Flexgas Ltd Ahuroa B Gas Storage Facility Monitoring Programme

Monitoring Programme Annual Report 2021-2022

Technical Report 2022-74





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Taranaki Regional Council Private Bag 713 Stratford

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Executive summary

The Ahuroa B Gas Storage Facility (Ahuroa B/AGS) is owned and operated by Flexgas Ltd (the Company). Ahuroa B is located on the corner of Barleymans Road and Croydon Road, east of Midhirst, in the Waitara catchment. Ahuroa B supplies natural gas to one of its main customers, Contact Energy, for use in their Stratford Power Station. This report for the period July 2021 to June 2022 describes the monitoring programme implemented by the Taranaki Regional Council (the Council) to assess the Company's environmental and consent compliance performance during the period under review. The report also details the results of the monitoring undertaken and assesses the environmental effects of the Company's activities.

During the monitoring period, the Company demonstrated a high level of environmental performance and good level of administrative performance.

The Company holds 11 resource consents setting out the requirements that the Company must satisfy. Two of the consents permit the discharge of effluent /stormwater into unnamed tributaries of the Makara Stream, two the discharge of emissions into air, two the discharge of natural gas, stormwater and drilling waste into/onto land, and three the use of land for installation of pipes and culvert framework. In addition, two consents are also held for land use associated with the pipeline route to their nearest customer.

Three of the 11 consents were actively exercised during the period being reported.

The Council's monitoring programme for the year under review included one inspection. Data on gas injection, well pressure, and flaring volumes were provided by the Company to the Council, and an annual report was also provided. The Company undertook stormwater and produced water sampling and provided the results to the Council upon request.

The monitoring showed that stormwater samples generally remained within compliance limits and flaring emissions remained at a higher level than reported in previous years. The increase in flare emissions are partly due to expansion of the facility in 2020 and partly due to the Company now reporting operational flaring volumes in addition to those required to be reported on under current consent conditions.

There were no significant unauthorised incidents recording non-compliance in respect of this consent holder during the period under review. There were some minor issues that required follow up due to administrative performance.

For reference, in the 2021-2022 year, consent holders were found to achieve a high level of environmental performance and compliance for 88% of the consents monitored through the Taranaki tailored monitoring programmes, while for another 10% of the consents, a good level of environmental performance and compliance was achieved.

In terms of overall environmental and compliance performance by the consent holder over the last several years, this report shows that the consent holder's performance has improved in the year under review.

This report includes recommendations to be implemented during the 2022–2023 monitoring period.

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1 Introduction

1.1 Compliance monitoring programme reports and the Resource Management Act 1991

1.1.1 Introduction

This report is for the period July 2021 to June 2022 by the Taranaki Regional Council (the Council) on the monitoring programme associated with resource consents held by Flexgas Ltd (the Company) for the Ahuroa B Gas Storage Facility (AGS).

The Company operates the Ahuroa B wellsite, located on the corner of Barleymans Road and Croydon Road, east of Midhirst, in the Waitara catchment. Ahuroa B is used as a natural gas storage facility for Contact Energy's Stratford Power Station (SPS), which is one of the Company's main customers.

The report includes the results and findings of the monitoring programme implemented by the Council in respect of the consents held by the Company that relate to the discharges of water within the Waitara catchment, and the air discharge permit held by the Company to cover emissions to air from the site.

One of the intents of the *Resource Management Act 1991* (RMA) is that environmental management should be integrated across all media, so that a consent holder's use of water, air, and land should be considered from a single comprehensive environmental perspective. Accordingly, the Council generally implements integrated environmental monitoring programmes and reports the results of the programmes jointly. This is the 4th report prepared by the Council discussing the environmental effects of the Company's use of water, land and air.

1.1.2 Structure of this report

Section 1 of this report is a background section. It sets out general information about:

- consent compliance monitoring under the RMA and the Council's obligations;
- the Council's approach to monitoring sites through annual programmes;
- the resource consents held by the Company in the Waitara catchment;
- the nature of the monitoring programme in place for the period under review; and
- a description of the activities and operations conducted in the Company's site/catchment.

Section 2 presents the results of monitoring during the period under review, including scientific and technical data.

Section 3 discusses the results, their interpretations, and their significance for the environment.

Section 4 presents recommendations to be implemented in the 2022-2023 monitoring year.

A glossary of common abbreviations and scientific terms, and a bibliography, are presented at the end of the report.

1.1.3 The Resource Management Act 1991 and monitoring

The RMA primarily addresses environmental 'effects' which are defined as positive or adverse, temporary or permanent, past, present or future, or cumulative. Effects may arise in relation to:

- a. the neighbourhood or the wider community around an activity, and may include cultural and socialeconomic effects;
- b. physical effects on the locality, including landscape, amenity and visual effects;

- c. ecosystems, including effects on plants, animals, or habitats, whether aquatic or terrestrial;
- d. natural and physical resources having special significance (for example recreational, cultural, or aesthetic); and
- e. risks to the neighbourhood or environment.

In drafting and reviewing conditions on discharge permits, and in implementing monitoring programmes, the Council is recognising the comprehensive meaning of 'effects' in as much as is appropriate for each activity. Monitoring programmes are not only based on existing permit conditions, but also on the obligations of the RMA to assess the effects of the exercise of consents. In accordance with Section 35 of the RMA, the Council undertakes compliance monitoring for consents and rules in regional plans, and maintains an overview of the performance of resource users and consent holders. Compliance monitoring, including both activity and impact monitoring, enables the Council to continually re-evaluate its approach and that of consent holders to resource utilisation, to move closer to achieving sustainable development of the region's resources.

