

# BHP Nickel West Mt Keith Satellite Project

## COMPLIANCE ASSESSMENT REPORT 2020

STATEMENT 1087

March 2021



## Document Amendment Record

Version	Page No.	Version Description	Key Changes	Date
A	-	Draft for BHP Internal Review BHP Nickel West HSEC (S Hawkins, G Manning)	-	04.02.2021
B	-	Draft for BHP Approval BHP Nickel West HSEC (S Hawkins, G Manning)	-	15.03.2021
0	-	Final for BHP issue to EPA BHP Nickel West HSEC (S Hawkins, G Manning)	-	25.03.2021

## Endorsement

I have reviewed this Compliance Assessment Report prepared to meet the requirements of Condition 4-6 of the Statement 1087 approval for the Mt Keith Satellite Project, and accept that the information provided is an accurate account of the activities undertaken during the reporting period.



Christopher Stone  
General Manager Northern Operations  
BHP Billiton Nickel West Pty Ltd  
25 March 2021

## Executive Summary

BHP Billiton Nickel West Pty Ltd (BHP Nickel West) was granted environmental approval of the Mt Keith Satellite Project (the 'Project') in December 2018 by the Western Australian Minister for Environment in accordance with Section 45(5) of the *Environmental Protection Act 1986* (WA).

Works on the Project commenced in February 2019, which to date have included the clearing and establishment of the initial operating areas (Haul Road, Mine Pits, Waste Rock Landform and Mine Ore Pad) and the commencement of productive mining of ore from both the Six Mile Well Mine Pit and the Goliath Mine Pit. Implementation of the Project is currently expected to continue until approximately 2030+.

Condition 4-6 of the Statement 1087 approval requires BHP Nickel West to submit an annual Compliance Assessment Report which outlines the status of implementation of the Project and compliance with the approval conditions. This Report outlines the implementation status and compliance for the Project covering the period of 28 December 2019 to 31 December 2020. BHP Nickel West was in compliance with all conditions of the Statement 1087 approval during the reporting period.

# Contents

Document Amendment Record	2
Endorsement	2
Executive Summary	3
1.Introduction	5
2.Purpose and Scope	7
3.Project Status	7
4.Statement of Compliance	7
4.1 Audit Table	8
5.Proposed Changes to the Compliance Assessment Plan	16
6.References	17
7.Appendices	19
7.1 Appendix 1 - BHP Nickel West Statement of Compliance	
7.2 Appendix 2 – Groundwater Abstraction Monitoring Data	
7.3 Appendix 3 – Stantec (2021) 2020 Flora and Vegetation Monitoring Report	
7.4 Appendix 4 – Astron (2021) Remote Sensing Desktop Assessment	
7.5 Appendix 5 - Hydrological Processes EMP	
7.6 Appendix 6 - Mine Closure Plan	

# 1. Introduction

The Mt Keith Satellite Project (the 'Project') is for a satellite mining operation as an extension to the existing Mt Keith Nickel Mine<sup>1</sup>. The Project comprises two Mine Pits, a Waste Rock Landform, Support Infrastructure and a Haul Road, requiring the clearing of up to 1,069 hectares (ha) of native vegetation within a Development Envelope of 1,265 ha, as identified by Figure 1.

BHP Billiton Nickel West Pty Ltd (BHP Nickel West) referred the Project to the Environmental Protection Authority (EPA) in May 2017 in accordance with Section 38 of the *Environmental Protection Act 1986* (WA) (BHP Nickel West 2017). The EPA (2017) determined the Project required an environmental assessment, with the key assessment factors including 'Flora and Vegetation', 'Inland Waters', 'Social Surroundings' (Aboriginal Heritage) and 'Air Quality'. An 'Environmental Review' document (Environmental Impact Assessment) assessing the potential environmental effects of the Project was additionally prepared to assist the EPA assessment (BHP Nickel West 2018a).

The EPA (2018) assessment concluded the Project could be implemented subject to recommended conditions to ensure the potential environmental effects of the Project were appropriately managed. Following the advice of the EPA (2018), the Project was subsequently approved by the WA Minister for Environment (2018) through the Statement 1087 approval granted in accordance with Section 45(5) of the *Environmental Protection Act 1986* (WA).

Implementation of the Project commenced in February 2019, which to date has included the clearing and establishment of the initial operating areas (Haul Road, Mine Pits, Waste Rock Landform and Mine Ore Pad) and the commencement of productive ore mining from both the Six Mile Well Mine Pit and the Goliath Mine Pit.

Implementation of the Project is expected to occur over a period of 10+ years, with the cessation of mining (and the commencement of mine closure) estimated to occur from approximately 2030+.

<sup>1</sup> Note: The Mt Keith Nickel Mine commenced operations in 1993. The existing components of the Mt Keith Nickel Mine do not form part of the approved Project, and accordingly, are not addressed within this CAR document.

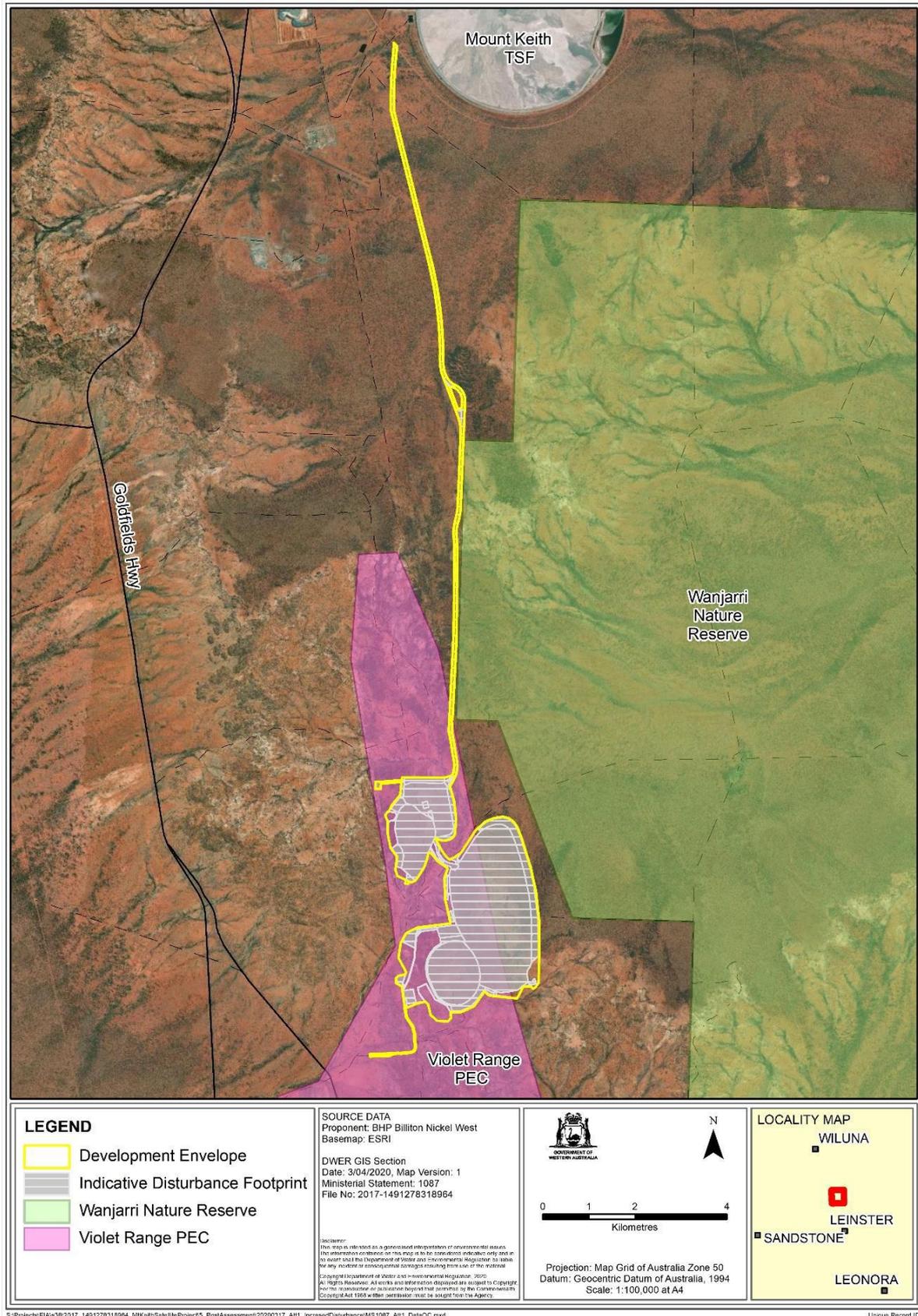


Figure 1. Project Area (Source: WA Minister for Environment 2018 (as amended))

## 2. Purpose and Scope

Condition 4-6 of the Statement 1087 approvals requires the submission of an annual Compliance Assessment Report (CAR) document which outlines the status of implementation of the Project and compliance with the approval conditions.

