Government of Western Australia
Department of Water and Environmental Regulation

Decision Report

Application for Works Approval

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

Works Approval Number	W3095/2025/1
Applicant	Focus Operations Pty Ltd
ACN	115 821 255
File number	APP-0029774
Premises	Caledonia North Extension Legal description L15/161, M15/154, M15/645, M15/142, M15/1788 and part of tenement L15/95. As defined by the premises maps attached to the issued works approval
Date of report	9 January 2026
Decision	Works approval granted

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1. Decision summary

This decision report documents the assessment of potential risks to the environment and public health from emissions and discharges during the construction and operation of the premises. As a result of this assessment, works approval W3095/2025/1 has been granted.

2. Scope of assessment

2.1 Regulatory framework

In completing the assessment documented in this decision report, the Department of Water and Environmental Regulation (the department; DWER) 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 Application summary and overview of premises

Licence L8249/2008/3 is held by Focus Operations Pty Ltd (Licence Holder) for the Three Mile Hill Gold Project (the Premises), located at Mining Tenements M15/1114, M15/154, M15/645, M15/646, M15/660, M15/958, M15/1294, M15/1432, M15/1788 and L15/161 COOLGARDIE WA 6429.

The Project is located approximately 650 metres northeast of Coolgardie and 40 km west of Kalgoorlie- Boulder in the eastern Goldfields region of Western Australia. The Project is situated within the Shire of Coolgardie local government area and accessed via the public Great Eastern Highway and Cairns Rd. The Project forms part of a broader tenement package covering the Coolgardie Gold Operations (CGO), owned wholly by Focus and its subsidiaries.

On 1 July 2025 the applicant submitted an application for a works approval to the department under section 54 of the *Environmental Protection Act 1986* (EP Act). Licence L8249/208/3 was amended in 2025, and these changes provide important context for the overall objective of the works approval.

Several items originally requested in the works approval application were excluded from scope as they were addressed in the October 2025 amendment to Licence L8249/2008/3. Works approval W3095/2025/1 authorises construction of a pipeline connecting CNX Pit to existing infrastructure and formalises discharge to Lindsays Pit and Greenfields Pit.

Overall objective of changes in L8249/2008/3 and W3095.

When considering the changes implemented in the October 2025 L8249/2008/3 amendment, and the changes requested in this works approval application, the licence holder is seeking to:

- Facilitate mining at the Bonnievale underground, through connection of dewatering pipelines to the Three Mile Hill site.
- Provision of minor back-up discharge points of Greenfields pit for small volumes if required, and larger volumes at Lindsays pit if required.
- Maintaining numerous discharge and abstraction points will allow Focus to have a flexible approach to the mining sequence without disrupting operations.

Proposed activities under W3095/2025/1

The main activities requested are: pipeline from CNX pit which connects into the existing pipeline, nomination of CNX pit, Greenfields pit, Lindsays Pit, Kings Cross Pit/underground and the Bayley's underground (Prices Shaft and Vent Rise) as abstraction and discharge locations for mine dewater.

The application is to undertake construction works relating to at the premises. The works approval area is approximately 2 km east of Coolgardie and 40 km west of Kalgoorlie-Boulder in the eastern Goldfields region of Western Australia.

In addition to the proposed activities under W3095/2025/1, a recent amendment has been granted for L8249/2008/3, which provides relevant context to the assessment of works approval W3095/2025/1. Several amendments were requested in the works approval which the department now considers out of scope, as these were captured in the licence amendment dated 14 October 2025.

L8249/2008/3 October 2025 Licence Amendment

Licence L8249/2008/3 approves category 5 (processing or beneficiation of metallic or non-metallic ore), Category 6 (Mine dewatering) and Category 89 (Putrescible landfill site).

