



Application for Licence Amendment

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

Licence Number	L9259/2020/1
Licence Holder	Golden Spur Resources Pty Ltd
ACN	161 329 933
File Number	DER2020/000278
Premises	Bellevue Gold Project Within Mining tenements M36/24, M36/25 and M36/299 Goldfields Highway, Shire of Leonora as depicted in Figure 1, Schedule 1
Date of Report	04 October 2023
Proposed Decision	Revised licence granted

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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 and M36/25, on Goldfields Highway in the Shire of Leonora.

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.

2. Scope of assessment

2.1 Regulatory framework

In completing the assessment documented in this Amendment Report, the Department of Water and Environmental Regulation (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 Application summary

On 20 June 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 amendments sought were as follows:

- Authorise continued operation of the wastewater treatment plant (WWTP) and spray field.
- Authorise continued operation of the landfill facility constructed under works approval W6479/2020/1.
- Expand the premises boundary to encompass the above activities.

On 11 July 2023, the Licence Holder submitted a second amendment application to the department to amend Licence L9259/2020/1. The amendments sought were as follows:

- To install additional gas and diesel generators at the existing thermal power station, bringing the total electricity generation by the power station to 20.8 MW by gas generation and 9 MW by diesel generation capacity. This brings the electricity generation from fuel above the category 52 threshold.

This amendment is limited only to a change in boundary and adding categories 52, 54 and 64 to the Existing Licence. No changes to the aspects of the existing Licence relating to Category 6 or 70 have been requested by the Licence Holder.

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

Table 1: Proposed design capacity for categories added to the licence

Category	Proposed design capacity
52: Electric power generation	30MW
54: Sewage Facility	150m ³ per day
64: Class II or III putrescible landfill site	500 tonnes per year

2.2.1 Wastewater treatment plant and irrigation spray field

The design capacity of the WWTP is for the treatment of 150 m³/day of waste, However the applicant advised that the expected actual throughput is estimated to be 80 - 100m³/day. The WWTP design is based on a sequencing batch reactor (SBR) system comprised of five treatment stages. Treated effluent from the WWTP is disposed of to land via an irrigation system.

The wastewater treatment plant and spray field were constructed under works approval W6697/2022/1. The works approval application stated that the planned spray field area had a footprint of 4.9ha to allow for irrigation of approximately 4.3ha as required to dispose of the treated effluent from the WWTP whilst maintaining at least a 5 meters (m) spray drift buffer (Figure 1).

The spray field as constructed deviated from the approved area to avoid an access road that was not identified in the original assessment. The constructed stray field has a footprint of just under 4.7ha. This non-compliance has been recorded for intelligence purposes. The Delegated Officer is satisfied that given other operational conditions of W6697/2022/1 that have been transferred to the licence in this amendment, the approximately 5% reduction in the spray field does not materially change the assessed risk.

The irrigation will be through above ground hammer type sprinklers that deliver spray over a radius of 30m and have 5mm nozzles to reduce clogging. The irrigation field will be fenced with safety signage every 50m of fencing.

The authorised time limited operations period under W6697/2022/1 ends on 10 October 2023. A small deviation in the location of the spray field was reported but does not change the environmental risk as assessed in the works approval.

2.2.2 Landfill

The landfill facility was constructed within the Prospero Waste Dump under works approval W6479/2020/1, and time limited operation was authorised.

There were minor non-compliances with the works approval in the construction of the landfill. These variations are considered in the risk assessment for this amendment but found to not alter the risk.

2.2.3 Power station upgrade

Much of the electricity for the premises is met through wind and solar electricity generation. This is supplemented by gas and diesel generators. The existing licence authorises emissions from a power station that is below the category threshold for category 52, under Schedule 1 of the EP Act.

That initial power station consisted of 2 x 1.5MW diesel generators and 6 x 2.6MW gas generators. These are authorised by DMIRS under Mining Proposal Reg ID 110429, and most of these generators have been constructed. These are considered existing infrastructure for the purpose of this assessment.