This CAR outlines the implementation and compliance status of the Project for the period of 28 December 2019 to 31 December 2020, and aligns with the requirements of the approved Compliance Assessment Plan (BHP Nickel West 2020a) under Condition 4-1 of the Statement 1087 approval.

This CAR document is the second CAR document to be submitted for the Project under the Statement 1087 approval, following from the first CAR document submitted in 2020 (BHP Nickel West 2020b).

This CAR document also follows a separate Audit Report prepared by the State Department of Water and Environmental Regulation (DWER) (DWER 2020a) from 2020 which independently verified BHP Nickel West's ongoing compliance with the conditions of the Statement 1087 approval.

## 3. Project Status

BHP Nickel West commenced implementation of the Project in February 2019. To date, implementation of the Project has included:

- Clearing and establishment of the initial operating areas (Haul Road, Mine Pits, Waste Rock Landform and Mine Ore Pad); and
- Commencement of productive mining of ore from both the Six Mile Well Mine Pit and the Goliath Mine Pit.

Ore supplied from the Project is now the primary product processed at the Mt Keith Nickel Mine.

Implementation of the Project is expected to occur over a period of 10+ years, with the cessation of mining (and the commencement of mine closure) estimated to occur from approximately 2030+.

## 4. Statement of Compliance

A completed Audit Table (consistent with the approved Compliance Assessment Plan (BHP Nickel West 2020a)) is provided in Section 4.1 to outline compliance with the conditions of the Statement 1087 approval. The Audit Table verifies that BHP Nickel West was in compliance with all conditions of the Statement 1087 approval during the reporting period. Nil non-compliance items occurred during the reporting period.

A completed and signed Statement of Compliance form (prepared using the DWER (2018) form 'PAF2 - Statement of Compliance – 2018') is provided at Appendix 1.

## 4.1 Audit Table

### AUDIT TABLE Mt Keith Satellite Project, Statement No.1087

- Phases that apply in this table = Pre-Construction, Construction, Operation, Decommissioning, Overall (several phases).
- This audit table is a summary and timetable of conditions and commitments applying to this project. Refer to the Minister's Statement for full detail/precise wording of individual elements.
- Code prefixes: M = Implementation condition; P = Proponent's commitment; N = Procedure.
- Compliance status: C = Compliant, CLD = Completed, NC = Non-compliant, NR = Not required at this stage. Please note terms NA = Not Audited and VR = Verification Required are only for EPA use. IP = In Process may only be used by the proponent in circumstances outlined in Section 2.8 of the *Post Assessment Guideline for Preparing an Audit Table*.

Table 1: Mt Keith Satellite Operation Audit Table (28 December 2019 to 31 December 2020).

AUDIT CODE	SUBJECT	REQUIREMENT	HOW	EVIDENCE	PHASE	TIMEFRAME	STATUS	FURTHER INFORMATION
1087:M1.1	<b>Proposal Implementation</b>	When implementing the proposal, the proponent shall not exceed the authorised extent of the proposal as defined in Table 2 of Schedule 1, unless amendments to the proposal and the authorised extent of the proposal have been approved under the EP Act.	Implement the Project in accordance with criteria outlined in Schedule 1.	Compliance Assessment Reports.	Overall	For the life of the Proposal.	COMPLIANT	<p>Table 2 of Schedule 1 of the Statement 1087 approval, as amended by Attachment 1 to the Statement 1087 approval under s45C in September 2020, authorises the clearing of up to 1,069 hectares (ha) of native vegetation within a 1,265 ha Development Envelope. To date, a total of 622.7 ha of native vegetation has been cleared within the Development Envelope; being within the total 1,069 ha authorised limit. No clearing of native vegetation beyond the Development Envelope has been undertaken for the Project. The area of native vegetation clearing undertaken to date, and the extent of the approved Development Envelope, is identified at Figure 2.</p> <p>Table 2 of Schedule 1 of the Statement 1087 approval authorises groundwater abstraction (mine pit dewatering) of up to 0.4 gigalitres (GL) per year (y) using bores and pit sumps. A total of 0.36 GL (355,819 kilolitres (KL)) of groundwater was abstracted during the reporting period; being within the 0.4 GL/y authorised limit. Groundwater abstractions records to verify the mine pit dewatering volumes from each bore/sump is provided in Appendix 2.</p>
1087:M2.1	<b>Contact Details</b>	The proponent shall notify the CEO of any change of its name, physical address or postal address for the serving of notices or other correspondence within twenty-eight (28) days of such change. Where the proponent is a corporation or an association of persons, whether incorporated or not, the postal address is that of the principal place of business or of the principal office in the State.	Notify the CEO of any change in proponent details.	Written notification to the CEO of any change in proponent details.	Overall	Within 28 days of such change.	NOT REQUIRED	No change to the Proponent name, physical address or postal address has occurred during the reporting period, and accordingly, no notification to the DWER CEO has been required.
1087:M3.1	<b>Time Limit for Proposal Implementation</b>	The proponent shall not commence implementation of the proposal after five (5) years from the date on this Statement, and any commencement, prior to this date, must be substantial.	Notify the CEO advising proposal has not commenced implementation.	Written notification to the CEO.	Overall	After 28 December 2023.	COMPLETED	Implementation of the Project commenced in February 2019 with the construction and operation of the Project. Implementation of the Project is considered to be 'substantial'. Compliance with Condition 3-1 is now completed.
1087:M3.2	<b>Time Limit for Proposal Implementation</b>	Any commencement of implementation of the proposal, on or before five (5) years from the date of this Statement, must be demonstrated as substantial by providing the CEO with written evidence, on or before the expiration of five (5) years from the date of this Statement.	N/A.	Compliance Assessment Reports.	Overall	Within 5 years from the date of Statement 1087, being on or before 28 December 2023.	COMPLETED	Implementation of the Project commenced in February 2019 with the construction and operation of the Project. Implementation of the Project is considered to be 'substantial'. Written evidence demonstrating substantial commencement of the Project was provided to the DWER CEO in March 2020 through submission of the first CAR document (BHP Nickel West 2020b). Compliance with Condition 3-2 is now completed.
1087:M4.1	<b>Compliance Reporting</b>	The proponent shall prepare, and maintain a Compliance Assessment Plan which is submitted to the CEO at least six (6) months prior to the first Compliance Assessment Report required by condition 4-6, or prior to implementation of the proposal, whichever is sooner.	Submit Compliance Assessment Plan to the CEO.	Compliance Assessment Plan (this document).	Pre-construction	At least six (6) months prior to the first Compliance Assessment Report required by condition 4-6, or prior to implementation of the proposal, whichever is sooner.	COMPLIANT	<p>A Compliance Assessment Plan (CAP) document (BHP Nickel West 2019a) was initially submitted to the DWER CEO in September 2019, with the DWER CEO granting initial approval of the CAP document in October 2019.</p> <p>The current version of the CAP document (Revision 2, BHP Nickel West 2020a) was approved by the DWER CEO in October 2020 (DWER 2020b).</p>

