



June 24





BGL-QUA-STP-00X

Revision 0.00

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1. EXECUTIVE SUMMARY

The Project is owned and operated by Golden Spur, a wholly owned subsidiary of Bellevue Gold Limited (BGL) (collectively referred to as the Client). The Project is located approximately 40 km north of Leinster, in the Northern Goldfields region, within the Shire of Leonora. The Project is surrounded by a pastoral lease (Yakabindie Station Property ID: 1507070).

The BGP was previously mined by open cut and underground methods from 1988 to 1997. Approval under the Mining Act 1978 for the consolidation of previous Mining Proposals was granted from the Department of Energy, Mines, Industry Regulation and Safety (DEMIRS) on the 28 May 2024 (Reg ID 122497). BGP currently operates under Licence L9259/2020/1 for the following Prescribed Premises:

- Category 6: Mine dewatering: premises on which water is extracted and discharged into the environment to allow mining of ore (500,000 tonnes per annual period),
- Category 70: Screening etc of material: premises on which material extracted from the ground is screened, washed, crushed, ground, milled, sized or separated (More than 5,000 but less than 50,000 tonnes per year),
- Category 52: Electric Power Generation (30MW),
- Category 54: Sewage Facility (150m³ per day),
- Category 64: Class II or III putrescible landfill site (500 tonnes per year).

This amendment proposes include an additional location for Category 70 activities within Licence L9259/2020/1. An assessment of risks associated with the Project demonstrates that emissions can be effectively managed to ensure there are no material impacts to sensitive receptors.

2. PURPOSE

This document constitutes "Attachment 3B" of the Licence Amendment application and provides additional information to support the Operating Licence amendment application for L9259/2020/1 dated 31 May 2024.

3. PROJECT BACKGROUND INFORMATION

3.1 Ownership

The Bellevue Gold Project (BGP or the Project) is owned and operated by Golden Spur Resources Pty Ltd (GSR), a wholly owned subsidiary of Bellevue. Additional infrastructure for the Project is also located on tenements owned by Giard Pty Ltd (Giard), also a wholly owned subsidiary of Bellevue. Bellevue is listed on the Australian Stock Exchange as ASX:BGL. The BGP tenements relevant to this application are M36/24, M36/25 and M36/299. All compliance and regulatory requirements regarding this assessment document should be forwarded by email, post or courier to the following address:



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3.2 Location, Tenure and Site Layout

The BGP is a historic gold mining operation in Mineral Field 36 in the Northern Goldfields Region of WA, approximately 40 km north of Leinster in the Shire of Leonora (**Figure 3-1**). The Project is adjacent to the Goldfields Highway that passes through the tenements west of the historic Bellevue Mine. An overview of the BGP tenure and site layout in relation to L9259/2020/1, including proposed amendments, is presented in Figure 1-2.

3.3 Prescribed Premises Categories and Existing Approvals

The BGP was previously mined by open cut and underground methods from 1988 to 1997. Approval under the *Mining Act 1978* for the consolidation of previous Mining Proposals was approved through the Department of Mines, Industry Regulation and Safety (DMIRS) on the 28 May 2023 (Reg ID 122497). BGP currently operates under Licence L9259/2020/1 for the following Prescribed Premises:

- Category 6: Mine dewatering: premises on which water is extracted and discharged into the environment to allow mining of ore (500,000 tonnes per annual period),
- Category 70: Screening etc of material: premises on which material extracted from the ground is screened, washed, crushed, ground, milled, sized or separated (More than 5,000 but less than 50,000 tonnes per year),
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This amendment proposes include an additional location for Category 70 activities within Licence L9259/2020/1. An assessment of risks associated with the Project demonstrates that emissions can be effectively managed to ensure there are no material impacts to sensitive receptors.

3.4 Purpose of Licence Amendment

This application seeks only to amend L9259/2020/1 to include an additional location for Category 70 activities (Crushing and screening) within the Prescribed Premise to the west of the current location, as indicated in **Figure 3-1**.

