Amendment Notice 4

Licence Number L4612/1989/11

Licence Holder BHP Billiton Nickel West Pty Ltd

ACN ACN 004 184 598

File Number: 2012/006877

Premises Leinster Nickel Operation

Legal description -

Mining tenements ML255SA, M36/230, L36/93 and

M36/289

LEINSTER, WA

Date of Amendment 30 January 2019

Amendment

The Chief Executive Officer (CEO) of the Department of Water and Environmental Regulation (DWER) has amended the above Licence in accordance with section 59 of the *Environmental Protection Act 1986* (EP Act) as set out in this Amendment Notice. This Amendment Notice constitutes written notice of the amendment in accordance with section 59B(9) of the EP Act.

A/Manager Process Industries

an officer delegated under section 20 of the Environmental Protection Act 1986 (WA)

Definitions and interpretation

Definitions

In this Amendment Notice, the terms in Table 1 have the meanings defined.

Table 1: Definitions

Term	Definition
ACN	Australian Company Number
AER	Annual Environment Report
Amendment Notice	refers to this document
ARI	Average Recurrence Interval, in the context of this Licence refers to the maximum amount of rainfall expected to fall within a 24 hour period once every 100 years.
Category/ Categories/ Cat.	categories of Prescribed Premises as set out in Schedule 1 of the EP Regulations
CEO	means Chief Executive Officer.
	CEO for the purposes of notification means:
	Director General Department Administering the Environmental Protection Act 1986 Locked Bag 33 Cloisters Square PERTH WA 6850 info@dwer.wa.gov.au
Delegated Officer	an officer under section 20 of the EP Act
Department	means the department established under section 35 of the <i>Public Sector Management Act 1994</i> and designated as responsible for the administration of Part V, Division 3 of the EP Act.
DWER	Department of Water and Environmental Regulation
EP Act	Environmental Protection Act 1986 (WA)
EP Regulations	Environmental Protection Regulations 1987 (WA)
Existing Licence	The Licence issued under Part V, Division 3 of the EP Act and in force prior to the commencement of and during this Review
Licence Holder	BHP Billiton Nickel West Pty Ltd
Occupier	has the same meaning given to that term under the EP Act.
Prescribed Premises	has the same meaning given to that term under the EP Act.

Premises	refers to the premises to which this Decision Report applies, as specified at the front of this Decision Report.
Risk Event	as described in Guidance Statement: Risk Assessment
TSF	Tailings Storage Facility

Amendment Notice

This amendment is made pursuant to section 59 of the *Environmental Protection Act 1986* (EP Act) to amend the Licence issued under the EP Act for a prescribed premises as set out below. This notice of amendment is given under section 59B(9) of the EP Act.

This notice is limited only to an amendment for Category 5: processing or beneficiation of metallic or non-metallic ore. No changes to the aspects of the original Licence relating to Category 6: Mine dewatering; category 57: Used tyre storage; Category 64: Class II putrescible landfill; or category 85: sewage facility have been requested by the Licence Holder.

The guidance statements that have informed the decision made on this amendment are listed in Appendix 1

Amendment description

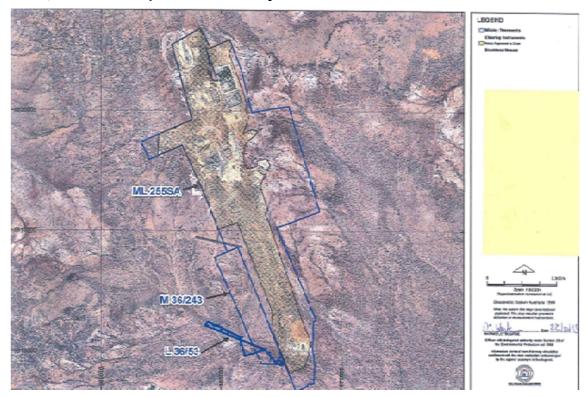
On 14 December 2018 the Licence Holder submitted an application to amend Licence L4612/1989/11 for the Leinster Nickel Operations. Appendix 1 contains a list of all the documents which form the application.