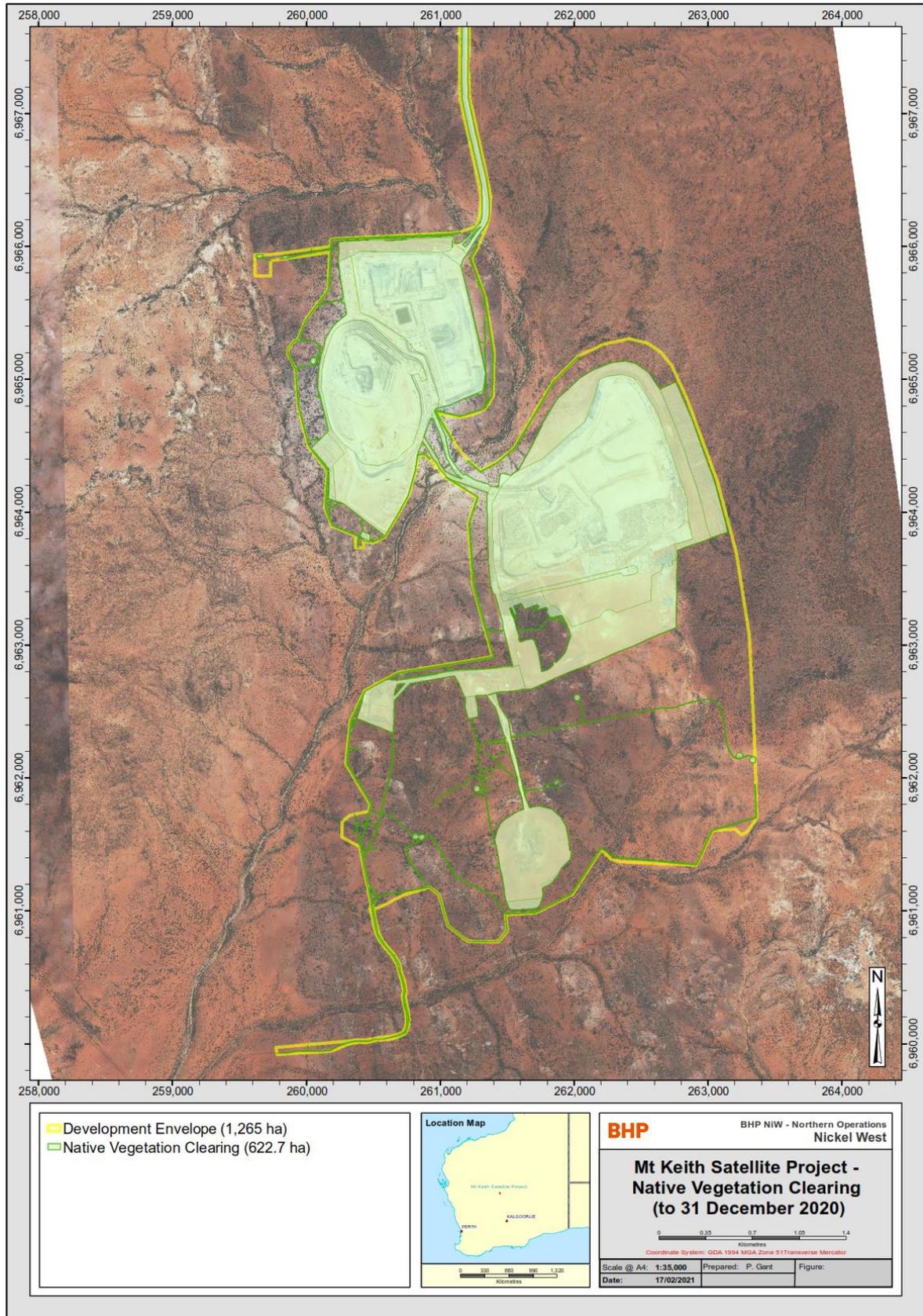
AUDIT CODE	SUBJECT	REQUIREMENT	HOW	EVIDENCE	PHASE	TIMEFRAME	STATUS	FURTHER INFORMATION
								BHP Nickel West will continue to review and maintain the CAP document, as required from time to time, to ensure ongoing compliance with Condition 4-1.
1087:M4.2	<b>Compliance Reporting</b>	The Compliance Assessment Plan shall indicate: (1) the frequency of compliance reporting; (2) the approach and timing of compliance assessments; (3) the retention of compliance assessments; (4) the method of reporting of potential non-compliances and corrective actions taken; (5) the table of contents of Compliance Assessment Reports; and (6) public availability of Compliance Assessment Reports.	Submit Compliance Assessment Plan to the CEO.	Compliance Assessment Plan (this document).	Pre-construction	At least six (6) months prior to the first Compliance Assessment Report required by condition 4-6, or prior to implementation of the proposal, whichever is sooner.	COMPLIANT	<p>A Compliance Assessment Plan (CAP) document (BHP Nickel West 2019a) was initially submitted to the DWER CEO in September 2019, with the DWER CEO granting initial approval of the CAP document in October 2019.</p> <p>The current version of the CAP document (Revision 2, BHP Nickel West 2020a) was approved by the DWER CEO in October 2020 (DWER 2020b).</p> <p>In accordance with Condition 4-2, the approved CAP document identifies:</p> <ul style="list-style-type: none"> <li>• frequency of compliance reporting;</li> <li>• approach and timing of compliance assessments;</li> <li>• retention of compliance assessments;</li> <li>• method of reporting of potential non-compliances and corrective actions taken;</li> <li>• table of contents of Compliance Assessment Reports; and</li> <li>• public availability of Compliance Assessment Reports.</li> </ul> <p>BHP Nickel West remains in compliance with the requirements of Condition 4-2.</p>
1087:M4.3	<b>Compliance Reporting</b>	After receiving notice in writing from the CEO that the Compliance Assessment Plan satisfies the requirements of condition 4-2 the proponent shall assess compliance with conditions in accordance with the Compliance Assessment Plan required by condition 4-1.	Implementation of Compliance Assessment Plan.	Notice in writing from the CEO and Compliance Assessment Reports.	Overall	Ongoing as per requirements of CAP.	COMPLIANT	<p>Notice in writing that the current version of the CAP document satisfies Condition 4-2 was received from the DWER CEO in October 2020.</p> <p>This Compliance Assessment Report (CAR) document provides an assessment of compliance with the conditions of the Statement 1087 approval consistent with the approved CAP document. Submission of this CAR document ensures that BHP Nickel West remains in compliance with the requirements of Condition 4-2.</p>
1087:M4.4	<b>Compliance Reporting</b>	The proponent shall retain reports of all compliance assessments described in the Compliance Assessment Plan required by condition 4-1 and shall make those reports available when requested by the CEO.	Retain records in accordance with Compliance Assessment Plan.	Written response to request by CEO.	Overall	When requested by CEO.	COMPLIANT	<p>Submitted CAR documents will be retained by BHP Nickel West for the duration of the Project in accordance with standard document control practices, as outlined within the approved CAP document.</p> <p>No requests were received from the DWER CEO during the reporting period to make additional copies of the submitted CAR documents available.</p>
1087:M4.5	<b>Compliance Reporting</b>	The proponent shall advise the CEO of any potential non-compliance within seven (7) days of that non-compliance being known.	Notification of the CEO via an email to compliance@dwer.wa.gov.au which will include any corrective actions taken to address the potential non-compliance.	Written correspondence to CEO.	Overall	Within 7 days of the potential non-compliance being known.	COMPLIANT	<p>Nil potential non-compliance items were identified for the Project during the reporting period. Accordingly, BHP Nickel West has not been required to provide advice to the DWER CEO of any potential non-compliance during the reporting period.</p>
1087:M4.6.1	<b>Compliance Reporting</b>	The proponent shall submit to the CEO the first Compliance Assessment Report fifteen (15) months from the date of issue of this Statement addressing the twelve (12) month period from the date of issue of this Statement and then annually from the date of submission of the first Compliance Assessment Report, or as otherwise agreed in writing by the CEO.	Submit Compliance Assessment to the CEO.	Compliance Assessment Reports.	Overall	The first report to be submitted by 28 March 2020 and from then on annual by 28 March each year.	COMPLIANT	<p>The first CAR document (BHP Nickel West 2020b) was submitted to the DWER CEO in March 2020 addressing compliance with the conditions for the first 12 month period following the granting of the Statement 1087 approval.</p> <p>This CAR document presents the second report addressing compliance with the conditions of the Statement 1087 approval, and is submitted annually after the first CAR document) for a reporting period covering 28 December 2019 to 31 December 2020.</p>