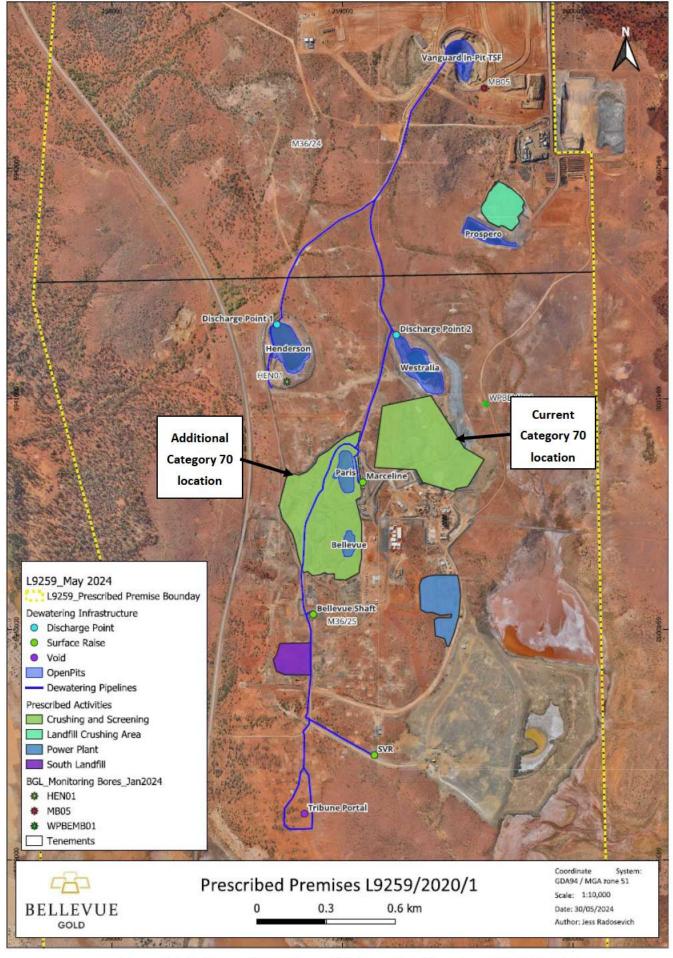


Figure 3-1: Category 70 locations within Prescribed Premises of L9259/2020/1



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4. ENVIRONMENTAL SETTING

4.1 Climate

The BGP is located in an area characterised by a semi-arid climate, with warm to hot summers and cool to mild winters. The nearest Bureau of Meteorology (BOM) weather station is 43 km south at Leinster Aero (Site Number 012314) (**Figure 4-1**). The mean maximum temperature is 37.3°C in January and mean minimum temperature of 6.2°C in July (BOM, 2023). The mean maximum 9 a.m. wind speed was 21.4 km/hr in January and mean minimum 9 a.m. wind speed was 16.0km/hr in July. The mean maximum 3 p.m. wind speed is 19.4 in September and mean minimum 3 p.m. wind speed is 15.6 in April (BOM, 2023).

The average annual rainfall as recorded at Leinster Aero Station is approximately 251.6 mm with an average of 30.8 days of rain per year. Rainfall generally comes from locally generated thunderstorms (during winter) and dissipating tropical cyclones tracking southeast from the Pilbara coast (during summer). The highest average rainfall occurs in February with 40.9 mm and the lowest occurring in September with 3.6 mm (BOM, 2023)

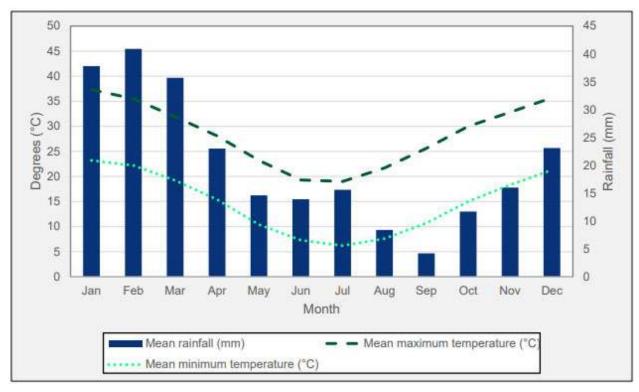


Figure 4-1: Climate Data

4.2 Landscape

The Project is located in the semi-arid Northern Goldfields region of Western Australia, on the fringes of Lake Miranda. The Project lies within the Interim Biogeographic Regionalisation for Australia (IBRA) Murchison bioregion, and within the East Murchison (MUR01) subregion. The region is defined by internal drainage and extensive areas of elevated red desert sandplains within minimal dune development. The salt lake systems are associated with the occluded paleo drainage system (Cowan et al., 2001).