1.1.4 Evaluation of environmental and administrative performance

Besides discussing the various details of the performance and extent of compliance by the consent holders, this report also assigns a rating as to each Company's environmental and administrative performance during the period under review. The rating categories are high, good, improvement required and poor for both environmental and administrative performance. The interpretations for these ratings are found in Appendix II.

For reference, in the 2021-2022 year, consent holders were found to achieve a high level of environmental performance and compliance for 88% of the consents monitored through the Taranaki tailored monitoring programmes, while for another 10% of the consents, a good level of environmental performance and compliance was achieved.¹

1.2 Process description

The Company holds resource consents to store natural gas in a depleted hydrocarbon reservoir in the Tariki formation, using injection and extraction facilities located at the Ahuroa B wellsite east of Midhirst (shown in Photos 1 and 2). Ahuroa B wellsite was established by the Petroleum Corporation of New Zealand Ltd (Petrocorp) in 1986, following which four production wells were drilled by Petrocorp, Fletcher Challenge

¹ The Council has used these compliance grading criteria for more than 18 years. They align closely with the 4 compliance grades in the MfE Best Practice Guidelines for Compliance, Monitoring and Enforcement, 2018

Energy New Zealand Ltd and Swift Energy New Zealand Ltd. From 2008, Contact Energy (under operatorship of Origin Energy Ltd) began to develop the Ahuroa B underground gas storage (AGS) project.

Storage involves the injection of gas into a depleted sub-surface reservoir. Natural gas is typically injected during periods when the demand for gas supply is relatively low (e.g. in the summer months). And when demand for gas supply increases, the injected gas is extracted from the storage reservoir.



Photo 1 Ahuroa B gas storage facility layout facing North West May 2014

1.2.1 Geological setting

At Ahuroa B, gas is injected, using cased wells at a depth of approximately 2,300 m, into the reservoir sandstone, known as the Tariki Sandstone Member. This member consists of interbedded sandstone, siltstone and mudstone deposited as submarine fans during the Oligocene period (~30 million years ago) as part of the Otaraoa Formation. Periods of tectonic activity during the Oligocene and Early Miocene (~20 million years ago) subsequently modified the structural geology of the region, particularly in relation to tectonic stresses acting upon the Taranaki Fault and Tarata Thrust Fault. The Tarata Thrust Fault is adjacent to the Ahuroa complex/system and aids in the effective trapping and storage of gas, in addition to the amalgamated sandstone deposits in the Tariki Sandstone Member which provide good reservoir quality and are overlain by alternating intervals of thin and thick siltstones, predominantly the Otaraoa formation, which form a continuous top-seal.

The potential environmental risk associated with this gas storage activity relates to the possible unintentional release of natural gas into the receiving environment, particularly into groundwater aquifers. Appropriate reservoir selection and continual pressure monitoring are integral safeguards implemented to mitigate against this risk.

The nearest potable water aquifer to the reservoir is in the Matemateaonga Formation, the base of which is located approximately 950 m below ground level, some 1,300 m above the storage reservoir. There are also at least three known hydrocarbon reservoirs in the overlying formations, meaning that, in the highly unlikely

event of any storage reservoir leakages, any potential upward migration of gas would likely be intercepted by these impermeable reservoirs on the way toward the surface.

1.2.2 Gas injection /extraction

At the Ahuroa B site, the gas storage project had been developed in two stages. The initial storage utilised the existing Ahuroa 2A production well (identified in Photo 2) to inject gas. The secondary stage involved the drilling of an additional three injection wells (Ahuroa 3, 4 and 5A side track (ST)-1, Photo 2), and the installation of additional compressors and surface processing equipment.

The site is configured so that the gas can run either through New Zealand Energy Corporation Ltd's (NZEC's) Waihapa production station (WPS) and then to Ahuroa B through the original 8-inch gas line, or through the new 18-inch gas line from the Company transmission system via Contact Energy's Stratford Power Station. The system can be configured to either inject or extract through one or more injection wells at any time using the same surface equipment, but cannot extract through one well and inject through another simultaneously.

During injection, gas comes in through either the Waihapa or Contact Energy pipeline and into the compressor. The compressor raises the pressure in the well to make injection into the reservoir possible.

Extraction is a similar process to natural gas production. During extraction, relatively small quantities of produced water and gas condensate are brought to surface with the gas. These are separated out in the facilities on site. The produced water is piped to a 63 m³ storage tank on site, before being transported by road tanker to Waihapa production station for disposal by deep-well injection. The condensate is separated and piped directly to Waihapa. No condensate is stored on site.

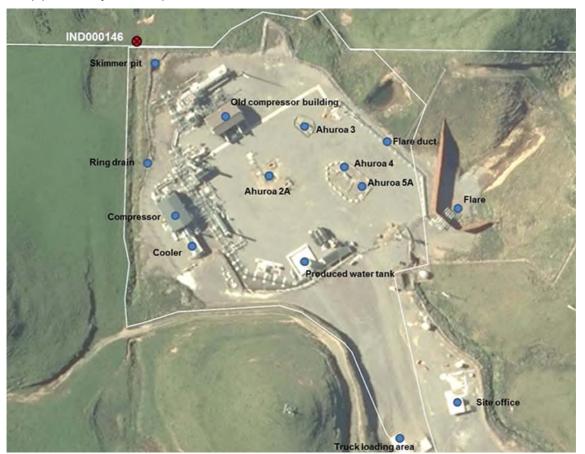


Photo 2 Ahuroa B site layout

1.2.3 Pressure monitoring

Pressure data is essential in understanding reservoir behaviour and response to injection and extraction, and in ensuring reservoir and pipeline integrity. Temperature and pressure data are monitored by operators at the Waihapa production station control room. High and low alarms are set on all the pressure transmitters to ensure any potential irregularities are quickly detected by site operators.