AUDIT CODE	SUBJECT	REQUIREMENT	HOW	EVIDENCE	PHASE	TIMEFRAME	STATUS	FURTHER INFORMATION
								As outlined in Section 5 <i>Proposed Changes to the Compliance Assessment Plan</i> , BHP Nickel West proposes that future CAR documents cover the financial year period 1 July to 30 June, with submission by 30 October (to align to other standard Government financial year reporting requirements). The request for agreement of the DWER CEO for this change is outlined in Section 5.
1087:M4.6.2	<b>Compliance Reporting</b>	The Compliance Assessment Report shall: (1) be endorsed by the proponent's Chief Executive Officer or a person delegated to sign on the Chief Executive Officer's behalf; (2) include a statement as to whether the proponent has complied with the conditions; (3) identify all potential non-compliances and describe corrective and preventative actions taken; (4) be made publicly available in accordance with the approved Compliance Assessment Plan; and (5) indicate any proposed changes to the Compliance Assessment Plan required by condition 4-1.	Compliance Assessment Report developed in accordance with the approved Compliance Assessment Plan.	Compliance Assessment Reports.	Overall	The first report to be submitted by 28 March 2020 and from then on annual by 28 March each year.	COMPLIANT	<p>This CAR document has been endorsed by the General Manager of BHP Nickel West, as an authorised delegate of the CEO of BHP Nickel West.</p> <p>BHP Nickel West has complied with all conditions of the Statement 1087 approval during the reporting period. Statements to this effect are included within this CAR document.</p> <p>Nil potential non-compliances with the conditions of the Statement 1087 approval occurred during the reporting period. Accordingly, no corrective or preventative actions have been required to address potential non-compliances.</p> <p>Following approval of this CAR document by the DWER CEO, this CAR document will be made publicly available through the BHP Nickel West website as outlined by the approved CAP report (refer to <a href="https://www.bhp.com/sustainability/environment/regulatory-information/">https://www.bhp.com/sustainability/environment/regulatory-information/</a>).</p> <p>Proposed changes to the CAP document are outlined in Section 5 <i>Proposed Changes to the Compliance Assessment Plan</i>.</p>
1087:M5.1	<b>Public Availability of Data</b>	Subject to condition 5-2, within a reasonable time period approved by the CEO of the issue of this Statement and for the remainder of the life of the proposal the proponent shall make publicly available, in a manner approved by the CEO, all validated environmental data (including sampling design, sampling methodologies, empirical data and derived information products (e.g. maps)) management plans and reports relevant to the assessment of this proposal and implementation of this Statement.	To be determined in consultation with CEO.	Written advice from CEO confirming manner approved.	Overall	To be determined in consultation with the CEO.	COMPLIANT	<p>Environmental data, management plans and reports relevant to the EPA assessment of the Project are publicly available through the EPA website (refer to <a href="https://www.epa.wa.gov.au/proposals/mt-keith-satellite-project">https://www.epa.wa.gov.au/proposals/mt-keith-satellite-project</a>). This public availability of the Project assessment information is considered to be appropriate, with further actions for the public availability of the assessment information by BHP Nickel West not considered to be considered necessary.</p> <p>Environmental data, management plans and reports relevant to the implementation of the Statement 1087 approval are publicly available through the BHP website (refer to <a href="https://www.bhp.com/sustainability/environment/regulatory-information/">https://www.bhp.com/sustainability/environment/regulatory-information/</a>). To date, this publicly available information includes:</p> <ul style="list-style-type: none"> <li>• Flora and Vegetation Environmental Management Plan (EMP) (BHP Nickel West 2019b);</li> <li>• Compliance Assessment Plan (BHP Nickel West 2020a); and</li> <li>• Compliance Assessment Report 2019 (BHP Nickel West 2020b).</li> </ul> <p>Following approval by the DWER CEO, this CAR document will additionally be made publicly available through the BHP website.</p> <p>To note, the DWER CEO has not provided written advice to BHP Nickel West on the approved manner or the timing for the public availability of information required under Condition 5-1 of the Statement 1087 approval. BHP Nickel West consider the above actions for public availability to meet the intent of Condition 5-1 and the objectives of the DWER CEO for the public availability of environmental data, management plans and reports.</p>
1087:M5.2	<b>Public Availability of Data</b>	If any data referred to in condition 5-1 contains particulars of: (1) a secret formula or process; or (2) confidential commercially sensitive information; the proponent may submit a request for approval from the CEO to not make these data publicly available. In making such a request the proponent	Proponent request to CEO to not make certain data publicly available, including explanation and reason why.	Notice in writing to CEO notifying of any information not to be made publicly available.	Overall	As required from time to time.	NOT REQUIRED	<p>No requests were made by BHP Nickel West to the CEO DWER to not make environmental data publicly available during the reporting period.</p> <p>Consistent with standard practices, BHP Nickel West will seek to ensure public availability of all environmental data which relates to the implementation of, and compliance with, the Statement 1087 approval.</p>

AUDIT CODE	SUBJECT	REQUIREMENT	HOW	EVIDENCE	PHASE	TIMEFRAME	STATUS	FURTHER INFORMATION
		shall provide the CEO with an explanation and reasons why the data should not be made publicly available.						
1087:M6.1	Flora and Vegetation Management Plan	The proponent shall implement the proposal to meet the following environmental objective: (1) Avoid, where possible, and minimise indirect impacts as far as practicable to Priority flora, the Violet Range PEC and the Wanjarri Nature Reserve.	Implement the proposal in accordance with the Flora and Vegetation Environmental Management Plan (FVEMP).	MKS FVEMP.  Compliance Assessment Reports.	Overall	The first report to be submitted by 28 March 2020 and from then on annual by 28 March each year.	COMPLIANT	BHP Nickel West has implemented the Project to avoid and minimise, where possible, indirect effects to DBCA-classified 'priority' flora taxa, the Violet Range 'priority' ecological community and the adjacent 'Class A' Wanjarri Nature Reserve. The avoidance / minimisation measures have been implemented through the Flora and Vegetation EMP (BHP Nickel West 2019b) (as described below under Condition 6-3).
1087:M6.2	Flora and Vegetation Management Plan	In order to meet the requirements of condition 6-1, the proponent shall implement the Flora and Vegetation Environmental Management Plan (Version 0, September 2018).	Implement the proposal in accordance with the FVEMP.	MKS FVEMP  Compliance Assessment Reports.	Overall	Throughout the life of the Project.  Annual compliance assessment reporting commencing 28 March 2020.	NOT REQUIRED	The Flora and Vegetation EMP dated September 2018 (Version 0) submitted during the Project assessment phase has since been revised in accordance with Condition 6-3 (below). Accordingly, implementation of the previous revision of the Flora and Vegetation EMP under Condition 6-2 is no longer required, with implementation of the revised/approved Flora and Vegetation EMP to be regulated in accordance with Condition 6-3 (as addressed below).
1087:M6.3	Flora and Vegetation Management Plan	The proponent shall implement the most recent version of the Flora and Vegetation Environmental Management Plan which the CEO has confirmed by notice in writing, addresses the requirements of condition 6-1, on advice of the Department of Biodiversity, Conservation and Attractions.	Implement the current and most recent version of the FVEMP.	Written notice from CEO confirming the FVEMP addresses condition 6-1, on advice from DBCA.  Compliance Assessment Reports	Overall	Throughout the life of the Project.  Annual compliance assessment reporting commencing 28 March 2020.	COMPLIANT	<p>The current revision of the Flora and Vegetation EMP (BHP Nickel West 2019b, Revision 0.2) was approved by the DWER CEO in February 2021 (DWER 2021).</p> <p>Consistent with the approved Flora and Vegetation EMP, the environmental management actions implemented to minimise the direct and potential indirect effects of the Project to flora and vegetation values has included:</p> <ul style="list-style-type: none"> <li>Implementation of the Environmental Heritage Impact Assessment process (internal process) prior to land disturbance (control of direct effects).</li> <li>Environmental monitoring within pre-defined quadrats for: <ul style="list-style-type: none"> <li>DBCA-classified 'priority' native flora taxa (tagged individuals);</li> <li>vegetation communities; and</li> <li>introduced flora taxa (weeds)</li> </ul>                     at defined monitoring sites located in close proximity to Project and distant from the Project (control sites).</li> <li>Hygiene inspections of equipment and vehicles to minimise the risk of introduction of introduced flora taxa (weeds), with targeted spray control for any identified infestations.</li> </ul> <p>The key environmental outcomes from the implementation of the management actions in the Flora and Vegetation EMP has notably included:</p> <ul style="list-style-type: none"> <li>All clearing of native vegetation for the Project has occurred within the authorised Development Envelope (spatial area), and within the total authorised clearing limit (area in hectares);</li> <li>Maintenance of plant health condition of tagged DBCA-classified 'priority' flora taxa adjacent to the Project (compared to control sites);</li> <li>No measurable effect to vegetation condition in proximity to the Project (including for the Violet Range 'priority' ecological community and the adjacent 'Class A' Wanjarri Nature Reserve), with no measured exceedance of trigger criteria or threshold criteria; and</li> <li>No recorded new infestations of introduced flora taxa, and no exceedance of trigger criteria or threshold criteria for the extent of weed occurrence.</li> </ul> <p>The results of the environmental monitoring which demonstrate the above key outcomes are outlined within the following consultant reports:</p> <ul style="list-style-type: none"> <li>Stantec Australia Pty Ltd (2021) <i>Mt Keith Satellite 2020 Flora and Vegetation Monitoring Report</i>. Report prepared by Duncan L of</li> </ul>