The application is for an amendment to Category 5: processing or beneficiation of metallic or non-metallic ore; specifically for the construction of a paste plant to service the below ground mining of the Venus deposit at the Leinster Nickel Operations (which includes the Perseverance underground mine, Rocky's Reward open pit, Harmony open pit mine).

The Venus deposit will be mined using the sub level open stoping method. Paste will be used to back fill or partially fill mining voids created by ore extraction to ensure stability of the remaining underground ore and also to provide a stable working platform for further extractive works where necessary.

The Licence Holder proposes to construct an operating pad for a new paste plant adjacent to the Venus underground deposit. A gravity driven reticulation circuit delivery unit will be used to convey the paste to the required stope through a 700m drop hole. The construction of the paste mixing pad will require the removal of remnant vegetation and be approximately 350m x 200m in size and will be undertaken in accordance with an existing clearing permit CPS2222/4. The area approved for clearing by CPS2222/4 as shown in Figure 1 below. The area proposed to be cleared in accordance with this Amendment Notice is shown in Figure 2 below.

Figure 1: The extent of Clearing Permit CPS2222/4 depicted by the area in yellow cross hatch, relative to the premises boundary shown in blue outline.



Source: Clearing permit Plan 2222/4

Legand
Priority Flora Level 1
Priority Flora Level 2
Priority Flora Level 2
Priority Flora Level 3
Priority Flora Level 4
Priority Flora

Figure 2: The extent of clearing required by the construction of the Venus paste plant.

Source: Amendment Application Form (BHP Billiton Nickel West Pty Ltd, 2018)

The base of the pad will be constructed of a 500mm graded oxide layer (*in-situ* materials) and it will be sloped for the collection of storm-water, and run-off will drain towards a purpose built lined stormwater collection sump (30m x 20m x 1.46m deep). The stormwater collection sump is clay lined and has sufficient capacity to contain 2640m³. Stormwater is primarily managed by the use of a water recovery pump that engages automatically once water reaches a designated level within the sump. The pump has a capacity of 100L/s and so water will be exported to the water circuit with an end fate of either the water storage dams, TSF or to the mill and is not depended on operation water use requirements. The pad will also be bunded to an approximate height of 1m, to prevent sheet water run-off from the wider catchment entering the pad area. Raw materials stored on the pad will not be permitted to be stacked against the bunds to maintain integrity of the bunds.

The paste is created by mixing sand, dried tailings sourced from tailings storage facility (TSF) 2 and TSF3; water and cement. The mixing plant will process consists of the mechanical mixing of sand and tailings on the pad using front end loaders in equal parts. The mixed material is then screened and placed into the mobile paste manufacturing plant which mixes the tailings and sand with water and a cement binder (4-8%). Paste production is a batch process and although the equipment has a throughput design capacity of approximately 125m3/hour; the Licence Holder proposes to produce up to 200,000m3 of past per annum on an as needs basis. The layout of the activities within the paste pad area are depicted in in Figure 3 below.

Figure 3: Paste Plant operational area layout in relation to the Venus underground mine



Source: Amendment Application Form (BHP Billiton Nickel West Pty Ltd, 2018)

Other approvals

The key regulatory control over the Leinster Nickel Operations comes from the *Nickel (Agnew) Agreement Act 1974 (WA)* which was ratified by parliament as a State Agreement as a major resources project for mining and mini8ng related activities.

BHP Billiton Nickel West Pty Ltd also have obtained the following approvals as outlined in Table 2.

Table 2: Relevant approvals

Legislation	Number	Approval
Nickel (Agnew) Agreement Act 1974 (WA)	-	Legal contract between the State of Western Australia and the proponent to develop a major nickel project within the boundary of Western Australia.
Environmental Protection Act 1986	CPS 2222/4	To clear up to 400Ha of land within the prescribed premises boundary
Environmental Protection Act 1986	L4612/1989/11	To undertake the mining and processing of ore; mine dewatering, used tyre storage, landfilling of waste and treatment of sewage.
Rights in Water and Irrigation Act 1914	GWL58111(5)	To take water for mining and processing activities from the Mid-Gum Pool and Alans Pool paleochanel aquifer
	GWL63834(4)	To take potable water from the combined fractured rock west and fractured rock aquifer
	GWL66248(5)	To take water for dewatering purposes from the combined fractured rock west and fractured rock aquifer

Amendment history

Table 3 provides the amendment history for L4612/1989/11.