In this amendment, the licence holder has applied for an additional 4 x 1.5MW diesel generators and 2 x 2.6MW gas generators, bringing the total electricity generation capacity of the power station to 20.8MW by gas generators and 9 MW by diesel generators. This brings the electricity generation from fuel above the category 52 threshold, so category 52 will be added to the revised licence and construction conditions for the new generators are required to authorise construction. The licence holder has submitted a new mining proposal (Reg ID 118343), which is currently under assessment.

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
Operation of wastewater treatment plant and spray field			
Odour	Wastewater treatment	Air / windborne pathway	<ul style="list-style-type: none"> Equipment and infrastructure will be maintained and services according to the manufacturer's specifications. The tanks are contained to reduce fugitive emissions.
Sewage (treated, partially treated, untreated)	Spillage from plant and pipelines	Overland flow	<ul style="list-style-type: none"> Equipment and infrastructure will be maintained and services according to the manufacturer's specifications. The nearby camp will be placed outside or upstream of any drainage that interest the WWTP facility or spray fields
Treated effluent	Discharge to land via a sprinkler irrigation system	Air / windborne pathway: Overspray from spray field into surrounding environment Overland flow and pooling of water in the spray field.	<ul style="list-style-type: none"> Equipment and infrastructure will be maintained and serviced according to the manufacturer's specifications. The nearby camp will be placed outside or upstream of any drainage that interest the WWTP facility or spray fields A 5m spray drift buffer is provided around the spray field to control spread of flow. Fauna proof fencing is installed around the spray field Fauna proof fencing is positioned along both sides of the Goldfields Highway so that animals are unlikely to be crossing the highway to reach the spray field. Management of spray field within capacity and

Emission	Sources	Potential pathways	Proposed controls
			<p>inspections to prevent water pooling.</p> <ul style="list-style-type: none"> • Cease operations of spray field during extreme weather events. • Regular effluent water quality monitoring to check water quality against potential impacts. • Normal operation will have a throughput of 80 kL waste water per day. • The SBR tanks will be held at approximately half full allowing for additional containment. • The spray field can be turned on and off as the ground gets wet (e.g. during rainfall events) and different areas of the spray field can be utilised as required. Where required the discharge of wastewater will be limited or stopped to prevent ponding. <p>Valves can be opened and closed to direct effluent to less impacted or drier areas.</p>
Contaminated stormwater	Stormwater coming into contact with effluent within spray field	Overland flow	<ul style="list-style-type: none"> • A 5m spray drift buffer is provided around the spray field to control spread of flow. • Slope of land is less than 1:20 • The irrigated area is not subject to seasonal flooding
Sludge residue from wastewater treatment	Spillage from plant and pipelines	Direct discharge	No controls are specified
Operation of Class II Putrescible Landfill			
Dust	Operation of landfill facility.	Air/ wind dispersion	Operations will be avoided during periods of high winds. Regular inspections.
Noise			Operations at the landfill to occur either first thing in the day or towards the end of shift.
Odour			Regular covering of wastes with a layer of at least 100mm of thickness.
Windblown wastes			Regular burial/covering of wastes. Regular inspections. Remedial actions such a baiting and trapping to be in place to control pests if required.
Seepage of landfill leachate		Infiltration through soil	Ensuring the correct wastes are disposed. Use of waste dump increases the separation distance between wastes and groundwater. The water table is

