



## Review of Existing Licence

### Division 3, Part V *Environmental Protection Act 1986*

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<b>Licence Number</b>	L8532/2011/2
<b>Applicant</b>	Saracen Metals Pty Limited
<b>ACN</b>	107 154 727
<b>File Number</b>	DER2014/000885-1
<b>Premises</b>	Kailis Mine  Mining Tenements M37/46, M37/219 and M37/564, M37/902, M37/955, M37/986 and L37/221  LEONORA WA 6438
<b>Date of Report</b>	18 July 2019
<b>Status of Report</b>	Final

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## 1. Definitions of terms and acronyms

In this Decision Report, the terms in Table 1 have the meanings defined.

**Table 1: Definitions**

Term	Definition
AACR	Annual Audit Compliance Report
ACN	Australian Company Number
AER	Annual Environment Report
Category/ Categories/ Cat.	Categories of Prescribed Premises as set out in Schedule 1 of the EP Regulations
Decision Report	refers to this document.
Delegated Officer	an officer under section 20 of the EP Act.
Department	means the department established under section 35 of the <i>Public Sector Management Act 1994</i> and designated as responsible for the administration of Part V, Division 3 of the EP Act.
DWER	Department of Water and Environmental Regulation  As of 1 July 2017, the Department of Environment Regulation (DER), the Office of the Environmental Protection Authority (OEPA) and the Department of Water (DoW) amalgamated to form the Department of Water and Environmental Regulation (DWER). DWER was established under section 35 of the <i>Public Sector Management Act 1994</i> and is responsible for the administration of the <i>Environmental Protection Act 1986</i> along with other legislation.
EPA	Environmental Protection Authority
EP Act	<i>Environmental Protection Act 1986 (WA)</i>
EP Regulations	<i>Environmental Protection Regulations 1987 (WA)</i>
Existing Licence	The Licence issued under Part V, Division 3 of the EP Act and in force prior to the commencement of, and during this Review
Licence Holder	Saracen Metals Pty Limited
Occupier	has the same meaning given to that term under the EP Act.
Prescribed Premises	has the same meaning given to that term under the EP Act.
Premises	refers to the premises to which this Decision Report applies, as specified at the front of this Decision Report

Review	this Licence review
Revised Licence	the amended Licence issued under Part V, Division 3 of the EP Act following the finalisation of this Review.
Risk Event	As described in <i>Guidance Statement: Risk Assessment</i>

## 2. Purpose and scope of assessment

Saracen Metals Pty Limited (the Licence Holder) holds Licence L8532/2011/1 (Existing Licence) under the *Environmental Protection Act 1986* (EP Act) for the operations of the Kailis Mine (The Premises), a Category 6 premises under Schedule 1 of the *Environmental Protection Regulations 1987* (EP Regulations). This Licence renewal (Review) was initiated by the Licence Holder to extend the expiry date of the licence and to allow for continued operation of the site. The renewal also acts to remove redundant conditions, update the licence to the new format currently in use by DWER and to amalgamate licence conditions from issued amendment notices into a single instrument document.

### 2.1 Application details

Table 2 lists the documents submitted during the assessment process.

**Table 2: Documents and information submitted during the assessment process**

Document/information description	Date received
Kailis Licence Renewal Application form and attachments (DWERDT150696)	5/4/2019
Response to request for additional information via email (DWERDT168607)	17/06/2019
Response to request for additional information via email (A1801741)	26/06/2019

## 3. Background

The Kailis Project area, located 6km north of Leonora, has hosted mining activities since the late 1890s and contains a wide scattering of small historic workings. Sons of Gwalia (SGW) commenced open pit mining at the Kailis mine site in July 2000 and completed mining in July 2001. St Barbara Mines Ltd resumed mining at the Kailis mine in 2008 with the excavation of the Trump open pit and cutbacks of the Kailis main pit; however the open pit mining ceased in November 2008 before the Kailis pit was completed. In January 2016 the current Licence Holder (Saracen Metals Pty Limited) recommenced dewatering in January 2016 until May 2016 when the decision to delay mining was put on hold, all dewatering during this period was from Kailis pit to the Trump pit.

