

**Before a Hearing Panel Appointed by the  
Selwyn District Council and Canterbury Regional Council**

**In the Matter of**

the Resource Management Act  
1991 (**Act**)

**And**

**In the Matter of**

applications under section 88 of the  
Act by Bathurst Coal Limited in  
relation to the completion of mining  
and closure and rehabilitation of the  
Canterbury Coal Mine in the Malvern  
Hills, Canterbury.

**Memorandum of Counsel of Bathurst  
Coal Limited regarding service of  
Evidence**

Dated: 25 February 2022

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**lane neave.**

**MAY IT PLEASE THE COMMISSIONER**

1. This memorandum is filed on behalf of Bathurst Coal Limited (**BCL**) in accordance with Minute 5 of the Hearing Commissioners dated 18 February 2022.
2. BCL files the following documents along with this memorandum:
  - (a) Reply evidence of the following expert witnesses:
    - (i) Gary Bramley (Ecology);
    - (ii) Paul Weber (Acid mine drainage);
    - (iii) Chris Hickey (Ecotoxicology);
    - (iv) Claire Hunter (Planning);
    - (v) Eden Sinclair;
    - (vi) Sioban Hartwell (Water quality);
    - (vii) Kristy Hogsden (Aquatic ecology); and
    - (viii) James Griffiths (Hydrology).
  - (b) Revised proposed consent conditions attached to the reply evidence of Claire Hunter.
  - (c) A report from Mahaanui Kurataio Limited (**MKT**), which has assessed the revised proposed compensation package against the policies of the Mahaanui Iwi Management Plan. The package was also discussed with representatives of Te Ngāi Tūāhuriri and Te Taumutu Rūnagnga who expressed a generally positive view of the updated management plan and provided recommendations. BCL has accepted all of these recommendations and updated the proposed conditions of consent accordingly.
3. BCL has elected filing statements of written reply evidence in conjunction with the revised set of conditions today and prior to the 8 April 2022 due date set by the Hearing Panel. The reason for doing so is to ensure that the experts appointed by Selwyn District Council and Canterbury Regional Council the benefit of BCL's expert discussion of the revised conditions.

Dated this 25<sup>th</sup> day of February 2022

A handwritten signature in blue ink, appearing to read 'Joshua Leckie'.

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Joshua Leckie/Katharine Hockly  
Counsel for Bathurst Resources Limited