plan
Bathurst	Bathurst Resources Limited, including its subsidiary companies BT Mining Ltd, Bathurst Coal Ltd, and Buller Coal Ltd
BCM	Brunner Coal Measures
Betterment	The definition of 'Betterment' in the context of the BPCP is: *The term betterment has been applied to rivers in New Zealand (i.e. Waikato River) that have experienced long term anthropogenic contamination. It is recognised that managed improvement will take 3 generations (80-100 years) and require a collective, sustained, and sustainable effort between stakeholders.* *Betterment is the process of active and progressive improvement of river health over the long-term.* *The betterment pathway for a given waterbody is marked by a combination of discrete events and long-term decay in AMD sources. Performance monitoring is used to track short- to medium-term water quality improvements along the betterment pathway. These improvements are site / project specific but contribute to overall long-term recovery.* Betterment requires that water management activities have a positive contribution to ongoing long-term water quality improvement, rather than merely avoiding or mitigating adverse impacts. The long-term goal is for aquatic ecosystem to be compositionally and functionally returned to their natural or near natural state and mahinga kai will be suitable to gather.
BPCP	Buller Plateau Continuation Project
Buller Plateaux	A collective reference to the Stockton Plateau and Denniston Plateau
CaO	Calcium Oxide – acid neutralising agent
Clean Water	Runoff from undisturbed ground or rehabilitated areas where water quality is suitable for direct discharge into natural streams without treatment. Comparable to natural background water quality.
CML	Coal Mining Licence
DCA	The Millerton Drainage Control Adit (DCA) (the adit) was constructed during historic underground mining to drain a naturally forming syncline in the coal floor (now called MW16). The DCA is formed predominately in basement with the inlet and outlet points daylighting within the coal seam.
ELF	Engineered Landform
EOML	End of Life Mine
FTAA	Fast-track Approvals Act 2024
km	Kilometres
LDPD1 and 2	Lime Dosing Plant 1 (Mangatini Catchment) and 2 (Saint Patricks Catchment)

Term	Definition
LDS	Low Density Sludge
LINZ	Land Information New Zealand
Mahinga kai	The customary gathering of food and natural materials and the places where those resources are gathered.
Mangatini Treatment System	The collective 'Mangatini Treatment System' includes all associated AMD collection, alkaline dosing, and AMD sludge capture / sumps, and treated water discharge infrastructure.
Millerton Block	AMD impacted waterways draining various catchments within the Millerton and northern Rockies mining areas at Stockton.
Mine Water	Runoff from disturbed, mining and historic areas where the water requires AMD correction and/or sediment capture prior to discharge into natural streams. that is contaminated Next Planned Review: January 2027 Term/Abbreviation Definition predominantly by coal fines (i.e. runoff from stripped coal and coal stockpiles).
MgO	Magnesium Oxide – acid neutralising agent
MP	Mining Permit
NZSOLD	New Zealand Society of Large Dams
PAF	Potentially Acid Forming
Performance monitoring	Monitoring the performance of water and AMD management. Can be measured against betterment reference values.
Point of Exit	The point, when the mining company is released from its obligations to manage AMD at Stockton and can formally hand the site back to the Crown under LINZ administration.
QA/QC	Quality assurance and quality control
SEMP	Site Environmental Management Plan
Small dams	Dams that do not meet the specification of a classifiable dam. A classifiable dam is a dam that has a height of 4 or more metres and stores 20,000 or more cubic metres of water or other fluid.
Stormwater	Runoff from disturbed areas where the water requires sediment capture prior to discharge into natural streams.
Syncline	A downward forming fold in rock layers forming a natural low point in the coal floor bedrock.
The Project	The Buller Plateaux Continuation Project
Treatment	Treatment refers to both: • Sediment capture of storm water; and • Sediment capture and pH correction of mine water.
TSS	Total Suspended Solids
UWHR	Upper Waimangaroa Haul Road (a Project sub-area)
Water Infrastructure	Water management structures e.g. sumps, pumps, drains, dams, ponds, pipelines and monitoring equipment.

1. Introduction

1.1 Purpose

Bathurst Resources Limited (Bathurst) (including its subsidiary companies BT Mining Ltd, Bathurst Coal Ltd, Buller Coal Ltd, and joint venture BT Mining Ltd, are seeking approvals through the Fast-track Approvals Act 2024 (FTAA) for the Buller Plateau Continuation Project (BPCP, or the Project).

This Millerton Block Water and Acid and Metalliferous Drainage (AMD) Management Plan (also referred to as the "Plan"), is developed as part of the Project and relates to the Stockton sub-area. The Millerton Block occupies the northern portion of Stockton Mine. This Plan fulfils the Advice note to **Consent Condition WAT13 (Appendix B)**, whereby the focussed water and AMD management approach for the Millerton Area may be presented in a separate sub-plan.

The Plan complements the existing Stockton Environmental Management Plans and other related sub-plans, procedures and guidance and specifically provides the objectives, risks, management controls, responsibilities, and training requirements to effectively manage water and AMD environmental effects across three distinct Millerton Block Project phases- the Operational Phase, End of Mine Life (EOML) Phase, and Closure Phase.

This Plan has been prepared in accordance with the recommendations from the following key assessments:

- Buller Plateau Aquatic Ecology: history, thresholds and long-term management. Instream 2026.
- Stockton Water Management and Assessment of Effects on Waterways and Water Users from the BPCP Stockton Mining Activities. GHD 2026.
- Millerton Block Water and AMD Management Report. BRL 2026a.

The Plan is intended to be a practical operational document for relevant site personnel, contractors, and management, and is to be implemented alongside related plans and procedures as required and listed throughout this Plan. Aspects related to consent compliance are retained in the overarching Stockton Mine AMD Management Plan (STO-ENV-PLN-016) (Implementation of this Plan is a requirement of **Condition WAT12)**, Stockton Mine Environmental Water Management Plan (STO-ENV-PLN-013) (Implementation of this Plan is a requirement of **Condition WAT13)**, and the Erosion and Sediment Control Plan for Land Disturbance Activities (BPCP-ENV-PLN-013). This includes consent conditions that are also relevant to Millerton Block activities, including:

- Implementation of water and AMD Management Plans;
- Water takes, diversions, and impoundment for process purposes and treatment;
- Overburden and AMD sludge management requirements, including ELF performance;
- Monitoring requirements (including surface water, groundwater, and aquatic ecology);
- Compliance and performance assessment; and
- External reporting.

The linkages between consent conditions and specific operational water and AMD management approaches within Millerton Block have not been made in this Plan, to reduce duplication.

Design details (e.g., pipeline specifications, diversion channel sizing, pit sump sizing for sedimentation, pit sump and pump live storage / float switch configuration, etc.) for water and AMD management infrastructure are not provided in this Plan directly. These water management infrastructure design details are provided in the:

- Water Infrastructure Design Plan (BPCP-ENV-PLN-012, where water reports to management infrastructure within the mine). Implementation of this Plan is a requirement of **Condition ERO3**; and
- Erosion and Sediment Control Plan for Land Disturbance Activities (BPCP-ENV-PLN-013, where runoff / sump discharge reports directly to the receiving waterway). Implementation of this Plan is a requirement of **Condition ERO4**.

The infrastructure design process uses a risk rating (Low, medium, or high-risk structures) and structure permanence (temporary versus permanent) to determine the appropriate average recurrence interval (ARI) for design adequacy.

This Plan discusses AMD as a collective term for surface flows and sub-surface / groundwater flows (e.g., seepage flows, flows through historic underground workings, etc.). This is considered appropriate as the GHD (2026) review noted that groundwater interacts with waterways (surface water) draining the Stockton Plateau.

2. Objectives

The overall objective for water and AMD management across Stockton (aligned with the Stockton Mine AMD Management Plan (STO-ENV-PLN-016), Stockton Mine Environmental Water Management Plan (STO-ENV-PLN-013), and the Erosion and Sediment Control Plan for Land Disturbance Activities (BPCP-ENV-PLN-013)) is to describe and then implement controls that ensure compliance with the relevant conditions of approvals, and:

- Ensure that the generation of AMD affected water is prevented, minimised, and/or treated in accordance with the proposed conditions of consent to minimise associated environmental impacts, reduce ongoing environmental liabilities, and to ensure that statutory and non-statutory discharge limits are achieved.
- Ensure infrastructure is appropriately designed and fit for purpose, covering design needs in the short term, long term and for permanent landforms.
- Provide for an adaptive management approach within the conditions of the approval framework to manage environmental uncertainty associated with water and AMD, to reflect new information as it becomes available or identified hazards and risks, over the management phase timeframe. This will inform ongoing effectiveness, prevention and mitigation, need for investigation of management responses/measures, monitoring and reporting.
- Ensure that any corrective action and response meets regulatory requirements, including as may be required by or within the approval framework, consideration of adaptive management processes that respond to operational, environmental, monitoring and climatic variances overtime.

- Assist in achieving internal Environmental Policy through positive mitigation and restoration of impacted ecosystems.
- Ensure relevant personnel (staff and contractors) are appropriately informed, inducted and trained across relevant water and AMD management procedures.

2.1 Actions to achieve objectives

Specific actions have been recommended for the Millerton Block to achieve these objectives in recognition of the unique context/externalities affecting Millerton Block receiving environments (refer **Section 4.0**). The actions as informed by BRL (2026a) are to:

- Construct diversions around work areas to separate clean water and minimise the quantity of water reporting to the water management systems.
- Collect stormwater during stripping of the vegetation and construction of the main sumps in sediment treatment systems to discharge back to the natural catchment (described in the Erosion and Sediment Control Plan for Land Disturbance Activities (BPCP-ENV-PLN-013) and Water Infrastructure Design Plan (BPCP-ENV-PLN-012).
- Divert AMD impacted mine water to existing in-pit sumps or to interim sumps constructed within the overburden. Water from these sumps will be pumped to the Mangatini Treatment System[1] for AMD treatment / pH correction and discharged to Mangatini Stream during the Operational Phase and EOML Phase.
- Increase capture and transfer of AMD (including fire suppression water) from the Millerton Drainage Control Adit (DCA) stopping (described in **Section 7.2.1.3**) for treatment at the Mangatini Treatment System from 2026 to 2028 to reduce underground workings / groundwater AMD loads and improve Mine Creek water quality (until the MW16 / Syncline area is mined out by the end of 2028). This will be followed by a period of AMD capture in Mine Pit sumps / MW16 Sump and transfer to the Mangatini Treatment System from 2029 onwards, with MW16 Sump fully commissioned by 2032/33.
- Mine out a further ~88.4 ha of underground workings from 2026 to 2033 (with the majority scheduled to be removed by 2028), reducing the historic AMD sources, groundwater AMD loads, and removing fuel for fires. A total of 187 ha of underground workings are estimated to be mined out by opencast mining from 2010 to EOML (2033); a ~50% reduction from 369.5 ha pre opencast (2010). When combined with the assumed long term acidity load decay rate (0.62%/yr), this removal is estimated (in BRL 2026a) to reduce the acidity loads discharging historic underground workings from ~4,200 t/yr in 2010 to ~1,600 t/yr at EOML (2033);
- Cease operational fire suppression in 2028 (subject to the mine schedule) reducing flow volumes through historic underground workings and additional flushing of acidity.
- Sealing portals in historic underground workings to reduce water flow into workings, particularly where workings intersect pit sumps (e.g., sealing the DCA portal in MW16 Sump).
- Construct and commission the ~718,900 m^3 MW16 Sump in the void created by mining out overburden above the Syncline area.

[1] The collective 'Mangatini Treatment System' includes all associated AMD collection, alkaline dosing, and AMD sludge capture / sumps, and treated water discharge infrastructure.

