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3 June 2021

Anthony Sutton
Executive Director
EPA Services
Department of Water and Environmental Regulation
Locked Bag 10
Joondalup DC WA 6919

Dear Mr Sutton

**Attention: Anna Valikovs
CMS17988 - Request for Further Information**

I refer to your notice dated 18 May 2021 requesting further information regarding the Irwin Hills Nickel Project Grade Control Drilling.

Minara Resources Pty Ltd (**Minara**) provides the following additional information requested by the Environmental Protection Authority (**EPA**). Note that excerpts from your notice are in bold text while Minara's responses are in plain text.

- 1. Details regarding the Aboriginal Heritage studies and surveys that have been completed across the project areas as stated in the supporting documentation provided by Minara Resources.**

Please refer to Attachment 1 to this letter for a copy of the survey report 'Aboriginal site surveys at the Irwin Hills Project southeast of Laverton in the Great Victoria Desert' (2020) by Waru Consulting Pty Ltd. This report is provided on a confidential basis. Please note that all cultural information obtained in the course of the study remains the intellectual property of those who originally supplied the information.

- 2. Location of the known Aboriginal heritage sites in relation to the proposal area.**

Please refer to the map in Attachment 2, which details the location of known Aboriginal heritage sites.

- 3. A copy of any stakeholder, traditional owner group and/or community consultation undertaken for the proposal**

Minara provides the following stakeholder consultation material and information in Attachment 3:

- Letter sent to Nyalpa Pirniku native title claimants through Native Title Services Goldfields (**NTSG**). Minara confirms that no further correspondence was received from Nyalpa Pirniku.
- Presentation given to the bi-annual meeting of the Murrin Murrin Aboriginal Environmental Liaison Committee in December 2020 regarding the proposed grade control drilling at Irwin Hills.
- As part of other matters, presentation to Nyalpa Pirniku regarding potential infrastructure aspects of the Irwin Hills mining project and the mining project more broadly which Minara is currently engaging with Nyalpa Pirniku through NTSG. This presentation is provided as an example of the level of detail provided during current stakeholder engagement.
- Presentation to the Department of Mines, Industry Regulation and Safety (**DMIRS**) in September 2020 regarding the proposed grade control drilling.
- Presentation to the Shire of Menzies in November 2020.
- Presentation to the Shire of Leonora in September 2020.
- Presentation to the Shire of Laverton in November 2019.

4. The distance between the proposal and the nearest sensitive receptor

The nearest sensitive receptor to the proposal is the temporary mine accommodation camp at the Lord Byron Mine, which is approximately 9.5 km north-east from the proposal. The nearest permanent sensitive receptor is White Cliffs homestead which is approximately 74 km north of the proposal.

5. The proposed life of the project

The project has a proposed life of 3.5 years, this is comprised of:

- Clearing and access road construction
- Grade control drilling for Phase 1
- Grade control drilling for Phase 2
- Rehabilitation and closure activities

6. Further details regarding the drilling program including, but not limited to:

- a. The number and location of proposed drill holes**
- b. Depths of drill holes and whether groundwater is likely to be intercepted**
- c. Drilling methodology**

Phase 1 of the grade control program will involve reverse circulation drilling of 4,603 holes on a 12.5 m by 12.5 m grid pattern. Please refer to Attachment 4 for the location of these drill holes. Electronic spatial data of the drill hole locations has also been enclosed with this response.

The drill holes will be drilled to an average depth of 47 m and Minara is anticipating to intercept groundwater. Drill generated water will be controlled with drains and sumps to prevent any saline groundwater impacting surrounding vegetation.

Phase 2 of the grade control drilling, shown in Attachment 4, has not been designed in detail as yet and the number of holes to be drilled is yet to be determined. The drilling method will

also be reverse circulation and groundwater is also anticipated to be intercepted during phase 2.

7. Water requirements if any and whether this would be subject to the *Rights in Water and Irrigation Act 1914*

Minara currently holds a section 5C licence under the *Rights in Water and Irrigation Act 1914* for the abstraction of up to 50,000 kL/yr from Rocky Well (GWL203461(1) – refer to Attachment 5). This water is for the purposes of camp water, dust suppression and mineral exploration. Minara does not anticipate any change will be required to this licence to facilitate the proposed grade control drilling at Irwin Hills.

8. Dust management and through which document this would be regulated e.g. managed under *Mining Act 1978*

Activities as a result of the implementation of the proposal which may generate dust include clearing activities, vehicle movement and drilling activities. Dust mitigation measures proposed to be implemented include:

- Minimising clearing footprint and open areas
- Vehicle speed limits
- Avoidance of clearing during high winds
- Use of water for dust suppression where required.

It is anticipated that potential impacts of dust will be mitigated and managed through the Mining Proposal to be submitted to DMIRS for grade control drilling, which will result in the potential issue being managed under the *Mining Act 1978*.

9. The EPA notes that the proponent has consulted with the Department of Agriculture, Water and the Environment (DAWE) in relation to potential impacts to Matters of National Environmental Significance (MNES). It is also noted that the proposal is not intended to be formally referred to DAWE. Please provide a copy of any advice or feedback given by DAWE in relation to the proposal.

Minara consulted with DAWE on 19 March 2021 regarding potential impacts to Matters of National Environmental Significance. Please refer to Attachment 6 for a copy of the briefing material and minutes from the meeting and also a copy of the Significance Test

10. Provision of spatial data

This data was provided with the referral and EPA Services has subsequently confirmed that it meets the required standard.

11. Provision of IBSA Data Package

Please refer to the enclosed IBSA data package for the biological surveys conducted at Irwin Hills. For your reference the IBSA number for the surveys is IBSA-2021-0003.

If you require any additional information, or would like to discuss this matter further, please contact me on 0404 185 145.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Luke Vernon', with a long horizontal flourish extending to the right.

Luke Vernon
Superintendent - Environment
Murrin Murrin Operations Pty Ltd