On 10 February 2025, the Licence Holder submitted an application to the department to amend Licence L8249/2008/3 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act). The following amendments were approved in October 2025 and are now out of scope:

- Operation of dewatering pipelines
- CNX discharge approval
- Operation of of Water Ponds and Dams
- Operation of Bonnievale Landfill and relocation of Dreadnought and Tindal's landfills
- Amendment to monitoring bores

Revised Scope of W3095/2025/1

Following a review of L8249/2008/3. The scope of the works approval has been refined to:

- Construction of pipeline to connect the CNX pit to existing pipeline infrastructure
- Construction of mine water ponds and standpipes at CNX
- Addition of Greenfields pit as a discharge location
- Direct discharge to Lindsays Pit
- Abstraction from Bayley's Underground (Prices Shaft and Vent Rise)

Figure 1 provides a summary of the key infrastructure to be installed in this amendment.

Specifically, the following items from the works approval application have been removed as they are now considered out of scope:

- CNX pit as a discharge location
- Abstraction from Greenfields pit
- Abstraction from Lindsays pit
- Discharge approval for Bonnievale underground and Bayley's underground (Price Shaft and Vent rise)

This amendment is limited only to changes to Category 6 and 89 activities from the Existing Licence. No changes to the aspects of the existing Licence relating to Category 5 has been requested by the Licence Holder.