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There are widespread broad plains of red-brown soils and breakaway complexes as well as red sandplains. The vegetation is dominated by Mulga woodlands often rich in ephemerals, hummock grasslands, saltbush shrublands and *Halosarcia* shrublands (Cowan et al., 2001). The dominant land uses in the vicinity of the Project are mining, exploration, and pastoralism. There are no Environmentally Sensitive Areas (ESAs) declared under Section 51B of the EP Act in the Project area.

4.3 Flora and Vegetation

Two detailed flora surveys across the BGP site covered 2,428.4 ha. RPS Australia West Pty Ltd (RPS) undertook five field surveys between August 2018 and October 2019. The other was conducted by Native Vegetation Solutions (NVS) in December 2022.

The survey programs were conducted in accordance with:

- Environmental Factor Guideline: Flora and Vegetation (Environmental Protection Authority (EPA), 2016a); and
- Technical Guidance Flora and Vegetation Surveys for Environmental Impact Assessments (EPA), 2016b).

A total of 345 vascular flora species were identified during the survey program within the greater BGP area. No Threatened flora species or Threatened Ecological Communities (TECs) listed under the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act), or the *Biodiversity Conservation Act 2016* (WA) (BC Act) were observed during this assessment (RPS, 2020). A total of three species listed under the Department of Biodiversity Conservation and Attractions (DBCA) as Priority flora species were identified including:

- Grevillea inconspicua (Priority 4);
- Hibiscus sp. Perrinvale Station (Priority 1); and
- Goodenia lyrata (Priority 3).

A total of 19 vegetation communities were described across the BGP (NVS, 2022; RPS, 2020). Vegetation communities recorded within the Prescribed Premises boundary include:

- <u>H09: Drainage lines on stony hills</u> *Mulga spp.* Low Open to Closed Forest over *Acacia xanthocarpa* Tall Sparse to Open Shrubland over *Eremophila exilifolia* and Senna spp. Mid to Low Open Shrubland over *Aristida contorta* Sparse to Open Tussock Grassland in drainage lines on stony hill slopes.
- H08: Drainage lines on stony hills Mulga spp. Low Open Woodland over Senna spp. Mid Sparse Shrubland over Ptilotus obovatus var. obovatus Low Sparse Shrubland over Enneapogon caerulescens and Cymbopogon ambiguus Sparse Tussock Grassland.
- H07: Drainage lines on stony hills Acacia doreta (long phyllode form) Low Open Woodland over A. xanthocarpa Tall Sparse to Open Shrubland over Senna sp. Meekatharra and S. artemisioides subsp. Helmsii Mid Sparse Shrubland over Ptilotus obovatus var. obovatus Low Shrubland on stony hillslopes, spurs and crests.
- P02: Stony hardpan plains Mulga spp. Low Open Woodland to Isolated Trees over Eremophila pantonii and E. galeata Tall Open to Sparse Shrubland over Senna sp. Meekatharra Mid Open Shrubland over Ptilotus obovatus var. obovatus and mixed Chenopods Low Open to Sparse Shrubland over Aristida contorta Sparse Tussock Grassland in drainage lines on stony hardpan plains.



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 G01: Gypsum dunes – Cratystylis subspinescens Mid Sparse Shrubland over Maireana pyramidata and Tecticornia sp. Low Sparse Chenopod Shrubland over mixed Sparse Tussock Grassland / Forbland on low stony rises adjacent to Samphire shrublands.

• <u>Cleared/Highly Modified</u>: Highly modified and cleared areas devoid of native vegetation – includes roads, tracks, buildings, mining infrastructure, historical pits, processing areas and camps.

The desktop assessment identified one Priority Ecological Community (PEC), Violet Range (Perseverance Greenstone) Banded Iron Formation (BIF), mapped as potentially occurring across the BGP. The mapped extent of the PEC, including a 500 m buffer, occupies a total of 19,256.21 ha, with the majority of the PEC in the BGP in a degraded state due to historical mining activities (NVS 2022; RPS, 2020).