On 1 June 2016, the Licence Holder applied for an amendment to the Licence for construction of a new 4.5 km dewater pipeline from Trump pit to Harbour Lights pit, with an extension of the premises boundary to include Harbour Lights pit (which is owned by St Barbara's Limited). Once approved dewatering recommenced in January 2017 with water from Kailis discharged to Harbour Lights pit.

The Licence Holder holds a miscellaneous licence (L37/221) that covers the pipeline to Harbour Lights Pit and includes the Pit. This lease overlaps St Barbara's mining tenement (M37/251). There is an agreement outlined in the Sale Agreement between St Barbara and the Licence Holder which covers the use of Harbour Light Pit by Saracen for dewatering (see A1052079). There is also a corresponding Environmental Management Plan which outlines the responsibilities of each party (EMP 2016).

The Licence Holder has a licence to take groundwater at Kailis which has an approved extraction of 1,300,000kl per annum (GWL181982).

## 4. Overview of Premises

The Kailis Project area is located approximately 6km north of Leonora off the Goldfields Highway on the Braemore Pastoral Lease. Permanent infrastructure at the site includes two open pits (Kailis and Trump), a backfilled pit, waste dump and associated mine infrastructure (Run of mine (ROM) pad, workshop area etc.). The premises boundary also includes the Harbour Lights Pit which is owned by St Barbaras Limited, with a 4.5km pipeline from Trump Pit to Harbour Lights Pit. The layout of the site with the location of the three pits is shown in Figure 1.

To allow mining of the Kailis open pit water is pumped from sumps in the pit using submersible bore pumps and piped to the Trump pit and then the Harbour Lights pit for storage. All pipes are polyethylene, constructed and installed to Australian standards and Plastics Industry Pipe Association of Australia Limited (PIPA) Guideline POP003. Pipelines are banded or buried along their length. Flow meters are located within the pipelines at each pump site. Pipelines are visually inspected for integrity daily.

The Existing Licence allows for the discharge of 1,300,000 tonnes of dewater per annual period from Kailis pit to Trump Pit and then on to Harbour Lights pit.

Table 3 lists the prescribed premises categories that are approved under the Existing Licence.

**Table 3: Prescribed Premises Categories on the Existing Licence**

Classification of Premises	Description	Approved Premises production or design capacity or throughput
Category 6	Mine dewatering: premises on which water is extracted and discharged into the environment to allow mining of ore.	1,300,000 tonnes per annual period

### Harbour Lights Pit

The Harbour Lights Pit was mined between 1985 and 1989. The original groundwater level around the pit was between 12-15 meters below ground level (mbgl). While being mined the pit was dewatered resulting in a cone of depression forming (groundwater levels dropping an addition 10-40 m) (Rockwater Pty Ltd, 2016). The Harbour Lights pit has become a permanent groundwater sink, where the low water level has stabilized and groundwater inflows plus rainfall accumulation balance evaporation losses. This had resulted in a gradual rise in salinity to almost 59,000 mg/L TDS in June 2015 (Rockwater Pty Ltd, 2016).

Rockwater Pty Ltd, 2016 determined that the Harbour Lights pit has sufficient capacity to hold the water volume from Kailis pit. The volume available in the Harbour Lights was estimated to be 5,880,000 kL. It was estimated that up to 1,640,000 kL of water will need to be pumped from Kailis into Harbour Lights pit during operation of the Kailis open-cut mine. Rockwater Pty Ltd (2016) determined that (without seepage and additional evaporation losses) the volume of water deposited into Harbour Lights pit would raise the water level in the pit to 335 m AHD, 26 m below the original static groundwater level and 38 m below ground level. Some water will initially flow out of the pit and partially fill the cone of depression that has formed around the pit, but the pit will continue to be a groundwater sink into the future and the water level will decline until groundwater inflows plus rainfall accumulation balance evaporative losses. Consequently it was determined that there will be no long-term flow from the pit to groundwater in the surrounding rocks (Rockwater Pty Ltd, 2016).