Both the pipeline and the reservoir pressure alarms are significantly lower than the design pressure (of the pipeline) or the known safe pressure (for the reservoir).

Hydraulic control valves are installed which can be used to shut the wells in, either remotely, or automatically, as required should there be a pressure anomaly during injection or extraction. In an extreme emergency, if none of the control valves are working, there is a subsurface safety valve on each well which will automatically close if the well is exposed to atmospheric pressures.

1.2.4 Pipeline to Stratford Power Station

An 18-inch pipeline, 8.5 km in length, was installed between AGS and SPS in 2013 for the bidirectional conveyance of gas associated with the AGS project. A fibre optic cable was installed in the same trench. The pipeline route crosses 14 waterways, comprising the Kahouri and Piakau Streams and unnamed tributaries of the Kahouri (2) and Piakau (4) Streams in the Patea catchment, and unnamed tributaries of the Makara (5) and Ahuroa (1) Streams in the Waitara catchment. The pipeline route is shown in Figure 1 below.

1.3 Resource consents

A summary of the consents held by the Company in relation to AGS and the gas pipeline connecting it to Stratford Power Station is given in the following Tables 1 and 2 respectively. Of the 11 consents held in relation to AGS only three were actively exercised during the 2021-2022 monitoring year.

Consent 9576-1.1 replaced consent 9576-1 on 17 August 2021.

A copy of each of the consents for the storage and pipeline can be found in Appendix I



Figure 1 Pipeline route from Ahuroa B Gas storage to Stratford Power Station

Consent number	Purpose	Consent Granted/ Commencement Date	Next review date	Expiry date
	Discharge to Air	· Permits		
7745-1*	Discharge emissions to air from flaring of hydrocarbons associated with well clean-up and well testing associated with exploration activities at Ahuroa B wellsite	Oct 2009	-	2028
7746-1	Discharge emission to air during flaring from well workovers and in emergency situations associated with production activities at Ahuroa B wellsite, together with miscellaneous emissions	Oct 2009	-	2028
	Discharge to Wat	er Permits	,	
3681-2	Discharge stormwater, site water and uncontaminated production water to land and Makuri Stream tributary in the Waitara catchment	Jan 2011	2027	2033
7621-1*	Discharge stormwater and sediment from Ahuroa B site development (wellsite) earthworks to two unnamed Makara Stream tributaries	Apr 2010	_	2027
	Discharge to Lan	d Permits		
7432-1	Discharge natural gas into land for purpose of gas storage	Apr 2011	-	2027
7748-1*	Discharge stormwater and sediment into/onto land from earthworks during extension of Ahuroa B wellsite	Jan 2011	-	2027
7622-1*	Install, use and maintain a culvert in unnamed Makara Stream tributary	Apr 2010	-	2027
7749-1*	Install pipe in bed of unnamed Makara Stream tributary	Jan 2011	-	2027
7750-1.1*	Install and use a culvert in unnamed Makara Stream tributary	Mar 2016	-	2027

Table 1 Summary of resource consent held by the Company

Table 2Summary of resource consents for the pipeline from AGS to SPS

Consent number	Purpose	Consent Granted/ Commencement Date	Next review date	Expiry date
	Land Use Pe	rmits		
9309-1 to 9322-1*	Install and use pipeline for conveying gaseous hydrocarbons under various streams between Ahuroa B wellsite and SPS	Aug 2012	-	2028
9576-1.1*	Install and use a culvert in an unnamed Makara Stream tributary for associated realignment	Jun 2013	-	2027

* Consents not actively exercised during the 2021-2022 monitoring period

1.4 Monitoring programme

1.4.1 Introduction

Section 35 of the RMA sets obligations upon the Council to gather information, monitor and conduct research on the exercise of resource consents within the Taranaki region. The Council is also required to assess the effects arising from the exercising of these consents and report upon them.

The Council may therefore make and record measurements of physical and chemical parameters, take samples for analysis, carry out surveys and inspections, conduct investigations and seek information from consent holders.

The monitoring programme for the AGS site consisted of four primary components.

1.4.2 Programme liaison and management

There is generally a significant investment of time and resources by the Council in:

- ongoing liaison with resource consent holders over consent conditions and their interpretation and application;
- discussion over monitoring requirements;
- preparation for any consent reviews, renewals or new consent applications;
- advice on the Council's environmental management strategies and content of regional plans; and
- consultation on associated matters.

1.4.3 Site inspections

The Ahuroa B site was visited on 10 March 2022 for sampling and inspection purposes during the 2021-2022 monitoring period.

The Inspection focused on flaring activities and potential water discharge points including surface drainage networks and skimmer ponds. General site housekeeping was also assessed, and the neighbourhood was surveyed for environmental effects.

1.4.4 Chemical sampling

The Council did not undertake sampling of the skimmer pit discharge or upstream and downstream of the Makara Stream during the review period as the Company were not discharging at the time of inspection.

During this monitoring period the Company undertook regular sampling of the discharge to ascertain if it was within the consented limits required to discharge.

1.4.5 Data Review

The Company is required to provide reservoir pressure and gas injection data routinely for Council review. Special conditions 3 and 4 of Consent 7432-1 stipulate the maximum allowable reservoir pressure, and require the Company to record injection pressures and relate this to maximum reservoir pressure. An annual summary of flaring data and an annual flaring report are required under special condition 18 and 19 respectively of consent 7746-1. All other data is required for submission upon request.