- Design operational and final landforms with pit sumps at topographical low points in each area of disturbance to capture all seepage and runoff for management including:
    - Sedimentation treatment of sediment laden water prior to discharge to manage receiving environment Total Suspended Solids (TSS) and turbidity; and
    - Collection of the majority of AMD impacted water from the opencast disturbance footprint (using surface drains and sub-surface collection drains to intercept seepage / reduce AMD migration into groundwater) to enable either pumping to the Mangatini Treatment System for AMD treatment (until 2046) or in-sump alkaline dosing at MW16 (2047 onwards).
- Minimise the volume of potentially acid forming (PAF) waste rock in Engineered Landforms (ELF) in the upper Twins, Granity, and Miller catchments to reduce long term AMD loads in these sub catchments, reduce the areal extent for AMD seepage loss to groundwater, and to concentrate PAF waste rock in the Millerton ELF and resultant AMD seepage in the MW16 Sump catchment for treatment.
- Develop a final landform design strategy minimising the footprint of Millerton ELF and leaving coal floor and highwall areas permanently exposed to reduce long term treatment requirements. This strategy:
    - Minimises the footprint of Millerton ELF and therefore potential AMD seepage volumes; and
    - Incorporates highwall/coal floor surface types (with relatively rapid acidity load decay) in the final landform.
- Construct Millerton ELF to incorporate AMD minimisation techniques and staged rehabilitation.
- Configure sumps to allow natural overtopping via engineered spillways to the receiving environment once water quality criteria are met to minimise long term pumping requirements. Pit sump pump capacity is sized for capture of up to the 90th percentile[2] rainfall event while AMD treatment is required.
- Utilise the Mangatini Treatment System for AMD treatment / Low density sediment (LDS) management until 2046, while rehabilitation occurs and MW16 acidity loads are in a relatively rapid decay phase.
- Transition to MW16 Sump AMD treatment by alkaline slurry dosing (in sump) from Lime Dosing Plant (LDP) 1 from 2047 onwards.
- Introduce infrastructure to collect the majority of water and AMD generated from the Millerton Block opencast disturbance footprint, including AMD generated from disturbance prior to implementation of BPCP.
- Allow for flexible degrees of AMD treatment during the EOML and Closure Phases, enabling partial treatment for water quality improvement to meet betterment reference values at key

[2] Twins Sump pump capacity sized for 95th percentile flows to further reduce spill frequency.

downstream sites by EOML, effective AMD treatment and sludge management and progressive improvement in water quality as part of the 80-year recovery programme[3].

3. Buller Plateaux Continuation Project Description

3.1 Overview

Bathurst is a publicly listed New Zealand coal mining company with a focus on people and long-term environmental sustainability. Bathurst is New Zealand's largest coal mining company, who proposes to mine approximately 20 million tonnes of coal over a 25-year period as part of the Project.

The Project is located on the Stockton Plateau and the Denniston Plateau (collectively referred to as the Buller Plateaux), approximately 15 kilometres (km) northeast of Westport on the West Coast of the South Island.

The Project area includes a combination of Bathurst-owned land, Crown land, and private land, and encompasses both existing and proposed mining areas. Mining activities currently occur within several Coal Mining Licence (CML), Mining Permit (MP), and ancillary coal mining licence (ACML) boundaries that collectively define the operational footprint of the Project.

The proposed Stockton sub-area within the overall Project consent boundary is shown in **Figure 1** and will be covered by a new MP once approved under the FTAA with various approvals and land Access Arrangements to support operations within the MP.

3.2 Operations

The Project involves coal extraction across multiple operational areas on the Stockton and Denniston Plateaux, linked by the Upper Waimangaroa Haul Road (UWHR), which enables coal and equipment to be transported from Denniston to Stockton for processing. Mining activities are undertaken on a continuous basis, and include coal extraction, overburden removal, material placement, rehabilitation works, coal transportation and routine maintenance of haul roads and infrastructure.

Coal extracted from the Buller Plateaux is processed and transported using existing infrastructure, including the Ngākawau Rail Loadout and associated aerial ropeway, which enable the transfer of coal from the mine sites to the national rail network.

The Project represents the continuation and spatial extension of existing operations at the Stockton Mine.

This Plan is developed as part of the Project and as part of the Stockton sub-area.

This Plan (and associated Stockton procedures, plans etc, as listed throughout) will, as required, be updated to reflect BPCP obligations if approved under the FTAA.

[3] A focus for Bathurst mine planning is an 80 to 100-year (three generations) water quality improvement programme that will be a partnership with the Crown and Iwi. The Crown (LINZ) has liability for treating AMD from acid forming mine waste rock disturbed at Stockton prior to 2017. Responsibility for AMD generated subsequently lies with Bathurst as the incumbent mining licence holder. The three generations improvement programme aims to restore Mahinga kai values in the streams flowing from the Stockton mine (and surrounding areas) (Instream 2026).

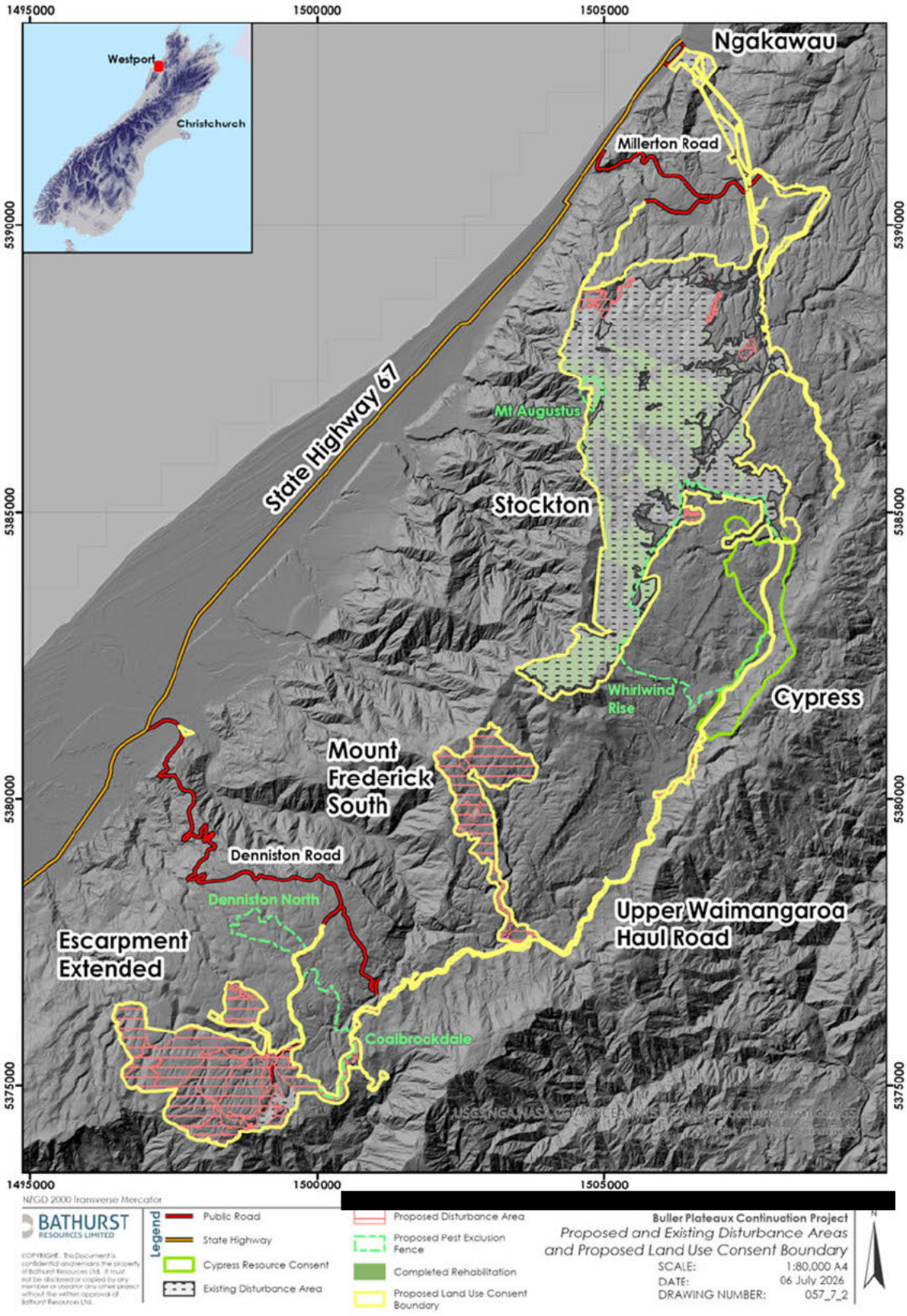

Figure 1: Proposed and Existing Disturbance Areas and Proposed Land Use Consent Boundary for the Project

4. Millerton Overview

4.1 Environmental Setting

A full description of the Stockton Mine, including Millerton Block is included in GHD (2026). Key Millerton Block details are provided below.

4.1.1 Millerton Block Location

The Millerton Block occupies the northern portion of Stockton Mine. The Millerton Block extent includes the upper reaches of Rudolph Stream, Twins Stream, Granity Stream, Miller Stream, and Mine Creek sub-catchment streams, as identified in **Figure 2**.

The northern boundary of the Millerton Block is defined by a combination of the existing CML boundary and the northern extent of historic underground workings. The eastern and western boundaries are defined by the existing CML. The southern boundary is formed by the border with Mangatini Catchment, which drains a large portion of Stockton Mine into the Ngākawau River. Elevation varies across Millerton Block from ~500 to 700 m above sea level. The terrain is rugged with steep slopes and undulating surfaces. Surface water drains across this steep landscape from south to north into smaller creeks and streams. The streams are defined by steep and narrow rocky valleys, slightly opening up towards Millerton township (BRL 2026a).

4.1.2 Waterbodies

The sub-catchments of the main waterbodies draining the Millerton Block are identified in **Figure 2.**

Granity Stream runs along the western edge of the Millerton block, while Miller Stream is a tributary of Granity Stream and flows northward across the centre of the Millerton Block. Granity and Miller Streams merge near Millerton township and Granity Stream then continues to drain into the ocean at Granity township. Granity Stream and the Miller Stream tributaries (east and west) are primarily fed by rainwater runoff from shallow soils and exposed sandstone and granite rock with low permeability. These streams begin within the Stockton mining areas, with flows that increase rapidly in response to rainfall. Granity Stream maintains a higher baseflow from groundwater compared to Miller Stream, likely due to rainwater seeping through surface cracks caused by historic underground mining.

Mine Creek runs along the eastern edge of the Millerton block. Similar to the other streams, Mine Creek is also fed by rainwater runoff from shallow soils and exposed sandstone and granite rock with low permeability. The Eastern tributary of Mine Creek (S6 tributary) begins within the Stockton mining areas with flows that increase rapidly in response to rainfall. Mine Creek discharges into the Ngākawau River directly east of Ngākawau township then drains into the ocean.

Twins Stream is located along the south-western edge of the Millerton block. Twins Stream has a small catchment up on the Stockton Plateau before discharging down the escarpment to drain into the ocean just south of Granity township. AMD seeps from historic underground workings (i.e., 3rd West workings) that report to monitoring site T1[4] in Twins Stream cannot be captured (at source /

[4] T1 is considered the representative site for monitoring historic and proposed future (BPCP) effects of mining in Twins Catchment. The effects of the neighbouring privately owned Rockies Mining Limited (RML) operation on Twins Stream are measured downstream of T1.

emergence) and treated as they are not located at a specific adit but likely seep via faults to report at T1. Further work via the Crown (through Land Information New Zealand (LINZ)) AMD management project is underway to determine if it is practical to treat upper Twins Stream AMD from historic workings in the long term.

Rudolph Stream is located south of Twins Stream and receives AMD discharges from unnamed small historic underground workings sources, similar to Twins Stream. A small portion (~0.9 ha) of the upper Rudolph Stream catchment will be cutoff by Twins Pit (scheduled disturbance starts late 2028) and diverted into Twins Stream. This will not result in any new / additional discharge to Rudolph Stream. New compliance criteria are proposed for Rudolph Stream based on existing water quality datasets described in Instream (2026).