Table 3: Licence amendments

Instrument	Issued	Amendment
L4612/1989/11	12/12/2013	Amendment to authorise dewatering from Rocky's Reward Open Pit to Harmony Open Pit and a Turkey's Nest
L4612/1989/11	21/05/2015	Amendment to authorise operation of a pipeline to discharge tailings supernatant from the TSF to Harmony Open Pit.
L4612/1989/11	17/12/2015	Amendment to authorise operation of a new dewatering bore at Rocky's Reward Open Pit and construction and operation of a new pipeline from the dewatering bore to Harmony Open Pit.
L4612/1989/11	29/04/2016	The Licence duration extended from 18 October 2018 to 18 October 2030 by Amendment Notice.
L4612/1989/11	15/12/2016	Amendment Notice 1 to authorise construction and operation of a replacement waste water treatment plant.
L4612/1989/11	22/08/2017	Amendment Notice 2 to authorise embankment raise to TSF3 Cell CD to RL 10,556.5m
L4612/1989/11	20/03/2018	Amendment Notice 3 to authorise embankment raise to TSF3 Cell AB to RL 10,556.5m
L4612/1989/11	30/01/2019	Amendment to authorise construction and operation of the Venus paste plant.

Location and receptors

Table 2 below lists the relevant sensitive land uses in the vicinity of the Prescribed Premises which may be receptors relevant to the proposed amendment.

Table 2: Receptors and distance from activity boundary

Residential and sensitive premises	Distance from Prescribed Premises			
Town of Leinster	9 km (to the south–west) as shown in Figure 4.			

Rocky's Reward West Harmony Open-Pit and Waste Rock Landlo Waste Rock Landford (operations ceased) (Open Pit Active) Active NLN Tailings Storage Rocky's Reward Open-Pit and East Waste Rock Landfo NLN Bioremediation Area NLN Tyre Disposal Cell Rocky's reward Putrescible Landform See Further Detail figure 3 NLN Sand and Tailings Mix Pad See Further Detail Figure 4 CAPES Site Yard NLN Site WWTP See Further Detail Figure 2 Material Stockpiles NLN Mine Evaporation Ponds NLN ER Training Ground Septic Disposal Cell See Further Detail Figure 4 NLN Restricted Access Waste Facility NLN South West drain Perseverance Underground Nickel Mine and Waste Rock Landform NLN Site WWTP Effluent Irrigation NLN Core Farm Leinster Airport 11 Mile Open-Pit and Waste Rock Town of Leinster

Figure 4: Location of Town of Leinster with respect to the Leinster Nickel Operations

Source: Amendment Application Form (BHP Billiton Nickel West Pty Ltd, 2018a)

Table 3 below lists the nearest environmental receptors to the TSF.

Table 3: Environmental receptors and distance from activity boundary

Environmental receptors	Distance from Prescribed Premises			
11 mile (potable) borefield	5 km (~11 km south of the paste plant)			
McArthurs (historical pastoral) Bore	5 km to the north			
Priority flora	Surrounding the paste plant pad area as shown in Figure 2.			

Local Hydrogeology

There are a number of minor non-perenial watercourses, or drainage lines within the vicinity of the of the premises and these flow towards the Lake Miranda and Lake Raeside salt lake systems following heavy rainfall. Rainfall is sporadic and although the annual average is 274mm per annum, up to 100mm can fall within a 24 hour period. These Salt lake systems are over 15km away from the premises boundary.

