

**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 on behalf of
Bathurst Coal Limited regarding service
of closing legal submissions and
supplementary evidence**

Dated: 14 April 2022

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MAY IT PLEASE THE COMMISSIONER

1. This memorandum is filed on behalf of Bathurst Coal Limited (**BCL**). BCL files the following documents along with this memorandum in accordance with directions given by the Commissioner on 21 March 2022:
 - (a) Supplementary reply evidence of:
 - (i) Craig Pilcher (General manager of BCL); and
 - (ii) Claire Hunter (Planning).
 - (b) Closing legal submissions of BCL;
 - (c) A 'clean' word version of the revised consent conditions proposed by BCL.

this 14th day of April 2022



Joshua Leckie/Katharine Hockly
Counsel for Bathurst Resources Limited