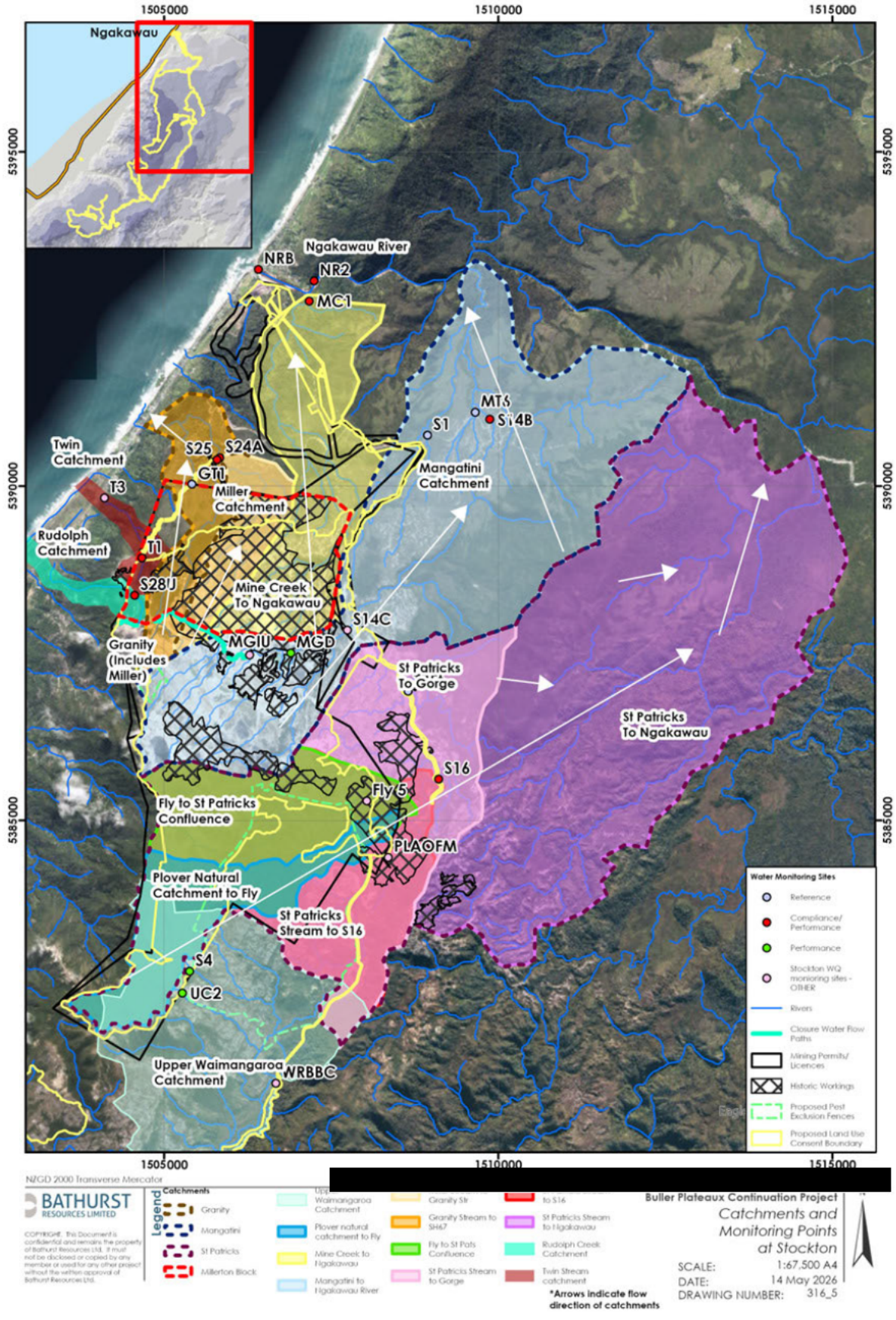

Figure 2: Stockton main drainage catchments

4.1.3 Millerton Block Historic and Current Mining Activities

Mining of the Stockton Plateau commenced in the 1880's targeting Brunner Coal Measures (BCM). The Millerton Block is characterised by highly fractured sandstone overlying an extensive network of historic underground workings. Remnant fires continue to burn in the underground coal in several areas and have done so for many decades. Early underground mining left a legacy of historic underground workings that discharge AMD to streams and rivers.

Contemporary AMD is derived from waste rock deposits and the exposure of rock strata to the atmosphere within the opencast disturbance footprint.

All drainage from the Millerton Block either naturally reports to Twins Stream, Granity Stream, Miller Stream, or Mine Creek, or is pumped to underground workings for fire suppression or back to the Mangatini Treatment System. The water quality of these natural streams is highly affected due to discharge from the historic underground workings, effects of fire suppression activities to manage underground burning coal seams and surface run-off over the pyrite rich sandstone (BRL 2026a and Instream 2026).

4.1.4 AMD and Water Management

AMD management across Stockton is complex and challenging due to the terrain and climate and involves managing the effects of historic / legacy underground mining activities and contemporary opencast mining activities.

Bathurst currently employs a range of methods to treat AMD from both historic and contemporary sources. Existing passive and active treatments include lime dosing, sediment settling facilities and mussel shell reactors. These methods neutralise acidity and raise the pH of dosed water, causing dissolved metals to precipitate, flocculate and be retained, while treated water is discharged to the environment. Excavation of historic underground workings, diversion and treatment of contaminated water, purpose built engineered landforms (ELF) for overburden storage weathered granite capping, and revegetation are employed by the mine to reduce AMD (Instream 2026).

AMD also affects aquatic ecosystems including biota which are affected by the low pH and elevated dissolved metals contained within uncontrolled and untreated discharges.

The BPCP and its proposed water management initiatives, including the proposed water and AMD management strategies across the Millerton Block, will continue to reduce legacy and contemporary AMD impacts. The approach involves improvement of future waterway quality that will contribute to the realisation of the long-term goal of aquatic ecosystems, recovery, and mahinga kai being suitable to gather (within approximately 80 years or 3 generations). In summary the approach is to facilitate a shift over time from an improvement management approach (for water quality) in waterways classified as AMD impacted or recovering, to a protection management approach (for aquatic ecosystems) for those designated as recovered, as waterway quality and aquatic ecosystem health improves (GHD 2026).

The Stockton Mine AMD Management Plan (STO-ENV-PLN-016), Stockton Mine Environmental Water Management Plan (STO-ENV-PLN-013), Mangatini Sump Management Plan (GHD 2018, GHD 2024 update), Stockton Operational AMD Sludge Management Report (BRL 2025), and this Plan will underpin much of the future water quality improvements in waterways draining the Millerton Block

(specifically from the contemporary opencast disturbance footprint) and subsequent improvements in the quality of water in streams draining the Millerton Block and in the lower Ngākawau River.

4.2 Project Phases

Managing the AMD generated by contemporary (post 2010) opencast disturbance in the Millerton Block, is focused on contributing to an overall betterment[5] in downstream water quality relative to pre-opencast (2010) conditions. Effective management of water and AMD of the Millerton Block will occur across three distinct Project phases - the Operational Phase, EOML Phase, and Closure Phase.

The timeframes for each phase are indicative for a point in time, i.e., based on anticipated approval of the BPCP application in April 2027, and are subject to change if project schedules are changed. These timeframes / dates will be updated through the Annual Work Plan (AWP) process, as required.

- Operational Phase – covering the years between consent commencement (April 2027) and EOML (2033);

  The Operational Phase spans the period of:

  - Proposed consent commencement from April 2027;
  - Progressive rehabilitation commencing, including vegetation direct transfer (VDT); until
  - EOML (end 2033) when scheduled coal and overburden extraction cease

- EOML Phase – covering the years between EOML (2033) and completion of final landform rehabilitation (2046);

  The EOML Phase spans from the end of 2033 to completion of final landform rehabilitation expected by the end of 2046. Through this period rehabilitation activities will include:

  - Final landform shaping;
  - Capping and topsoil spreading; and
  - Vegetation planting and ongoing maintenance

- Closure Phase – covering the years from 2047 onwards ;

  The Closure Phase runs from 2047 onwards when the Stockton mine is expected to be rehabilitated (with respect to final landform rehabilitation) and the site is required to be transferred back to the Crown (in accordance with the requirements of the Deed of Commitment[6] entered into between the Crown, Buller District Council, West Coast Regional Council and BT Mining Ltd). At that stage it will be administered by LINZ on behalf of the Crown.

[5] Bettermen is the process of actve and progressive improvement of river health over the long term. A full description of Betterment in the context of the BPCP and Millerton block is defined in Section 4.2.1.

[6] The Deed of Commitment states that once BT Mining has completed its mining operations at Stockton and carried out final landform rehabilitation it must transfer the land, comprising the Stockton mine, and any associated permits and licences and infrastructure for treatment of AMD to the Crown and make the Terminal Payment (to cover costs of treatment of AMD caused by BT Mining's Operations) and at that time BT Mining is released from any future obligations to treat AMD. Refer Acid Mine Drainage. History of AMD Management and Proposed Future Management. January 2026

The unique context/externalities affecting the receiving environments (as mentioned above) of the Millerton Block requires a series of actions across the three distinct Project phases. Each phase recognises:

- the Millerton Block open cast mining water and AMD management philosophy;
- final landforms;
- betterment reference values to optimise water and AMD management and/or treatment;
- infrastructure requirements across phases;
- estimated AMD volumes and acidity loads generated (and their management) in the Millerton catchment;
- sludge management;
- downstream monitoring sites acidity loads and acidity / Aluminium (Al) concentrations based on final landform AMD modelling;
- potential workable options as a way to support Millerton Block water and AMD management transitions across water and AMD management strategies as may be required (BRL 2026a).

The focus of this Management Plan is the Operational and EOML phases (aligning with the term of the BPCP). The Closure Phase (from 2047 onwards), when the Stockton mine is expected to be rehabilitated (with respect to final landform), is when the site is transferred back to the Crown for ongoing management. Notwithstanding this, the infrastructure outlined in this Plan will be available to assist the Crown to manage AMD in the longer term.

4.2.1 Betterment

The definition of 'Betterment' in the context of the BPCP is:

> *The term betterment has been applied to rivers in New Zealand (i.e. Waikato River[7]) that have experienced long term anthropogenic contamination. It is recognised that managed improvement will take 3 generations (80-100 years) and require a collective, sustained, and sustainable effort between stakeholders.*
>
> *Betterment is the process of active and progressive improvement of river health over the long-term.*
>
> *The betterment pathway for a given waterbody is marked by a combination of discrete events and long-term decay in AMD sources. Performance monitoring is used to track short- to medium-term water quality improvements along the betterment pathway. These improvements are site / project specific, but contribute to overall long-term recovery.*

The Millerton Block was extensively disturbed by underground mining from 1890 to 1969, leaving an estimated 369.5 ha network of historic underground workings discharging AMD to multiple streams

[7] "Betterment" in Waikato River water quality plans is primarily highlighted in legal interpretations of the Vision and Strategy (Te Ture Whaimana), which interpret "restoration" as requiring enhancement beyond just maintaining the current state. It is linked to Policy 5 of the proposed Waikato Regional Plan Change 1 (PC1) (to be enacted 2026). Proposed Waikato Regional Plan Change 1 (PC1) | Waikato Regional Council

draining the Millerton Block (including Rudolph, Twins, Granity, Miller, and Mine Catchments). These streams do not currently meet ecological recovery thresholds described in Instream (2026).

Modern opencast mining in the Millerton Block was commenced by Solid Energy New Zealand Ltd in 2010 in the same areas of the historic underground workings. This has reduced the extent of the historic underground workings network to an estimated 271.2 ha in 2025 (with a further reduction in area to 182.5 ha by EOML (2033) as part of the BPCP). Opencast mining has also enabled the removal of a number of remnant fires within the underground workings that had been burning uncontrollably since the 1970's.

