



Memorandum

To: Bendigo-Ophir Gold Project Expert Panel

From: Santana Minerals

Date: 17 August 2026

Re: RFI 11 Response to Question 5

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Please find attached the memorandum *Response to RFI 11 Item 5: Assessment of Potential Adverse Impacts on the Ardgour and Bendigo Aquifers*, prepared jointly by Hydro Geochem Group Limited, Boffa Miskell Limited, Komanawa Solutions Limited and Geocontam Risk Management in response to Request for Information 11, Item 5.

The memorandum provides an updated assessment of the potential adverse impacts of the Bendigo-Ophir Gold Project on the Ardgour and Bendigo Aquifers, taking account of the additional investigations, monitoring, aquifer testing and modelling undertaken in response to RFI 11 Items 1 to 4. This includes additional baseline water quality and freshwater ecology investigations, updated groundwater contaminant modelling, and revised water and contaminant load balance modelling.

The memorandum assesses the downstream receiving environment of the Lindis River and Bendigo Creek, evaluates potential seepage and contaminant migration pathways, and considers the potential effects on the beneficial use of groundwater and surface water resources. It also outlines the monitoring, design and management measures proposed to detect and manage potential seepage losses and water quality effects.

The assessment concludes that the principal seepage risks are expected to be associated with the shallow groundwater and surface water systems within the Shepherds Creek catchment and that the proposed monitoring network and seepage management measures provide a robust framework for the detection and management of any seepage losses. The memorandum further concludes that the additional investigations and modelling undertaken provide a sufficient basis to understand and assess the potential effects of the Project on the Ardgour and Bendigo Aquifers and their associated receiving environments.