The paste plant will be located on a regional catchment divide more than 10km from significant aquifers (valley fill alluvial groundwater systems including 11 Mile Potable borefield). Drilling programs in 1996 a section of deep weathered fractured bedrock running north – south under TSF2 was detected. Monitoring indicates that groundwater levels adjacent to the TSF fluctuate depending on TSF deposition and nearby mine dewatering activities

Immediately underlying the TSFs is alluvial soil, of moderate permeability to a depth of less than 5m, overlying low permeability saprolitic clay. Highly weathered granite extends to 20-30m deep and pre-development static water levels were at this level (~490 m AHD). The only natural groundwater occurrences were minor and discontinuous zones associated with bedrock fractures (Berry, 2017).

Risk assessment

Tables 5 and 6 below describe the Risk Events associated with the amendment consistent with the *Guidance Statement: Risk Assessments*. Both tables identify whether the emissions present a material risk to public health or the environment, requiring regulatory controls.

Table 5: Risk assessment for proposed amendments during construction

Table 5. RIS	Risk Event								
Source/	Activities	Potential emissions	Potential receptors	Potential pathway	Potential adverse impacts	- Consequence rating	Likelihood rating	Risk	Reasoning
Cat 5 Processing or beneficiation of metallic or non- metallic ore	Construction of Venus paste plant; including, the hard pad, sump and bund construction activities; vegetation clearing, topsoil removal and relocation	Dust: associated with civil and construction activities Noise: associated with civil and construction activities	Nearby native vegetation No receptors as nearmenity impacts	Air: transport and dispersion of articulates (fugitive dust)	Deposition on vegetation which may harm plants	Slight ver 10km away. N	Unlikely o pathway to o	Low	The Licence Holder controls are deemed adequate to control dust. Including the use of dust suppression infrastructure such as water trucks; water carts on roads, sprinklers on stockpiles, a wet batch process and monitoring of tailings moisture content. The Licence Holder will be required to construct the Venus paste plant in accordance with the methods and specifications detailed within the amendment application. No further assessment. There is a separation distance of over 250m between the nearest priority flora and the paste plant area.

Table 6: Risk assessment for proposed amendments during operation

. 25.0 0. 100	Risk Event								
Source/.	Activities	Potential emissions	Potential receptors	Potential pathway	Potential adverse impacts	Consequence rating	Likelihood rating	Risk	Reasoning
Cat 5	Transport, stockpiling, mixing and screening of input materials;	Dust: associated with transport, stockpiling, mixing and screening of input materials	Nearby native vegetation including priority species	Air: transport and dispersion of particulates (fugitive dust)	Deposition which may harm plants	Slight	Possible	Low	The Licence Holder controls are deemed adequate to control dust during operation Including the use of water carts, sprinklers on stockpiles, ensuring the input materials are sufficiently wet prior to mixing to minimise dust emissions. Cement mixing part of the process is a wet process only. No further assessment required
Processing or beneficiation of metallic or non- metallic ore	Seepage through the base of the hardstand area and the wastewater collection sump	Contaminated runoff containing traces of heavy metals and metalloids such as Ni, As, Cr, Cu and Se	Soil and groundwater	Through the base of the hardstand and sump liner and soil to groundwater	Soil and groundwater contamination over time	Minor	Unlikely	Medium	Continue to detailed risk assessment
	Overtopping of runoff collection sump	Contaminated runoff containing traces of heavy metals and metalloids such as Ni, As, Cr, Cu and Se	Soil, nearby vegetation and groundwater	Surface runoff	Localised soil contamination and potential for loss of vegetation health for nearby vegetation. Potential for groundwater contamination with repeat events	Minor	Unlikely	Medium	Continue to detailed risk assessment

Cat 5 Processing or beneficiation of metallic or non- metallic ore	Stormwater runoff from hardstand area	Contaminated runoff containing traces of heavy metals and metalloids such as Ni, As, Cr, Cu and Se	Soil and groundwater	Surface runoff	Localised soil and potential for groundwater contamination with repeat events	Minor	Unlikely	Medium	Continue to detailed risk assessment
Cat 5 Processing or beneficiation of metallic or non- metallic ore	Pipeline ruptures delivering paste to mining stopes and contaminated storm water delivery to processing plant	Contaminated runoff containing traces of heavy metals and metalloids such as Ni, As, Cr,	Soil and vegetation	Surface runoff	Localised soil and potential harm to vegetation	Minor	Possible	Medium	Continue to detailed risk assessment