In recent years, the Crown has been reviewing economic alternatives to treat AMD on the Stockton Plateau. The current AMD management approach adopted and supported by iwi, the local councils and the Crown is to progressively improve impacted streams with the objective of sustaining mahinga kai values within 3 generations (or 80 years approximately).

To measure AMD improvement / betterment in light of the objective above, the BPCP has adopted 2010 as the reference point for the Millerton Block water quality for the following reasons:

- 50+ years of AMD discharge from the historic underground workings to the Millerton streams has in effect defined the environment up until the commencement of modern open cast mining in 2010;
- 2010 reference point enables a high degree of separation between effects of new practices and contemporary AMD sources from the effects of remnant historic underground AMD sources that will remain outside the opencast disturbance footprint post BPCP;
- Acidity loads in 2010 were not influenced by the short-term AMD generation / effects from the use of pit water required to cool or extinguish underground fires; and
- Sets the datum from which the trajectory of AMD improvement from contemporary activities can be sensibly measured.

Time-dependent betterment reference values for acidity load, acidity concentration, and Al concentration have been developed for key sites in streams discharging Millerton Block to guide long term AMD management. These sites are Twins Stream (T1), Granity Stream (S25), Miller Stream (S24A), and Mine Creek (MC1). These betterment reference values estimate what acidity loads and acidity / Al concentrations would have been if:

- The contemporary (i.e., 2010 onwards) opencast mining in Millerton Block had not occurred;
- The Millerton Block historic underground workings had remained at their full 2010 areal extent (369.5 ha); and
- AMD continued to discharge from these historic workings without treatment.

Millerton Block Water and AMD management strategies have been developed to keep the forecast long term annual median Al concentration (post EOML) below sub-catchment specific betterment reference values at T1, S25, S24A, and MC1. This has all been included in the mitigation and control measures for management of AMD and water across the three project phases. Derivation of these betterment reference values is described in the Millerton Block water and AMD management report (BRL 2026a).

This Plan (and associated Stockton procedures, plans etc, as listed throughout) will, as required, be updated to reflect BPCP obligations if approved under the FTAA.

5. Statutory Requirements

5.1 Legal Framework

This Plan (and associated Stockton procedures, plans etc, as listed throughout and italicised below) will, as required, be updated to reflect BPCP obligations if approved under the FTAA.

All Consent Conditions that apply to the Millerton Block water and AMD management sub-plan are defined in the overarching Stockton Mine AMD Management Plan (STO-ENV-PLN-016), Stockton Mine Environmental Water Management Plan (STO-ENV-PLN-013), and the Erosion and Sediment Control Plan for Land Disturbance Activities (BPCP-ENV-PLN-013). The linkages between consent conditions and specific operational water and AMD management approaches within Millerton Block have not been made in this Plan, to reduce duplication.

5.2 Other Guidance[8]

- Bathurst Resources Limited Environmental Policy
- Agreed Crown Liability for Stockton acid and metalliferous drainage including terminal payment for long-term management of BT Acid and Metalliferous Drainage Liability (Refer History of AMD Management and Proposed Future Management (BRL 2026b))
- STO-ENV-PLN-013 Stockton Mine Environmental Water Management Plan
- STO-ENV-PLN-016 Stockton Mine AMD Environment Management Plan
- BRL 2025. Stockton Operational AMD Sludge Management Report 2025
- Mangatini Sump Management Plan (GHD 2018)
- Mangatini Sump Management Plan – Council Update (GHD 2024)
- STO-TEC-FRM-087 Dig/Dump Planning Checklist - Sign Off
- STO-MIN-SOP-069 Dumps, Stockpiles and Hoppers Standard Operating Procedure
- STO-ENV-PRO-024 Management of Clean Water Diversions Standard Operating Procedure
- STO-ENV-PRO-031 Rehabilitation Stages and Planning
- STO-ENV-PRO-032 Water Sampling Procedure
- STO-ENV-PRO-069 Dump Standard Operating Procedure
- STO-ENV-PRO-087 Dig Plan Checklist
- STO-ENV-SOP-065 Water Management Infrastructure and Pond Inspections Standard
- Operating Procedure

[8] As italicised, listed Stockton plans, operating procedures, standard operational procedures and other applicable checklists or guidance will be updated, as required, pending FTAA approval to reflect BPCP obligations.

- STO-ENV-SOP-098 Site Pond and Dump Cleaning Standard Operating Procedure
- STO-ENV-SOP-107 LDS Filter Bed Maintenance and Cleaning Standard Operating Procedure
- STO-MIN-SOP-105 Pumping Set Up and Maintain Pumps Standard Operating Procedure
- STO-TEC-PRO-104.4 Disturbance Permit
- STO-ENV-FRM-319 Active Mining Daily Inspection
- Community Expectations around water quality and quantity
- Iwi – Mahinga Kai Water Quality Targets -3 generations of water improvements, targeting life supporting capacity of water (Refer History of AMD Management and Proposed Future Management (BRL 2026a))
- Specific water infrastructure or other design standards as required.

6. Stakeholder Consultation

A draft of this management plan was supplied to relevant regulators as part of the FTAA pre-consultation engagement.

The stakeholder consultation regarding associated technical reports and this management plan has been summarised in the Stakeholder Consultation section of the BPCP FTAA main application.

Once this management plan is approved, this section will document all future stakeholder engagement undertaken for subsequent versions.

7. Management Approach

This section outlines the management approach for water and AMD related effects associated with the Millerton Block.

A risk-based approach to minimise potential effects on the environment is used. This approach recognises an adaptive risk management framework that reduces uncertainty, supports informed decision-making, and remains responsive to evolving operational, regulatory and environmental conditions. Refer to Stockton Mine AMD Management Plan (STO-ENV-PLN-016) for the full discussion on Risk Assessments.

Risk assessments have informed current operations and BPCP design and implementation with respect to management of AMD.

7.1 Sources and Effects

Environmental risks associated with AMD and water management across the Stockton sub-area include the following[9]. All are relevant to the Millerton Block. Specific risks to the Millerton Block are noted also.

[9] As per Stockton Mine Environmental Water Management Plan (STO-ENV-PLN-013) and Stockton Mine AMD Management Plan (STO-ENV-PLN-016).

- Less than ideal or suboptimal water management leads to poor or decreasing water quality.
- Effects on aquatic biota and vegetation from poorly maintained water treatment infrastructure and water treatment methods that are not fit for purpose.
- Loss of topsoil caused by inadequate water controls during mine development works and vegetation stripping pose sedimentation risk alongside inadequate water and erosion controls on soiled but non-vegetated rehabilitated surfaces.
- Increasing interaction of water and sediment (e.g., the avoidance or minimisation of material movements and stockpiling in areas subject to runoff is not kept to an absolute minimum).
- Clean water is not separated from storm/mine water wherever possible to avoid unnecessary contamination and to reduce treatment volumes (i.e., clean water should be diverted around the operations where practicable).
- Mine planning does not properly define water courses and flows or recognise for appropriate sediment retention structures (i.e., silt ponds or check sumps) leading to uncontrolled runoff and increased sedimentation.
- Water infrastructure life expectancy e.g., pumps, pipes, sumps, and drainage channels are not designed accordingly to accommodate for contributing catchments flows, including increasing flows and peak rainfall events for the required design life.
- Poor or incorrect characterisation of overburden materials resulting in inappropriate overburden management, unplanned AMD generation, and additional treatment/management requirements.
- AMD **prevention** measures are inadequate or fail, resulting in excessive AMD loads, increased treatment costs, and potential exceedance of AMD treatment capacity.
- AMD **minimisation** measures are inadequate or fail, resulting in excessive AMD loads, increased treatment costs, and potential exceedance of AMD treatment capacity.
- Controls to prevent the release of AMD influenced water are inadequate or fail. Controls to segregate AMD and clean water fail, resulting in unplanned discharge of AMD, impacts to downstream catchments, excessive AMD loads, increased treatment costs and exceedance of treatment capacity.
- Sustainability of functioning ecosystems.
- Ability to meet betterment reference values specific to the Millerton Block are not realised.
- Inadequately phased Millerton Block water and AMD management infrastructure, including diversion drains, final landform pit sumps and management strategies over time for each sub-catchment i.e., for sedimentation, pump and treat at the Mangatini Treatment System, controlled discharge within betterment reference values, in-sump alkaline dosing.
- Less than adequate maintenance of water infrastructure inflows and management of discharges to prevent health and safety risk.
- Forecast acidity loads for treatment and associated AMD sludge management requirements across all Millerton Block project phases require recasting;

- Forecast residual water quality at key downstream performance monitoring sites require recasting.
- AMD treatment method or capacity is insufficient, resulting in increased treatment costs and complexity. Undersized treatment systems could result in unexpected reagent costs and accumulation of treatment by-product (i.e., AMD sludge), causing additional cost and removal complexity to Bathurst and/or The Crown at Mine Closure.
- Deterioration in Mangatini Stream/ Ngākawau River water quality if combined Mangatini and Millerton AMD treatment in the Mangatini Treatment System is not managed effectively.

7.2 Mitigation and Management Measures

Effects associated with water and AMD management across the Millerton Block will be managed through a combination of operational controls, monitoring, inspection, and response procedures. Control and mitigation measures will vary across each phase and are focused on managing effects at the source, controlling the timing and location of activities, and responding to issues should they arise. An adaptive management learning-oriented approach to managing environmental uncertainty associated with water and AMD will be employed to reflect new information as it becomes available over the management timeframe).

As discussed, infrastructure design details for water and AMD management infrastructure are provided in the:

- Water Infrastructure Design Plan (BPCP-ENV-PLN-012, where water reports to management infrastructure within the mine); and
- Erosion and Sediment Control Plan for Land Disturbance Activities (BPCP-ENV-PLN-013, where runoff / sump discharge reports directly to the receiving waterway).

The infrastructure design process uses a risk rating (Low, medium, or high-risk structures) and structure permanence (temporary versus permanent) to determine the appropriate average recurrence interval (ARI) for design adequacy.

The following mitigation and management measures focus on the Operational and EOML phases.

7.2.1 Millerton Block Operational Phase

The Operational Phase water management infrastructure is shown in **Figure 3** and includes the final landform and permanent pit sumps. Water and AMD management will evolve / transition from the current situation (e.g., use of temporary in-pit sumps for AMD capture, fire suppression, etc.) to the final landform over the Operational Phase. As such, not all operational water management infrastructure used throughout the Operation Phase are shown in **Figure 3**.

