



## Application for Licence Amendment

### Part V Division 3 of the *Environmental Protection Act 1986*

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<b>Licence Number</b>	L9259/2020/1
<b>Licence Holder</b>	Golden Spur Resources Pty Ltd
<b>ACN</b>	161 329 933
<b>File Number</b>	DER2020/000278
<b>Premises</b>	Bellevue Gold Project  Legal description –  Within Mining tenements M36/24, M36/25 and M36/299  Goldfields Highway, Shire of Leonora  As defined by the Premises map attached to the Revised Licence
<b>Date of Report</b>	21 December 2023
<b>Decision</b>	Revised licence granted

A/MANAGER, RESOURCE INDUSTRIES  
REGULATORY SERVICES  
an officer delegated under section 20 of the *Environmental Protection Act 1986* (WA)

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## 1. Decision summary

Licence L9259/2020/1 is held by Golden Spur Resources Pty Ltd (Licence Holder) for the Bellevue Gold Project (the Premises), located within Mining Tenements M36/24, M36/25 and M36/299.

This Amendment Report documents the assessment of potential risks to the environment and public health from proposed changes to the emissions and discharges during the operation of the Premises. As a result of this assessment, Revised Licence L9259/2020/1 has been granted.

The Revised Licence issued as a result of this amendment consolidates and supersedes the existing Licence previously granted in relation to the Premises. This Amendment Report will be included with the current Decision Report on file.

## 2. Scope of assessment

### 2.1 Regulatory framework

In completing the assessment documented in this Amendment Report, the department has considered and given due regard to its Regulatory Framework and relevant policy documents which are available at <https://dwer.wa.gov.au/regulatory-documents>.

### 2.2 Amendment summary

On 5 September 2023, the Licence Holder submitted an application to the department to amend Licence L9259/2020/1 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act). The following amendments are being sought:

- To approve construction and operation of a new putrescible landfill within mining tenement M36/25; and
- To include dewatering pipelines from the Tribune Portal and the Marceline Rising Main (East of the Paris portal) to connect to existing dewatering pipelines that discharge into the already authorised discharge pits, Henderson and Westralia.

This amendment is limited only to changes to Category 6 and 64 activities from the Existing Licence. No changes to the aspects of the existing Licence relating to Category 52, 54 and 70 have been requested by the Licence Holder. The Licence Holder has requested the addition of wording to the licence to allow for the discontinuing of monitoring to the monitoring bore at the Vanguard Pit (MB05). The licence will now not require the monitoring of MB05 once the levels at the TSF3 reach the location of the monitoring bore.

Table 1 below outlines the proposed changes to the existing Licence.