2 Results

2.1 Water

2.1.1 Results of abstraction and discharge monitoring

There were no samples of the skimmer pit discharge or the receiving stream collected by the Council Officer during the annual inspection as the Company were not discharging at the time of inspection.

Stormwater sampling was undertaken onsite by the Company and the results are included below in Table 3.

The stormwater sample collected on 31 October 2021 indicated that total suspended solids were slightly elevated (115 g/m³) however, sampling taken immediately prior and following indicated low concentrations, so the Company considered the result anomalous and not indicative of any significant issues with the stormwater discharge.

The sample collected on 27 February 2022 indicated that pH within the stormwater system was below the consented range of pH 6.5-8.5. Following these results the skimmer pit was neutralised by dosing with pH increaser prior to any discharge taking place.

Ahuroa Stormwater (Skimmer Pit) Sampling							
Date	Date pH		Total Suspended Solids (g/m ³)	Total Hydrocarbons (g/m³)			
Limits	6.5-8.5	50	100	15			
31-Jul-21	7.5	10.2	2	<1			
06-Sep-21	7.6	6.7	3	1.5			
27-Sep-21	7.8	5.6	2	<1			
31-Oct-21	7.1	4.2	115	<1			
28-Nov-21	7.4	5.7	7	<1			
19-Dec-21	7.0	5.2	9	<1			
30-Jan-22	7.2	15.6	7	<1			
27-Feb-22	6.1	11.1	12	1			
27-Mar-22	6.8	3.8	7	1			
30-Apr-22	6.8	3.4	12	2			
29-May-22	7.1	7.1	6	1			
26-Jun-22	8.1	10.5	11	1			

Table 3 Stormwater sampling undertaken by the Company July 2021 to June 2022

2.2 Air

2.2.1 Review of flaring data

As expressed in consent 7746-1, special condition 18, the Company must monitor and log all monthly flaring totals. The Company recorded this data and provided it to the Council upon request. In the 2021-2022 monitoring period the estimated total annual gas flared was 352,697 Sm³. The volumes reported since October 2021 have been estimated by the Company using flare header pressure data due to failure of the flow meter. A new flow meter is currently being sourced from overseas and will be replaced as soon as practicable.

Figure 2 details the monthly flaring totals for this monitoring period (July 2021-June 2022). The largest period of flaring occurred in July 2021 with a total of 37,156 Sm³ of gas being flared. Overall, the annual flare data for this period was high and similar to that reported in the previous year, with both years being significantly higher than previous years. (Figure 3). The Company were contacted for an explanation due to the significant increase in volumes now being reported and responded as follows:

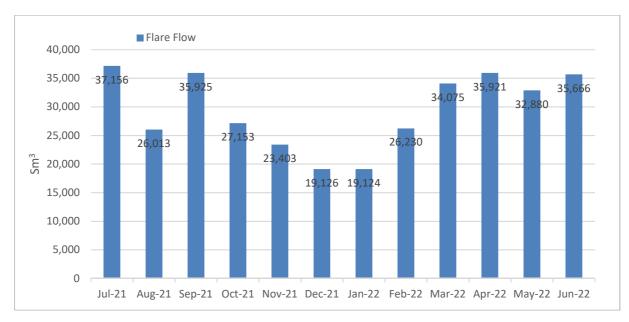
Facility expansion commissioned in Q4 of 2020 increased the injection/extraction capacity of the facility from 45TJ/day to 65TJ/day. This expansion has resulted in an increase to 4 compressors, from the original 1 compressor, resulting in increased 'blowing' of gas during the operational processes.

From October 2018 to February 2021 the facility was operated by the NZ Energy Corp (NZEC) on behalf of First Gas. Differences in reporting volumes may also arise from differences in what was monitored/reported and the volumes reported prior to October 2018 may not capture all operational flaring volumes, only events required to be reported to Council.

There were six planned events notified during the 2021-2022 monitoring period (Table 4).

Date planned	Duration (hours)	Volume (m ³)	Cause
10 Jul 21	1 hour	2000	Plant maintenance
13 Jul 21	2 hour	2000	Plant equipment depressure
7 Jul 21	Intermittent over 4 days	500,000 per day	Coil Tubing/wellhead flow back testing
5 Oct 21	6 hours	10000	Plant maintenance
12 Feb 22	4 hours	15000	Plant shutdown
27 Apr 22	2 hours	15000	Plant maintenance

 Table 4
 Flaring notifications received during the 2021-2022 monitoring period





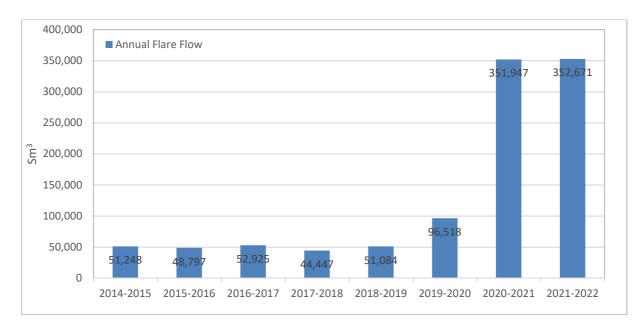


Figure 3 Total annual flaring 2014-2022

2.2.2 Reservoir pressure and injection pressure data review

Consent 7432-1 stipulates a maximum reservoir pressure of 3,400 psi. There is also a requirement for the consent holder to record injection pressures and relate these data to the maximum reservoir pressures.

