

IN THE MATTER

of the Resource Management Act 1991

AND

IN THE MATTER

applications for resource consents to take and use
water in the Waitaki River Catchments

**MEMORANDUM OF COUNSEL ON BEHALF OF
MACKENZIE WATER RESEARCH LIMITED**

20 NOVEMBER 2009

RUSSELL McVEAGH

C N Whata
Phone 64 9 367 8000
Fax 64 9 367 8163
PO Box 8
DX CX10085
Auckland

MAY IT PLEASE THE COMMISSIONERS:

1. The purpose of this memorandum is to:
 - (a) Respond to matters of clarification arising from the evidence of Dr Gamage.
 - (b) Table a supplementary statement from Dr Valerie Snow addressing questions raised by the Committee.
 - (c) Respond to the Commissioners 10th minute dated 19 November 2009.

Clarification - Dr Gamage

2. I attach as **Appendix A**, a table of responses to matters of clarification sought by the Committee, as set out in the memorandum on behalf of MWRL dated 13 November 2009. I am happy to convert this into a joint statement of evidence of the relevant experts if necessary.
3. The table and attachments have been prepared by the MWRL expert team including, Dr Greg Ryder, Dr Brian Coffey, Dr Nimal Gamage and Dr Melissa Robson and responds in a holistic manner to specific questions raised by the Committee.

Supplementary statement - Dr Snow

4. I attach as **Appendix B**, a supplementary statement prepared by Dr Val Snow. I trust that given that this statement is in the nature of clarification it will be accepted by the Committee.

10th Minute

5. In relation to the proposed timetable in the 10th Minute of the Commissioners, I record that I am satisfied with the approach that has been set out.

Dated 20 November 2009

C N Whata

Counsel for Mackenzie Water Research Limited