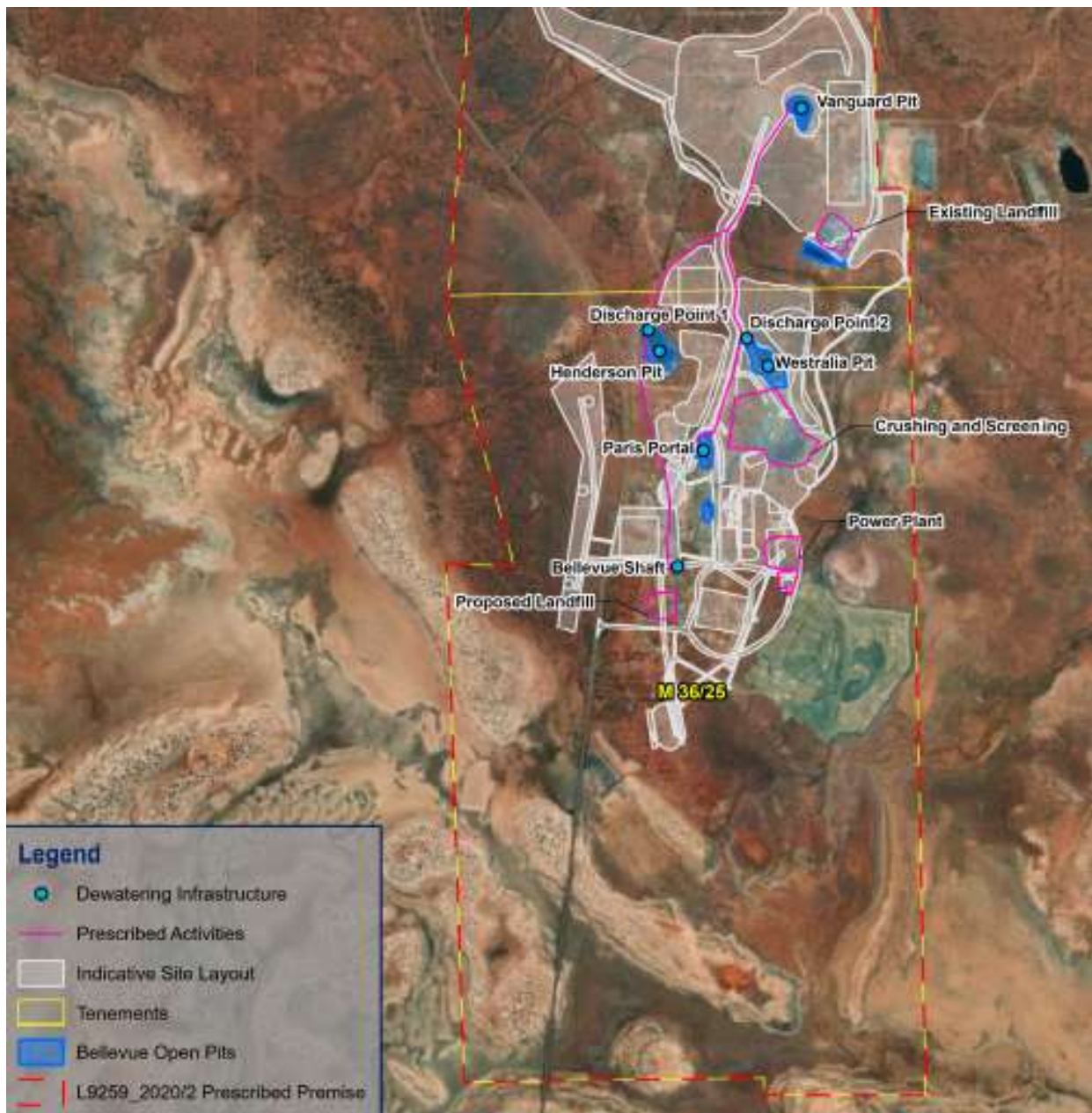
**Table 1: Proposed design changes**

Category	Current throughput capacity	Description of proposed amendment
6	500,000 tonnes per annual period	Inclusion of two additional de-watering pipelines to connect to the existing network. No new dewatering water discharge points are authorised.
64	500 tonnes per annual period	Change of location for the putrescible landfill.

### **Landfill (Category 64)**

The licence holder has applied to include a second location for the class II putrescible landfill, as the original location is nearing capacity due to construction of nearby infrastructure to support recommencement of mining activities. The new landfill will be located upon a previously disturbed section of the mine and will not require any clearing of native vegetation.

There will be no additional throughput of waste over the prescribed 500 tonnes per annual period and there are no changes proposed to the types of waste approved for disposal at the premises. Licence L9259/2020/1 currently allows disposal of class II waste in defined trenches within the premises area with conditions designed to minimise wind-blown waste and dust. These conditions will be applicable to the new landfill facility. The location of both the existing and proposed landfill facilities are shown below in figure 1.