4.4 Vertebrate Fauna and Habitat

Bamford Consulting Ecologists Pty Ltd (Bamford) undertook a detailed terrestrial fauna and habitat assessment for the Project in 2018 and 2019. A total of six Vegetation and Substrate Associations (VSAs) were identified across the BGP to describe the types of habitats available to local fauna species (Bamford, 2020). The VSA's recorded within the Prescribed Premises include:

- Long-leaf Mulga over shrubs and tussock grass on rocks and loam of undulating hills.
- Broad-leaf Mulga over shrubs and tussocks grass on sandy-loam plains.
- Isolated trees over open shrubland on gypsum soils close to Lake Miranda.
- Samphire marsh in loam clay on margins and across parts of Lake Miranda.
- Lake Miranda.
- Degraded area.

A total of 110 vertebrate fauna species were observed within the Project area throughout the surveys consisting of one amphibian, 32 reptiles, 64 birds and 13 mammals (nine native and four introduced) (Bamford, 2020). Of these, five were identified as being species of conservation significance being:

- Common Greenshank (Tringa nebularia) Listed under the EPBC Act as Marine and Migratory.
- Sharp-tailed Sandpiper (Calidris acuminata) Listed under the EPBC Act as Marine and Migratory.
- Sandplain Worm-lizard (Aprasia repens) Listed as a species of local significance.
- Australian Bustard (Ardeotis australis) Listed as a species of local significance.
- Bush Stone-curlew (Burhinus grallarius) Listed as a species of local significance.

4.5 Subterranean Fauna

Invertebrate Solutions Pty Ltd (Invertebrate Solutions) undertook a preliminary subterranean fauna species and habitat assessment for the Project in 2021. The technical memorandum served as a preliminary assessment of records by the Western Australian Museum (WAM) and DBCA. Desktop results for stygofauna and troglofaunal records found in the vicinity of the BGP are limited to calcrete outcrops, including Miranda East and Miranda West calcretes. These habitats have not been identified in the Project area.



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The absence of stygofauna records outside of calcrete geology in the Project area would suggest that stygofauna habitats are generally absent or present in low abundance. However, it is unknown what sampling intensity has previously been undertaken and the lack of records may be due to a scarcity of sampling. The groundwater within the BGP is almost saline to hypersaline with salinity ranging from 17,900 mg/L TDS up to 155,000 mg/L in Vanguard pit, further reducing the likelihood of stygofauna within local aquifers. Whilst stygofauna have occasionally been recorded in hypersaline groundwater, this has mostly been associated with aquifers at the edges of salt lakes. Most hypersaline waters have not been found to contain stygofauna. Core photos examined for the saturated zone confirm the general absence of suitable fracturing that provides interconnected void space in the rock strata that may provide a habitat for stygofauna (Invertebrate Solutions Pty Ltd, 2021).

Whilst overlaying colluvium, known as the Mesovoid Shallow Substratum, is virtually unsampled, it is increasingly known worldwide to contain troglobiont communities. However, the colluvium across the BGP is dominated by sand and soil, making it unlikely to contain troglofauna. Additionally, core photos examined for the unsaturated zone confirm the absence of suitable fracturing that provides interconnected void space in the rock strata that may provide habitat for troglofauna (Invertebrate Solutions Pty Ltd, 2021).

4.6 Hydrology

The Project area is situated on a gently undulating landscape of minor ridges, with slopes generally less than 10°, and colluvial flats 50-200m wide and 10-20m below the ridges. The area is described as drainage lines, with salt lake features to the south (Lake Miranda), undulating plains to the east and hills to the west. There are no wetlands or permanent surface water features on the site. All streams are ephemeral, driven by the erratic nature of rainfall in the region.

The existing open pits are aligned with the local topographical high of the greenstone belt, which also defines the top of the local surface water catchments in the area. Drainage near the site is generally south towards Lake Miranda (salt lake with periodic inundation driven by seasonal rainfall events). East of the site lies a braided streambed with four major tributaries that converge at a point about 2 km east of the southernmost point of the site. Substantial surface run-off occurs following thunderstorms or cyclonic activity, resulting in intermittent and short duration surface water flows in the local drainage lines. Run-off rates during these large rainfall events are generally high.

The BGP is located on a north-south ridge line, with runoff flowing either side to the east and west. The Water Management Plan (RPS Australia West Pty Ltd, 2021) outlines surface water management measures to accommodate predicted overflows.

2D flood modelling determined that whilst the Project could be affected by a 1 in 100-year flood event, the predicted water velocities are typically non-destructive to earth structures and unlikely to impact the BGP. Additional modelling was completed for a 1 in 500-year flood event to account for extreme rainfall events due to climate change. The assessment identified that flood extents would increase by up to 40 m laterally compared to the 1 in 100-year events. The Water Management Plan describes this type of flood event was very low and that the site topography naturally encourages water to flow away from the Project.