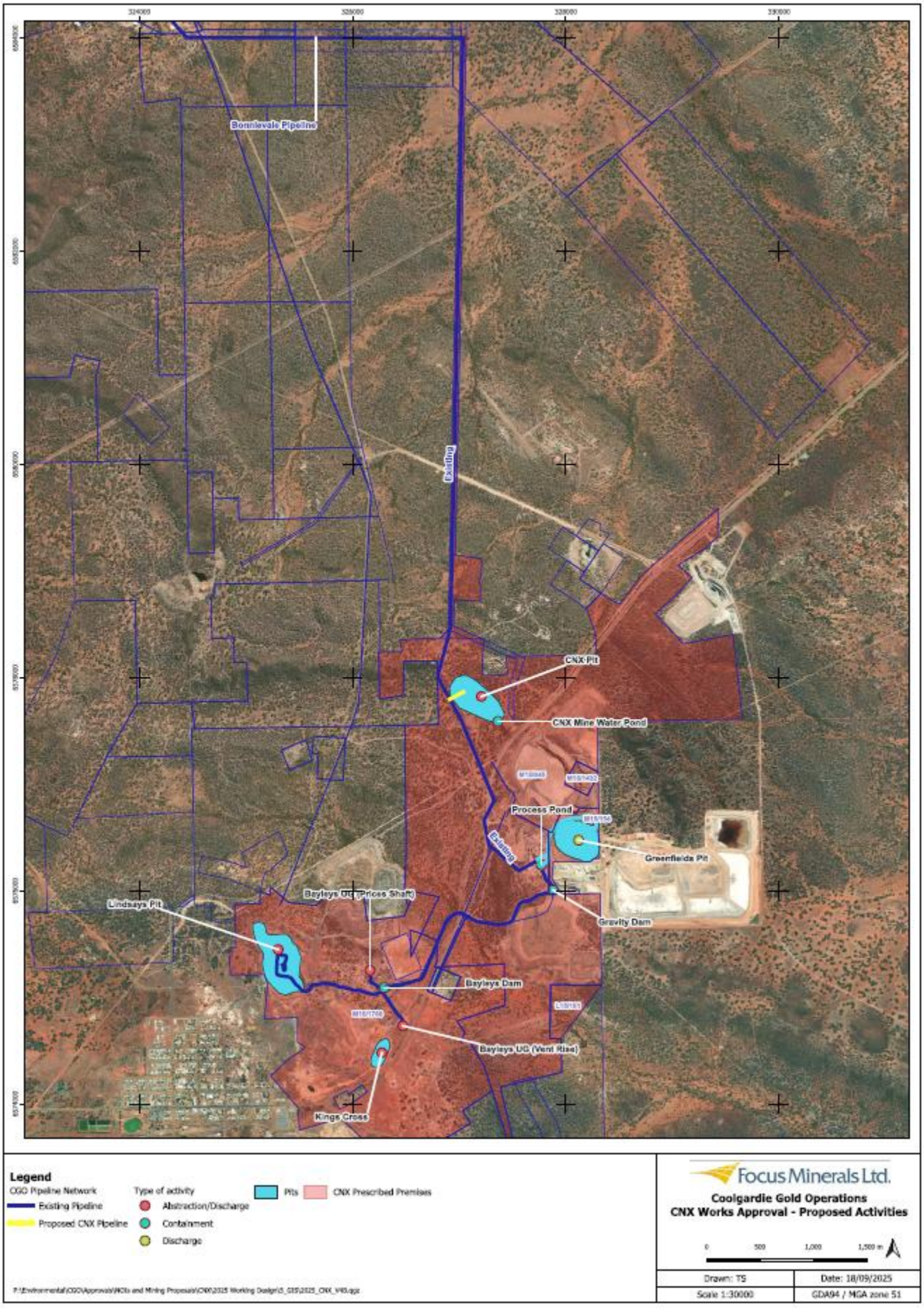

Figure 1: Infrastructure Location

Works approval: W3095/2025/1

2.3 Infrastructure at CNX Pit

Mine water ponds (MWPs) will be constructed at CNX Pit as per designs that have been previously approved for other locations on the prescribed premises. There are two ponds connected via an overflow with one being a settling pond that receives the water from the mine pit and the second is a holding pond from which the water is sent to the standpipe or tanks. The standpipe is used for filling water trucks for dust suppression. Excess water from the ponds may be stored in tanks, diverted for use in the process plant or pumped for discharge to a pit.

They will be constructed using compacted clay placed over in-situ transitional material and lined with a high-density polyethylene (HDPE) liner of at least 1 mm thickness to minimise seepage. MWPs will include a standpipe and pump for watercart filling, with embankments constructed to a maximum 2:1 batter slope using competent waste rock. To ensure containment during rainfall events, all MWPs will maintain a minimum operational freeboard of 300 mm, sufficient to manage a 1:100 AEP event. Perimeter fencing will be installed to deter fauna ingress.

The standpipes will be located adjacent to the water ponds. The standpipe will comprise a pump (submersible or floating from pits), genset and pipeline from the water source to standpipe. The standpipe is installed as a modular system and secured at the base to prevent toppling.

The standpipe will be located within a bunded area to prevent vehicle collision and to ensure safe access of the water cart in relation to the haulage network and in accordance with the Traffic Management Plan.

Flow will be manually controlled by the water cart operator (gate valve) and/or with telemetry (button press start and stop). Flow rate will be determined by pump installation (4-8-inch, dependent on-site requirements).

2.4 Water Quality of the receiving pit

A dedicated pipeline will connect CNX Pit to Greenfields, Bonnievale, and Lindsays Pit, enabling flexible water transfer. Receiving pits will maintain a minimum 6 m freeboard to accommodate inflows and prevent overtopping during extreme rainfall.

Table 1: Water quality of abstraction and discharge points (taken from the application supporting documentation)

	CNX (abstraction and discharge)	Lindsays (abstraction and discharge)	Kings Cross (abstraction only)	Greenfields (discharge only)
Standing Water Level	390.4mRL (24.6mbgl)	271mRL (144mbgl)	DRY	277.5mRL (119.5mbgl)
pH	6.63	N/A	N/A	6.22
TDS (mg / L)	57,000	N/A	N/A	72,000

Groundwater at CGO sites is generally acidic to slightly alkaline, brackish to hypersaline:

- Bonnievale, salinity ranges from 3,170–30,400 mg/L TDS with pH ~5–7.
- CNX Pit water quality: pH 6.63, TDS 57,000 mg/L.
- Greenfields Pit: pH 6.22, TDS 72,000 mg/L.