### Groundwater quality

The Existing Licence contain conditions which require the Licence holder to monitor the volume of water (monthly cumulative) being discharged from Kailis Pit to Trump Pit and then

onto Harbour Lights Pit. Water quality monitoring (for the following parameters; pH, Total Dissolved Solids (TDS), calcium, arsenic, magnesium, nickel, sulphate and carbomate) is carried out on a quarterly basis at all three pit locations.

Water from Kailis Pit is alkaline (pH ~8.1) and has a salinity ranging from 64500 – 75300 mg/L TDS. Arsenic concentrations are approximately 0.23 mg/L (Renewal Application 2019).

As detailed in the 2018 Annual Environmental Report (AER) for the site groundwater parameters have continued to increase in concentration across all pit lakes over time. TDS and metalloid concentrations have increased in the Kailis pit over time, likely due to the diminishing volume of pit water interacting with the exposed mineralised and sodic material in the pit walls. Groundwater in non-active production bores surrounding the pit remained static at levels far below that of the pit lake which suggests the Kailis pit is not being affected by infiltration.

Water from Trump pit is very similar to Kailis Pit with a pH approximately 8, salinity of 68 000 mg/L TDS and arsenic concentration ~0.23 mg/L (Renewal Application 2019).

Water within the Harbour Lights pit has a pH of approximately 8.3 which is similar to that of the other two pits. Salinity is lower with an average TDS of 41 950 mg/L. TDS concentration is increasing over time due to the increase in salinity in Kailis Pit. Arsenic levels are on average 0.4mg/L (Renewal Application 2019).

Saracen conducts all environmental monitoring in accordance with their document *SM-EN-PR-2010 Groundwater, Surface Water and Sediment Monitoring Work Instruction* to ensure that sample collection, preservation, handling and transport meet the relevant AS/NZS standards. Contractors engaged to conduct monitoring on behalf of Saracen are required to provide their sampling procedures to ensure they comply with SM-EN-PR-2010 (AER, 2018).