**Figure 1: Current and proposed landfill facility locations**

Waste will be disposed of into defined trenches with a maximum length of 30 metres, 4 metres deep and 4 metres wide. Management of the new landfill will be in accordance with conditions (condition 2 and 3) already present on the licence, namely:

- (a) Waste must be placed in the defined trench;
- (b) Only the following waste types may be disposed of by landfilling: Clean fill, Putrescible waste, Inert waste Type 1 and Inert Waste type 2 (Tyres);
- (c) The tipping area must be less than 30m in length;
- (d) All reasonable and practical measures must be taken to ensure that no windblown waste escapes from the Premises;
- (e) Wind-blown waste must be collected on at least a fortnightly basis and returned to the tipping area; and
- (f) A water cart must be used as required to minimise dust generation.

### **Dewater Pipelines (Category 6)**

The licence holder has applied to include two additional dewatering pipelines to service mining activities.

Currently groundwater is pumped to the surface via underground pumps and up one raising main (Bellevue shaft) and is discharged into two authorised discharge pits: Henderson and Westralia. The licence holder is expanding their underground workings and require two additional dewatering points and associated pipelines to gain safe access to the underground ore bodies (Tribune and Marceline orebodies).

A pipeline is proposed to dewater the Tribune underground operations and will be connected to the existing dewatering pipelines that discharge into the Henderson and Westralia Pits. The Tribune dewatering pipeline will be approximately 600 metres in length.

A new rising main (Marceline Rising Main) will be constructed east of the Paris Portal and the associated pipeline will be connected to the existing dewatering pipelines that discharge into the Henderson and Westralia Pits. The Marceline Rising Main dewater pipeline will be approximately 200 metres in length.

Both the Tribune and Marceline dewater pipelines will be constructed from high-density polyethylene (HDPE) at a nominal diameter of 280mm. The pipelines will be contained within a V-type drain or bund as per all other dewatering pipelines on site and required under licence L9259/2020/1. Flow meters will be installed to measure the volumes abstracted from underground.

Existing conditions on the licence for management and monitoring of the pipelines will be incorporated for the two additional pipelines. The licence holder has not requested additional dewatering discharge limits to the licence limit of 500,000 tonnes per annual period as dewatering activities are not expected to increase from current levels.

All dewatering water not recycled underground will be discharged to the authorised discharge points at the Henderson and Westralia pits. The Henderson pit can hold 314,000 KL of water, the Westralia once the Westralia berm stage 2 is completed can hold 457,000 KL of water. There is enough capacity in both pits to store the underground dewatering water. The freeboard on the pits will be maintained as per current licence conditions (1.5m).

Groundwater in the underlying area has salinity between 17,900mg/L and 90,400mg/L total dissolved solids (TDS). No clearing of native vegetation is required for the construction of the pipeline bunding.

The locations of the two proposed pipelines are shown below in figure 2.