4.7 Hydrogeology

There are two locally occurring aquifers in the region surrounding the BGP including:

The Fractured Rock Aquifer (developed in the hard rock areas around the BGP).



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 The Carey Paleochannel Aquifer (formed in the now-filled Carey paleovalley to the west and south of the BGP).

The crystalline basement rocks in this region offers low aquifer permeability and storage characteristics. Groundwater occurs mainly within the secondary porosity developed in the weathered lower saprolite horizon and structural defects such as faults, shears zones and fractures. The BGP lies almost entirely within the Fractured Rock Aquifer. However, the underground workings and associated dewatering will create a very steep hydraulic gradient between the underground and the adjacent Carey Paleochannel Aquifer.

4.8 Social Setting and Cultural Heritage

4.8.1 Social setting

A review of the environmental and social setting surrounding the greater BGP has guided the identification of potential sensitive receptors that have been considered when assessing this Project's risks and potential emissions. The relevant potential sensitive receptors identified include (Figure 4-1):

- Local flora, fauna and vegetation.
- Heritage sites outside the agreed development envelope.
- Yakabindie Pastoral Lease homestead approximately 10 km from the Project.
- Leinster townsite (located approximately 40 km to the south).
- Lake Miranda

Although not considered a sensitive receptor under the EP Act, GSR has also considered the potential for impacts at the Mining Administration Building and Accommodation Village.

4.8.2 Aboriginal Cultural Heritage

The BGP tenements are located within an area of high cultural heritage significance. Bellevue executed a Native Title Agreement (NTA) with Tjiwarl (Aboriginal Corporation) RNTBC (Tjiwarl AC) as the holder on trust for the Tjiwarl Native Title Holders, being the native title rights and interests' holders and traditional owners of the land, which hosts the BGP. The NTA ensures that important cultural and heritage considerations have been included in the surface design and layout of the Project, protecting sensitive areas and developing a co-designed Cultural Heritage Management Plan (CHMP) to manage future activities.

The Project area has been extensively and thoroughly surveyed for Aboriginal ethnographical and archaeological sites with registered sites shown in Table 4-1. In addition to the registered sites on the Aboriginal Heritage Inquiry System (AHIS) register, there are 13 sites which are lodged and are awaiting formal assessment before entry into the Register by the Registrar of Aboriginal Sites. Many of these sites have been mapped by the Department of Planning, Lands and Heritage (DPLH) with large extended boundaries and overlapping large polygons that do not reflect the actual location of the site and completely cover the Project area. As a result of consultation with the Aboriginal Consultation Group and additional heritage survey work, heritage sites' locations and cultural values within the Project area are well understood. BGL and TAC signed a Native Title Agreement in September 2022 of which a comprehensive CHMP formed a part. As a result of the consultation and cultural mapping that took place ahead of writing the CHMP all cultural heritage values were captured within the immediate project area and a process was defined that would lead to Bellevue and TAC agreeing to those areas where Bellevue would be permitted to expand its current extent.



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Table 4-1 AHIS Registered Aboriginal Sites

Tenement	Site ID	Legacy ID	Site Name	Site Type
M36/24	459	W02261	Sir Samuel Camp	Ceremonial, Camp
	38870	-	Wati Kutjarra Old Lore Ground	Ceremonial
	460	W02262	Mother's Camp	Historical
	22277	-	Violet Range 2	Mythological,
				Natural feature.
M36/25	464	W02262	Katatjuna	Ceremonial, Mythological
	819	W02164	Mitan	Ceremonial, Mythological, Water Source
	823	W02168	Ngunan	Artefact/Scatter, Ceremonial, Man-Made
				Structure, Mythological
	1200	W01966	Lake Miranda North	Artefacts/Scatter, Quarry
	1295	W01896	Matintjiti	Artefacts/Scatter, Ceremonial, Mythological
	1376	W01818	Yakabindie S./Pilkari Kutji	Mythological
	1377	W01819	Yakabindie S.E./Yulkapa	Mythological
M36/25 and	22183	-	Vanguard South Scatter 1	Artefacts/Scatter, Other: Grindstone
M36/24	1301	W01902	Lake Miranda (Katawill)	Ceremonial, Mythological, Plant Resource
	1304	W01905	Ingkatala	Artefacts/Scatter, Ceremonial, Man-Made
				Structure, Repository/Cache, Skeletal
				Material/Burial, Camp.