AUDIT CODE	SUBJECT	REQUIREMENT	HOW	EVIDENCE	PHASE	TIMEFRAME	STATUS	FURTHER INFORMATION
								<p>Stantec Australia Pty Ltd for BHP Billiton Nickel West Pty Ltd. March 2021.</p> <ul style="list-style-type: none"> <li>Astron Environmental Services Pty Ltd (2021) <i>Mt Keith Remote Sensing Analysis</i>. Report prepared by Fisk C (Dr.) of Astron Environmental Services Pty Ltd for BHP Billiton Nickel West Pty Ltd. March 2021.</li> </ul> <p>A copy of the environmental monitoring reports by Stantec (2021) and Astron (2021) are provided in Appendix 3 and Appendix 4, respectively.</p> <p>The Stantec (2021) monitoring report outlines a general decline in flora and vegetation health condition at both 'impact' and 'control' monitoring sites. This is further highlighted in the Astron (2021) remote sensing data which confirms the health condition decline occurring over a much larger area. The recording of the health condition decline across a broad spatial area indicates the decline is not caused by the Project. Review of meteorological data for the local area suggests the health condition decline can be attributed to an extended 2-year period of substantially low rainfall; with the 2019 rainfall (~ 140 mm) followed by 2020 rainfall (~100 mm) representing a 45 % then a 60 % decline in comparison to the long-term annual average rainfall (~ 250 mm/y) (BoM 2021a, 2021b). This rainfall data includes multiple months in which either Nil or &lt; 0.1 mm of rainfall fell over consecutive months. Whilst acknowledging that the declining rainfall may have had a detrimental effect to the environmental values present (flora and vegetation, terrestrial fauna), it can be reasonably expected that a return to near-average annual rainfall over multiple future years will enable the recovery of the vegetation health condition.</p> <p>To note, the environmental monitoring completed during 2019 and 2020 for DBCA-classified 'priority' flora taxa has occurred at a quarterly frequency (first 2 years of Project operations in spring, summer, autumn and winter). As outlined within the approved Flora and Vegetation EMP (BHP Nickel West 2019b), future environmental monitoring DBCA-classified 'priority' flora taxa will be undertaken at an annual frequency (spring). The environmental monitoring for vegetation condition will remain unchanged, with monitoring to continue at an annual frequency (spring).</p>
1087:M6.4	<b>Flora and Vegetation Management Plan</b>	The proponent shall continue to implement the Flora and Vegetation Environmental Management Plan (Version 0, September 2018), or any subsequent revisions as approved by the CEO in condition 6-3, until the CEO has confirmed by notice in writing that the plan meets the objective specified in condition 6-1.	Implement the current and most recent version of the FVEMP.	Compliance Assessment Reports.  Written notice from CEO confirming that the objective specified in condition 6-1 has been met.	Overall	Throughout the life of the Project until CEO confirms in writing that the objective specified in condition 6-1 has been met.  Annual compliance assessment reporting commencing 28 March 2020.	COMPLIANT	The Flora and Vegetation EMP (BHP Nickel West 2019b, Revision 0.2) continues to be implemented for the Project as described above under Condition 6-3.
1087:M7.1	<b>Aboriginal Heritage</b>	Prior to the commencement of ground-disturbing activities, the proponent shall consult with the Tjjarl Native Title Claim Group and ensure that the proponent has complied with its obligations under the <i>Aboriginal Heritage Act 1972</i> .	Consult with the Tjjarl Native Title Claim Group and comply with obligations under the <i>Aboriginal Heritage Act 1972</i> .	Compliance Assessment Report.	Pre-construction	Prior to commencement of ground-disturbing activities.	COMPLETED	<p>As described within the first CAR document (BHP Nickel West 2020b), consultation with the Tjjarl Native Title Claim Group and BHP Nickel West occurred prior to the commencement of ground disturbing activities for the Project, with a summary of this consultation supplied to the DWER CEO to verify compliance with Condition 7-1. The requirements of Condition 7-1 for consultation prior to the commencement of ground disturbing activities has been completed.</p> <p>To note, ongoing consultation with the Tjjarl Native Title Claim Group and BHP Nickel West will continue to occur during operation of the Project in accordance with the cultural agreement between the parties. Further reporting under Condition 7-1 of the Statement 1087 for consultation with the Tjjarl Native Title Claim Group during ongoing operations is not proposed (as Condition 7-1 relates only to pre-construction consultation).</p>

AUDIT CODE	SUBJECT	REQUIREMENT	HOW	EVIDENCE	PHASE	TIMEFRAME	STATUS	FURTHER INFORMATION
								<p>BHP Nickel West obtained Consent approval under Section 18 of the <i>Aboriginal Heritage Act 1972 (WA)</i> prior to the commencement of commencement of ground disturbing activities for the Project which may affect sites or objects of Aboriginal heritage value (WA Minister for Aboriginal Affairs 2019). The requirements of Condition 7-1 for compliance with obligations under the <i>Aboriginal Heritage Act 1972 (WA)</i> prior to the commencement of ground disturbing activities has been completed.</p> <p>To note, ongoing compliance with the <i>Aboriginal Heritage Act 1972 (WA)</i> will continue to occur during operation of the Project in accordance with the granted Section 18 Consent approval. Further reporting under Condition 7-1 of the Statement 1087 for compliance with the <i>Aboriginal Heritage Act 1972 (WA)</i> and the conditions of the Section 18 Consent is not proposed (as Condition 7-1 is only applicable for pre-construction), with ongoing compliance to be reported through the State Department of Planning, Lands and Heritage.</p>
1087:M8.1	<b>Greenhouse Gas Reporting</b>	The proponent shall publicly report the greenhouse gas emissions from the proposal on an annual basis, in a manner approved by the CEO.	To be determined in consultation with CEO.	Written notice form CEO approving manner of reporting.	Overall	<p>Throughout the life of the Project.</p> <p>Annual reporting in accordance with the National Greenhouse and Energy Reporting Scheme (NGERS).</p>	COMPLIANT	<p>As identified in the first CAR document, BHP Nickel West reports greenhouse gas emissions through NGERS, with the first report on greenhouse gas emissions from the Project submitted during 2020. The NGERS provides a national framework for all large companies to report emissions data, with the NGERS website providing the repository for all emissions data across Australia.</p> <p>As acknowledged by the DWER (2020a) Compliance Audit, emissions data from the Project will continue to be publicly reported through the NGERS framework as the manner approved by the DWER CEO (in lieu of reporting through an annual CAR document).</p>



Document Path: Y:\Jobs\A201\_A100\A9603\Project\A96\_02\_MKS\_Clearing\_Cat3\_Figure1\_RevA.mxd

**Figure 2a. Native Vegetation Clearing within Development Envelope** (refer Condition 1-1). A total of 622.7 ha of native vegetation clearing has occurred within the Development Envelope; being within the total 1,069 ha clearing limit authorised under the Statement 1087 approval.



