Government of Western Australia
Department of Water and Environmental Regulation

Amendment Report

Application for Licence Amendment

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

Licence Number	L8907/2015/1
Licence Holder	Big Bell Gold Operations Pty Ltd
ACN	090 642 809
File Number	APP-0029571
Premises	Cue Gold Operations – Day Dawn CUE WA 6640 Legal description – Mining tenements M21/7, M21/10, M21/14, M21/44, M21/65 and M21/89. As defined by the Premises maps attached to the Revised Licence.
Date of Report	26 November 2025
Proposed Decision	Intent to grant revised licence

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1. Decision summary

Licence L8907/2015/1 is held by Big Bell Gold Operations Pty Ltd (Licence Holder) for the Cue Gold Operations – Day Dawn (the Premises), located within Mining tenements M21/7, M21/10, M21/14, M21/44, M21/65 and M21/89.

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 L8907/2015/1 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.

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 20 June 2025 Big Bell Gold Operations Pty Ltd (BBGO) seeks an amendment to the following activities to Licence L8907/2015/1:

- Category 6: Mine Dewatering – addition of an approved emission point at existing Yellow Taxi pit for dewatering effluent.
- Category 12: Screening etc. – inclusion of an additional crushing and screening area; and
- Category 64: Class II or Class III putrescible landfill – inclusion of used tyre disposal at two of the existing approved landfill sites as an additional waste stream.

The prescribed premises boundary (PPB) will remain as currently approved under Prescribed Premises Licence L8907/2015/1 with no alterations requested.

Specifically, the requested amendments incorporate the following changes:

- Installation of a pipeline connecting the existing pipeline network to the proposed Yellow Taxi discharge point. The pipeline will be situated along a previously disturbed corridor of approximately 20 m wide by 2.5 km in length. An access road will be established adjacent to the pipeline corridor.
- A new location for crushing and screening is requested. The new and current positions for crushing and screening are shown in the premises location map and the infrastructure location map in Schedule 1 of the licence. No changes to the existing crushing and screening infrastructure are proposed as approved in previous licence amendment under L8907/2015/1 approved on 7th December 2021.
- Used tyre disposal areas will be situated within the existing Great Fingall historic tailings, within approved landfill sites (Landfill 2 and 3). Used tyres will either be buried in dug out cells or in previously excavated areas in the historical tailings.

2.3 Yellow Taxi Pit Capacity and Water Quality

BBGO proposes to add Yellow Taxi Pit as a new discharge point for dewatering effluent from the Day Dawn Project, specifically to support full-scale underground mining at Great Fingall. The new discharge point provides operational flexibility and additional storage capacity, especially as existing pits (Try Again and 3210) near their volume limits.

The pit is already approved for groundwater abstraction (200,000 kL/year) and discharge to Lake Austin (950,000 kL/year[1]) under existing GWL156542 . BBGO anticipates short-term increases in discharge rates (up to 60,000 tonnes/month) during late 2025, with rates stabilising to 30,000 tonnes/month in 2026.

Initially, the Yellow Taxi pit will receive water from Great Fingall pit. Great Fingall pit is authorised for groundwater abstraction up to 900,000 kL under Rights in Water and Irrigation 1914 (RIWI Act) GWL156542(8). It is currently being dewatered to facilitate underground mining, with discharge directed to Try Again pit and 3210 pit.

Water quality across the site is of comparable quality. No new risks or impacts are expected and existing discharge controls from L8907 will apply. Projected pit capacity and quality of the Yellow Taxi pit and other discharge locations are summarised in Table 1 below.

Table 1: Projected Pit Capacity and Water Quality (March 2025)

Pit	Current Water Volume (m^3)	Pit Capacity (m^3)	pH	Total Dissolved Solids (TDS)
3210	168,085	369,001	7.7	186,839
South Fingall	60,982	318,491	8.7	14,215
Try Again	768,366	1,087,248	7.6	42,640
Yellow Taxi	439,563	2,085,904	8.0	109,915
Great Fingall	6,062	6,085,382	7.6	57,000

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.

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.

[1]The licence L8907/2015/1 measures throughput as tonnes per year in keeping with the prescribed premises descriptions in Schedule 1 of the Environmental Protection Regulations 1987. Tonnes are equivalent to kL in terms of quantity of water as 1L of water weighs 1kg.