These values are comparable to the discharge points water quality, and no beneficial use exists outside mining operations.

Groundwater quality of the Greenfields pit (receiving environment) is of comparable quality to the discharge water received from CNX pit.

2.5 Capacity of receiving pit

Lindsays Pit is identified as the primary discharge location, estimated as having approximately 15.96 million m^3 capacity. Additional discharge points are identified as including the Greenfields Pit, CNX pit and Kings Cross Pit.

Lindsays Pit has an estimated effective storage capacity of ~15.96 million m^3 after applying a 70% shape correction factor. This capacity far exceeds the maximum projected discharge volume of 270,000 kL per annum, even under contingency scenarios. All receiving pits will maintain a minimum 6 m freeboard during operations. (Astill, 2025)

Lindsays Pit calculations

Peak abstraction is identified as 135,000 kl per year, with contingency up to 270,000 kL/year. Desktop estimates indicate:

- Surface Area: ~20 hectares (200,000 m^2)
- Depth Range: 90 m to 150 m below the groundwater table
- Average Depth: 120 m
- Operational Freeboard: 6 m (to manage extreme rainfall events)
- Effective Storage Depth: 114 m

Using these parameters:

- Indicative Volume: 200,000 m^2 x 114 m = 22,800,000 m^3
- Adjusted for Pit Geometry (70% shape correction): 22,800,000 m^3 x 0.70 = 15,960,000 m^3

This conservative estimate demonstrates that Lindsays Pit can accommodate far more than the proposed discharge volume of up to 270,000 kL per annum, even when accounting for contingency and extreme weather events (Astill, 2025)

Secondary discharge location

Greenfields Pit has been proposed as a minor contingency discharge point for small volumes if required. Hydrogeological data indicates standing water level at ~277.5 mRL with hypersaline water quality (TDS ~72,000 mg/L)

Design controls

- All receiving pits will maintain minimum 6 m freeboard during operations.
- Operational monitoring will ensure compliance with freeboard requirements and prevent overtopping.
- Pipeline integrity and scour pits will provide additional safeguards against uncontrolled releases

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.

2.6 Source-pathways and receptors

2.6.1 Emissions and controls

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

Table 2: Proposed applicant controls

Emission	Sources	Potential pathways	Proposed controls
Construction			
Dust	Clearing of native vegetation and related stripping of topsoil required for construction of pipeline infrastructure	Air / windborne pathway	Any visual dust emissions from construction activities will be managed through dust suppression via water carts if required
Operation			
Hypersaline Water	Discharge into Lindsays Pit. Greenfields Pit and CNX pits	Overtopping	Minimum 6m freeboard maintained at discharge points, daily inspections
		Seepage from pit floor and walls	No controls proposed
	Pipeline leaks	Overland runoff	Daily inspections for visual integrity and leaks (during operation)
			Scour pits placed where required at low points over the pipeline route, with sufficient capacity to contain a spill event between routing inspection (twice daily)
			Existing controls from the licence for pipelines containing environmentally hazardous material (conditions 8,) are relevant to operations occurring across the premises and include:

Emission	Sources	Potential pathways	Proposed controls
			• They must be: ○ equipped with telemetry systems and pressure sensors along pipelines to allow the detection of leaks and failures; ○ equipped with automatic cut-outs in the event of a pipe failure: or ○ provided with secondary containment sufficient to contain any spill for a period equal to the time between routine inspections. • Pipelines and associated dewatering infrastructure will be inspected twice per 24-hour period when in operation.
	Discharge of dewater to mine water ponds	Direct discharge to land from overtopping	A minimum operational freeboard of 300 mm, sufficient to manage a 1:100 AEP event will be maintained.
		Seepage from liner of ponds to ground	The ponds will be lined with a high-density polyethylene (HDPE) liner of at least 1 mm thickness over compacted clay
	Discharge of dewater from standpipe:	Direct discharge to land from leaks or spills during filling of water trucks/ damage to standpipe by trucks causing uncontrolled release of water.	• The standpipe is to be located within a bunded area to prevent vehicle collision, and • secured at the base to prevent toppling.