**Figure 2b. Native Vegetation Clearing within Development Envelope** (refer Condition 1-1). A total of 622.7 ha of native vegetation clearing has occurred within the Development Envelope; being within the total 1,069 ha clearing limit authorised under the Statement 1087 approval.

## 5. Proposed Changes to the Compliance Assessment Plan

BHP Nickel West has reviewed the approved CAP document (BHP Nickel West 2020a) and proposes the following changes to the CAP document:

- It is proposed that future CAR documents will cover a financial year period 1 July to 30 June annually, with submission by 30 October. The purpose of this proposed change is to better align the compliance reporting timeframes with other standard Government reporting requirements for BHP Nickel West, as well as to provide a sufficient time (4 months) for both the receipt of input external reports (e.g. consultant flora and vegetation monitoring reports) and the drafting of the CAR documentation by BHP Nickel West personnel.

Subject to agreement on the above change, the next CAR document would then be due 30 October 2021 covering the period 1 January 2021 to 30 June 2021 (6 month period), before then moving to reporting on the full financial year (12 month period) in subsequent reports.

- The CAP document in Section 2.6 identifies that annual CAR documents will include monitoring data collected to support the Hydrological Processes EMP (BHP Nickel West 2018b). As the Hydrological Processes EMP is not regulated by the conditions of the Statement 1087 approval, it is proposed the CAP document is amended to remove reference to reporting such data within future annual CAR documents. Whilst noting this requested change, it should be noted that groundwater abstraction data will continue to be reported to DWER CEO in accordance with Condition 1-1 of the Statement 1087 approval (as provided in this CAR document).
- The CAP document in Section 2.6 identifies that annual CAR documents will include monitoring data collected to support the Mine Closure Plan (BHP Nickel West 2019c). As the Mine Closure Plan is not regulated by the conditions of the Statement 1087 approval, it is proposed the CAP document is amended to remove reference to reporting such data within future annual CAR documents. The Mine Closure Plan is regulated by DMIRS under the *Mining Act 1978* (WA), with BHP Nickel West to continue to report on the monitoring data for the Mine Closure Plan through that process.

BHP Nickel West respectfully requests written notice from the DWER CEO that the above changes to the CAP document are acceptable. Following confirmation from the DWER CEO that the proposed changes are acceptable, BHP Nickel West will submit a revised CAP document (incorporating the above changes) to the DWER CEO for approval in accordance with Condition 4-1.

## 6. References

- Astron Environmental Services Pty Ltd (2021) *Mt Keith Remote Sensing Analysis*. Report prepared by Fisk C (Dr.) of Astron Environmental Services Pty Ltd for BHP Billiton Nickel West Pty Ltd. March 2021.
- BHP Billiton Nickel West Pty Ltd (2017) *Mt Keith Satellite Project*. Form for the referral of a proposal to the Environmental Protection Authority under Section 38 of the Environmental Protection Act 1986. May 2017.
- BHP Billiton Nickel West Pty Ltd (2018a) *Mt Keith Satellite Project Environmental Review*. Revision D. July 2018.
- BHP Billiton Nickel West Pty Ltd (2018b) *Hydrological Processes Environmental Management Plan – Mt Keith Satellite Project*. Revision A. April 2018.
- BHP Billiton Nickel West Pty Ltd (2019a) *Nickel West Mt Keith Satellite Project – Compliance Assessment Plan*. Version 1. September 2019.
- BHP Billiton Nickel West Pty Ltd (2019b) *Flora and Vegetation Environmental Management Plan – Mt Keith Satellite Project*. Version 0.2. December 2019.
- BHP Billiton Nickel West Pty Ltd (2019c) *Mt Keith Satellite Mine Closure Plan*. December 2019.
- BHP Billiton Nickel West Pty Ltd (2020a) *Nickel West Mt Keith Satellite Project – Compliance Assessment Plan*. Version 2. October 2020.
- BHP Billiton Nickel West Pty Ltd (2020b) *BHP Nickel West Mt Keith Satellite Project – Compliance Assessment Report*. March 2020.
- Bureau of Meteorology (2021a) *Leinster Aero Site 012314 Monthly 2020 and Annual Rainfall*. Accessed March 2021 from Bureau of Meteorology Climate Data Online at <http://www.bom.gov.au/climate/data/>.
- Bureau of Meteorology (2021b) *Leinster Aero Site 012314 Monthly 2019 and Annual Rainfall*. Accessed March 2021 from Bureau of Meteorology Climate Data Online at <http://www.bom.gov.au/climate/data/>.
- Department of Water and Environmental Regulation (2018) Post Assessment Form 2 – Statement of Compliance.
- Department of Water and Environmental Regulation (2020a) *Statement 1087 - Mt Keith Satellite Project*. Compliance audit of the Statement 1087 approval for the Mt Keith Satellite Project prepared by Da Silva K of the Department of Water and Environmental Regulation. May 2020.
- Department of Water and Environmental Regulation (2020b) *Ministerial Statement 1087 – Proposal – Compliance Assessment Plan Approval*. Letter of the Department of Water and Environmental Regulation to BHP Billiton Nickel West Pty Ltd approving a revised Compliance Assessment Plan (Revision 2) under Condition 4-1 of the Statement 1087 approval. October 2020.
- Department of Water and Environmental Regulation (2021) *Mt Keith Satellite Project – Ministerial Statement 1087 – Flora and Vegetation Management Plan - Approved*. Letter of the Department of Water and Environmental Regulation to BHP Billiton Nickel West Pty Ltd approving a revised Flora and Vegetation Environmental Management Plan (Revision 0.2) under Condition 6 of the Statement 1087 approval. February 2021.

Environmental Protection Authority (2017) *Decisions Pursuant to s.39(1) under the Environmental Protection Act 1986 - Mt Keith Satellite Project*. Assessment decision of the Environmental Protection Authority on the Mt Keith Satellite Project Referral. July 2017.

Environmental Protection Authority (2018) *Mt Keith Satellite Project*. Report and recommendations of the Environmental Protection Authority to the Western Australian Minister for Environment under Section 44 of the Environmental Protection Act 1986 (WA). Report 1625. November 2018.

Stantec Australia Pty Ltd (2021) *Mt Keith Satellite 2020 Flora and Vegetation Monitoring Report*. Report prepared by Duncan L of Stantec Australia Pty Ltd for BHP Billiton Nickel West Pty Ltd. March 2021.

Western Australian Minister for Aboriginal Affairs (2019) *Aboriginal Heritage Act 1972 Consent Pursuant to Section 18(3)*. Consent approval granted to BHP Billiton Nickel West Pty Ltd by the Western Australian Minister for Aboriginal Affairs for the Mt Keith Satellite Project. January 2019.

Western Australian Minister for Environment (2018) *Mt Keith Satellite Project*. Statement 1087 approval granted to BHP Billiton Nickel West Pty Ltd by the Western Australian Minister for Environment under s45(5) of the Environmental Protection Act 1986 (WA). December 2018.