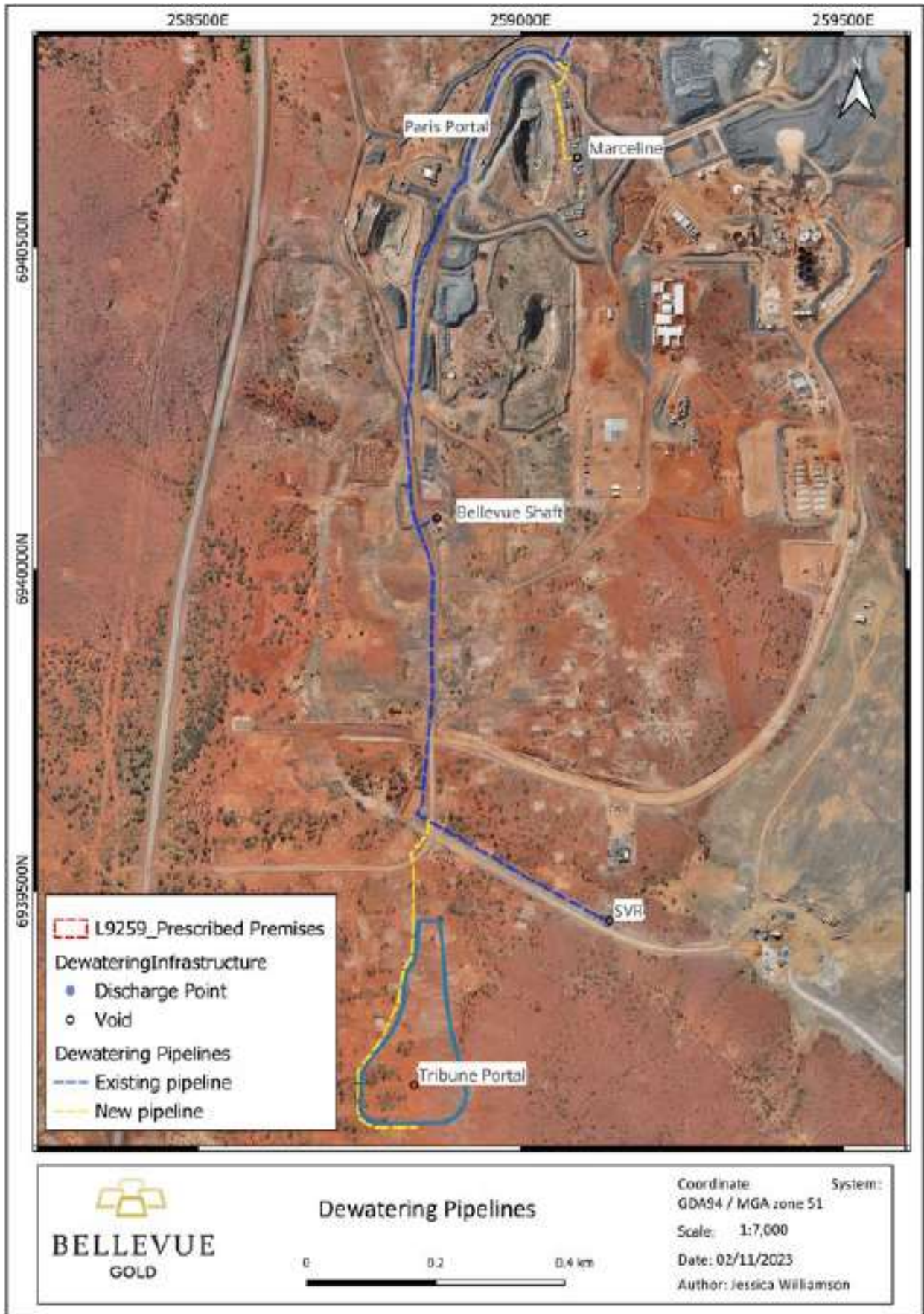


Figure 2: Proposed dewater pipelines

### 3. Risk assessment

The department assesses the risks of emissions from prescribed premises and identifies the potential source, pathway and impact to receptors in accordance with the *Guideline: Risk assessments* (DWER 2020).

To establish a Risk Event there must be an emission, a receptor which may be exposed to that emission through an identified actual or likely pathway, and a potential adverse effect to the receptor from exposure to that emission.

#### 3.1 Source-pathways and receptors

##### 3.1.1 Emissions and controls

The key emissions and associated actual or likely pathway during premises construction and operation which have been considered in this Amendment Report are detailed in Table 2 below. Table 2 also details the proposed control measures the Licence Holder has proposed to assist in controlling these emissions, where necessary.

**Table 2: Licence Holder controls**

Emission	Sources	Potential pathways	Proposed controls
Dust (construction)	Construction of pipeline bunding and landfill trenches	Air/windborne pathway	Existing dust suppression system will be used to prevent dust generation.
Dust (operation)	Operation of landfill facility	Air/windborne pathway	Existing dust suppression system will be used to prevent dust generation. Operations will be avoided during periods of high winds. Regular inspections of the landfill facility.
Wind-blown waste			Fencing installed to manage windblown wastes. Regular burial/covering of wastes. Regular inspections of the landfill facility. Remedial actions such a baiting and trapping to be in place to control pests if required.
Seepage of landfill leachate		Infiltration through soil to groundwater	Ensuring the correct wastes are disposed. Use of waste dump ensures the separation distance between wastes and water is maintained. Records of acid-forming material burial shall be kept for future reference.
Saline water	Dewater pipelines	Infiltration through soil to groundwater	Pipelines contained in v-drains and bunds. Flow meters installed. Daily inspection of entire pipeline infrastructure.