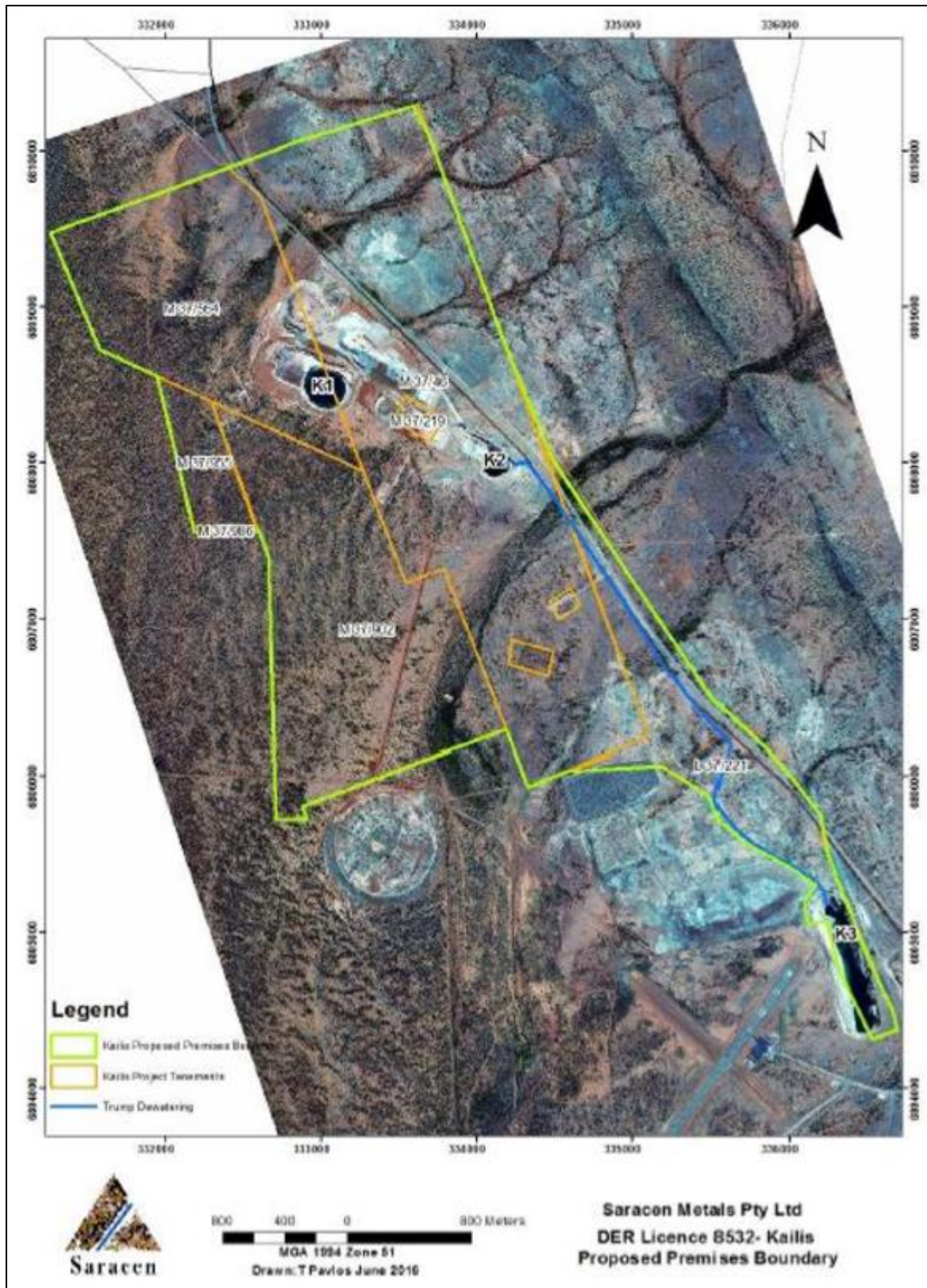


Figure 1: Site layout and dewatering pipeline route, K1 (Kailis pit), K2 (Trump pit) and K3 (Harbour Lights pit).



## 5. Legislative context

Table 4 summarises approvals relevant to the assessment.

**Table 4: Relevant approvals and tenure**

Legislation	Number	Approval
RIWI Act	GWL181982	Abstraction of water
<i>Mining Act 1978</i>	ID59686	Mining Proposal
<i>Mining Act 1978</i>	L 37/221	Miscellaneous Lease for the pipeline to Harbor Lights Pit

### 5.1 Part V of the EP Act

#### 5.1.1 Applicable regulations, standards and guidelines

The overarching legislative framework of this assessment is the EP Act and EP Regulations.

The guidance statements which inform this assessment are:

- *Guidance Statement: Regulatory Principles (July 2015)*
- *Guidance Statement: Licence Duration (August 2016)*
- *Guidance Statement: Decision Making (February 2017)*
- *Guidance Statement: Risk Assessments (February 2017)*

#### 5.1.2 Works approval and licence history

Table 5 summarises the works approval and licence history for the premises.

**Table 5: Works approval and licence history**

Instrument	Issued	Nature and extent of works approval, licence or amendment
L8532/2011/1	22/8/2011	New licence for dewatering.
L8532/2011/1	14/04/2016	Licence transfer and amendment to update licence format and premises boundary.
L8532/2011/1	30/06/2016	Licence amendment to add tenements to the Premises boundary and for construction of a new dewatering pipeline from Trump Pit to Harbour Lights pit.
L8532/2011/1	22/08/2017	Amendment Notice 1: Increase in Category 6 design capacity from 900 000 tonnes to 1 300 000 tonnes per annual period and the operation of dewatering pipeline to Harbour Lights Pit.
L8532/2011/2	-	Licence renewal. Amalgamation of Amendment notice 1 and licence into one instrument. New licence format used.