# 7. Appendices

## 7.1 Appendix 1 - BHP Nickel West Statement of Compliance

POST ASSESSMENT FORM 2

### Statement of Compliance

#### Proposal and Proponent Details

Proposal Title	Mt Keith Satellite Project
Statement Number	1087
Proponent Name	BHP Billiton Nickel West Pty Ltd
Proponent's Australian Company Number (where relevant)	ACN 004 184 598

#### Statement of Compliance Details

Reporting Period	29/03/20 to 31/12/20
------------------	----------------------

Implementation phase(s) during reporting period (please tick ✓ relevant phase(s))							
Pre-construction	<input type="checkbox"/>	Construction	<input checked="" type="checkbox"/>	Operation	<input type="checkbox"/>	Decommissioning	<input type="checkbox"/>

Audit Table for Statement addressed in this Statement of Compliance is provided at Attachment:	Table 1
<p>An audit table for the Statement addressed in this Statement of Compliance must be provided as Attachment 2 to this Statement of Compliance. The audit table must be prepared and maintained in accordance with the Department of Water and Environmental Regulation (DWER) <i>Post Assessment Guideline for Preparing an Audit Table</i>, as amended from time to time. The 'Status Column' of the audit table must accurately describe the compliance status of each implementation condition and/or procedure for the reporting period of this Statement of Compliance. The terms that may be used by the proponent in the 'Status Column' of the audit table are limited to the Compliance Status Terms listed and defined in Table 1 of Attachment 1.</p>	

Were all implementation conditions and/or procedures of the Statement complied with within the reporting period? (please tick ✓ the appropriate box)			
No (please proceed to Section 3)	<input type="checkbox"/>	Yes (please proceed to Section 4)	<input checked="" type="checkbox"/>

Each page (including Attachment 2) must be initialed by the person who signs Section 4 of this Statement of

Compliance. INITIALS: 

**Details of Non-compliance(s) and/or Potential Non-compliance(s)**

The information required Section 3 must be provided for each non-compliance or potential non-compliance identified during the reporting period covered by this Statement of Compliance.

**Non-compliance/potential non-compliance 7-1**

Which implementation condition or procedure was non-compliant or potentially non-compliant?	
Was the implementation condition or procedure non-compliant or potentially non-compliant?	
On what date(s) did the non-compliance or potential non-compliance occur (if applicable)?	
Was this non-compliance or potential non-compliance reported to the Chief Executive Officer, DWER?	
<input type="checkbox"/> Yes <input type="checkbox"/> Reported to DWER verbally      Date _____ <input type="checkbox"/> Reported to DWER in writing      Date _____	<input type="checkbox"/> No
What are the details of the non-compliance or potential non-compliance and where relevant, the extent of and impacts associated with the non-compliance or potential non-compliance?	
What is the precise location where the non-compliance or potential non-compliance occurred (if applicable)? (please provide this information as a map or GIS co-ordinates)	
What was the cause(s) of the non-compliance or potential non-compliance?	
What remedial and/or corrective action(s), if any, were taken or are proposed to be taken in response to the non-compliance or potential non-compliance?	
What measures, if any, were in place to prevent the non-compliance or potential non-compliance before it occurred? What, if any, amendments have been made to those measures to prevent re-occurrence?	
Please provide information/documentation collected and recorded in relation to this implementation condition or procedure:	
<ul style="list-style-type: none"> <li>• in the reporting period addressed in this Statement of Compliance; and</li> <li>• as outlined in the approved Compliance Assessment Plan for the Statement addressed in this Statement of Compliance.</li> </ul> (the above information may be provided as an attachment to this Statement of Compliance)	

***For additional non-compliance or potential non-compliance, please duplicate this page as required.***

Each page (including Attachment 2) must be initialed by the person who signs Section 4 of this Statement of Compliance. INITIALS: 

**Proponent Declaration**

I, **Christopher Stone**, **General Manager Northern Operations**, (*full name and position title*) declare that I am authorised on behalf of **BHP Billiton Nickel West Pty Ltd** (*being the person responsible for the proposal*) to submit this form and that the information contained in this form is true and not misleading.

Signature: 

Date: 25 March 2021

Please note that:

it is an offence under section 112 of the *Environmental Protection Act 1986* for a person to give or cause to be given information that to his knowledge is false or misleading in a material particular; and

the Chief Executive Officer of the DWER has powers under section 47(2) of the *Environmental Protection Act 1986* to require reports and information about implementation of the proposal to which the statement relates and compliance with the implementation conditions.

**Submission of Statement of Compliance**

One hard copy and one electronic copy (preferably PDF on CD or thumb drive) of the Statement of Compliance are required to be submitted to the Chief Executive Officer, DWER, marked to the attention of Manager, Compliance (Ministerial Statements).

Please note, the DWER has adopted a procedure of providing written acknowledgment of receipt of all Statements of Compliance submitted by the proponent, however, the DWER does not approve Statements of Compliance.

**Contact Information**

Queries regarding Statements of Compliance, or other issues of compliance relevant to a Statement may be directed to Compliance (Ministerial Statements), DWER:

**Manager, Compliance (Ministerial Statements)****Department of Water and Environmental Regulation**

Postal Address: Locked Bag 10  
 Joondalup DC  
WA 6919

Phone: (08) 6364 7000

Email: [compliance@dwer.wa.gov.au](mailto:compliance@dwer.wa.gov.au)

**Post Assessment Guidelines and Forms**

Post assessment documents can be found at [www.epa.wa.gov.au](http://www.epa.wa.gov.au)

Each page (including Attachment 2) must be initialed by the person who signs Section 4 of this Statement of

Compliance. INITIALS: 

Table 2 Compliance Status Terms

Compliance Status Terms	Abbrev	Definition	Notes
Compliant	C	Implementation of the proposal has been carried out in accordance with the requirements of the audit element.	This term applies to audit elements with: <ul style="list-style-type: none"> <li>ongoing requirements that have been met during the reporting period; and</li> <li>requirements with a finite period of application that have been met during the reporting period, but whose status has not yet been classified as 'completed'.</li> </ul>
Completed	CLD	A requirement with a finite period of application has been satisfactorily completed.	This term may only be used where: <ul style="list-style-type: none"> <li>audit elements have a finite period of application (e.g. construction activities, development of a document);</li> <li>the action has been satisfactorily completed; and</li> <li>the DWER has provided written acceptance of 'completed' status for the audit element.</li> </ul>
Not required at this stage	NR	The requirements of the audit element were not triggered during the reporting period.	This should be consistent with the 'Phase' column of the audit table.
Potentially Non-compliant	PNC	Possible or likely failure to meet the requirements of the audit element.	This term may apply where during the reporting period the proponent has identified a potential non-compliance and has not yet finalized its investigations to determine whether non-compliance has occurred.
Non-compliant	NC	Implementation of the proposal has not been carried out in accordance with the requirements of the audit element.	This term applies where the requirements of the audit element are not "complete" have not been met during the reporting period.
In Process	IP	Where an audit element requires a management or monitoring plan be submitted to the DWER or another government agency for approval, that submission has been made and no further information or changes have been requested by the DWER or the other government agency and assessment by the DWER or other government agency for approval is still pending.	<b>The term 'In Process' may not be used for any purpose other than that stated in the Definition Column.</b>  The term 'In Process' may not be used to describe the compliance status of an implementation condition and/or procedure that requires implementation throughout the life of the project (e.g. implementation of a management plan).

Each page (including Attachment 2) must be initialed by the person who signs Section 4 of this Statement of Compliance. INITIALS: 

## 7.2 Appendix 2 – Groundwater Abstraction Monitoring Data

MT KEITH SATELLITE PROJECT  
WATER METER READINGS

ID	METER DESCRIPTION	JAN-20	FEB-20	MAR-20	APR-20	MAY-20	JUN-20	JUL-20	AUG-20	SEP-20	OCT-20	NOV-20	DEC-20	ANNUAL TOTAL
MKS1	MKS MINE - In pit dewatering	56,500	66,000	60,000	21,700	28,986	27,314	26,080	15,544	0	0	7,217	8,821	318,162
MKS2	MKS MINE - Ex pit bore	0	0	0	0	0	0	0	0	0	0	0	0	0
MKS3	MKS MINE - SMW Shaft	0	6,300	5,000	0	10,096	1,701	2,828	2,464	1,831	1,648	2,605	3,184	37,657
MKS4	MKS MINE - QUBE Standpipe	0	0	0	0	0	0	0	0	0	0	0	0	0
MKS5	MKS MINE - Turkeys Standpipe	0	0	0	0	0	0	0	0	0	0	0	0	0
	MONTHLY TOTAL	56,500	72,300	65,000	21,700	39,082	29,015	28,908	18,008	1,831	1,648	9,822	12,005	355,819

Volumes in kilolitres (kL)

### **7.3 Appendix 3 – Stantec (2021) Mt Keith Satellite 2020 Flora and Vegetation Monitoring Report**

**7.4 Appendix 4 – Astron (2021) Mt Keith Remote Sensing Analysis**

### 7.5 Appendix 5 - Hydrological Processes EMP

The CAP document prepared under Condition 4-1 of the Statement 1087 approval identifies that annual identifies that annual CAR reports will include monitoring information collected during implementation of the Hydrological Processes EMP. The Hydrological Processes EMP is not subject to the conditions of the Statement 1087 approval.