2.6.2 Receptors

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

Table 3 and Figure 2 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 activity**
Town of Coolgardie	Approximately 650 metres south-east of Lindsays Pit (receiving environment for dewatering) but greater than 3 km from the CNX Pit where construction of the pipeline is to occur.
Environmental receptors	**Distance from activity**
Native Vegetation	Scattered native vegetation immediately surrounds Lindsay and CNX pits.
Conservation significant fauna	There is potential for the presence of mallee fowl in the prescribed premises based on previous record and suitable habitat in the broader region but no confirmed mounds or sitings have been recorded. **Screened out due to low evidence of presence in areas of activity related to works approval.**
Underlying groundwater (non-potable purposes)	The premises is located within the Goldfields Groundwater Area proclaimed under the Rights in Water and Irrigation Act 1914. Groundwater is hypersaline with 14,000 to 35,000 total dissolved solids (TDS) (DWER Geocortex).
Surface Water	No permanent surface water features are in the vicinity of the Project. A minor unnamed creek line is visible on the department's GIS as 1km west of Lindsays pit and crossed by the existing pipeline between Gravity and Bayley's dams.
Cultural receptors	**Distance from activity / prescribed premises**
Aboriginal heritage site	Two registered Aboriginal sites and two lodged places intersect with the prescribed premises boundary, however, the actual sites will not be impacted by the proposed works. **Screened out due to distance from areas of activity related to works approval.**
State Heritage Register: State Battery	This is located partly within the south-western boundary of the premises, approximately 770 m south of Kings Cross Pit. **Screened out due to distance from areas of activity related to works approval.**