Table 2: Licence Holder controls

Emission	Sources	Potential pathways	Proposed controls
Construction			
Dust	Construction of mine dewatering pipeline	Air/windborne pathway	• Water cart will be used when required to manage dust • General provisions of the EP Act and Regulations
	Construction- Excavation of cells or cell closure for inert waste type 2 – used tyre disposal		
	Placement of crushing and screening plant		
Noise	Construction- Excavation of cells or cell closure for inert waste type 2 – used tyre disposal		• General provisions of the EP Act and Regulations
Operation			
Dust	Operation – Disposal and covering of used tyre waste	Air/windborne pathway	• Nil - Due to the small size of the landfills and a separation distance to sensitive receptors of over 3 km, additional dust and odour conditions are not required.
	Screening, crushing, unloading, loading and storage of material Vehicle movements		• Existing design and construction requirements for the mobile crushing and screening equipment are conditioned in the licence.
Odour	Operation – Disposal and covering of used tyre waste	Air/windborne pathway	• Nil
Leachate	Operation – Disposal and covering of used tyre waste	Overland runoff	• Existing waste management conditions in licence.
Highly saline dewatering effluent	Discharge of mine dewater into Yellow Taxi pit Pipeline failure	Direct discharge, seepage, overtopping of pit	• Dewatering pipelines equipped with telemetry systems and pressure sensors to detect leaks as per L8907

Emission	Sources	Potential pathways	Proposed controls
			• Inspection of pipelines as per conditions in licence, including freeboard. • Monitoring of Yellow Taxi pit in accordance for analytes as per existing table 3.3.1 (flow rate, pH, TDS, TSS and metals).
Sediment Laden stormwater	Screening, crushing, unloading, loading and storage of material Vehicle movements	Overland runoff	• Earthen windrows (bunded) to be installed to prevent contaminated stormwater escaping the crushing and screening area.
Hydrocarbon spills (relating to fueling procedures on site)	Screening, crushing, unloading, loading and storage of material Vehicle movements	Soil infiltration impacting Overland runoff	

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 3 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
Cue Townsite	7 km north-east of the proposed landfill **Screened out due to distance**
Dairy Well Homestead	3.2 km east of closest existing landfill area, 3 km from crushing and screening location and 5.3 km north-east of the Yellow Taxi pit emission point. **Screened out due to distance**
Environmental receptors	**Distance from prescribed activity**
Public Drinking Water Source Area – Cue Water Reserve	7 km north-east of the closest approved landfill area, 6.5 km north-east of the crushing and screening area and 9.5 km north-east of the Yellow Taxi pit emission point. **Screened out due to distance**

Environmentally Sensitive Areas (ESA)	Five ESAs are located near Cue, 7 km north-east of the closest approved landfill area, 6.5 km north-east of the crushing and screening area and 10.2 km north of the Yellow Taxi pit emission point **Screened out due to distance**
Native Vegetation	Located within premises boundary and adjacent to select activities. Pipeline corridor for the proposed Yellow Taxi pit emission point, and landfill upgrade are located within previously disturbed locations with no surrounding native vegetation.
Localised groundwater	The pre-mining levels of groundwater are estimated to be approximately 10 metres below ground level (BGL). Due to mining activities spanning over 100 years, the current groundwater is between 40 and 150 metres BGL at various sites within the premises. Groundwater salinity 1300 mg/L (DWER,2021 Licence Amendment)