Risk Assessment

Seepage

Leinster has an extremely hot dry climate with annual rainfall averaging 240-260mm and an annual evaporation rate of above 2800mm per annum (BOM, 2019). Excess water from paste production is likely to evaporate from the pad surface in most circumstances, or following high intensity cyclonic events which can deliver up to 100mm of rainfall over a 24hour period, the stormwater runoff will drain to the clay lined water collection sump with capacity of 2640m3. Although the expected maximum incidental rainfall that will fall on the past plant pad area during a 1:100 year 72 hour Average Recurrence Interval (ARI) rainfall event is greater than the capacity of the sump; the excess water will be recycled into the mill return water system to ensure no loss to the environment.

The base of the paste pant is designed to minimise seepage through a 500mm compacted oxide layer. Incidental rainfall and excess water applied during the mixing of input materials is not considered to have sufficient residence time on the pad area, even during high ARI events to allow seepage to occur.

Should pooling occur on the past or saturate of the paste plant pad occur, the seepage is not considered to be high risk as the tailings used in the manufacture of paste are non- acid forming when mixed with water so any metals contained within the seepage are unlikely to be mobilised. Furthermore should contaminants from seepage reach the groundwater table the groundwater surrounding the nearby TSF2 is recorded approximately 13mbgl, the groundwater quality beneath the base of the paste plant is saline and has limited beneficial use (12,000-14,000mg/L TDS). Groundwater monitoring bore MB04 is approximately 250m east, and MB66 is approximately 450m south east of the Venus paste plant area. Changes in groundwater quality or quantity as a result of this amendment are not expected to show in the results, however changes in analytical data following construction and operation of the past plant can be monitored to determine if any impacts from the Venus paste plant are impacting on local groundwater quality.

The Delegated Officer considers the likelihood of seepage from the hardstand area causing impacts to soil and groundwater beneath the paste plant pad as unlikely. Should seepage pass through the hardstand to soil and groundwater, the consequence impacts ground and soil is considered minor with low level on site impacts expected. The overall risk is considered medium and suitable for regulatory controls.

Overtopping of runoff collection sump

The sump has a capacity of which accounts for the maximum rainfall expected from a 1:100year ARI event over a 1 hour duration event including freeboard (2640m³). The Licence has provided that the total volume of water from a 1:100 ARI event over a 72 hour period is approximately 9000m³ is not required due to the use of the stormwater recovery pump is operating throughout such rainfall events at a rate of 100L/s. The maximum storage required at any one time during a 1:100 ARI events of durations of between 1 hour to72 hours is 2100m3 (Latto, 2019)

On this basis, the runoff water collection sump is of sufficient capacity to manage runoff from extreme rainfall events. The Licence Holder will recycle excess water through the mill return water system should high rainfall periods be predicted, to ensure levels are sufficient to maintain runoff capacity from such extreme rainfall events.

Incidental rainfall will be diverted away from the past plant pad area during high rainfall periods through drains and diversion channels outside of the pad area, to ensure the sump does not collect more water than falls within the bunded paste plant area.

Sediment derived from tailings and sand on the mixing pad has the potential to be carried into the run-off water collection sump and impact on the storm water retention capacity of the

sump should sediment be allowed to accumulate with in the sump.

The likelihood of overtopping of the lined collection sump is considered **unlikely**. The consequence of over topping on the soil and native vegetation surrounding the run off collection sump is considered **minor** with low level on site impacts to soil and vegetation.

The Delegated Officer considers the overall risk of over topping from the run off collection sump to be medium and suitable for regulatory control.

Stormwater runoff

Storm water runoff from outside the paste plant area will be routed away from the by a series of constructed diversion channels, bunds and drains to a collection sump for re-use within the plant, such as for dust suppression. Within the paste plant hardstand area, potentially contaminated and sediment laden storm water will be contained within the paste pad area via a 1m bund surround the external perimeter of the pad and surface runoff will be drained towards the paste plant wastewater collection sump via a gradient within the pad.