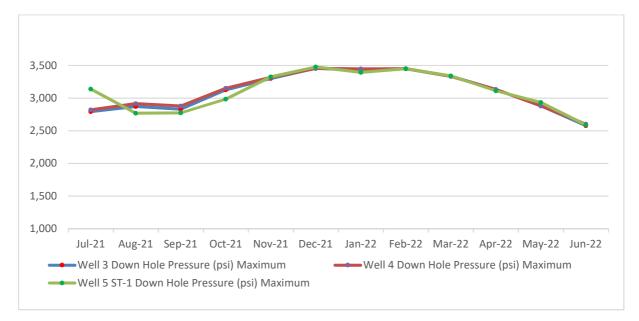
The data supplied to the Council are hourly reservoir pressure values from down-hole pressure gauges in the Ahuroa 3, 4, and 5ST-1 wells, and hourly injection pressure values from surface gauges on the Ahuroa 2A, 3, 4 and 5ST-1 wells. Figure 4 and Figure 5 show monthly maximum readings for the down-hole and top-hole pressure gauges, respectively. The highest downhole pressures were recorded during December 2021, January 2022 and February 2022 with wells recording pressures between 3,429 and 3,477 psi (Table 5). As these pressures appeared to exceed the consent pressure limit the Company were contacted and provided the following explanation:

These pressures are raw pressure data which has not been corrected to the pressure within the gas reservoir. Typically the pressure within the reservoir is 100-180 psi less than the observed injection pressure.

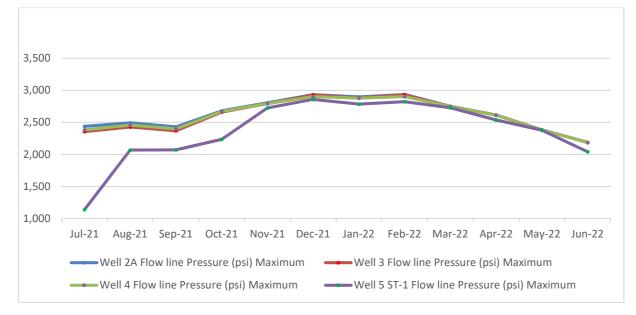
All of the wells complied with the pressure limits for the entire monitoring period when the above explanation is taken into consideration.

Month	Well 3 Down Hole (psi)	Well 4 Down Hole (psi)	Well 5 ST-1 Down Hole (psi)	Well 2A Flow line (psi)	Well 3 Flow line (psi)	Well 4 Flow line (psi)	Well 5 ST-1 Flow line (psi)	Flare Flow (sm ³)
Jul-21	2,794	2,820	3,140	2,438	2,357	2,384	1,140	37,156
Aug-21	2,873	2,916	2,770	2,492	2,429	2,457	2,069	26,013
Sep-21	2,831	2,881	2,774	2,431	2,369	2,398	2,072	35,925
Oct-21	3,128	3,152	2,986	2,681	2,660	2,671	2,235	27,153
Nov-21	3,302	3,318	3,327	2,805	2,792	2,792	2,725	23,403
Dec-21	3,456	3,455	3,477	2,931	2,926	2,902	2,858	19,126
Jan-22	3,429	3,448	3,395	2,898	2,879	2,878	2,786	19,124
Feb-22	3,450	3,449	3,450	2,936	2,929	2,902	2,823	26,230
Mar-22	3,335	3,332	3,341	2,751	2,748	2,747	2,728	34,075
Apr-22	3,133	3,133	3,113	2,616	2,613	2,612	2,537	35,921
May-22	2,882	2,879	2,933	2,386	2,383	2,383	2,378	32,880
Jun-22	2,579	2,602	2,589	2,189	2,184	2,186	2,042	35,666

Table 5	Down hole and	top hole pre	ssures reported	for the July	2021 to June 202	2 period









2.3 Pipeline

The gas pipeline between AGS and SPS was constructed and commissioned between January and October 2013. Various silt retention measures, including hay bales, silt cloth, fluming, bunds and rip-rap, were used along the pipeline, and revegetation with grass and by riparian planting took place when soil moisture levels became suitable.

No significant effect on waterways was found during the construction, or has been reported since.

2.4 Annual flare report by the Company for AGS

Under condition 19 on consent 7746-1 to discharge emissions to air, the Company is required to provide to the Council during May each year a report:

- Detailing any energy efficiency measures implemented on the site;
- Detailing smoke emissions as required under condition 17;
- Detailing any measures undertaken or proposed to reduce smoke emissions;
- Detailing any measures undertaken or proposed to reduce flaring;
- Addressing any other issue relevant to the minimisation or mitigation of emissions from the flare;
- Detailing any complaints received and any measures undertaken to address complaints; and
- Reviewing all options and technological advances relevant to the reduction or mitigation of any discharge to air from the site, how these might be applicable and/or implemented at the site, and the benefits and costs of these advances.

Information provided in the 2021-2022 report is summarised below in the following sections.

Energy Efficiency measures Implemented at Ahuroa Gas Storage

The Company have been making small improvements

to the plant operations to reduce the number of plant trips and hence flaring events, some of which have arisen from the 'bedding-in' process of the new equipment installed as part of the expansion of the facility in 2021.

Smoke emissions

There were no visible smoke emissions at Ahuroa B as a result of exercising consent 7746-1 during the reporting period.

Flaring & flare emissions

Flaring is only undertaken as absolutely necessary due to the economic cost of flaring stored gas. A pilot flare is maintained at all times to ensure that there is a source of ignition for flared gas to ensure safe ignition, meaning there is a small continual amount of gas continually being flared. The flare installed at Ahuroa B was designed to have a high combustion efficiency, smokeless operation and reduced air emissions. Regular maintenance on the flare system is carried out to ensure the flare continues to operate as per design.