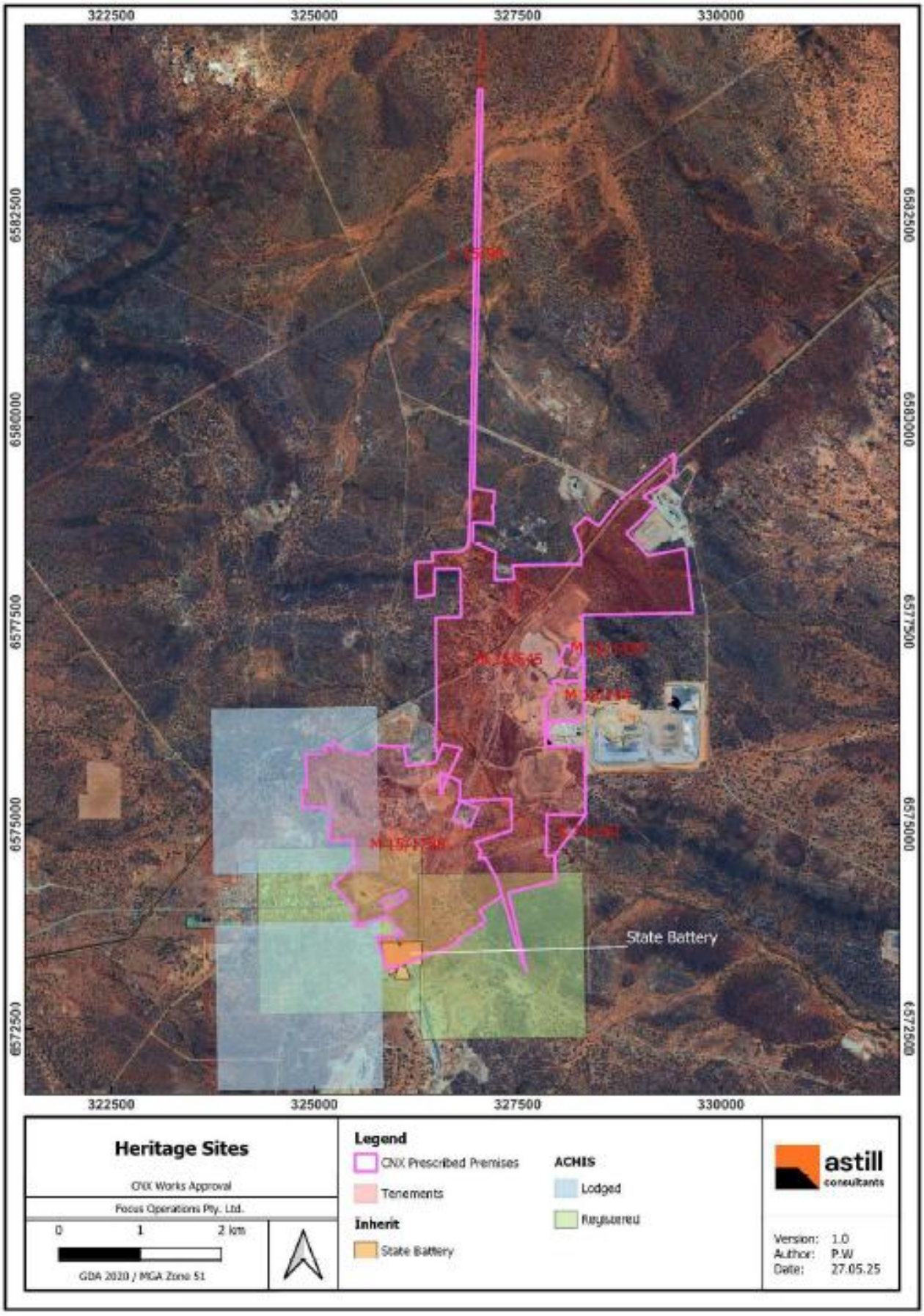

Figure 2: Distance to sensitive receptors

2.7 Risk ratings

Risk ratings have been assessed in accordance with the *Guideline: Risk Assessments* (DWER 2020) for each identified emission source and takes into account potential source-pathway and receptor linkages as identified in Section 2.6. Where linkages are in-complete they have not been considered further in the risk assessment.

Where the applicant has proposed mitigation measures/controls (as detailed in Section 2.6), these have been considered when determining the final risk rating. Where the delegated officer considers the applicant's proposed controls to be critical to maintaining an acceptable level of risk, these will be incorporated into the works approval as regulatory controls.

Additional regulatory controls may be imposed where the applicant's controls are not deemed sufficient. Where this is the case the need for additional controls will be documented and justified in Table 4.

Works approval W3095/2025/1 that accompanies this decision report authorises construction and time-limited operations. The conditions in the issued works approval, as outlined in Table 4 have been determined in accordance with *Guidance Statement: Setting Conditions* (DER 2015).

A licence is required following the time-limited operational phase authorised under the works approval to authorise emissions associated with the ongoing operation of the premises. A risk assessment for the operational phase has been included in this decision report, however licence conditions will not be finalised until the department assesses the licence application.

Table 4: Risk assessment of potential emissions and discharges from the premises during construction, commissioning and operation

Risk Event					**Risk rating** C = consequence L = likelihood	**Applicant controls sufficient?**	**Conditions of works approval**	**Justification for additional regulatory controls**
Source/Activities	**Potential emissions**	**Potential pathways and impact**	**Receptors**	**Applicant controls**				
Construction								
Clearing of scattered native vegetation for pipeline route. Excavation of scour pits Vehicle and equipment movements	Dust	**Pathway:** Air/windborne pathway **Impact:** Health and amenity	Native vegetation	Refer to Section 2.5.1	C = Slight L= Rare ***Low Risk***	N	Condition 2 – Water cart during construction	N/A
	Noise		Residences greater than 3 km from the CNX Pit where construction of the pipeline is to occur.	Refer to Section 2.5.1	C = Slight L = Rare ***Low Risk***	Y	N/A	Provisions of the *Environmental Protection (Noise) Regulations 1997* apply.
Commissioning was requested in the application, however, with the alteration of the works to be assessed this is no longer required.								
Operation								
Dewatering operations – Overtopping of Lindsays Pit, Greenfields and CNX pits)	Hypersaline or saline water	**Pathway:** Direct discharge to soil **Impact:** Potential contamination to nearby surface waters and/or infiltrating to groundwater	Groundwater Native Vegetation Minor unnamed creek line - 1km west of Lindsays pit	Refer to Section 2.5.1	C=Moderate L= Rare ***Medium Risk***	Y	Condition 9, Table 2	N/A