### 3.1.2 Receptors

In accordance with the *Guideline: Risk assessments* (DWER 2020), the Delegated Officer has excluded employees, visitors and contractors of the Licence Holder's from its assessment. Protection of these parties often involves different exposure risks and prevention strategies and is provided for under other state legislation.

Table below provides a summary of potential human and environmental receptors that may be impacted as a result of activities upon or emission and discharges from the prescribed premises (*Guideline: Environmental siting* (DWER 2020)).

**Table 3: Sensitive human and environmental receptors and distance from prescribed activity**

Human receptors	Distance from prescribed activity
No human receptors within 5km	
Environmental receptors	Distance from prescribed activity
Violet Range (Perseverance Greenstone Belt) vegetation complexes (banded ironstone formation) – Priority Ecological Community (PEC) - Priority 1	Mapped as “present” across the premises.
DBCA Priority Flora <ul style="list-style-type: none"> <li>• Grevillea inconspicua (P4);</li> <li>• Hibiscus sp. Perrinvale Station (P1); and</li> </ul> Goodenia lyrata (P3).	Within the premises.
Lake Miranda (salt lake)	Within the premises.
Underlying groundwater (saline) Within the Goldfields Groundwater area under the <i>Rights in Water and Irrigation Act 1914</i>	15 – 30m below ground level.



## 3.2 Risk ratings

Risk ratings have been assessed in accordance with the *Guideline: Risk Assessments* (DWER 2020) for those emission sources which are proposed to change and takes into account potential source-pathway and receptor linkages as identified in Section 3.1. Where linkages are incomplete they have not been considered further in the risk assessment.

Where the Licence Holder has proposed mitigation measures/controls (as detailed in Section 3.1), these have been considered when determining the final risk rating. Where the Delegated Officer considers the Licence Holder's proposed controls to be critical to maintaining an acceptable level of risk, these will be incorporated into the licence as regulatory controls.

Additional regulatory controls may be imposed where the Licence Holder's controls are not deemed sufficient. Where this is the case the need for additional controls will be documented and justified in Table .

The Revised Licence L9259/2020/1 that accompanies this Amendment Report authorises emissions associated with the operation of the Premises i.e. dewatering and putrescible landfill activities.

The conditions in the Revised Licence have been determined in accordance with *Guidance Statement: Setting Conditions* (DER 2015).

**Table 4. Risk assessment of potential emissions and discharges from the Premises during operation**

Risk Event					Risk rating <sup>1</sup> C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions <sup>2</sup> of licence	Justification for additional regulatory controls
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls				
<b>Construction</b>								
Construction of dewatering pipelines and landfill trench	Dust	Air/windborne pathway causing impacts to health and amenity	Priority 1 PEC intersect the proposed prescribed premises	Refer to Section 3.1	C = Slight L = Possible <b>Low Risk</b>	Y	N/A	N/A
<b>Operation</b>								
<u>Category 64 activities</u> Disposal of wastes Covering of wastes	Dust	Air/windborne pathway causing impacts to health and amenity	Priority 1 PEC intersect the proposed prescribed premises	Refer to Section 3.1	C = Slight L = Possible <b>Low Risk</b>	Y	Conditions 2 & 3	Additional regulatory controls are not required. Current operating licence L9259/2020/1 contains conditions related to the operation and management of the class II landfill.
	Wind-blown waste	Air/windborne pathway causing impacts to health and amenity	Native fauna - Foraging animals	Refer to Section 3.1	C = Minor L = Rare <b>Low Risk</b>	Y		
	Seepage of landfill leachate	Infiltration through soil to localised groundwater	Localised groundwater	Refer to Section 3.1	C = Moderate L = Unlikely <b>Medium Risk</b>	Y		
<u>Category 6 activities</u> Operation of dewater pipelines	Saline water	Pipeline spills and leaks causing Infiltration through soil to localised groundwater  Overtopping of authorized discharge pits	Localised flora/fauna  Priority 1 PEC intersect the proposed prescribed premises	Refer to Section 3.1	C = Moderate L = Unlikely <b>Medium Risk</b>	Y	Conditions 2, 9, 10 & 14	Additional regulatory controls are not required. Current operating licence L9259/2020/1 contains conditions related to sufficient secondary containments to hold any potential spills between inspections and regular inspection of pipelines to ensure infrastructure