#### 5.1.3 Compliance inspections and compliance history

An inspection of the site by DWER compliance officers occurred on 18 May 2016. No non-compliances were found at the time.

The 2018 AER for the Premises identified that daily inspections of the pipeline between Kailis and Harbour Lights pits did not occur at the correct frequency during January 2018. Site manning numbers over the Christmas/New Year period were low which resulted in additional tasks being assigned to personnel who were not familiar with the inspection requirements. Telemetry (with automatic cut off if a leak is detected) was in operation throughout this period as a safeguard had there been a leak/malfunction. Pipeline bunding can contain discharge of a 24 hour period.

No other compliance issues have been recorded for the Premises.

## 6. Consultation

The application was advertised in the West Australian newspaper on 27 May 2019 for a comment period ending on 17 June 2019. No comments were received.

## 7. Location and siting

### 7.1 Siting context

The Kailis Project area is located approximately 6km north of Leonora off the Goldfields Highway on the Braemore Pastoral Lease. The predominant land use in the area is pastoral, prospecting and mining. The nearest town is Leonora 6km away, the nearest residential property to the Kailis mining operations is a farm house 5km to the south east. The nearest residential property from Harbour Lights pit is approximately 500m to the south of the pit.

### 7.2 Residential and sensitive Premises

The distances to residential and sensitive receptors are detailed in Table 6.

**Table 6: Receptors and distance from activity boundary**

Sensitive Land Uses	Distance from Prescribed Activity
Residents of the town of Leonora	<p>Closest residence to the Kailis central pit mine activities is 5.5 km away.</p> <p>Closest residence to Trump pit is 5 km away.</p> <p>Closest residence to Harbour Lights pit is approximately 500 m away.</p>

### 7.3 Specified ecosystems

Specified ecosystems are areas of high conservation value and special significance that may be impacted as a result of activities at or Emissions and Discharges from the Premises. The distances to specified ecosystems are shown in Table 7. Table 7 also identifies the distances to other relevant ecosystem values which do not fit the definition of a specified ecosystem.

The table has also been modified to align with the *Guidance Statement: Environmental Siting*.

**Table 7: Environmental values**

Specified ecosystems	Distance from the Premises
Threatened Ecological Communities and Priority Ecological Communities	A priority ecological community (associated with Melita calcrete groundwater assemblage type on Raeside palaeodrainage on Melita (Sons of Gwalia) Station) is located approximately 4km

	south of the Harbour Lights pit.
<b>Biological component</b>	<b>Distance from the Premises</b>
Threatened/Priority Flora	No Threatened/Priority Flora have been recorded within 5km of the Premises.
Threatened/Priority Fauna	1.6km from Harbour Lights pit threatened/priority fauna was sighted (peregrine falcon). No other priority Fauna has been recorded within a 2km radius of the Premises.

## 7.4 Groundwater and water sources

The distances to groundwater and water sources are shown in Table 8.

**Table 8: Groundwater and water sources**

<b>Groundwater and water sources</b>	<b>Environmental value and distance from Premises</b>
Public drinking water source areas	P1 Public Drinking Water Source Area – Leonora Water Reserve Approximately 5.8 km north of the dewatering pipeline.
Major watercourses/waterbodies	Lake Raeside is approximately 5 km south west of the premises
Minor perennial water courses	Surface water in the area occurs as sheet flow and defined channels and transitions into a flood plain leading to Lake Raeside south-west of the Kailis mine area. One creek line that formerly ran through the Kailis Pit area has been blocked by the Goldfields Highway and the Kailis north waste rock dump. (Operating strategy, February 2019). The mine is located on Braemore pastoral lease which runs cattle and goats in the area and sources water from a number of dams and pastoral bores and creeks in the area. The Shire of Leonora and St Barbara source fresh water from Station Creek 7km north of Kailis (Operating strategy, 2019).
Groundwater	The Kailis mine is located in the Raeside Groundwater Subarea. Bores and the open Kailis pit are located within Combined Fractured Rock West – Alluvium aquifer. Pre mining ground water levels were 15m below surface in the Trump shaft and 18m in the Kailis pit area. Salinities range from 3,500mg/L to 81,000mg/L TDS indicating some stratification in groundwater with depth. There are no other ground water users in the immediate Kailis pit area; 4 Mile Well located immediately north of the Trump pit has either been destroyed or is no longer in use. The mine is located on Braemore pastoral lease which runs cattle and goats in the area and sources water from a number of dams and pastoral bores and creeks in the

	area. Closest pastoral bore is approximately 2.5km away from Kailis pit.
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## 8. Risk assessment