Risk Event					Risk rating C = consequence L = likelihood	Applicant controls sufficient?	Conditions of works approval	Justification for additional regulatory controls
Source/Activities	**Potential emissions**	**Potential pathways and impact**	**Receptors**	**Applicant controls**				
Dewatering operations – pipeline leaks	Hypersaline or saline water	**Pathway:** Direct discharge to soil **Impact** Soil and vegetation degradation and/or contamination of nearby surface waters and/or infiltrating to groundwater	Groundwater Native Vegetation Minor unnamed creek line - 1km west of Lindsays pit	Refer to Section 2.5.1	C=Moderate L= Unlikely ***Medium Risk***	Y	Condition 1, Table 1	Additional controls aren't conditioned in the works approval. The Delegated Officer notes that the controls present on the licence L8249/2008/3 refer to pipelines containing environmentally hazardous material so that the pipelines relevant to this works approval are included in the operational requirements on the licence.
Dewatering operations – Mine water ponds and standpipes	Hypersaline or saline water	**Pathway:** Direct discharge to soil **Impact** Soil and vegetation degradation and/or contamination of nearby surface waters and/or infiltrating to groundwater	Native Vegetation	Refer to Section 2.5.1	C=Moderate L= Unlikely ***Medium Risk***	Y	Condition 1, Table 1	

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

Note 2: Proposed applicant controls are depicted by standard text. **Bold and underlined text** depicts additional regulatory controls imposed by department.

3. Consultation

Table 5 provides a summary of the consultation undertaken by the department.

Table 5: Consultation

Consultation method	Comments received	Department response
Application advertised on the department's website on 27 October 2025.	Refer to Appendix 1	Refer to Appendix 1
Applicant was provided with draft documents on 06/01/2026	Refer to Appendix 2	Refer to Appendix 2

4. Conclusion

Based on the assessment in this decision report, the delegated officer has determined that a works approval will be granted, subject to conditions commensurate with the determined controls and necessary for administration and reporting requirements.

References

1. Astill Consultants, 2015 *Caledonia North Extended Project Works Approval Supporting* Document, Perth, Western Australia
2. Department of Environment Regulation (DER) 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.
3. Department of Water and Environmental Regulation (DWER) 2020, *Guideline: Environmental Siting*, Perth, Western Australia.
4. DWER 2020, *Guideline: Risk Assessments*, Perth, Western Australia.