The Delegated Officer considers the likelihood of storm water runoff from the hardstand area causing impacts to soil and vegetation surrounding the past plant pad as **unlikely**. Should contaminated storm water runoff occur, the consequence is considered **minor** with low level on site impacts expected. The overall risk is considered **medium** and suitable for regulatory controls.

Pipeline ruptures and failures

Impacts from failure and rupture of pipelines containing paste or storm water run-off are considered **unlikely** as the will probably not occur in most circumstances. Paste contains a cement bind and would set relatively quickly upon contact with dry air, should loss of containment of a past conveyance delivery line occur. The consequence failure and rupture of pipelines is considered **minor** with low level site impacts. The Delegated Office

Decision

Seepage

Current Licence conditions W6(a) monitor groundwater levels and groundwater contamination. The Delegated Officer requires that the past plant hardstand is built in accordance with the amendment application. No further regulatory control are required.

Overtopping of runoff collection sump

Exisiting Licence condition W15 requires that an operational freeboard of 300mm be maintained at all times. In order to maintain capacity of the water collection sump, the Delegated Officer requires that sediment build up from the run off collection sump be periodically removed. Condition S7 has been added to require the periodic removal of sludge and excess water to ensure the run-off water collection sump maintains sufficient capacity to contain run off during a 72 hour 1:100 year ARI rainfall event. The Delegated Officer notes that the functionality of the sump pump is the main environmental control for the management of overtopping of the sump from the paste pad area. A condition has been included requiring that the Licence Holder has a maintenance schedule to ensure the pump is maintained in good working order.

Stormwater runoff

The Delegated Officer considers that a condition requiring the construction of diversion channels, drains and bunds around the Venus paste plant area as specified in the application form to be sufficient to address the risk associated with storm water runoff. No further regulatory controls are required.

Pipeline ruptures and failures

Licence Conditions W17(a) requires all pipelines containing return water deliver lines to be either buried or sited within secondary containment infrastructure. Condition W17(b) on the existing licence requires that catch pits are situated along delivery line pipelines to ensure containment of any spilt materials.. No further regulatory control are required.

Licence Holder controls for the construction of the works are conditioned on the Licence to ensure that the Venus past plant is built according to the specifications detailed in the application form. Condition S7 has been included to include ensure operational functionality of the past plant run-off collection sump.

Licence Holder's comments

The Licence Holder was provided with the draft Amendment Notice on 16 January 2019. The Licence Holder provided editorial comments only to Conditions C1(c); C1(d) and S7.

Amendment

1. The Licence is amended by the insertion of the following Condition C1(a):

CONSTRUCTION OF PASTE PLANT

C1(a) The Licensee shall ensure that each item of infrastructure or equipment specified in column 1 of Table 7 is designed and constructed in accordance with the requirements specified in column 2 of Table 7.

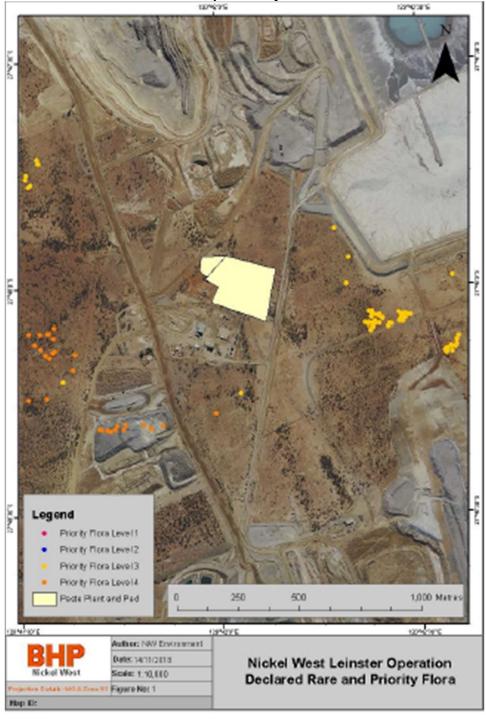
Table 7: Infrastructure or equipment requirements (construction)