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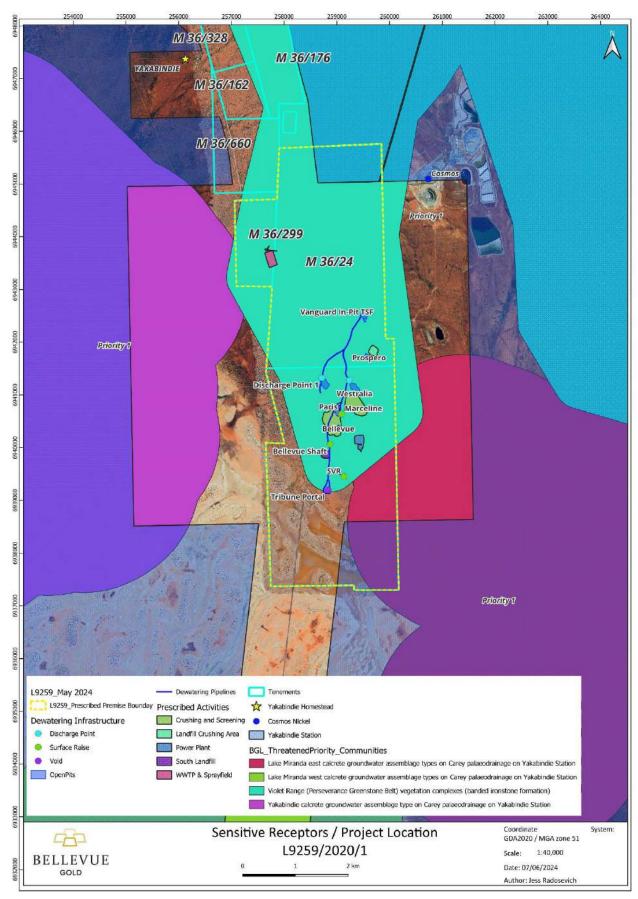


Figure 4-2: Sensitive Receptors – L9259/2020/1



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5. PROJECT DESCRIPTION

This amendment seeks only to include an additional location within the Prescribed Premises for the purpose of conducting Crushing and Screening related activities, as shown in **Figure 3-1**. Activities at the second location will be conducted as per existing management practices, indicated in **Table 6-4**.

6. CONTROL OF EMISSIONS

6.1 Risk Assessment Overview

A risk assessment was completed in accordance with DWER Guidance Statement: Environmental Risk Assessments Framework (DWER, 2017) and the DWER Guidance Statement: Environmental Siting (DWER, 2016). The risk assessment process identified the following:

- The sources of pollution and where available, quantification of emissions.
- The pathway which pollution follows from the source to the receptor.
- The environmental and health receptors.
- The potential impacts on the receptors from this source of pollution.
- The controls and mitigation measures applied to the Project.
- The likelihood, consequence and overall risk rating associated with this factor.
- The requirement for monitoring.

Likelihood and consequence categories (Table 6-1 and Table 6-2) were derived from these Guidance Statements and used to develop the associated risk matrix is presented in Table 6-3.

6.2 Risk and Impact Assessment

Potential impacts, control measures and risk evaluation associated with the proposal is summarised in Table 6-4.

Table 6-2 Likelihood Categories

Likelihood of Occurrence	Probability
Almost Certain	The risk event is expected to occur in most circumstances.
Likely	The risk event will probably occur in most circumstances.
Possible	The risk event could occur at some time.
Unlikely	The risk event will probably not occur in most circumstances.
Rare	The risk event may only occur in exceptional circumstances.