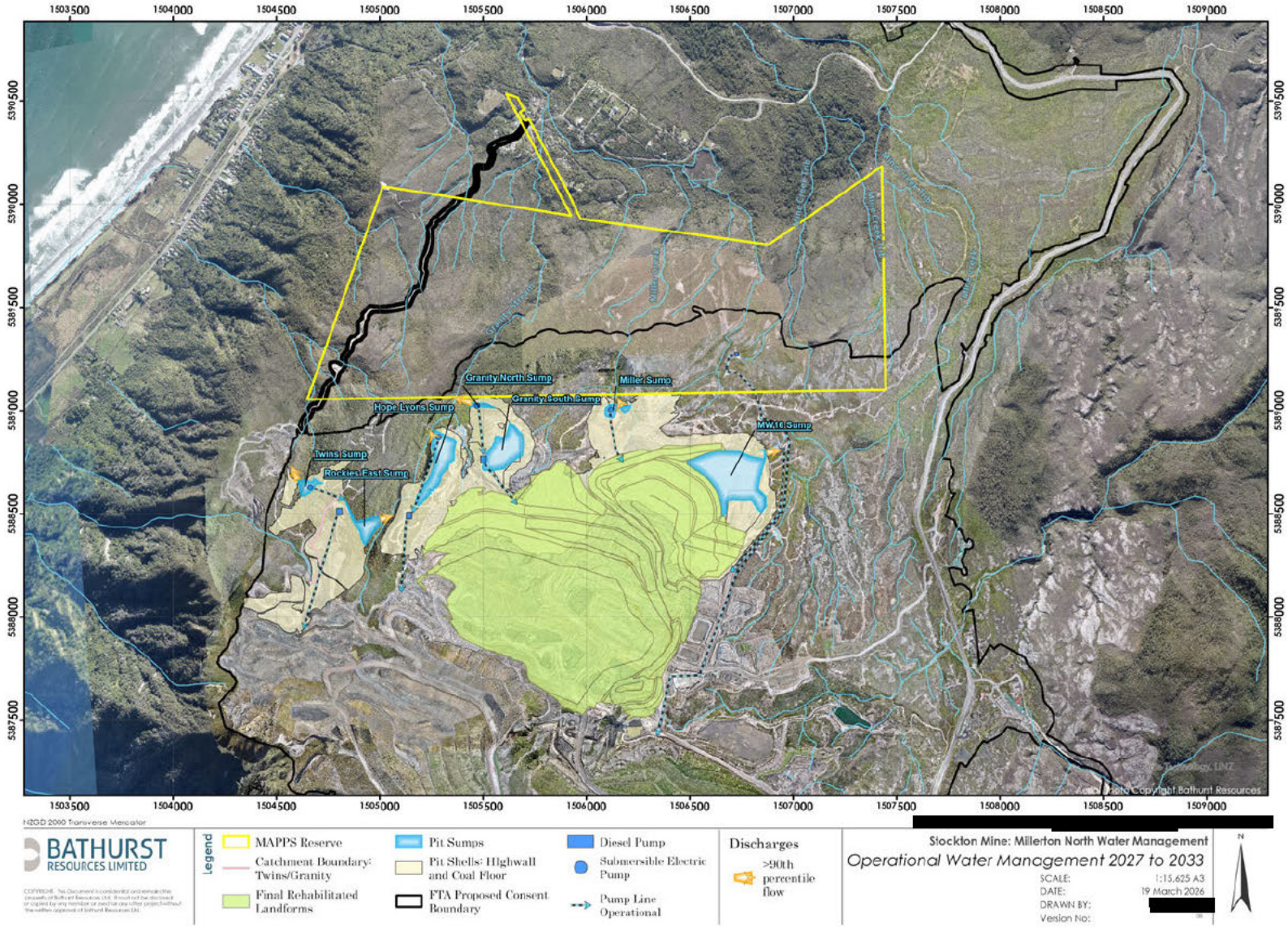

Figure 3: Operational Water management 2027 to 2033:

7.2.1.1 Sumps / Dams

Diversions around work areas will be constructed both to separate clean water and minimise the quantity of water reporting to the water management systems/sumps. Clean water diversions will be directed towards natural catchments.

While stripping of the vegetation, water will be collected in sediment treatment systems and discharged back to the natural catchment in accordance with the Erosion and Sediment Control Plan for Land Disturbance Activities (BPCP-ENV-PLN-013). Storm water is typically run-off from stripping areas and the initial break in works where water chemistry is similar to natural run-off (e.g., before overburden exposure and associated sulfide oxidation / generation of AMD has affected water chemistry). Sediment treatment sumps will be constructed downstream of stripping areas to capture and settle sediment and discharge clean water back to the natural catchment.

Once overburden removal commences, including during the construction of the main sumps, water will either be diverted to existing in pit sumps or to interim sumps constructed within the overburden. This run-off will be treated as mine water. Interim sumps will be constructed as needed to capture runoff from overburden and coal mining areas. Sumps will be sized based on lifespan and catchment to accommodate sediment capture and provide sufficient storage for pumping. In-pit sumps will be constructed as mining progresses and coal floor becomes available.

Water management infrastructure will be designed in accordance with the Water Infrastructure Design Plan (BPCP-ENV-PLN-012), as this water reports to management infrastructure within the mine disturbance footprint (i.e., is not discharged to natural catchments). Mine water from these sumps will be pumped to the Mangatini Treatment System. Sumps will have spillways appropriately sized, as per the Stockton Mine Environmental Water Management Sub Plan (STO-ENV-PLN-013) and Water Infrastructure Design Plan (BPCP-ENV-PLN-012). At times, the pits themselves will act as sumps as it is impractical to design an in-pit sump that has capacity for the largest expected storm event.

Required water volume capacity may use small dams[10]. Detailed designs will be confirmed depending on final catchments / topography and engineering assessments. Small dam design details are provided in the:

- Water Infrastructure Design Plan (BPCP-ENV-PLN-012, where water reports to management infrastructure within the mine),
- Erosion and Sediment Control Plan for Land Disturbance Activities (BPCP-ENV-PLN-013, where runoff / sump discharge reports directly to the receiving waterway).

The filter bed sumps (used for Mangatini Treatment System Low Density Sludge (LDS) dewatering) are all located in the Millerton Block and will remain permanently, as discussed in the Stockton Operational AMD Sludge Management Report (BRL 2025).

[10] Dams that do not meet the specification of a classifiable dam. Dams that meet the classifiable dam specification of a dam that has a height of 4 or more metres and stores 20,000 or more cubic metres of water or other fluid are outside the scope of this Plan. These dams shall be specifically designed following the New Zealand Society on Large Dams (NZSOLD) Dam Safety Guidelines 2024 for design, construction and management. Classifiable dam design typically requires assistance from external consultants.

7.2.1.2 Sediment Management

Sediment management within mining areas will consist of silt fences, check dams, coir / coconut fibre logs, and contour drains to reduce velocity and capture sediment. These structures will be recorded on an inspection schedule to ensure they remain operational, and any cleaning or maintenance can be undertaken as required. Sediment sumps will also be utilised for sediment management. These will be sized to settle the desired particle size, provide storage for accumulated sediment, and achieve an acceptable discharge TSS / turbidity. The sump configurations will allow for cleaning and optimal settling within the topographic limitations.

Small sediment ponds and silt fences may be required to manage run off from access tracks where these report directly to the natural environment. These will be sized to settle the desired particle size, provide storage for accumulated sediment, and achieve an acceptable discharge TSS / turbidity (Refer Erosion and Sediment Control Plan for Land-Disturbance Activities (BPCP-ENV-PLN-013)).

It is expected that there could be up to a 10 m depth of sediment accumulated in the Syncline. The accumulated sediment is derived from wall / roof collapse material, TSS in surface runoff that enters underground workings through cracks / portals, TSS in fire suppression water pumped into workings, voids / stowing material, and AMD precipitates. This accumulated sediment will be removed in conjunction with the surrounding overburden.

7.2.1.3 Pumps

Pumps will be a mix of electric submersibles, diesel centrifugal and electric centrifugal depending upon application and location.

Electric centrifugal pumps at the DCA stopping will manage underground water reporting from the Syncline as required. The Millerton DCA was constructed during historic underground mining to drain a naturally forming syncline (**Figure 4**) in the coal floor. Pit sump pump capacity is sized for a 90th percentile rainfall event. Once the sump capacity is overwhelmed, the overflow water will report to the natural catchment. The DCA stopping and pumps remain in place to manage any elevated turbidity that may arise while overburden above the Syncline is removed (refer **Section 7.2.1.7**), in addition to capturing AMD. The Syncline area is scheduled to be mined out by the end of 2028. This will be followed by pump reconfiguration and a period of AMD capture in Mine Pit sumps / MW16 Sump and transfer to the Mangatini Treatment System from 2029 onwards, with MW16 Sump fully commissioned by 2032/33.

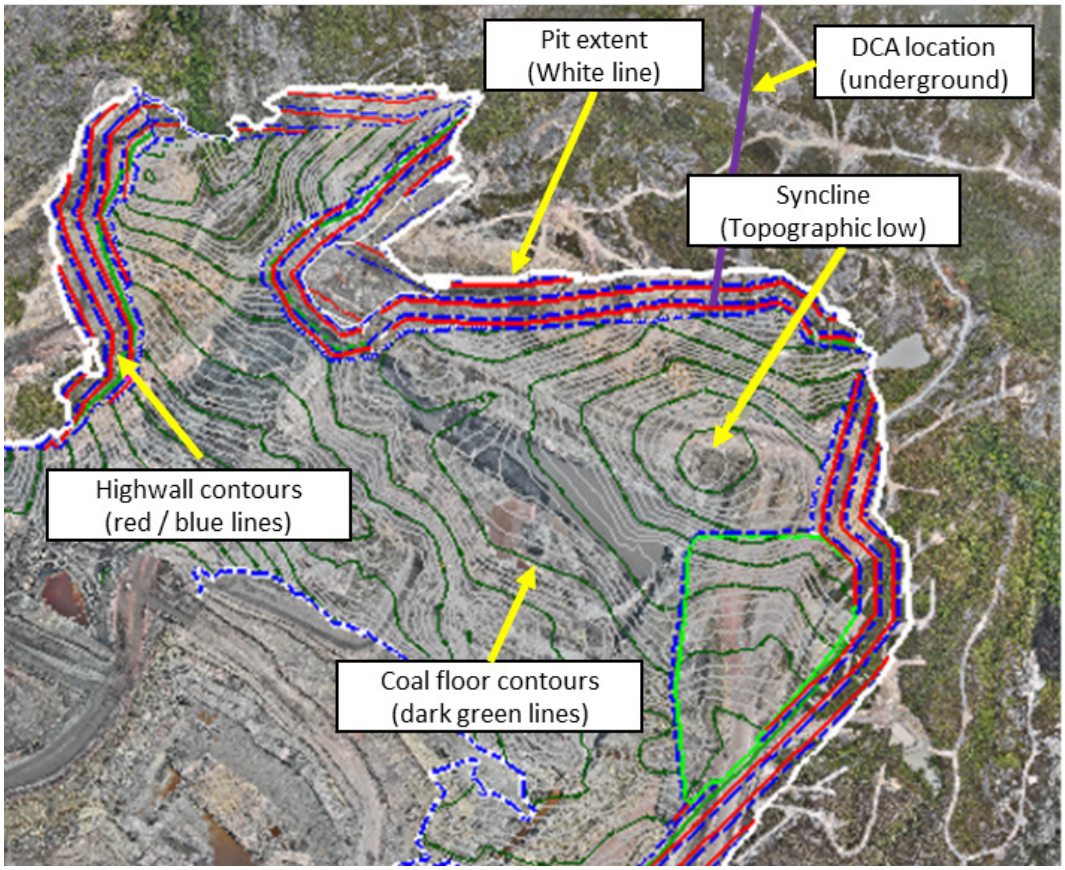

Figure 4: Syncline location within proposed pit shell in upper tributary of Mine Creek

Where pumps are at risk of flooding, they will be placed on a pontoon. Electric pontoon pumps will be powered by a generator located on a high point. Diesel pontoon pumps may have an auxiliary fuel tank also placed on a pontoon to ensure continuous diesel supply when they are inaccessible by fuel cart due to flooding. The diesel pontoon pumps may also have a remote fuelling system in place where the diesel is supplied by an auxiliary tank placed above the flood level with the fuel supplied based on level sensors. Access for maintenance of floating pumps is either by boat or floating walkway.

The maximum water pump rates from in-pit sumps during the operational phase has been calculated (**Table 1**). These sumps will be pumped to the Mangatini Treatment System throughout the full Operational Phase, with treatment as described in the Mangatini Sump Management Plan (GHD 2018; GHD 2024 update).

Table 1: Operational phase (2027 – 2033) maximum water pump rates by Sump / Catchment

Catchment (originating from)	Sump (pumped from)	Sump (pumped to)	Max flow rate (L/s) (2027 – 2033) *
Twins (T1)	Twins	Mangatini Treatment System	72
Granity (S25)	Rockies East	Mangatini Treatment System	68
Granity (S25)	Hope Lyons	Mangatini Treatment System	35
Granity (S25)	Granity North	Mangatini Treatment System	13
Granity (S25)	Granity South	Mangatini Treatment System	30
Miller (S24a)	Miller	Mangatini Treatment System	32
Mine (S6)	Mine / MW16	Mangatini Treatment System	319

** NB: Pumping from all sumps required throughout the full operational phase.*

7.2.1.4 Pipelines

Pipelines will typically be HDPE100, Ø400 mm with pressure ratings selected for the application. These will be laid within work areas or along access tracks as determined to create the least disturbance to the natural environment and operations, where possible, or managed for new pipelines under site operating procedure. Flexible pipes are used for the suction and short connections between the pumps and main pipeline. Pressure lay flat may be required for short lengths between submersibles and sumps, as specified in the Water Infrastructure Design Plan (BPCP-ENV-PLN-012).