Licence: L9259/2020/1

Risk Event					Risk rating <sup>1</sup> C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions <sup>2</sup> of licence	Justification for additional regulatory controls
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls				
								integrity. Current licence also includes conditions for the monitoring of the volume of dewater being discharged to the authorized discharge pits, along with conditions requiring a freeboard to be maintained on the pits. These are sufficient to manage the risk of overtopping and additional controls are not required.

Note 1: Consequence ratings, likelihood ratings and risk descriptions are detailed in the *Guideline: Risk assessments* (DWER 2020).

Note 2: Proposed Licence Holder's controls are depicted by standard text. **Bold and underline text** depicts additional regulatory controls imposed by department.

## 4. Consultation

Table provides a summary of the consultation undertaken by the department.

**Table 5: Consultation**

Consultation method	Comments received	Department response
Licence Holder was provided with draft amendment on 19/12/2023.	<p>Comments were received from the Licence Holder on 19/12/2023.</p> <p>The Licence Holder requested an inclusion to Table 1 and Table 8 of the licence to state:</p> <p><i>Vanguard monitoring bore may be discontinued when no longer practical due to encroachment of deposited tailings in the TSF Stage 3.</i></p>	As the Vanguard monitoring bore will become inactive once the deposits in TSF 3 reach it, the request is reasonable and will be implemented into this amendment.

## 5. Conclusion

Based on the assessment in this Amendment Report, the Delegated Officer has determined that a Revised Licence will be granted, subject to conditions commensurate with the determined controls and necessary for administration and reporting requirements.

### 5.1 Summary of amendments

Table provides a summary of the proposed amendments and will act as record of implemented changes. All proposed changes have been incorporated into the Revised Licence as part of the amendment process.

**Table 6: Summary of licence amendments**

Condition no.	Proposed amendments
Condition 1, Table 1, Item 1	Remove mention of <i>Bellevue shaft, south vent and Paris Pit decline</i> and replace with all dewater pipelines.
Condition 1, Table 1, Item 6	Remove reference to <i>Prospero Waste Dump</i> and clarify the location described in Schedule 1 Figure 1 map.
Condition 1, Table 1	Note 3 added - Vanguard monitoring bore to be maintained <i>where practicable</i> until deposits within TSF 3 envelope it.
Condition 9, Table 5	Include the Class II landfill as an Authorised discharge point.
Condition 10, Table 6	Include the Class II landfill, parameters and discharge limit.
Condition 17, Table 8	Note 1 added - Vanguard monitoring bore to be monitored <i>where practicable</i> until deposits within TSF 3 envelope it.
Schedule 1: Maps, Figure 1	Replace the Premises map with an updated version showing new landfill location and dewater pipelines.
Schedule 1: Maps, Figure 2	Included a new map showing location of proposed pipelines to be constructed



## References

1. Department of Environment Regulation (DER) 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.
2. Department of Water and Environmental Regulation (DWER) 2020, *Guideline: Environmental Siting*, Perth, Western Australia.
3. DWER 2020, *Guideline: Risk Assessments*, Perth, Western Australia.
4. Bellevue Gold Limited 2023, *L9259/2020/1 Licence Amendment Supporting Information – Dewatering Infrastructure*, West Perth, WA.
5. RPM Global 2023, *Bellevue Gold Project – Amendment to Licence L9259/2020/1*.