Emission	Sources	Potential pathways	Proposed controls
		to groundwater Uptake via roots	at least 5m below ground level. Records of acid forming material burial shall be kept for future reference.
Construction of additional gas and diesel electricity generators			
Noise	Operation of machinery and mobile plant	Airbourne pathway	No receptors near enough to plausibly be impacted. These emissions will not be considered further in this assessment.
Dust	Movement of vehicles		
Spill or leak of hydrocarbons	Direct spill to ground; run off in surface water	Direct deposition or run off	<p>Hydrocarbons will be managed on site in accordance with Australian Standard 1940-2004: The Storage and Handling of Flammable and Combustible Liquids. Specific management measures associated with hydrocarbons comprise:</p> <ul style="list-style-type: none"> • Diesel will be stored and transferred within low permeability compounds designed to contain not less than 110% of the volume of the largest storage vessel and at least 25% of the total capacity of all tanks for a multiple tanks system. • All diesel and gas gensets will be self-bunded. • LNG holding tanks will be double skinned and self contained. • Fuel delivery inlets will be located on concrete or HDPE-lined pads to contain any drips and spills. The pads will drain to a sump to allow removal of collected material. • Spill kits will be located at all hydrocarbon and chemical storages and will be carried on surface mobile equipment to ensure immediate clean-up of any spills of contaminants such as oil or fuel. • Hydrocarbon contaminated water will be directed to a closed-circuit water treatment system. • Oily rags, vehicle filters and other hydrocarbon waste (e.g., waste oil) will be collected and stored in bins, tanks or on bunded pallets for periodic collection and disposal offsite by a licensed contractor. • Soil contaminated by hydrocarbons will either be treated in-situ or moved to a bioremediation area for treatment. • Development of hydrocarbon management procedure and spill management procedure

Emission	Sources	Potential pathways	Proposed controls
Operation of expanded power station			
Noise	Operation of generators	Airbourne pathway	<ul style="list-style-type: none"> Regular maintenance of vehicles and plant equipment. Where possible, mufflers and other noise attenuating equipment will be installed and maintained on plant, vehicles and equipment. Adherence to the Environmental Protection (Noise) Regulations 1997. <p>No receptors near enough to plausibly be impacted. These emissions will not be considered further in this assessment.</p>
Spill or leak of hydrocarbons	Direct spill to ground; run off in surface water	Direct deposition or run off	Hydrocarbons will be managed on site in accordance with Australian Standard 1940-2004: The Storage and Handling of Flammable and Combustible Liquids. Specific management measures associated with hydrocarbons are summarized in this table under construction.
Increased emission of hydrocarbon combustion products (NO _x , SO _x , CO _x), particulates, uncombusted hydrocarbons	Direct emission to air	Airbourne pathway	<ul style="list-style-type: none"> Diesel engines will be maintained and serviced on a regular basis and according to the manufacturer's specifications to ensure efficient running and optimum fuel consumption. Natural gas generators are constructed and maintained according to the manufacturers specifications to ensure efficient running and optimum fuel consumption. Low sulfur diesel will be used in fixed and mobile plant.

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
Yakabindie Homestead	<p>Approximately 3.8 km north west of the WWTP, and further from the landfill and power station.</p> <p>Air / windborne emissions are unlikely to impact this potential receptor as distance is significant. Not considered further in this assessment.</p>