Complaints received relating to Ahuroa Gas Storage

No complaints were received as a result of any flaring events or smoke emissions at Ahuroa B during the reporting period.

Technological advances relevant to any discharge to air

Although potential exists to recover gas sent to flare and re-use within the plant with the addition of Flare Gas Recovery Units, the intermittent nature of operation of Ahuroa B does not allow for the collection and re-use of the flare gases in the part of the plant using gas. Therefore, these measures have not been pursued further.

2.5 Incidents, investigations, and interventions

The monitoring programme for the year was based on what was considered to be an appropriate level of monitoring, review of data, and liaison with the Company. During the year matters may arise which require additional activity by the Council, for example provision of advice and information, or investigation of

potential or actual causes of non-compliance or failure to maintain good practices. A pro-active approach, that in the first instance avoids issues occurring, is favoured.

For all significant compliance issues, as well as complaints from the public, the Council maintains a database record. The record includes events where the individual/organisation concerned has itself notified the Council. Details of any investigation and corrective action taken are recorded for non-compliant events.

Complaints may be alleged to be associated with a particular site. If there is potentially an issue of legal liability, the Council must be able to prove by investigation that the identified individual/organisation is indeed the source of the incident (or that the allegation cannot be proven).

Table 6 below sets out details of any incidents recorded, additional investigations, or interventions required by the Council in relation to the Company's activities during the 2021-2022 period. This table presents details of all events that required further investigation or intervention regardless of whether these were found to be compliant or not.

Under condition 19 on consent 7746-1 to discharge emissions to air, the Company is required to provide to an annual flaring report to the Council during May each year. The report was provided late on 27 September 2022. A reduction in the administrative performance has been included in this report to reflect the non-compliance.

Date	Details	Compliant (Y/N)	Enforcement Action Taken?	Outcome
14 September 2022	Annual report submission condition was not met during May 2022	Ν	A request to submit the required information was emailed on 14/09/2022	Report was received 27 September 2022

Table 6 Incidents, investigations, and interventions summary table

3 Discussion

3.1 Discussion of site performance

Company performance in respect to consent compliance in the 2021-2022 monitoring period was generally high. One non-compliance in relation to the provision of data and information in a timely manner was recorded.

The additional surface water sampling proposed in the 2020-2021 compliance report, to assess for any potential leaching from the Mix-Bury-Cover (MBC) into the nearby Makara Stream was not undertaken during the period under review. This has now been included as a recommendation for the 2022-2023 monitoring programme.

Monthly and annual pressure and flaring data was provided by the Company throughout the monitoring period upon request.

3.2 Environmental effects of exercise of consents

There were no environmental effects noted during the annual site inspection and the Company were found to be compliant with all consent conditions that could be assessed. To date there have been no significant or long-term environmental effects identified in the Makara Stream attributable to the storage facility.

Effects to groundwater could not be assessed as no groundwater monitoring is undertaken at the site. To enable groundwater sampling to be undertaken in the future a recommendation to install a monitoring bore at the site has been included in Section 4 of this report.

In the upcoming monitoring period further sampling of the Makara Stream has also been recommended to ensure that the installation of the skimmer pit, on top of the MBC, has not mobilised any contaminants from the MBC.

The Company reported more flared gas in the 2020-2021 and 2021-2022 monitoring periods, than in previous years. No complaints related to flaring activities at the site were received from the public during the 2021-2022 monitoring period.

3.3 Evaluation of performance

A tabular summary of the consent holder's compliance record for the year under review is set out in Tables 7-9 and an evaluation of the Company's environmental performance in relation to their activities since 2009 is presented in Table 10.

Table 7 Summary of performance for consent 3681-2

Purpose: To discharge treated stormwater and uncontaminated treated site water and uncontaminated treated production water from hydrocarbon exploration and production operations at the Ahuroa B wellsite onto and into land and into and unnamed tributary of the Makara Stream in the Waitara catchment

	Condition requirement	Means of monitoring during period under review	Compliance achieved?
1.	Adopt best practicable option to prevent or minimise adverse effects	No complaints received or issues notified	Yes
2.	Catchment area limited	Inspections and records	Yes

Purpose: To discharge treated stormwater and uncontaminated treated site water and uncontaminated treated production water from hydrocarbon exploration and production operations at the Ahuroa B wellsite onto and into land and into and unnamed tributary of the Makara Stream in the Waitara catchment

	Condition requirement	Means of monitoring during period under review	Compliance achieved?
3.	Notification provided prior to commencement of site works or drilling	No site works undertaken	Yes
4.	Consent holder to provide site contingency plans for the site.	Most recent update May 2016	Yes
5.	All stormwater and uncontaminated production water to be directed through a stormwater treatment system prior to discharge	Inspections	Yes
6.	Stormwater system management and maintenance in accordance with consent application documentation	Skimmer pit location now changed from original location	No
7.	Hazardous substance storage areas to be bunded and directed to sumps	Inspections	Yes
8.	Limits on constituents in the discharge	Sampling indicated the majority of samples were compliant with consent condition	Two samples did not meet all limits
9.	Discharge shall not result in increase in temp or BOD downstream of the mixing zone	No sampling undertaken during monitoring period	Not assessed
10.	Controls on effect of discharge in receiving water	Inspections	Yes
11.	Consent holder to notify prior to site reinstatement	Site still in use	N/A
12.	Optional review provision re environmental effects	Next review June 2027	N/A
	erall assessment of consent compliance a	and environmental performance in respect of	High
	erall assessment of administrative perfor	mance in respect of this consent	High