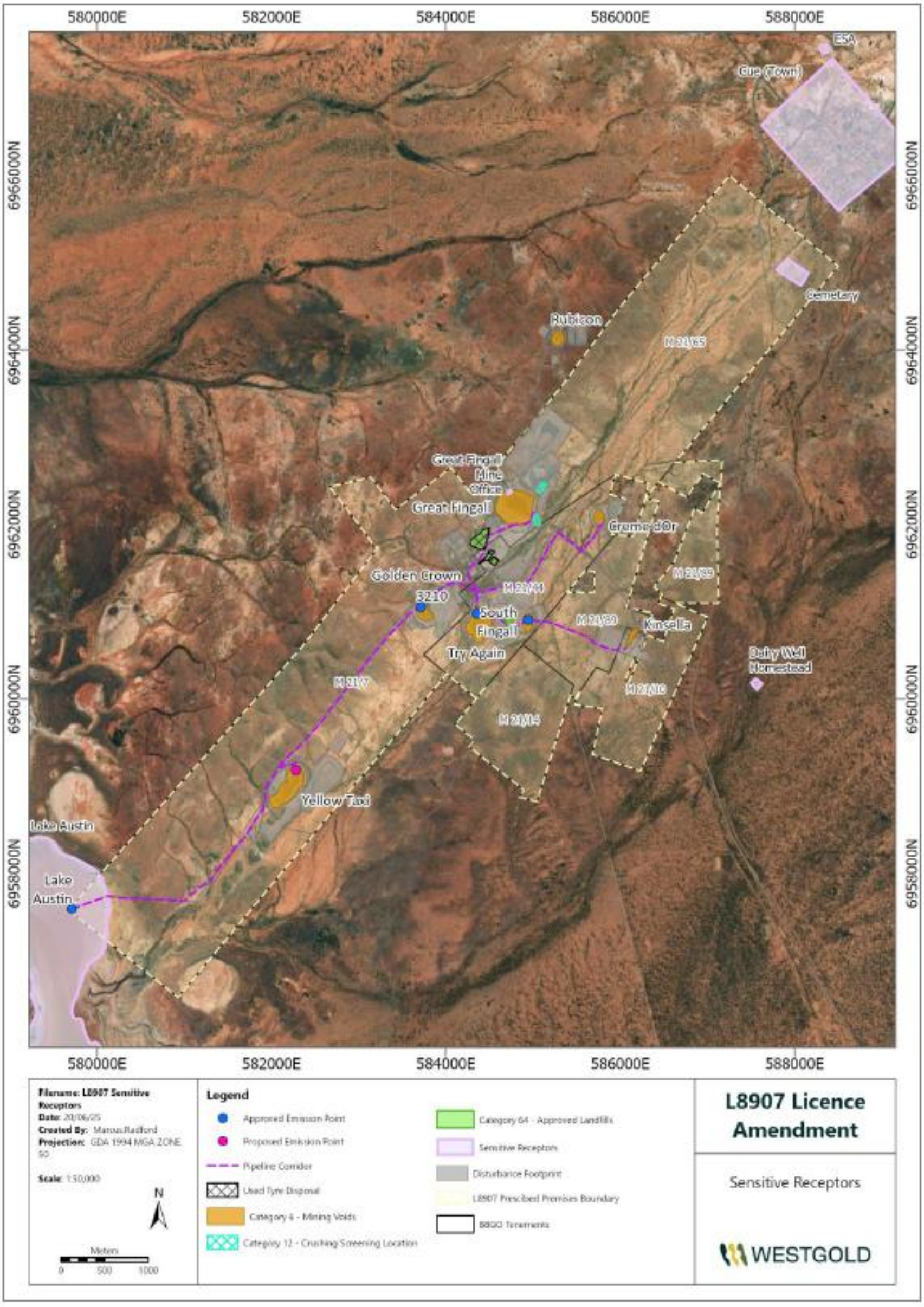

Figure 1: Distance to sensitive receptors

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 0. Where linkages are in-complete they have not been considered further in the risk assessment.

Where the Licence Holder has proposed mitigation measures/controls (as detailed in Section 0), 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 4.

The Revised Licence L8907 that accompanies this Amendment Report authorises emissions associated with the operation of the Premises i.e. category 6, 12 and 64 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 construction and operation

Risk Event					Risk rating C = consequence L = likelihood	Licence Holder controls sufficient?	Conditions of Licence Amendment	Justification for additional regulatory controls
Source/Activities	**Potential emissions**	**Potential pathways and impact**	**Receptors**	**Applicant controls**				
Construction								
Construction of mine dewatering infrastructure (i.e. the pipeline).	Dust	**Pathway:** Air/windborne pathway **Impact:** Health and amenity	Native vegetation (less than 50 metres from some corridor area)	Refer section 3.1	C= Slight L = Rare **Low Risk**	Y	N/A	N/A
Construction- Excavation of cells or cell closure for inert waste type 2 – used tyre disposal	Dust			Nil	C= Slight L = Rare **Low Risk**	Y	N/A	N/A
Construction of additional category 12 crushing and screening area – specifically construction of windrows, placement of screens	Dust		Native Vegetation, adjacent southern boundary of proposed screen planting area and approximately 50 metres to east of screening area	Nil	C= Minor L = Possible **Medium Risk**	Y	N/A	*N/A*
Operation								