Cosmos Nickel accommodation village	<p>Approximately 3.8 km north east of the WWTP and further from the landfill and power station.</p> <p>Air / windborne emissions are unlikely to impact this potential receptor as distance is significant. Not considered further in this assessment.</p>
Environmental receptors	Distance from prescribed activity
Violet Range (Perseverance Greenstone Belt) vegetation complexes (banded ironstone formation) – Priority Ecological Community - Priority 1	<p>Mapped as present across the premises including WWTP, landfill and power station.</p> <p>The Violet Range Land System is described as undulating stony and gravelly plains and low rises, supporting mulga shrublands (Meissner and Write, 2010).</p> <p>Vegetation surveys of the area describe the vegetation unit over the irrigation field as Flat sandplains over hardpan containing: Mulga spp. Low Open Woodland to Low Woodland over <i>Eremophila forrestii</i> subsp. <i>forrestii</i> Mid Sparse Shrubland over <i>Eragrostis eriopoda</i>, <i>Monachather paradoxus</i> and <i>Eriachne helmsii</i> Tussock Grassland on sand over hardpan plains. The condition of the vegetation is classed as good to very good.</p>
Soil	<p>Soil investigations were carried out across the premises to support applications for the development of the Bellevue Gold Project, including sampling of the proposed accommodation village area (samples V1 and V2 in Figure 2). Samples from the Village and the Bullimore Land system (refer Figure 2) were assessed for Phosphorus Retention Index (PRI) and total phosphorus to assess their suitability for use as a WWTP spray field.</p> <p>The V1 sample was taken close to the area proposed for the spray field and was found to be Red Deep Sand. Red Deep Sand was described as: characterised by red sands within the top 50 cm and had little to no gravel or surface coverage (Plate 6). These soils were able to support medium sized shrubs, scattered spinifex grass and in some areas taller Eucalypts and Acacias.</p> <p>This description supports the mapped rangeland system as being a Bullimore Land System: Gently undulating sandplain with occasional linear dunes and stripped surfaces supporting spinifex grasslands with mallees and acacia shrubs.</p>
Underlying groundwater (saline) Within the Goldfields Groundwater area under the <i>Rights in Water and Irrigation Act 1914</i>	<p>Fractured rock aquifer below the WWTP spray field with water levels approximately 15 – 30m below ground level. Salinity between 17,900mg/L and 90,400mg/L total dissolved solids.</p> <p>Groundwater 5-11m below ground level under the landfill area.</p>
Minor surface water flow line (Ephemeral) near spray field	<p>A minor flow line is located close to the southern edge of the spray field. Another minor flowline is present to within 212m of the northernmost edge of the spray field. The northern flow line will be separated from the spray field however by the accommodation camp access roadway.</p> <p>The gradient across the spray field and WWTP area slopes from east to west (slope of land is less than 1:20) so that any flow outside of the irrigation area is unlikely to intersect the naturally occurring flow lines.</p>
Ephemeral surface water line	Adjacent to the landfill area (Prospero Waste Dump).

Lake Miranda (salt lake)	<p>The power station is within the processing plant area, practically adjacent to Lake Miranda.</p> <p>The distance of Lake Miranda from WWTP and the landfill (over 1km) means there is minimal chance of impact from these facilities.</p>
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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 4.

The Revised Licence L9259/2020/1 that accompanies this Amendment Report authorises emissions associated with the operation of the Premises.

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 ¹	Licence Holder's controls sufficient?	Conditions ² of licence	Justification for additional regulatory controls	
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls	C = consequence L = likelihood				
Operation of wastewater treatment plant and spray field									
Treatment of sewage through WWTP	Sewage (treated, partially treated, untreated)	Spills and leaks from pipelines and containment infrastructure	Soil and native vegetation (including P1 PEC)	Surface water in contact with contaminated soil.	Refer to section 3.1.1.	C = Minor L = Unlikely Medium Risk	Y	Condition 1 - recovery of spills Condition 2 - operational requirements for WWTP	All conditions are consistent with licence holder proposed controls and/or conditions of W6697/2022/1, which application states licence holder will continue to comply with. They are therefore now considered licence holder controls.
	Nutrient rich water with pathogens					C = Minor L = Unlikely Medium Risk	Y		
	Chemical spills					C = Minor L = Unlikely Medium Risk	Y		
	Sludge resulting from treatment of sewage					C = Minor L = Unlikely Medium Risk	Y		
Disposal of treated effluent via spray field	Nutrient rich water with pathogens	Controlled irrigation of land (spray field) causing pooling. Pooled irrigation water flowing into surface water drainage areas.	Soil and native vegetation (including PEC) Surface water in contact with contaminated soil.	Refer to section 3.1.1.	C = Minor L = Unlikely Medium Risk	Y	Condition 2 - operational requirements for spray field Condition 9 - Authorised discharge points Condition 10 - emissions limits. Condition 18 - Spray field emissions monitoring		