Column 1	Column 2
Infrastructure	Requirements
Areas subject to construction activities for paste plant	 Minimise dust by using water carts and/or sprinklers to wet down work areas.
Paste Plant hardstand area	 To a minimum depth of 500mm, compacted oxide layer; graded towards runoff collection sump; Location as shown in Attachment 11 Bunding around perimeter of 1m +/-0.25m Slope of entry point designed to ensure containment of any run-off water to the sump
Paste Plant run off collection sump	 30m by 60m in area; 1.46m depth Clay lined to a minimum permeability of 1 x 10-8 m/s With a retention capacity of at least 2640m³
Paste Plant run off collection sump pump	 A pump be available at all times in good working order to remove stormwater from the run off collection sump; The pump to have a capacity of 100L/s To have a regular maintenance schedule
Run off water and past plant pipelines	 Constructed with secondary containment infrastructure where above ground Spills and rupture to drain towards a catch pit
Paste plant bund walls	 To a minimum height of 1m above the base of the paste plant hardstand area; except through vehicle access route.
Sprinklers within hard pad area	 Stockpiles of sand and tailings to be within spray area for dust suppression
Diversion channels and drains	Drain incidental stormwater away from the bund walls and the pad access area

- 2. The Licence is amended by the insertion of the following Condition C1(b):
 - C1(b) The Licensee must not depart from the requirements specified in Column 2 of Table 7 except where such departure does not increase risks to the public health, public amenity or the environment.
- 3. The Licence is amended by the insertion of the following Condition C1(c):
 - C1(c) Subject to Condition C1(a) and not more than 30 days after completing the construction works for the paste plant, and prior to commissioning of the same, the Licence Holder must provide to the CEO certification from a suitably qualified Engineer confirming that each item of infrastructure or component of infrastructure specified in Column 1 of Table 7 has been constructed with no material defects and to the requirements specified in Column 2 of Table 7.
- 4. The Licence is amended by the insertion of the following Condition C1(d):
 - C1(d) Where a departure from the requirements specified in Column 2 of table 7 occurs, the Licence Holder must provide to the CEO a description of, and explanation for, the departure together with the report required by Condition C1(c).

- 6. The Licence is amended by the insertion of the following Condition S7:
 - The Licence Holder shall maintain the paste plant runoff collection sump such that sludge and run off water is periodically removed to ensure a retention capacity equaling 2640m³ is maintained prior to the commencement of 1 December each year.
- 7. The Licence is amended by the insertion of Attachment 11:

The Paste Plant construction area is depicted in yellow



Appendix 1: Key documents

	Document title	In text ref	Availability
1	LicenceL4612/1989/11– Leinster Nickel Operations	L4612/1989/11	accessed at www.dwer.wa.gov.au
2	Licence amendment application for current amendment application	BHP Billiton Nickel West Pty Ltd, 2018	DWER records (A1748959)
3	Licence amendment application for Amendment Notice 3	BHP Billiton Nickel West Pty Ltd, 2018a	DWER record A1607127
4	Berry K (2017) Nickel West Leinster Assessment of Groundwater Characteristics, April 2017	Berry 2017	DWER records (Appendix 2 of A1607127)
5	Application Supporting document: Email correspondence received from Annette Latto, 25 January 2019. Email Correspondence received from Licence Holder 25 January 2019	Latto, 2019	DWER record A17558922
6	Application Supporting document: Email correspondence received from Annette Latto, 23 January 2019		DWER record A1758443
7	Bureau of Meteorology; average rainfall and evapotranspiration data for Leinster Airport	BOM, 2019	http://www.bom.gov.au/jsp/ncc/climate averages/evaporation/index.js
8	DER, July 2015. <i>Guidance Statement:</i> Regulatory principles. Department of Environment Regulation, Perth.	DER 2015a	accessed at www.dwer.wa.gov.au
9	DER, October 2015. Guidance Statement: Setting conditions. Department of Environment Regulation, Perth.	DER 2015b	
10	DER, November 2016. Guidance Statement: Risk Assessments. Department of Environment Regulation, Perth.	DER 2016b	
11	DER, November 2016. Guidance Statement: Decision Making. Department of Environment Regulation, Perth.	DER 2016c	