Risk Event					Risk rating C = consequence L = likelihood	Licence Holder controls sufficient?	Conditions of Licence Amendment	Justification for additional regulatory controls
Source/Activities	**Potential emissions**	**Potential pathways and impact**	**Receptors**	**Applicant controls**				
Operation – Disposal and covering of used tyre waste	Smoke from combustion of tyres	**Pathway:** Air/windborne **Impact:** Impacts to health of flora and fauna.	Native vegetation	*Nil*	C= Moderate L = Possible **Medium Risk**	N	1.2.7. – Used tyre disposal requirements	Standard controls for disposal of used tyres applied to limit potential for fire.
Discharge of mine dewater into Yellow Taxi pit	Saline dewatering effluent	**Pathway:** Overtopping, Seepage, pipeline spills **Impact:** Native vegetation, Groundwater	Native vegetation, Groundwater	*Refer section 3.1*	C= Moderate L = Rare **Medium risk**	*Y* *Y*	Condition 1.2.3, 1.2.6, 3.3.1, 3.3.2	*N/A*
Screening, crushing, unloading, loading and storage of material Vehicle movements	Dust	**Pathway** Air/windborne **Impact:** Impacts to health and amenity Impacts to native vegetation by smothering	Native vegetation (TEC	Nil	C= Slight L = Unlikely **Low Risk**		No controls proposed	N/A

Risk Event					Risk rating C = consequence L = likelihood	Licence Holder controls sufficient?	Conditions of Licence Amendment	Justification for additional regulatory controls
Source/Activities	**Potential emissions**	**Potential pathways and impact**	**Receptors**	**Applicant controls**				
	Sediment laden stormwater	**Pathway:** Overland runoff **Impact:** Ecosystem disturbance or impact to surface water quality	Seasonal minor creek 300m southeast	Refer to section 3.1	C= Minor L = Rare **Low Risk**	Y	Condition 1.2.3 Earthen windrows (bunded) to be installed to prevent contaminated stormwater escaping the crushing and screening area.	N/A
	Hydrocarbon spills (relating to fueling procedures on site)	**Pathway:** Soil infiltration Overland runoff **Impact:** Groundwater degradation ecosystem disturbance Impact surface water quality	Groundwater 10 mbgl Seasonal minor creek 300m southeast	*Refer to section 3.1*	C= Minor L = Rare **Low Risk**	Y	Condition 1.2.3. Earthen windrows (bunded) to be installed to prevent contaminated stormwater escaping the crushing and screening area.	*N/A*

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 underlined text** depicts additional regulatory controls imposed by department.

4. Consultation

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

Table 5: Consultation

Consultation method	Comments received	Department response
The Licence Holder was provided with draft amendment on 11 November 2025	*Refer to Appendix 1*	*Refer to Appendix 1*

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.

Summary of amendments

Table 6 provides a summary of the proposed amendments and will act as a 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
1.2.6	Addition of Yellow Taxi Pit to infrastructure inspection requirements.
1.2.7	Crushing and screening infrastructure location updated to provide additional flexibility in location of infrastructure.
1.2.7.	Requirements for used tyre disposal in Landfill 2 and 3 specified.
1.2.8.	Used tyre disposal cover requirements specified.
2.3.1.	Addition of Yellow Taxi Emission Point as a point source emission to groundwater.
3.3.1	Monitoring requirements added for Yellow Taxi Pit
3.3.2, 3.3.3, 3.3.4	Construction requirements specified for Yellow Taxi discharge pipeline and reporting requirements detailed.
Schedule 1: Maps	Revised figure included which also now incorporates the emission points from previous figure title map of emission points.
Map of emission points	Figure removed with required data now included on premise map.
Map of infrastructure location	Figure updated to include new crushing and screening location and settlement ponds.

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. Government of Western Australia 2002, Environmental Protection (Rural Landfill) Regulations 2002, Western Australia

Appendix 1: Summary of Licence Holder's comments on risk assessment and draft conditions

Condition	Summary of Licence Holder's comment	Department's response
1.2.6	• Table 1.2.2 proposed change from "Daily" to "daily during dewatering operations"	Condition updated to only require inspection during dewatering.
1.2.7	• Table 1.2.3 "Great Fingall run-of-mine pad" and inclusion of "Great Fingall Crushing and Screening Area"	Updated to include new
1.2.8	• Table 1.2.4. "To be covered at least fortnightly with sufficient quantities of inert waste type 1 or clean fill with a layer of at least 100mm of thickness" proposed change to "Fortnightly or as soon as practicable after deposit".	Condition unchanged. Fortnightly covering is a standard condition for landfills that receive between 500 and 2,000 tonnes of waste per year. The approved capacity on this licence is 600 tonnes.
3.3.2	• Table 3.3.2 " A Density Polyethylene (HDPE) fully welded pipeline with a PN25 pressure rating or equivalent" proposed change to …">PN10 pressure rating".	Condition changed to specify PN10 pressure rating.