Risk Event					Risk rating ¹ C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions ² of licence	Justification for additional regulatory controls
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls				
		Overspray from irrigation area Increased weed growth resulting from increased nutrients in soil.						
Operation of landfill								
Disposal of waste into the landfill facility	Dust	Air/windborne pathway causing impacts to native vegetation	Vegetation (including PEC)	Refer to section 3.1.1.	C = Slight L = Possible Low Risk	Y	Condition 2 - operational requirements.	All conditions are consistent with licence holder proposed controls
	Contaminated stormwater	Overland runoff potentially causing ecosystem disturbance or impacting surface water quality.	Seasonal minor creek adjacent to landfill area	Refer to section 3.1.1.	C = Moderate L = Unlikely Medium Risk	Y	Condition 2 - operational requirements.	
	Wind-blown waste	Air/windborne pathway	Native fauna - Foraging animals	Refer to section 3.1.1.	C = Minor L = Rare Low Risk	Y	Condition 2 - operational requirements.	
	Leachate from putrescible waste	Seepage through soil to	Soil Seasonal	Refer to section 3.1.1.	C = Moderate	Y		

Risk Event					Risk rating ¹ C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions ² of licence	Justification for additional regulatory controls
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls				
		groundwater	minor creek adjacent to landfill area Groundwater 5-11 mbgl		L = Unlikely Medium Risk			
Construction of additional gas and diesel generators								
Use of machinery	Spill or leak of hydrocarbons	Direct spill to soil; contamination of stormwater; potential seepage to groundwater	Soil, adjacent vegetation, groundwater, and Lake Miranda	Refer to section 3.1.1.	C = Minor L = Possible Medium Risk	Y	Condition 1 – recovery of spills	Consistent with licence holder's controls
Operation of expanded power station								
Operation of new gas generators and diesel generators	Combustion products, uncombusted hydrocarbons (diesel), particulate matter	Airbourne emissions, causing impact to health and amenity	Native vegetation, including PEC	Refer to section 3.1.1.	C = Minor L = Unlikely Medium Risk	Y	Condition 5 – installation Condition 2 – maintenance	Consistent with licence holder's controls
	Spill of hydrocarbons	Direct spill to soil; contamination of stormwater; potential seepage to groundwater	Soil, adjacent vegetation, groundwater, and Lake Miranda	Refer to section 3.1.1.	C = Minor L = Possible Medium Risk	Y	Condition 1 – recovery of spills Condition 6 – installation Condition 2 – maintenance	Consistent with licence holder's controls

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

Table 5: Consultation

Consultation method	Comments received	Department response
Department of Mines, Industry Regulation and Safety (DMIRS) advised of power station expansion proposal (27 July 2023)	DMIRS replied on 21 August 2023 outlining the generation capacities for gas, diesel, wind and solar under Mining Proposal Registration ID 110429 (approved), and Mining Proposal Reg ID 118343 (under assessment). Stated that DMIRS has no objection to the power station expansion.	Noted. The Delegated Officer also notes that the landfill and WWTP continued operation were not re-referred to DMIRS at this stage. DMIRS comments were sought and considered during assessment of the works approval applications.
Licence Holder was provided with draft amendment on 29 September 2023	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.

5.1 Summary of amendments

Table 6 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
Cover page	<ul style="list-style-type: none"> Tenement M36/299 added Categories 52, 54 and 64 added
1	New general condition added to recover spills of environmentally hazardous materials. All other conditions consequently renumbered.
2, 3	<ul style="list-style-type: none"> Operational requirements added for WWTP, spray field, landfill and power station Pipeline south to the turkey nest is removed. LH advised that the pipeline has been decommissioned. This is consistent with the new premises map.
6, 7, 8	Construction and reporting conditions for new generators
9	Spray field added as an authorised discharge point

10	Spray field emission limits added
11,12, 13	General licencing conditions – defining monitoring intervals as per current licence format, and bringing general conditions into one section to avoid repetition
14	Averaging updated from 'monthly' to 'each monthly period', consistent with current terminology
18	Monitoring for spray field
23	Monitoring and comparison with limits added as an Annual Environmental Report requirement.
Definitions	Definitions added for class II landfill, clean fill, inert waste type 1, inert waste type 2 and weekly period.
Schedule 1	All three previous figures are replaced with a new premises map, updated with new infrastructure. Note that the dewatering pipeline south to the turkey nest has been decommissioned and removed.