Table 8 Summary of performance for consent 7432-1

Purpose: To discharge contaminants (natural gas) into land for the purpose of gas storage			
Condition requirement		Means of monitoring during period under review	Compliance achieved?
1.	Consent holder to adopt best practicable option at all times	Inspections, consent holder liaison and data review	Yes
2.	Gas discharged must meet defined specifications	Confirmation from Company received	yes

Purpose: To discharge contaminants (natural gas) into land for the purpose of gas storage			
	Condition requirement	Means of monitoring during period under review	Compliance achieved?
3.	The pressure in the reservoir must not exceed 3,400 psi	Review of records indicated bottom hole pressures exceeded. Company was contact and explanation provided and excepted	Yes
4. Consent holder to record injection pressure and reservoir pressure and supply to Council upon request Data supplied and revi		Data supplied and reviewed	Yes
5.	Lapse condition	Consent exercised	N/A
6.	Review provision	Non remaining	N/A
Overall assessment of consent compliance and environmental performance in respect of High this consent			
Overall assessment of administrative performance in respect of this consent High			

Table 9 Summary of performance for consent 7746-1

Purpose: To discharge emissions to air during flaring from well workovers and in emergency situations associated with production activities at the Ahuroa B wellsite, together with miscellaneous emissions

	Condition requirement	Means of monitoring during period under review	Compliance achieved?
1.	Consent holder to notify of flaring events longer than 5 minutes in duration	Notifications received as required	Yes
2.	Consent holder to notify nearby residents of flaring events longer than 5 minutes in duration	Notifications received as required No complaints received from neighbours	Yes
3.	No alteration of plant equipment or processes leading to changes in the quality of emissions	Company records and inspections	Yes
4.	Consent holder to monitor wind conditions prior to flaring	Company records not requested in current period	N/A
5.	Liquids and solids to be separated prior to flaring	Company records and inspections	Yes
6.	Consent holder to notify if unable to comply with special condition 5 and to immediately work to re-establish separation process	No instances of non-compliance with special condition 5 were conveyed	Yes
7.	No liquids/solids to be combusted through the flare system unless during emergency	Company confirmed	Yes
8.	Consent holder to adopt BPO to minimise effects from emissions	Company records, notification and annual report noted elevated flaring emissions associated with site expansion	Yes

	Means of monitoring during period under Compliance			
	Condition requirement	review	achieved?	
).	Only treated substances from well stream to be combusted in flare pit	Company records, inspections	Yes	
0.	No objectionable odours or smoke beyond site boundary	Inspections, no complaints received	Yes	
1.	All hydrocarbon storage vessels shall be fitted with vapour recovery systems	Only produced hydrocarbon storage vessels on site so does not apply	N/A	
2.	Opacity of emissions to not exceed level 1 on Ringlemann scale for more than 4 minutes	Not assessed	N/A	
3.	The consent holder shall control carbon monoxide emissions to not exceed 10 mg/m ³ under ambient conditions	Not assessed	N/A	
4.	Consent holder to control nitrogen oxide emissions to not exceed 100 ug/m ³ under ambient conditions	Not assessed	N/A	
5.	Consent holder to ensure other contaminants from flaring do not exceed workplace exposure standards (DOL, 2002)	Not assessed	N/A	
6.	Consent holder to make an analysis of the gas/condensate stream available on request	Assessment of data provided following request	Partially – analysis was requested however gas is not regularly sampled. It is continuously monitored to ensure it meets NZ5442 specifications.	
7.	Visible smoke instances to be recorded and supplied to Council upon request	Not requested	N/A	
8.	Consent holder to record flaring events in a log and supply records to Council in an annual report	Inspections, records received in annual report	Yes	
9.	The consent holder to supply an annual report during May	Report was received late	No	
0.	Optional review provision re environmental effects	Non remaining	N/A	
	erall assessment of consent compliance an consent	d environmental performance in respect of	High	
)ve	erall assessment of administrative performa	ance in respect of this consent	Good	

Purpose: To discharge emissions to air during flaring from well workovers and in emergency situations associated with production activities at the Ahuroa B wellsite, together with miscellaneous emissions

Year	Consent no	High	Good	Improvement required	Poor
	3681-2	1	-	-	-
2021-2022	7432-1	1	-	-	-
	7746-1	1	-	-	-
	3681-2	-	1	-	-
2020-2021	7432-1	1	-	-	-
	7746-1	1	-	-	-
	3681-2	-	1	-	-
2019-2020	7432-1	1	-	-	-
	7746-1	1	-	-	-
	3681-2	1	-	-	-
2018-2019	7432-1	1	-	-	-
	7746-1	1	-	-	-
	3681-2	1	-	-	-
2017-2018	7432-1	1	-	-	_
	7746-1	1	-	-	_
	3681-2	1	-	-	_
2016-2017	7432-1	1	-	-	_
	7746-1	1	-	-	-
	3681-2	1	-	-	_
2015-2016	7432-1	1	-	-	-
	7746-1	1	-	-	-
	3681-2	1	-	-	-
2014-2015	7432-1	1	-	-	-
	7746-1	1	-	-	-
Totals		21	3	0	0

Table 10 Evaluation of environmental performance over time

During the year, the Company demonstrated a high level of environmental and a good level of administrative performance with the resource consents as defined in Appendix II.