Emissions generated through site activities are subject to a risk assessment as detailed in Table 9 below.

**Table 9: Risk assessment – Prescribed Premises operation**

Risk Events					Consequence rating	Likelihood rating	Risk	Reasoning	Regulatory controls (refer to conditions of the granted instrument)
Sources/ Activities	Potential emissions	Potential receptors	Potential pathway & Receptor (impact)	Applicant controls					
<b>Category 6:</b> Discharge of dewater into Harbour Lights pit (1,300,000 tonnes per annum)	Seepage of water with high concentration of solids from Harbour Lights pit.	Groundwater - RIWI Act Goldfields Groundwater Area  Groundwater users – pastoral bores in the area (closest 2.5km away from Kailis pit).	Seepage through soil into groundwater causing reduced quality of groundwater and potential mounding of the water table.	Not applicable	Minor	Unlikely	Medium	<p>The consequence of this risk event has been deemed to be Minor due to the potential for low level on-site impacts and minimal off site impacts occurring.</p> <p>Pit water salinity at Harbour Lights pit pre-mining was found to be saline with a TDS approximately 58600 mg/L. Data from 2018 monitoring have confirmed that TDS concentration (salinity) of the water in Harbour Lights pit is now (on average) approximately 35,850 mg/L (AER, 2018). Pit water salinity at Trump pit is (on average) approximately 68,000 mg/L (AER, 2018).</p> <p>The likelihood of this risk event occurring has been deemed to be unlikely due to the fact that a cone of depression surrounds the Harbour Lights pit due to historic dewatering activities. Rockwater (2016) concluded that some water will initially flow</p>	Monitoring conditions 3.1.1 to 3.2.1 from Existing Licence has been transferred to the Renewed Licence as conditions 5 to 10.

Risk Events					Consequence rating	Likelihood rating	Risk	Reasoning	Regulatory controls (refer to conditions of the granted instrument)
Sources/ Activities	Potential emissions	Potential receptors	Potential pathway & Receptor (impact)	Applicant controls					
								<p>out of the pit to partially fill the cone of depression that has formed around the pit, but the pit acts as a groundwater sink and will continue to be in the future. No long-term flow from the pit to groundwater in the surrounding rocks is expected. The current groundwater level surrounding the Harbour Lights pit is approximately 42.3 mbgl.</p> <p>Based on the above information the Delegated Officer has determined the rating for this risk event to be <b>Medium</b>.</p> <p>Conditions exist on the licence requiring the Licence Holder to monitor water quality within the Kailis, Trump and Harbour Lights pits on a quarterly basis.</p> <p>The Delegated Officer has determined that these regulatory controls are adequate to manage this risk event.</p>	
	Overtopping of water from Trump Pit and Harbour Lights pit to the surrounding	Native vegetation located on the premises and in the local vicinity. The closest PEC	Direct discharge to land causing contamination of surrounding soils with dissolved solids from saline	The Licence Holder has committed to the following controls;  Freeboard is maintained on all	Moderate	Rare	Medium	Consequence rating for this risk event has been determined to be Moderate. If receiving pits were to overtop then mid-level onsite impacts will occur (death of adjacent vegetation, contamination of soils with	Condition 4.