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.

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

Condition	Summary of Licence Holder's comment	Department's response
2(m)	Draft specifies a minimum spray field size of 4.9ha. LH states that constructed size is just under 4.7ha. Requested 'no larger than 4.9 ha in size'	A minimum spray field size is specified to control the nutrient application rates, so a maximum is not appropriate. However given the dry climate and existing condition 2(o) to prevent pooling, The Delegated Officer considers that a size reduction of approximately 5% is acceptable. A minimum size of 4.6ha is specified to align with the existing spray field.
2(n)	Requested the irrigation volume per day be increased from 100m ³ /day to 150m ³ /day, to be consistent with the category 54 assessed volume.	100m ³ /day was the stated expected maximum throughput. 150m ³ /day is the plant capacity. DWER has reviewed the risk assessment based on the plant capacity of 150m ³ /day and found that the risk does not materially change. Change granted.
2(z)	Incorrect cross reference – should reference condition 7.	Agreed, corrected.
8	Incorrect cross reference – should reference condition 7(b).	Agreed, corrected.
16	Incorrect cross reference – should reference condition 18	Agreed the reference is incorrect, but it originally referenced the previous condition (now condition 15). It is noted that this should also apply to the new condition 18. Updated to reference both.
17	It is requested the limit for the standing water level for the Westralia Pit Bore (MB01) is changed to 2 mbgl. During construction of this bore on 31st July 2023, the water table was encountered at less than 5 mbgl (as per well construction report submitted to the DWER). Seven days after construction the standing water level was 2.4 mbgl and one month later in early September the standing water level was 2.3 mbgl. At the same time, Bellevue installed an additional bore 200 m northwest of MB01 (namely MB02), this bore was constructed to the same depth as MB01 and is closer to Westralia pit than MB01. This bore was dry during both August and September monitoring. The elevated static water level in MB01 is likely due to its proximity to Lake Miranda rather than Westralia Pit. The water levels recorded at MB01 are all above the 5 mbgl limit which makes	<p>This request relates to groundwater monitoring for mine dewater discharge, which is not related to the current licence amendment. This amendment would require risk assessment, and is outside the scope of this amendment.</p> <p>The licence holder may apply for a new licence amendment. Generally a SWL limit under 5m requires consideration of local vegetation root depth. If MB02 is proposed as a regulatory replacement to MB01, figures showing the location of Westralia Pit relative to MB01, MB02 and anticipated seepage direction will be required.</p>

Condition	Summary of Licence Holder's comment	Department's response
	the 5 mbgl limit not appropriate for this bore.	
21	Should refer to works in both condition 4 (as per draft licence) and condition 6 (generators).	Agreed, reference added.
23	<ul style="list-style-type: none"> a) Remove reference to deleted condition 25. b) Condition 14, Table 5 should read condition 14, Table 7. 	Agreed, done.

Appendix 2: Application 1 validation summary

SECTION 1: APPLICATION SUMMARY			
Application type			
Amendment to licence	<input checked="" type="checkbox"/>	Current licence number:	L9259/2020/1
		Relevant works approval number:	W6697/2022/1 – WWTP W6479/2020/1 - Landfill
Date application received		20/6/23	
Applicant and Premises details			
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 (<i>added</i>) Goldfields Highway, Shire of Leonora To be depicted in Schedule 1 of amended licence	
Local Government Authority		Shire of Leonora	
Application documents			
HPCM file reference number:		DER2020/000278~7	
Key application documents (additional to application form):		Attachment 2 - Prescribed premises map Attachment 3B - Supporting information	