Appendix 1: Summary of Comments During Consultation

Summary of submission from one member of public	Department's response
The proposed dewatering works at Caledonia North Extension raise significant scientific and regulatory concerns that require careful scrutiny. The Department of Water and Environmental Regulation (DER) must ensure that the hydrogeological assessment provided meets the highest standards for protecting groundwater resources, ecosystems, and other water users in the region. The submission focuses on the below key themes:	Noted. Refer individual comments addressed line by line.
1. Aquifer parameters from direct testing are required (e.g., pumping tests), especially regarding hydraulic conductivity, storativity, and fracture connectivity in fault zones.	A hydrogeological assessment was completed for CNX. Key findings were: • Hydraulic conductivity: low, typical of fractured rock aquifers; drawdown is steep-sided and localised. • Storativity & connectivity: limited to discrete fractures with minimal fault zone interconnectivity; recharge is local. • Groundwater: hypersaline (TDS up to 72,000 mg/L), >40 m depth, no groundwater-dependent ecosystems. While site-specific pump tests were not undertaken, modelling validated against observed pit water levels supports these parameters. The delegated officer considers that no further action is necessary by department.
2. Updated groundwater levels and monitoring data are from newly installed observation and production bores around the proposed dewatering area are required to validate groundwater models.	There are no new groundwater monitoring or production bores proposed as part of this application. Baseline standing water levels and water quality for CNX and associated pits are provided in the supporting document. A condition during time limited operation has been added for standing water levels to be monitored quarterly.
3. Recharge rate estimations under current climatic conditions are required to predict aquifer recovery and sustainability post-dewatering.	Focus will monitor standing water levels quarterly and report recovery trends as part of licence compliance reporting.
4. Focus operations have not provided adequate identification and mapping of minor or localised groundwater-dependent ecosystems (GDE) potentially affected by the project.	No vegetation indicative of groundwater dependent ecosystems was recorded, and groundwater is hypersaline with depths >40 m, making GDE occurrence highly unlikely. The delegated officer considers that no further action is required in response to this comment

Summary of submission from one member of public	Department's response
5. The department should require ecological monitoring plans to detect changes in vegetation or fauna indicative of groundwater impacts over project life.	Dewatering is associated with mine pits only, and with a contingency level of 6 metres below pit level, the department does not consider it likely that vegetation quality will be impacted by the activities approved in this works approval and therefore does not consider vegetation or fauna monitoring to be necessary.
6. The department should require clear environmental commissioning plan including emission controls and mitigation measures.	The scope of works to be completed under this works approval has been reduced significantly and commissioning is no longer required.
7. The department should require a comprehensive weed management and rehabilitation strategy addressing invasive species control.	This is out of scope, given the minor nature of disturbance works associated with the works approval.
8. The department should focus on a risk assessment covering hydrogeological uncertainties and contingency plans for unexpected impacts.	A detailed risk assessment is included in Section 8 and Table 21 of the Works Approval Supporting Document, prepared in accordance with DWER's Environmental Risk Assessment Framework (2017). It is adequate in the context of the potential risks of the proposed activities and addresses hydrogeological uncertainties such as saline water spills, pit overtopping, and groundwater drawdown, with inherent and residual risk ratings. Controls to mitigate the above risks are conditioned in the works approval as required.
9. The applicant must provide updated timelines for construction, commissioning, and dewatering phases.	Indicative timelines are provided by the applicant in the supporting document: • Construction of dewatering infrastructure: October–December 2025 • Commissioning: This is no longer considered required • Dewatering operations: Commence post-construction and continue for the two-year mine life
10. Applicant is requested to provide precise mapping of infrastructure, clearance areas, and discharge points with GPS coordinates.	Detailed mapping of prescribed premises, infrastructure layout, and discharge points is provided by applicant and have been incorporated in the works approval. The Department notes that the final version of this works approval represents a significant reduction in scope to the advertised documents.

Appendix 2: Summary of comments during consultation

Condition/ Section of report	Summary of applicant's comment	Department's response
Report		
Table of contents and main body of report.	Formatting and typographical errors noted.	Corrected
Section 2.2	Mine water ponds and standpipe at CNX were not approved under the licence L8249 amendments and require authorisation to construct under W3095.	Mine water ponds and standpipe are included in the main text (Section 2.3) and the risk assessment.
Works Approval		
Condition 1, Table 1	Include the mine water ponds and standpipe in the infrastructure table.	Infrastructure has been included in the table.
Condition 10, Table 3	Bonnievale Pit should be corrected to Bonnievale Underground.	Corrected.
Condition 11, Table 4	Query why Total cyanide and WAD cyanide appear as parameters for Lindsays Pit and Bayleys Undergrounds locations as the discharges are not emanating from processing but from dewatering.	The delegated officer agrees that Total cyanide and WAD cyanide are not required for the time limited operations monitoring.