Risk Events					Consequence rating	Likelihood rating	Risk	Reasoning	Regulatory controls (refer to conditions of the granted instrument)
Sources/ Activities	Potential emissions	Potential receptors	Potential pathway & Receptor (impact)	Applicant controls					
	environment	is 4 km south of the premises.	water and stress/death to vegetation	pits. A target of 6 meters below ground level and a limit of 4 meters below ground level.				<p>saline water).</p> <p>The likelihood of overtopping of pits occurring has been determined to be rare. Rockwater Pty Ltd, 2016 determined that the Harbour Lights pit has sufficient capacity to hold the water volume from Kailis pit. The volume available in the Harbour Lights was estimated to be 5,880,000 kL. It was estimated that up to 1,640,000 kL of water will need to be pumped from Kailis into Harbour Lights pit during operation of the Kailis open-cut mine. Rockwater Pty Ltd (2016) determined that (without seepage and additional evaporation losses) the volume of water deposited into Harbour Lights pit would raise the water level in the pit to 335 m AHD, 26 m below the original static groundwater level and 38 m below ground level.</p> <p>The likelihood of overtopping of pits occurring has been determined to be rare. The Licence Holders have confirmed that the maximum pit fill depth of 4 mbgl will be used to protect surrounding vegetation. A target is set a 6 mbgl, where if</p>	

Risk Events					Consequence rating	Likelihood rating	Risk	Reasoning	Regulatory controls (refer to conditions of the granted instrument)
Sources/ Activities	Potential emissions	Potential receptors	Potential pathway & Receptor (impact)	Applicant controls					
								<p>reached actions will be put into place to lower water level (Email 26/6/2019). The current Pit water levels for each pit are; Kailis Pit – 80.4 mbgl, Trump Pit – 12.4 mbgl and Harbour Lights Pit – 42.3 mbgl.</p> <p>Based on the above information the Delegated Officer has determined the rating for this risk event to be <b>Medium</b>.</p> <p>Condition 4 (previously condition 1.2.2) has been updated to include inspection of pits for freeboard.</p>	
<p><b>Category 6:</b> Transport of dewater by pipeline from Kailis Pit to Harbour Lights pit (4.5km of pipeline)</p>	<p>Release of dewater due to pipeline failure.</p> <p>Water from Kailis Pit is alkaline (pH ~8.1), saline (~69, 325TDS), and arsenic concentration approximately 0.23 mg/L.</p> <p>Water from Trump pit is</p>	<p>Native vegetation located on the premises and in the local vicinity.</p> <p>The closest PEC is 4 km south of the premises.</p> <p>Surface water – the pipeline crosses a drainage line.</p>	<p>Direct discharge to land causing contamination of surrounding soils with dissolved solids from saline water and stress/death to vegetation</p>	<p>The Licence Holder has committed to the following controls;</p> <ul style="list-style-type: none"> <li>Dewater pipelines are bunded along the entire length apart from where it is buried under three road crossings and where it crosses a creek line. Bunding can contain discharge of a 24 hour</li> </ul>	Moderate	Unlikely	Medium	<p>The dewatering pipeline from Kailis pit to Harbour Lights pit is approximately 4.5km in length and travels across a drainage line. If a leak was to occur moderate onsite impacts would occur due to the quality of the water, which is saline. This could result in vegetation stress/death from high total solids load in the water (saline).</p> <p>This impact is deemed to be unlikely due to the controls the Licence Holder has in place.</p> <p>No leaks/ruptures of the pipeline has been reported to DWER</p>	<p>Condition 1.2.1 and Condition 1.2.2 from Existing Licence has been transferred to Renewed Licence as conditions 3 and 4 respectively.</p>