Scope of application/assessment		
Summary of proposed activities or changes to existing operations.	<p><u>Licence amendment</u> for the operation beyond limited time operations (LTO) of the</p> <ul style="list-style-type: none"> wastewater treatment plant (WWTP) and spray field (W6697/2022/1; TLO ends 10 October 2023) Landfill facility (W6479/2020/1; TLO ends 4 July 2023) <p>The prescribed premises boundary will need to be expanded to encompass these facilities.</p>	
Category number/s (activities that cause the premises to become prescribed premises)		
Table 1: Prescribed premises categories		
Prescribed premises category and description	Proposed production or design capacity	
Category 54: Sewage Facility	150m ³ per day	
Category 64: Class II or III putrescible landfill site	500 tonnes per year	
Legislative context and other approvals		
Has the applicant referred, or do they intend to refer, their proposal to the EPA under Part IV of the EP Act as a significant proposal?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
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>M36/24 (expiry 16/01/2028), M36/25 (expiry 16/01/2028), 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 type="checkbox"/> No <input type="checkbox"/>	No clearing is proposed.

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"/>	No clearing is proposed.
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"/>	Name: Goldfields groundwater area Type: Proclaimed Groundwater Area Has Regulatory Services (Water) been consulted? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
Is the Premises situated in a Public Drinking Water Source Area (PDWSA)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Is the Premises subject to any other Acts or subsidiary regulations (e.g. <i>Dangerous Goods Safety Act 2004</i> , <i>Environmental Protection (Controlled Waste) Regulations 2004</i> , <i>State Agreement Act xxxx</i>)	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Mining Act 1978
Is the Premises within an Environmental Protection Policy (EPP) Area?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Is the Premises subject to any EPP requirements?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Is the Premises a known or suspected contaminated site under the <i>Contaminated Sites Act 2003</i> ?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	M36/24 only is classified as 'possibly contaminated – investigation required (PC-IR)' Date of classification: 9/5/23

Appendix 3: Application 2 validation summary

SECTION 1: APPLICATION SUMMARY			
Application type			
Amendment to licence	<input checked="" type="checkbox"/>	Current licence number:	L9259/2020/1
		Relevant works approval number:	N/A
Date application received		11/7/23	
Applicant and Premises details			
Applicant name/s (full legal name/s)		Golden Spur Resources Pty Ltd (ACN: 161 329 933) (a wholly owned subsidiary of Bellevue Gold Ltd)	
Premises name		Bellevue Gold Project	
Premises location		Mining tenements M36/24, M36/25 and M36/299 (added) Goldfields Highway, Shire of Leonora To be depicted in Schedule 1 of amended licence	
Local Government Authority		Shire of Leonora	
Application documents			
HPCM file reference number:		DER2020/000278~8	
Key application documents (additional to application form):		Attachment 2 - Prescribed premises map Attachment 3B - Supporting information Attachment 7 – siting and location	
Scope of application/assessment			
Summary of proposed activities or changes to existing operations.		<p><u>Licence amendment</u></p> <p>Installation of new gas and diesel generators in the existing power station, bringing the total generation capacity to over the threshold of category 52.</p> <p>The prescribed premises boundary will need to be expanded to encompass these facilities. The new premises boundary is the same as that proposed in the previous amendment, currently under assessment. LO recommends that these amendments be assessed together.</p>	
Category number/s (activities that cause the premises to become prescribed premises)			
Table 1: Prescribed premises categories			
Prescribed premises category and description		Proposed production or design capacity	
Category 52: Electric power generation: premises (other than premises within Category 53 or an emergency or standby power generation generating plant) on which electrical power is generated using fuel		30MW (from gas and diesel)	

Legislative context and other approvals		
Has the applicant referred, or do they intend to refer, their proposal to the EPA under Part IV of the EP Act as a significant proposal?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Not for this amendment. Recommencement of operations at Bellevue was previously referred but decision made not to assess.
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"/>	Mining lease / tenement <input checked="" type="checkbox"/> M36/24 (expiry 16/01/2028), M36/25 (expiry 16/01/2028), M36/299 (expiry 21/04/2036) Expiry dates verified by LO on Mineral Titles Online.
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
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"/>	
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"/>	Name: Goldfields groundwater area Type: Proclaimed Groundwater Area Has Regulatory Services (Water) been consulted? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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</i>, <i>Environmental Protection (Controlled Waste) Regulations 2004</i>, <i>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 checked="" 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>