The Hydrological Processes EMP was implemented during the reporting period, key components include:

- Weather data;
- Jones Creek peak flow water level;
- Monitoring of groundwater bores; and
- No sediment or water pool sampling was conducted during the period.

With specific regard to groundwater, the quarterly monitoring has identified continued localised groundwater drawdown in the monitoring bores within close proximity to the Six Mile Well shaft; as predicted by modelling completed prior to Project implementation. The monitoring bores at the Goliath Mine Pit do not indicate notable groundwater drawdown.

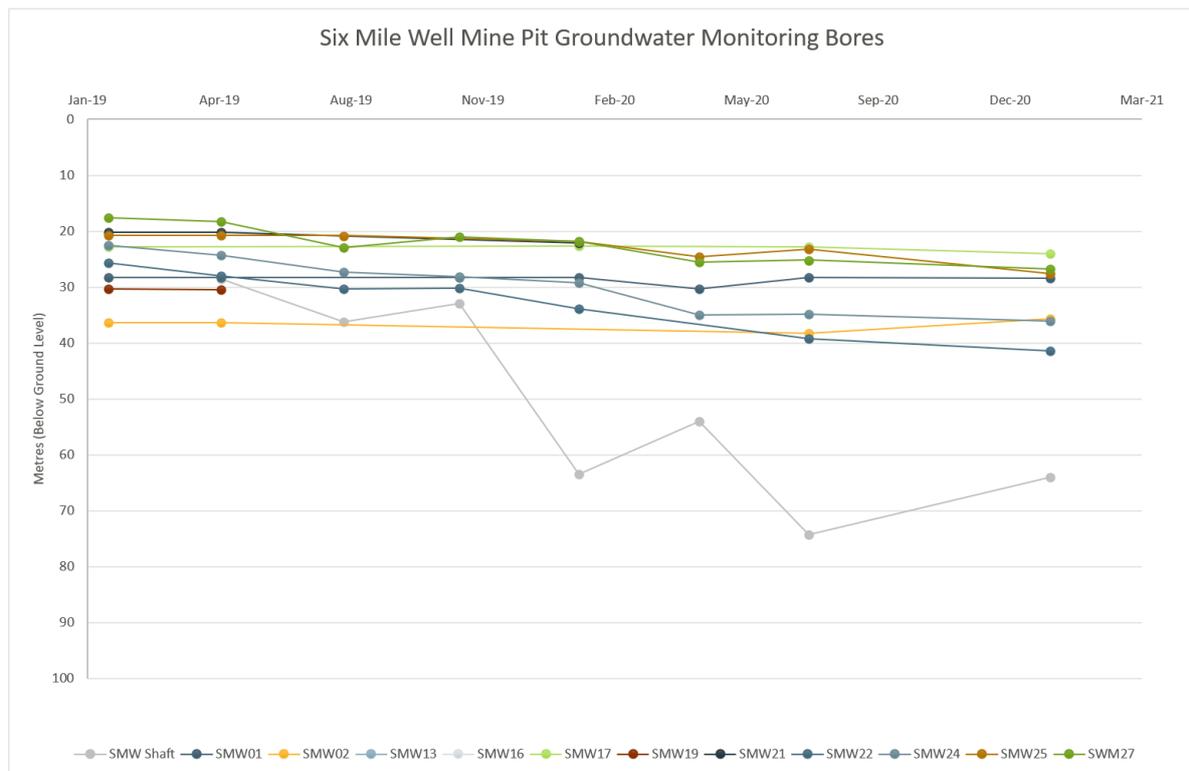


Figure A3-3: Six Mile Well Mine Pit Groundwater Monitoring Bore Levels 2019 to 2020.

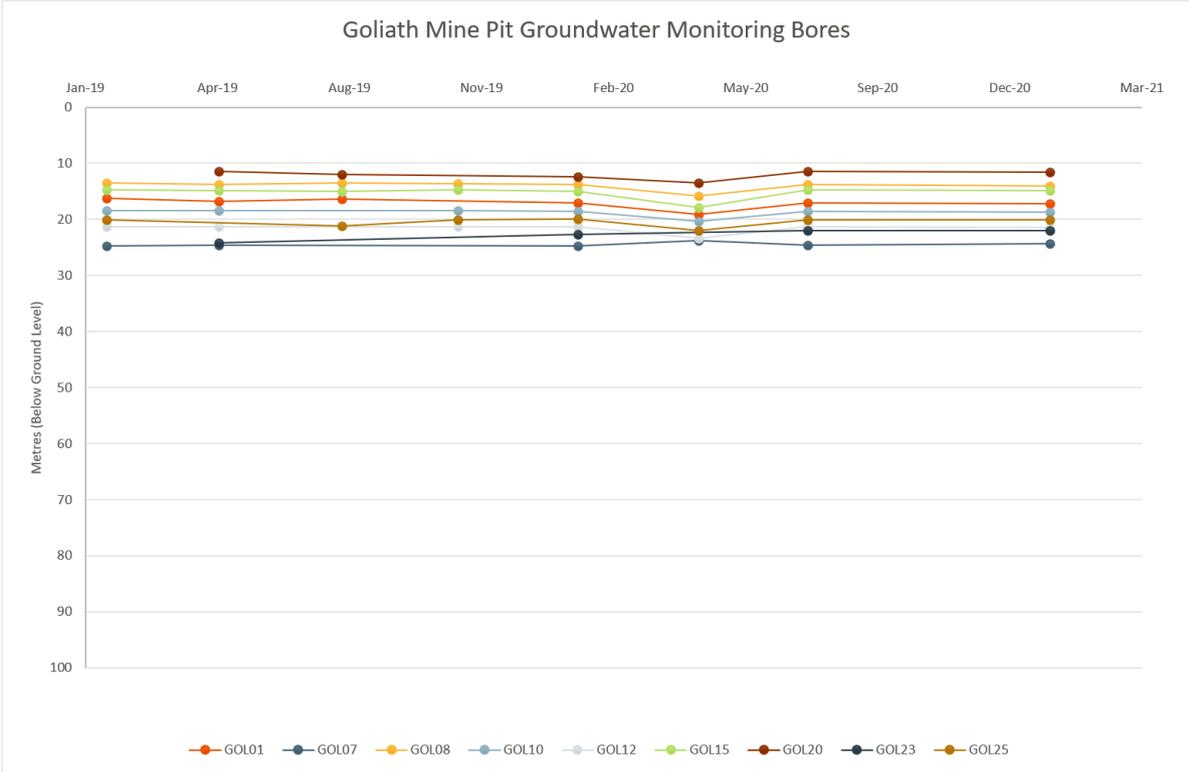


Figure A3-4: Goliath Mine Pit Groundwater Monitoring Bore Levels 2019 to 2020.

## **7.6 Appendix 6 - Mine Closure Plan**

The CAP document prepared under Condition 4-1 of the Statement 1087 approval identifies that annual CAR reports will include environmental monitoring data which has been collected to support the Mine Closure Plan (BHP Nickel West 2019c). The Mine Closure Plan is not subject to the conditions of the Statement 1087 approval.

No environmental monitoring information to support the Mine Closure Plan was collected during the reporting period.