Risk Events					Consequence rating	Likelihood rating	Risk	Reasoning	Regulatory controls (refer to conditions of the granted instrument)
Sources/ Activities	Potential emissions	Potential receptors	Potential pathway & Receptor (impact)	Applicant controls					
	alkaline (~8.07 pH), Saline (~68 000 TDS) and arsenic concentration ~0.23 mg/L			<p>period;</p> <ul style="list-style-type: none"> <li>Telemetry is fitted on the pipeline between Trump pit and Harbour Lights pit. The telemetry master system will shut off the pump if a significant variation in flow is detected; and</li> <li>Daily inspections of the pipelines is undertaken every 12 hours.</li> </ul>				<p>since operation of the dewatering pipeline began.</p> <p>Based on the above information the Delegated Officer has determined the rating for this risk event to be <b>Medium</b>.</p> <p>Conditions exist on the licence requiring the Licence Holder to ensure all pipelines containing saline water are equipped with telemetry systems, automatic cut-outs in the event of pipeline failure or have secondary containment.</p> <p>Conditions also require the Licence Holder to undertake inspections of the pipelines daily.</p> <p>The Delegated Officer has determined that these regulatory controls are adequate to manage this risk event.</p>	

## 9. Applicant's comments

The Licence Holder was provided with the draft Decision Report and draft issued Licence on 16 July 2019. The Licence Holder provided comments which are summarised, along with DWER's response, in Appendix 2.

## 10. Conclusion

This assessment of the risks of activities on the Premises has been undertaken with due consideration of a number of factors, including the documents and policies specified in this Decision Report (summarised in Appendix 1).

Based on this assessment, it has been determined that the Revised Licence will be granted subject to conditions commensurate with the determined controls and necessary for administration and reporting requirements.

As part of this assessment the Licence has also been updated to the new licence format currently in use by DWER and have amalgamated licence conditions from issued amendment notices into a single licence instrument.

The expiry date of the licence has been extended to 19 August 2039. In accordance with DWER *Guidance Statement; Licence duration* (2016) the expiry date has been extended to the maximum 20 years. DWER notes that it may review the appropriateness and adequacy of controls at any time and that, following a review, DWER may initiate amendments to the licence under the EP Act.

**Tim Gentle**

**Manager – Resource Industry**

Delegated Officer under section 20 of the *Environmental Protection Act 1986*

## Appendix 1: Key documents

	Document title	In text ref	Availability
1.	Licence renewal application form, Kailis Gold Project, Saracen Metals Pty Ltd, 5 April 2018	Renewal Application 2019	DWER records DWEDT150696
2.	Response to request for additional supporting documentation, received 17/06/2019 9:13AM, Kellie Carter, Environmental Advisor Saracen Metals Pty Limited.		DWER records DWERDR168607
3.	Response to request for additional supporting documentation, received 26/6/2019 3:42, Kellie Carter, Environmental Advisor Saracen Metals Pty Limited.		DWER records (A1801741)
4.	Kailis Gold Project, kailis to Harbour Lights Dewatering Environmental Management Plan (EMP), Saracen Metals Pty Ltd, Document SM-EN-PL-2018 V1, 25 February 2016	EMP, 2016	DWER records (A1464688)
5.	Kailis Gold Project – Assessment of Impact of Water Disposal to Harbour Lights Pit, Report for Saracen Mineral Holdings & St Barbara Ltd, March 2016, Rockwater PTY limited, report no 263-5/16/01a.	Rockwater PTY limited, 2016	DWER records (A146581)
6.	Kailis Operations Annual Environmental Report 2018, Saracen Metals Pty Ltd, October 2018	AER, 2018	DWER records (A1733738)
7.	North-Easter Goldfields Operations, Combined Groundwater Operating Strategy, Version 7, Saracen Metals Pty Ltd, 20 February 2019.	Operating strategy, 2019	DWER records DWERDR168607
8.	DER, August 2016. <i>Guidance Statement: Licence duration</i> . Department of Environment Regulation, Perth.	Guidance Statement: Licence duration.	Accessed at <a href="http://www.dwer.wa.gov.au">www.dwer.wa.gov.au</a>

## Appendix 2: Summary of applicant's comments on risk assessment and draft conditions

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Condition	Summary of Licence Holder comment	DWER response
-	The draft licence does not have correct premises details, not all of the premises tenements are listed. The Decision report has the correct details.	This was a mistake on DWERs behalf. The premises tenement details have been updated on the licence to the correct details.



## Attachment 1: Revised Licence L8532/2011/2

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