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Table 6-3 Consequence Categories

Consequence Category	Environmental Consequence	Public Health and Amenity Consequence
Severe	 Onsite impacts: catastrophic Offsite impacts local scale: high level or above Offsite impacts wider scale: mid-level or above Mid to long-term or permanent impact to an area of high conservation value or special significance Specific Consequence Criteria (for environment) are significantly exceeded 	 Loss of life Adverse health effects: high level or ongoing medical treatment Specific Consequence Criteria (for public health) are significantly exceeded. Local scale impacts: permanent loss of amenity
Major	 Onsite impacts: high level Offsite impacts local scale: mid-level Offsite impacts wider scale: low-level Short-term impact to an area of high conservation value or special significance Specific Consequence Criteria (for environment) are exceeded 	 Adverse health effects: mid-level or frequent medical treatment Specific Consequence Criteria (for public health) are exceeded. Local scale impacts: high-level impact to amenity
Moderate	 Onsite impacts: mid-level Offsite impacts local scale: low-level Offsite impacts wider scale: minimal Specific Consequence Criteria (for environment) are at risk of not being met 	 Adverse health effects: low-level or occasional medical treatment Specific Consequence Criteria (for public health) are at risk of not being met Local scale impacts: mid-level impact to amenity
Minor	 Onsite impacts: low-level Offsite impacts local scale: minimal Offsite impacts wider scale: not detectable Specific Consequence Criteria (for environment) likely to be met 	 Specific Consequence Criteria (for public health) are likely to be met. Local scale impacts: low-level impact to amenity
Slight	 Onsite impact: minimal Specific Consequence Criteria (for environment) met 	 Local scale: minimal to amenity Specific Consequence Criteria (for public health) met

Table 6-4 Risk Matrix

Libelih e e d	Consequence						
Likelihood	Slight	Minor	Moderate	Major	Severe		
Almost Certain	Medium	High	High	Extreme	Extreme		
Likely	Medium	Medium	High	High	Extreme		
Possible	Low	Medium	Medium	High	Extreme		
Unlikely	Low	Medium	Medium	Medium	High		
Rare	Low	Low	Medium	Medium	High		



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Table 6-5 Risk and Impact Assessment

Emission Source/Event	Pathway	Receptor	Event Impacts	Control Measures	Consequence on Receptor	Likelihood of Event Impact (After Controls)	Level of Risk
Dust and particulates: Operation of mobile crushing and screening plant Vehicle movements Stockpiles Loading of trucks	Direct emissions to air – wind dispersion.	Potential sensitive receptors include: Yakabindie Pastoral lease holders. Due to separation distances, dust impacts at these receptors are not anticipated Fauna, flora and Heritage sites outside of the development envelope.	Reduced amenity at potential sensitive receptors. Negative health impact to humans Negative health impact to flora and fauna. Reduced amenity at potentially sensitive receptors.	Dust suppression of fugitive dust emissions from operation of mobile plant including watering of stockpiles, unsealed roads and open areas. Diesel engines will be maintained and serviced on a regular basis and according to the manufacturer's specifications to ensure efficient running. Vehicle speed limits applied to reduce dust emissions. Crushing and screening will not ne undertaken within periods of extreme adverse weather conditions. Regular inspections of operations to monitor efficacy of dust control measures. Corrective actions implementated as	Slight	Rare Unlikely	Low



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Emission Source/Event	Pathway	Receptor	Event Impacts	Control Measures	Consequence on Receptor	Likelihood of Event Impact (After Controls)	Level of Risk
Sediment or hydrocarbon dispersal from surface water runoff	Water	Flora, fauna and vegetation. Land, soils and groundwater	Contamination of land, soil, vegetation and groundwater.	Strategic bunding and/or sumps at active crushing and screening area to prevent runoff, depending on site location and topography Spill kits in fuel/hydrocarbon storage, use and transfer locations, to ensure timely containment and cleanup of spills.	Minor	Unlikely	Medium
Noise during operations (mobile equipment)	Direct noise emissions	Yakabindie Pastoral Lease holders. Fauna	The additional location is within the existing mining operational area, therefore then noise at this location is anticipated to be a negligible addition to the operating mine site. Due to separation distances, impacts to receptors are not anticipated	Regular maintenance of vehicles and plant equipment. Where possible, noise attenuating equipment will be installed and maintained on vehicles and equipment. Adherence to the Environmental Protection (Noise) Regulations 1997.	Slight	Rare	Low



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7. COMPLIANCE

7.1 Environmental Protection Act 1986 - Part V

This Licence Amendment seeks to amend the existing Licence L9259/2020/1, issued under Part V of the EP Act. A summary of the proposed and current categories is outlined in Table 7-1. The licence fee calculation indicates a cost of \$326.40 for this amendment.

7.2 Mining Act 1978

Construction and operation of the Bellevue Gold Project is approved under the *Mining Act 1978* via a consolidated Mining Proposal (Reg ID 122497, approved 28 May 2023).





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