Trained and certified butt and electrofusion welding personnel as well as calibrated welders will be used to undertake the HDPE pipe work.

7.2.1.5 Diversions

Clean water diversions will be constructed where possible around work areas both to prevent contamination of clean water and minimise the quantity of water requiring treatment.

The existing Rockies West diversion drain above the Millerton Block remains in place to carry water from upper Rockies, Webb and 4-West areas to the Mangatini Treatment System for AMD treatment.

7.2.1.6 Fire Suppression

Remnant fires continue to burn coal in the historic underground workings in several areas and have done so for many decades (not related to contemporary opencast mining activity, refer to BRL (2026b). AMD impacted water from the existing Millerton main pit sump is pumped (flow rates of 100 – 200 L/s) into the workings (to cool or extinguish fires) for fire suppression. Fire suppression consumes the majority of the mine affected water to treat or extinguish the underground mine fires, when required.

Operational fire suppression is expected to be completed by the end of 2028 as fires in the mining pit areas are cooled and mined out. Prior to opencast mining in the Millerton block there were 12 historic fires burning underground. It is expected that there will be only 1 or 2 fires remaining at EOML. These legacy fires are located outside of the opencast disturbance footprint (and therefore won't be mined out), as shown in **Figure 5**.

Since 2021 fire suppression water has been sourced from Millerton Pit Sumps and has acidity concentrations varying between ~1,000 and ~2,500 mg/L. Pit water was used for fire suppression for several reasons (discussed in BRL (2026b)):

- Use of clean water is not feasible due to the prohibitively large volumes required for fire suppression;
- Use of treated AMD is not favourable (during the operational phase) due to transfer of AMD precipitates and sediments from treatment sumps into underground workings, creating clarity issues downstream;
- Pit water is already captured and stored nearby and has good clarity after sedimentation; and
- The mine workings contain secondary salts and so water used for fire suppression activities becomes more acidic regardless of source.

Through the Operational Phase the water source for fire suppression will predominately continue to be pit water supplemented by Duncan's Sump, the DCA, from the Mangatini Treatment System, as required.

Estimates of annual acidity load (reporting to pit sumps) have been equivalent to ~6,000 t/year for the past four years (BRL 2026a). The proportion of these loads reporting to the S23 tributary of Mine Creek are partially recoverable at the Syncline, while fire suppression water pumped into Miller Creek underground workings are unrecoverable. An increase in the transfer of AMD (including fire suppression water) from the DCA stopping to the Mangatini Treatment System from 2026 to 2028 will be used to improve Mine Creek water quality. With the cessation of operational fire suppression in 2028, AMD loads mobilised from underground workings is expected to significantly reduce.

Operational fire suppression is expected to be completed by the end of 2028 as fires in the mining pit areas are cooled and mined out. Prior to opencast mining in the Millerton block there were 12 historic fires burning underground (Crown liability). It is expected that there will be only 1 or 2 fires remaining at EOML located outside of the opencast disturbance footprint. These areas of potential fires are identified in **Figure 5** and may need cooling, as required. Fire suppression post EOML is discussed in **Section 7.2.2.6**.

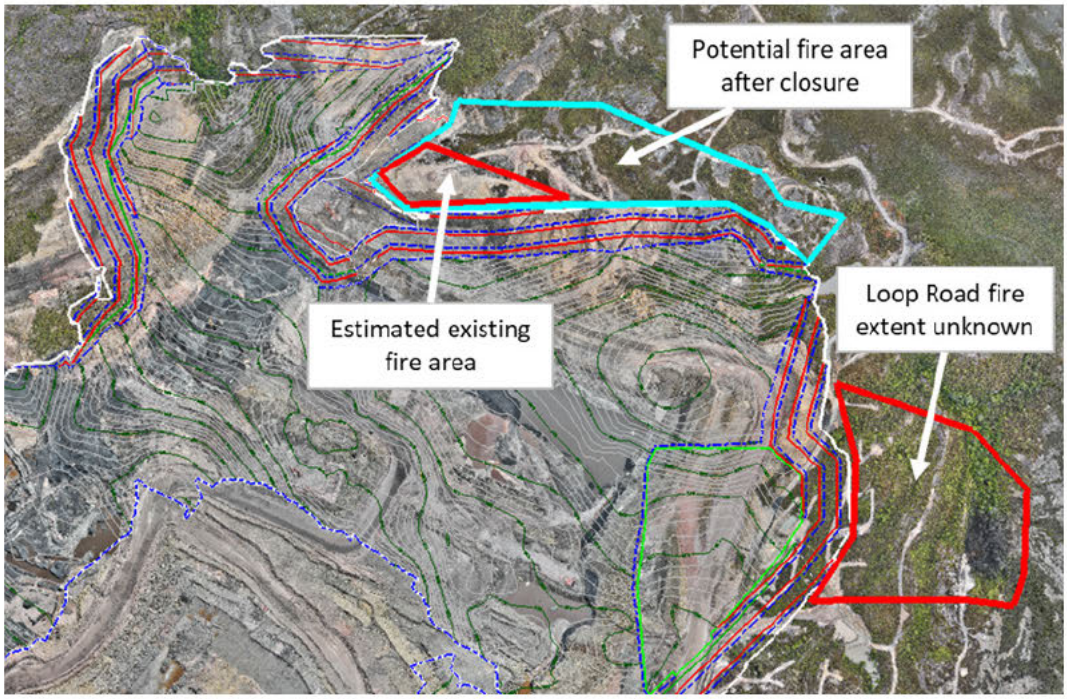

Figure 5: Potential fire areas post EOML

7.2.1.7 AMD Treatment and Low-Density Sediments (LDS)

Mine water removed from the pit sumps and the Syncline will be pumped to the Mangatini Treatment System for AMD treatment. A high-level description of expected AMD transfer timelines is provided in **Table 2**. These timelines may change depending on mining progression.

Table 2: Operational Phase AMD treatment across sub catchments

Operational Phase							
Year	**2026**	**2027**	**2028**	**2029**	**2030**	**2031**	**2032**
Twins (T1)	Pump pit sump AMD to Mangatini Treatment System						
Granity (S25)	Pump pit sumps AMD to Mangatini Treatment System						
Miller (S24A)	Ongoing fire suppression AMD not recovered for treatment			Pump pit sumps AMD to Mangatini Treatment System			
Mine (S23)	Ongoing fire suppression 40 - 75% of acidity load recovered from DCA, Pumped to Mangatini Treatment System			Not Applicable - S23 catchment cut-off by MW16 Pit / sealed DCA.			
Mine (MW16 / S6)	Not Applicable - Pit Sumps captured at Syncline / report to S23 catchment			Pump ~80% of Mine Pit Sump / MW16 Sump treatable acidity load to Mangatini Treatment System			

At the Mangatini Treatment System, AMD will be dosed with CaO slurry in open channels upstream of capture sumps. Pre settling sumps (Mangatini Quarry, Mumm's, and 4WP2) will be used for primary settling prior to water being directed to the Mangatini Sump.

LDS produced as a result of AMD treatment will be addressed as per the Mangatini Sump Management Plan (GHD 2018; GHD 2024 update) and the Stockton Operational AMD Sludge Management report (BRL 2025). The existing Lime dosing plant 1 (LDP1) will be used and this has sufficient capacity to treat the additional acidity from Millerton pits.

Nominal estimates of acid load pumped from Millerton Pit Sumps to Mangatini Treatment System have been made for forecasting lime (CaO) and LDS management requirements. These nominal loads use the ~6,000 t/yr Millerton pit sump acidity load estimate as the basis for the 2026 load. It should be noted that actual acidity loads sent for treatment through 2026 – 2028 will depend on the amount of pit sump water needed for fire suppression and potential capture and transfer rates for treatment.

7.2.1.8 Underground Workings

Water captured in pit sumps will be prevented from entering obvious portals (and flowing into remnant underground workings) by construction of seals.

The Syncline will continue to collect the majority of underground flow paths and this water reports to the DCA, until mined out around 2028.

Underground collapses may intermittently cause turbid water to be released downstream of portals / egress points if these collapses occur downstream of the water controls. Due to the fractured nature of the subsurface and unknown stoppings or collapses within the workings, exact water flow paths through the workings are uncertain. Accordingly, minimising water infiltration to the underground workings is the optimal management method.

Exposed portals will be sealed with an earth bund where there is a risk of pit water draining into underground workings. Where applicable, open portals will also be sealed around the perimeter of the Millerton ELF to limit air ingress into the ELF thereby reducing AMD production over long term.

<u>Design of a Pit Boundary Seal</u>

The proposed pit boundary does not mine out all the historic underground workings. Along the west, north and east boundaries it is anticipated that historic workings will be encountered in the boundary walls. Seepage flow directions (based on anticipated coal floor topography) suggest that seepage could escape from the Millerton ELF via the underground workings if appropriate measures are not included in the mine design.

A preliminary feasibility-level design of a pit-boundary seal is detailed in the URS (2009) **Part 3 – Preliminary Geotechnical Design of the Pit Boundary Seal** (modified to fit with this Plan). The URS report assesses the feasibility of preventing seepage from entering the underground workings, specifically addressing the following:

- Identification of regions that will require the placement of an impermeable seal;
- Identification of regions where groundwater flow/seepage along the coal floor may need to be redirected;
- Preliminary design of the impermeable seals; and
- Preliminary specification for placement and compaction.

Any seepage from the waste material within the Millerton ELF is expected to drain along the base of the final landform along coal floor. This seepage will be directed to the MW16 Sump, located in the lowest point of the pit. Where pit floor drainage falls towards the margins of the final landform, seepage will need to be redirected towards the MW16 Sump, or seals will need to be constructed to prevent seepage from entering the underground workings.

A combination of an engineered seal across underground workings and pit floor drains can be used to maximise the proportion of seepage directed to MW16 Sump for treatment. The anticipated coal floor topography (and therefore the majority of the Millerton ELF seepage) will naturally drain towards MW16 by gravity (excluding a small proportion reporting to Granity South Sump (equivalent to less than 0.1% of the Millerton ELF by rock volume, which is forecast to produce a minor ~3 t/year acidity load)). This additional load is already included in the S25 water quality betterment calculations.

A preliminary design for the seal is presented in URS (2009). The design includes reshaping the pit wall using bulk fill and constructing a compacted low permeability layer against the bulk fill. A wedge of bulk fill material may also need to be constructed over old underground workings in other parts of the pit perimeter. This will reduce the risk of collapse propagating up into the final landform and resulting in settlement of the capping layer. In these areas a boundary seal may also be required (even though seepage flow directions are toward the final ELF) to reduce the ingress of oxygen into the bulk fill.

7.2.2 Millerton Block EOML Phase

The EOML Phase water management infrastructure is shown in **Figure 6.**

7.2.2.1 Sumps/Dams

Final landform sumps will form in the natural low points of each remaining pit area. These sumps will be retained for long term / Closure water and AMD management purposes.

Final landform sump spillways will be designed depending on final catchment, topography, and engineering assessments (Erosion and Sediment Control Plan for Land Disturbance Activities (BPCP-ENV-PLN-013)). Indicative volumes and areas for each sump are listed in **Table 3**.

Table 3: Final landform / permanent pit sumps

Catchment	Pit / Sump	Sump area	Sump volume
		(m^2)	(m^3)
Twins	Twins (T1)	5,580	16,300
Granity	Hope Lyons	27,230	151,800
	Granity South	27,640	158,500
	Granity North	2,200	7,100
	Rockies East	11,630	71,000
Miller	Miller	5,200	10,700
Mine	MW16	70,410	718,900

These sumps will provide storage for pumping AMD impacted water to treatment systems or sedimentation prior to discharge to the natural catchment based upon water chemistry.