## Appendix 2: Application validation summary

SECTION 1: APPLICATION SUMMARY			
<b>Application type</b>			
Amendment to licence	<input checked="" type="checkbox"/>	Current licence number:	L9259/2020/1
		Relevant works approval number:	
Date application received		5/9/23	
<b>Applicant and Premises details</b>			
Applicant name/s (full legal name/s)		Golden Spur Resources Pty Ltd (ACN: 161 329 933)	
Premises name		Bellevue Gold Project	
Premises location		Mining tenements M36/24, M36/25 and M36/299 (to be added in amendment currently under assessment) Goldfields Highway, Shire of Leonora To be depicted in Schedule 1 of amended licence	
Local Government Authority		Shire of Leonora	
<b>Application documents</b>			
HPCM file reference number:		DER2020/000278~10	
Key application documents (additional to application form):		Attachment 2 - Prescribed premises map Attachment 3B – Landfill supporting information Attachment 7 – siting and location details	
<b>Scope of application/assessment</b>			
Summary of proposed activities or changes to existing operations.		<p><u>Licence amendment</u> to construct and operate a new landfill site within the premises. This is in addition to the current landfill which was constructed under works approval and is currently being assessed for inclusion on the licence.</p> <p>Construction includes clearing; compaction of hardstand; excavation of the first trenches and installation of fences.</p>	
<b>Category number/s (activities that cause the premises to become prescribed premises)</b>			
<b>Table 1: Prescribed premises categories</b>			
<b>Prescribed premises category and description</b>		<b>Proposed production or design capacity</b>	
Category 64: Class II or III putrescible landfill site		500 tonnes per year	
<b>Legislative context and other approvals</b>			
Has the applicant referred, or do they intend to refer, their proposal to the EPA under Part IV of the EP Act as a		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	

significant proposal?		
Does the applicant hold any existing Part IV Ministerial Statements relevant to the application?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Has the proposal been referred and/or assessed under the EPBC Act?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Has the applicant demonstrated occupancy (proof of occupier status)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<p>Mining lease / tenement <input checked="" type="checkbox"/></p> <p>Within existing premises:  M36/24 (expiry 16/01/2028),  M36/25 (expiry 16/01/2028),</p> <p>To be added in an amendment currently under assessment:  M36/299 (expiry 21/04/2036)</p> <p>Expiry dates verified by LO on Mineral Titles Online.</p>
Has the applicant obtained all relevant planning approvals?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	If N/A explain why? Mining Act tenure
Has the applicant applied for, or have an existing EP Act clearing permit in relation to this proposal?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Purpose Permit 9951/2 – LO confirmed that proposed landfill site is within approved area.
Has the applicant applied for, or have an existing CAWS Act clearing licence in relation to this proposal?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Clearing not in CAWS proclaimed area.
Has the applicant applied for, or have an existing RIWI Act licence or permit in relation to this proposal?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Licence/permit No: GWL202924(1) and GWL202960(2)
Does the proposal involve a discharge of waste into a designated area (as defined in section 57 of the EP Act)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<p>Name: Goldfields groundwater area</p> <p>Type: Proclaimed Groundwater Area</p> <p>Has Regulatory Services (Water) been consulted?</p> <p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p>
Is the Premises situated in a Public Drinking Water Source Area (PDWSA)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	

<p>Is the Premises subject to any other Acts or subsidiary regulations (e.g. <i>Dangerous Goods Safety Act 2004, Environmental Protection (Controlled Waste) Regulations 2004, State Agreement Act xxxx</i>)</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>	<p>Mining Act 1978</p>
<p>Is the Premises within an Environmental Protection Policy (EPP) Area?</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>	
<p>Is the Premises subject to any EPP requirements?</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>	
<p>Is the Premises a known or suspected contaminated site under the <i>Contaminated Sites Act 2003</i>?</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/></p>	<p>M36/24 only is classified as 'possibly contaminated – investigation required (PC-IR)' Date of classification: 9/5/23</p>