As run-off reporting to these sumps is predominately from highwalls and coal floors, TSS is expected to be low once rehabilitated surfaces stabilise, and comparable to natural sandstone pavement runoff.

MW16 Sump will receive the Millerton final ELF runoff and will manage the TSS generated through the ELF construction and rehabilitation activities.

Small dams may be required to achieve the specified water volume capacity. These will be designed and constructed as per:

- Water Infrastructure Design Plan (BPCP-ENV-PLN-012) where water reports to management infrastructure within the mine; or
- Erosion and Sediment Control Plan for Land Disturbance Activities (BPCP-ENV-PLN-013) where runoff / sump discharge reports directly to the receiving waterway.

The filter bed sumps located in the Millerton Block will remain to manage LDS from the Mangatini Treatment System. These sumps will be constructed specifically for LDS dewatering and are not considered sedimentation sumps /dams.

7.2.2.2 Sediment management

With active mining and final landform rehabilitation completed, sediment management requirements will reduce over time as vegetation becomes established. However, sediment management will continue to follow management practices as per Operational Phase utilising the established water management infrastructure (EOML sumps), as required.

Additional local primary settling sumps will be constructed downstream of rehabilitation activities to minimize sediment reporting to the EOML sumps whilst rehabilitation activities are occurring, as per the Water Infrastructure Design Plan (BPCP-ENV-PLN-012).

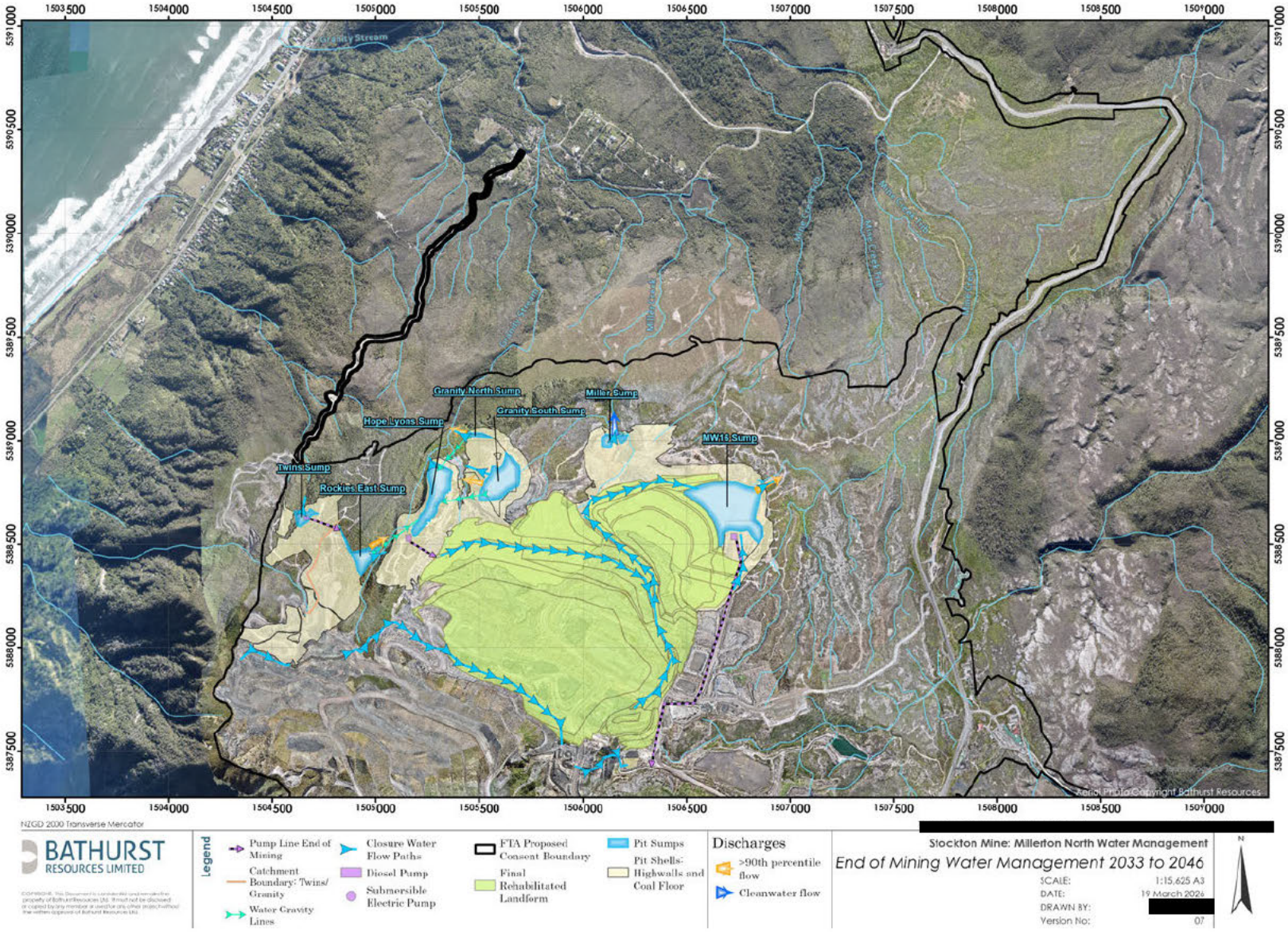

Figure 6: EOML water management 2033 to 2046:

7.2.2.3 Pumps

Pumps will be managed as per the Operational Phase while treatment of each sub catchment is required. The sub catchment specific expected date for when pumping ceases/AMD treatment is no longer required to meet betterment reference values is shown in **Table 4**.

Table 4: EOML (2033 – 2047) maximum water pump rates by Sump / Catchment

Catchment (originating from)	Sump (pumped from)	Sump (pumped to)	Max flow rate (L/s)	Pumping ceases
Twins (T1)	Twins	Rockies	72	2040
Granity (S25)	Rockies East	MW16 / Mangatini Treatment System	68	2037
Granity (S25)	Hope Lyons	MW16 / Mangatini Treatment System	35	2037
Granity (S25)	Granity North	MW16 / Mangatini Treatment System	13	2037
Granity (S25)	Granity South	MW16 / Mangatini Treatment System	30	2037
Miller (S24a)	Miller	-	0*	2033
Mine (S6)	MW16	Mangatini Treatment System	319	2047

* Miller Sump discharge directly to Miller Stream from EOML within betterment reference values.

7.2.2.4 Pipelines

Design and management of pipelines will be as per the Operational Phase.

7.2.2.5 Diversions

The AMD collection drain on the surface of the Millerton ELF will be engineered and constructed throughout the EOML Phase. Detailed designs, including the sharp junction where the Western branch meets the South – North branch, will be developed. Refer **Figure 6** EOML water management 2033 to 2046.

The existing Rockies West diversion drain above the Millerton Block remains in place to carry water from upper Rockies, Webb and 4-West areas to the Mangatini Treatment System for AMD treatment.

7.2.2.6 Fire Suppression

Operational fire suppression will cease (anticipated end date 2028) prior to EOML as fires in the mining pit areas will have been removed. Fires will remain in areas outside of the pit area and may need cooling as required.

Provision for pumps and pipelines will be made at EOML based on the underground fire situation at that time. If needed, fire suppression water would be sourced from the Mangatini Treatment System or MW16 Sump treated water through the EOML phase to minimise acid load addition to the underground workings.

7.2.2.7 AMD treatment and AMD sludge

Mine water will continue to be pumped from Millerton EOML sumps to the Mangatini Treatment System for AMD treatment (refer **Table 4, Section 7.2.2.3** for sub-catchment specific cessation dates). AMD treatment and AMD sludge management will be addressed as per the Mangatini Sump Management Plan (GHD 2018; GHD 2024 update) and the Stockton Operational AMD Sludge Management report (BRL 2025).

AMD treatment in Twins Sump is proposed for a short period (nominally 2041 to 2046 under current mine plans and schedules) as an option for AMD management. Prior to 2040, Twins Sump AMD will be pumped to the Mangatini Treatment System. Partial in-sump treatment will occur (commencing 2041) as Twins Sump acidity loads decay. It is estimated that in 2041 only minor treatment (equivalent to neutralisation of a < 3 t/year acidity load) would be required to enable discharge of partially AMD treated water from Twins Sump to Twins Stream, within betterment reference values at T1. AMD modelling indicates that partial treatment of Twins Sump would cease in 2047, with residual Twins Sump water discharged to Twins Stream within betterment reference values at T1.

7.2.2.8 Underground Workings

Underground workings within the mined out pits will have been removed by EOML. Exposed portals will be sealed with an earth bund where there is a risk of pit water being released into them.

The Syncline area will be mined out to create MW16 Sump during the Operational phase. This will utilise the naturally formed low in the coal floor. The portal to the DCA will be sealed to prevent further water flows into the remnant underground workings (via the DCA) during the EOML phase.

7.2.3 Millerton Block Closure Phase

While not a focus of this Plan, the transition to closure is important to recognise as the management decisions made over the first two phases will inform Crown and AMD management long term.

The Closure Phase runs from 2047 onwards when the Stockton mine is expected to be rehabilitated (with respect to final landform) and the site is transferred back to the Crown. This is essentially the 'Point of Exit' when Bathurst is released from its obligations to manage AMD at Stockton, including the Millerton Block, and can formally hand the site back to the Crown under LINZ administration.

Active treatment of AMD will continue when LINZ administration of the site under the Crown commences. This includes AMD treatment in:

- Millerton Block AMD treatment in MW16 Sump via LDP1 slurry dosing pipeline.
- Lower Millerton Block, capturing underground workings utilising LINZ infrastructure (at a conceptual stage, to be further developed and permitted by LINZ)
- Mangatini catchment via LDP1 and the Mangatini Treatment System.
- St Patrick catchment via LDP2 and the McCabes Treatment System.

It is forecast that ongoing active treatment and LDS management will be required to support the 80-year recovery plan for aquatic ecosystems.

Infrastructure to enable this work to be continued are contractually required to be left in place and this is a significant consideration for closure scheduling and planning and includes AMD sludge disposal discussed in the Stockton Operational AMD Sludge Management Report (BRL 2025).

It is anticipated that both active and passive water treatment systems will be required for the long-term management of AMD. These treatment systems will remain in place and be maintained for several decades, or until AMD loadings decrease to levels that are considered environmentally acceptable. This longer-term management will be undertaken by the Crown, as discussed in the History of AMD Management and Proposed Future Management (BRL 2026b).

Additional Mine Closure strategies for Stockton are being developed in the Conceptual Mine Closure Strategy (CMCS) March 2026 (BPCP-ENV-PLN-050).

8. Monitoring

The Stockton AMD Environment Management Plan STO-ENV-PLN-016 provides overarching monitoring requirements (including Millerton Block requirements which are only lightly referenced in this Plan (STO-ENV-PLN-027)). This is because the Millerton block monitoring and reporting need to be considered as part of the greater Stockton mine context, as effects on the Lower Ngākawau River / Estuary from St Patrick Stream, Mangatini Stream, and some Millerton Block sub-catchments are cumulative. This approach is also appropriate as the:

- Millerton Block AMD will largely be treated at the Mangatini Treatment System (until alkaline dosing in MW16 Sump commences in 2047),
- AMD discharged through the Mine Creek sub-catchment of Millerton Block effects lower Ngākawau River water quality (along with Mangatini and St Patrick discharges); and
- Long term ecological recovery will be periodically reviewed across all Stockton mine sub-catchments as part of the same 5-yearly process.

A broad range of surface water, groundwater, aquatic ecology, sediment, and mahinga kai monitoring will be undertaken to:

- Meet operational requirements;
- Verify compliance with resource consent conditions;
- Verify, validate and calibrate modelling;
- Measure water quality changes / improvements at S16 and S14B towards the modelled Al recovery trajectory; and
- Measure water quality changes / improvements at T1, S25, S24A, and MC1 towards the modelled Al betterment reference values.

Monitoring will provide early identification of potential water and AMD issues at both surface and seepage / groundwater monitoring sites. Monitoring outcomes inform operational decision-making and, where relevant, response activation.

Bathurst will implement quality assurance and quality control (QA/QC) measures to support the accuracy, reliability, and consistency of monitoring undertaken for the Project. This process is also described in Stockton AMD Environment Management Plan STO-ENV-PLN-016.

9. Adaptive Management

An adaptive management learning-oriented approach to managing environmental uncertainty associated with water and AMD will be employed to reflect new information as it becomes available over the management phase timeframe. This will inform the ongoing effectiveness, mitigation, monitoring, reporting and management measures across the Operational and EOML Phases, and toward the transition to closure. Part of the adaptive management may involve reassessing Al concentration recovery trajectories at S16 and S14B and betterment reference values at T1, S25, S24A, and MC1, as part of the 6-yearly water quality and ecology review proposed by Instream (2026).

Information from compliance, performance and reference monitoring, routine infrastructure inspections, complaints, and incident responses will be reviewed to identify opportunities for improvement. Where necessary, management measures may be refined or adjusted in response to the following (but not limited to):

- Ability to meet resource consent compliance limits, Al concentration recovery trajectories at S16 and S14B and betterment reference values at T1, S25, S24A, and MC1;
- Observed trends and incremental changes in the state of waterway quality and aquatic ecosystems over time;
- Minimising the duration of water diversion between catchments (e.g., minimising pumping rates and pumping costs);
- Minimising the duration that rapidly decaying highwall and coal floor AMD is pumped to the Mangatini Treatment System (e.g., finding a balance between achieving betterment reference values without deteriorating water quality e.g., Mangatini Stream and Ngākawau River);
- Avoiding treatment of moderate to large acidity loads in pit sumps as a long-term solution, to reduce AMD sludge management and manage downstream mixing effects between treated and untreated waters (which could generate turbidity);
- Utilising temporary minor AMD treatment at remote sumps (e.g., utilising alkaline (e.g., NaOH) dosing, or some other system to be determined) to achieve betterment reference values;
- Minimising the amount of high volume / relatively low acidity concentration water reporting to treatment systems to reduce pumping costs, CaO and MgO[11] usage, LDS generation, etc.;
- Integrating water / AMD management milestones with rehabilitation and mine closure milestones (e.g., transition to LINZ administration);
- Technological advances;
- Community complaints or stakeholder feedback;
- Change in the regulatory environment;
- Identified non-compliance or emerging risks; or
- Investigations into water and AMD management responses (as lead by and contributed to by responsible personnel as per **Table 5**) as part of the adaptive management process.

[11] A transition to use of MgO as the acid neutralising agent at all LDP is proposed in year 2032.

It is expected that a wide range of alternative scenarios / adaptive management responses can be addressed using the proposed Millerton Block water and AMD management infrastructure. This could include extending the duration of AMD treatment and / or increasing the level of treatment from what is defined in Millerton Block (BRL 2026a) and Mangatini / St Patrick (BRL 2026c) AMD models.

10. Reporting

Reporting is undertaken to document monitoring outcomes, demonstrate compliance and betterment, and support water and AMD mitigation, management measures and resourcing. Information from compliance, performance and reference monitoring, routine inspections, complaints, and incident responses will be reviewed to identify opportunities for improvement and will be reported as required or as necessary. Reporting in accordance with this Plan is proportionate to the scale and nature of monitoring undertaken.

10.1 Internal Reporting

Internal reporting will consist of:

- Reporting of relevant datasets provided to relevant operation teams to aid decision making, mine scheduling and planning. Internal stakeholders include Technical Services departments (Mining Engineers, Geologists, Mine Schedulers) and Operational Supervisors.
- Daily feedback on pump performance and water issues to the Daily Production Meeting.
- Weekly updates on water management aspects (e.g. 15 sample rolling median trends) to Environmental Manager and Environmental Team via the Weekly Team Meeting.
- Weekly Mining Pit Review with Operations Teams.
- Weekly updates on water management aspects to the Senior Management Team (SMT).
- Monthly BT Mining Management Reports.
- Weekly Pump Meetings with Pump Crew, Fixed Plant and Mobile Plant Teams.

Feedback from monthly inspections and monitoring outcomes will be communicated to site personnel through toolbox talks or other appropriate forums as required to reinforce good practice and inform staff behaviour. Where required, additional inspections will be undertaken to verify the effectiveness of revised controls. Adaptive management processes will be considered, where required, to ensure appropriate management responses.

Targeted interpretation of performance monitoring data may also be used for quantifying key milestones in AMD management. The results of these assessments will be communicated using internal memoranda. Assessments could include, for example:

- The effect of AMD capture and transfer to Mangatini Treatment System from the Syncline / DCA on S23 acidity loads and water quality;
- The effect of Twins catchment reduction on T1 acidity loads and water quality;
- The effect of fire suppression cessation on S23 and S24A acidity loads and water quality;
- The effect of opencast catchment cut-off on S23 and S24A acidity loads and water quality;

- The general effect of removing 'treatable' acidity load from a given catchment on remnant acidity loads and annual median / 75th percentile remnant acidity and Al concentrations to inform ecological recovery[12] forecasting.

Millerton Block performance monitoring datasets may also be used to update wider management plans including the Mangatini Sump Management Plan.

10.2 External Reporting

Annual Environmental Monitoring Reports (AEMR) and Monthly Compliance Reporting to regulators. Refer to Stockton Mine AMD Environmental Management Plan (STO-ENV-PLN-016).

10.2.1 Six yearly water quality and ecology review

The BPCP will also introduce a six yearly water quality and ecology review, as described in Instream (2026). Refer to Stockton Mine AMD Environment Management Plan (STO-ENV-PLN-016), for full details regarding the six yearly water quality and ecology review, including details specific to Millerton Block.

11. Roles, Responsibilities, and Training

Effective implementation of this Plan relies on clearly defined roles, responsibilities, and appropriate training for all personnel involved in Project activities. Bathurst is committed to ensuring that all staff, employees, and contractors understand their responsibilities and are aware of the processes for monitoring, response, and escalation.

Responsibilities under this Plan support the management pathway whereby monitoring and observations identify potential issues, triggers are assessed, and appropriate responses and escalation are implemented.

11.1 Roles and Responsibilities

Key roles and responsibilities associated with this Plan are outlined in **Table 5.**

Table 5: Responsible personnel and tasks

Position	Accountable Task
Senior Site Executive (SSE)	• Overall accountability for implementation of this Plan. • Ensure that achieving the objectives of this Plan is a core operating imperative. • Maintains oversight of operational performance. • Endorses significant management responses (as part of adaptive management responses) where required. • Manage risk when standards cannot be met due to operational or technical constraints.
Environmental Manager	• Primarily responsible for implementation and administration of this Plan.

[12] Instream (2026) describe Al concentration thresholds for ecological recovery which are based on 75th percentile concentrations; ecological recovery commences at 75th percentile Al < 2.8 mg/L and comprehensive ecological recovery at 75th percentile < 1.0 mg/L.

Position	Accountable Task
	• Coordinates monitoring in accordance with this Plan, where required. • Reviews monitoring results, inspection findings, and complaints relevant to this Plan. • Oversees implementation of mitigation measures and management responses where required. • Manages internal and external reporting obligations in accordance with this Plan. • Lead investigations into water and AMD management responses (as part of the adaptive management process) where required.
Supervisor/Superintendent	• Ensure day-to-day operations are undertaken in accordance with the mitigation and management measures set out in this Plan. • Identify and respond to operational activities that may contribute to environmental effects. • Report any exceedances, incidents, or complaints to the Environmental Manager. • Implement corrective actions as directed. • Maintain a documented record of any audits or inspections completed. • Contribute to investigations into water management responses (as part of the adaptive management process) where required. • Ensure that staff and/or contractors that they supervise are suitably trained to follow processes outlined in this Plan and other documents as referenced. This includes a regular review of training requirements to ensure that each staff member/contractor is appropriately trained to carry out their duties.
All Personnel	• Comply with the procedures and controls relevant to this Plan. • Report any issues, complaints, or incidents to their supervisor. • Participate in inductions and toolbox talks relevant to the requirements of this Plan.

11.2 Training and Inductions

Water and AMD management requirements associated with the Millerton Block will be included in the Mine Induction Package and induction process for relevant personnel.

Training records are kept in an Online Training Log or equivalent system.

Ongoing environmental awareness training will be delivered through toolbox talks and other appropriate forums. Toolbox talks will address, as required:

- Mitigation measures and good practice;
- Monitoring outcomes and trends;
- Complaints or incidents and lessons learned; and
- Changes to activities, controls, or response procedures.

This training reinforces the link between monitoring outcomes, trigger identification, and appropriate operational responses.

12. Document Management

This Plan forms part of the Site Environmental Management Plan (SEMP) and will be managed in accordance with BRL-HST-STD-003 Document Control Standard. This Plan will be reviewed three (3) yearly or:

- Following any major operational change at the Millerton Block;
- Following receipt of substantiated complaints related to the Millerton Block;
- Following significant incidents or non-compliance;
- At the request of the regulator.

12.1 Change Register

This Plan is issued, revised, and amended under the authorisation of the Site Senior Executive (SSE). Controlled electronic copies will be available to all workers, and a signed hard copy will be maintained in the Westport document library.

Reasons for changes will be documented in the document management table (see **Table 6**). Superseded versions will be retained for record purposes and marked as obsolete. Each revised version will be issued with a unique version number and date to prevent the use of outdated documents.

Table 6: Document management

Document Management:			
Regulatory Approvals Authorities:			
Document Owner:			
Document Owner Name:			
GM HSEC Approval Signature:			
Date:			
Document Approver:			
SSE/GM Name:			
SSE/GM Signature:			
Date Approved:			
Revision History:			
Date	**Version No.**	**Lead Author**	**Contributing Authors**
April 2026	1.0	[redacted]	[redacted]
Version No.:	**Detail / Changes:**		
Next Planned Review:			

13. References

ANZG 2018. Australian and New Zealand guidelines for freshwater and marine water quality.

BRL 2025. Stockton Operational AMD Sludge Management Report. 2025.

BRL 2026a. Millerton Block Water and AMD Management Report. 2026.

BRL 2026b. Acid Mine Drainage. History of AMD Management and Proposed Future Management. 2026

BRL 2026c. Stockton Mine 80-year Water Quality Forecast. 2026.

BPCP-ENV-PLN-012. Water Infrastructure Design Plan. 2026.

BPCP-ENV-PLN-013. Erosion and Sediment Control Plan for Land Disturbance Activities. 2026

BPCP-ENV-PLN-050. Conceptual Mine Closure Strategy (CMCS). March 2026

GHD 2018. BT Mining Limited. Mangatini Sump Management Plan. Report for BT Mining Limited – Mangatini Sump Project, 5137163. June 2018.

GHD 2024. Mangatini Sump Management Plan – Council Update. Memorandum (Internal use only), 12533107. 8 October 2024.

GHD, 2026. Stockton Water Management and Assessment of Effects on Waterways and water users from the BPCP Stockton Mining Activities. 2026

Instream, 2026. Buller Plateau Aquatic Ecology: history, thresholds and long-term management. 2026.

STO-ENV-PLN-013 Stockton Mine Environmental Water Management Plan[13]*.*

STO-ENV-PLN-016 Stockton Mine AMD Management Plan.

URS, 2009. Millerton L5 Geotechnical Part 3. Preliminary Geotechnical Design of Pit Boundary Seal. Report prepared for Solid Energy New Zealand. 23 December 2009. Report ref. 42169667.

[13] As italicised, listed Stockton plans will be updated, as required, pending FTAA approval to reflect BPCP obligations.

Attachment A: Summary of Relevant Conditions

Conditions to be inserted upon issue of final decision.