3.4 Recommendations from the 2020-2021 Annual Report

In the 2020-2021 Annual Report, it was recommended:

- 1. THAT in the first instance, monitoring of consented activities at Ahuroa B Gas Storage facilities and for the connecting pipeline to Stratford Power Station in the 2021-2022 year continue at the same level as in 2020-2021.
- 2. THAT should there be issues with environmental or administrative performance in 2021-2022, monitoring may be adjusted to reflect any additional investigation or intervention as found necessary.

3. THAT the option for a review of resource consents 3681-2 and 7432-1 in June 2021, as set out in conditions of the consents, not be exercised, on the grounds that the current conditions are adequate.

Recommendations 1 and 3 were undertaken, recommendation 2 was not required.

3.5 Alterations to monitoring programmes for 2022-2023

In designing and implementing the monitoring programmes for air/water discharges in the region, the Council has taken into account:

- the extent of information already made available through monitoring or other means to date;
- its relevance under the RMA;
- the Council's obligations to monitor consented activities and their effects under the RMA;
- the record of administrative and environmental performances of the consent holder; and
- reporting to the regional community.

The Council also takes into account the scope of assessments required at the time of renewal of permits, and the need to maintain a sound understanding of industrial processes within Taranaki exercising resource consents.

Planned changes for 2022-2023 monitoring programme include the requirement for additional surface water samples from the Makara Stream to assess for any mobilisation of contaminants from the expired MBC consent. The rest of the compliance programme will remain unchanged

It should be noted that the proposed programme represents a reasonable and risk-based level of monitoring for the site in question. The Council reserves the right to subsequently adjust the programme from that initially prepared, should the need arise if potential or actual non-compliance is determined at any time during 2022-2023.

4 Recommendations

- 1. THAT in the first instance, monitoring of consented activities at Ahuroa-B Gas storage facility (AGS) in the 2022-2023 year continue at the same level as in 2021-2022 with the addition of surface water sampling of the Makara Stream to assess for any mobilisation of contaminants from the expired MBC consent (5173-2).
- 2. That a monitoring bore be installed at a suitable location to enable groundwater monitoring to commence.
- 3. THAT should there be issues with environmental or administrative performance in 2022-2023, monitoring may be adjusted to reflect any additional investigation or intervention as found necessary.

Glossary of common terms and abbreviations

The following abbreviations and terms may be used within this report:

Al*	Aluminium.
As*	Arsenic.
Biomonitoring	Assessing the health of the environment using aquatic organisms.
BOD	Biochemical oxygen demand. A measure of the presence of degradable organic matter, taking into account the biological conversion of ammonia to nitrate.
BODF	Biochemical oxygen demand of a filtered sample.
Bund	A wall around a tank to contain its contents in the case of a leak.
CBOD	Carbonaceous biochemical oxygen demand. A measure of the presence of degradable organic matter, excluding the biological conversion of ammonia to nitrate.
cfu	Colony forming units. A measure of the concentration of bacteria usually expressed as per 100 millilitre sample.
COD	Chemical oxygen demand. A measure of the oxygen required to oxidise all matter in a sample by chemical reaction.
Conductivity	Conductivity, an indication of the level of dissolved salts in a sample, usually measured at 25°C and expressed in μ S/cm.
Cu*	Copper.
Cumec	A volumetric measure of flow- 1 cubic metre per second (1 m ³ s- ¹).
DO	Dissolved oxygen.
DRP	Dissolved reactive phosphorus.
E.coli	Escherichia coli, an indicator of the possible presence of faecal material and pathological micro-organisms. Usually expressed as colony forming units per 100 millilitre sample.
Ent	Enterococci, an indicator of the possible presence of faecal material and pathological micro-organisms. Usually expressed as colony forming units per 100 millilitre of sample.
F	Fluoride.
FC	Faecal coliforms, an indicator of the possible presence of faecal material and pathological micro-organisms. Usually expressed as colony forming units per 100 millilitre sample.
FNU	Formazin nephelometric units, a measure of the turbidity of water
Fresh	Elevated flow in a stream, such as after heavy rainfall.
g/m²/day	grams/metre ² /day.
g/m³	Grams per cubic metre, and equivalent to milligrams per litre (mg/L). In water, this is also equivalent to parts per million (ppm), but the same does not apply to gaseous mixtures.
Incident	An event that is alleged or is found to have occurred that may have actual or potential environmental consequences or may involve non-compliance with a consent or rule in a regional plan. Registration of an incident by the Council does not automatically mean such an outcome had actually occurred.

Intervention	Action/s taken by Council to instruct or direct actions be taken to avoid or reduce the likelihood of an incident occurring.
Investigation	Action taken by Council to establish what were the circumstances/events surrounding an incident including any allegations of an incident.
Incident register	The incident register contains a list of events recorded by the Council on the basis that they may have the potential or actual environmental consequences that may represent a breach of a consent or provision in a Regional Plan.
L/s	Litres per second.
m ²	Square Metres.
MCI	Macroinvertebrate community index; a numerical indication of the state of biological life in a stream that takes into account the sensitivity of the taxa present to organic pollution in stony habitats.
Mixing zone	The zone below a discharge point where the discharge is not fully mixed with the receiving environment. For a stream, conventionally taken as a length equivalent to 7 times the width of the stream at the discharge point.
MPN	Most Probable Number. A method used to estimate the concentration of viable microorganisms in a sample.
µS/cm	Microsiemens per centimetre.
NH_4	Ammonium, normally expressed in terms of the mass of nitrogen (N).
NH ₃	Unionised ammonia, normally expressed in terms of the mass of nitrogen (N).
NO ₃	Nitrate, normally expressed in terms of the mass of nitrogen (N).
NTU	Nephelometric Turbidity Unit, a measure of the turbidity of water.
O&G	Oil and grease, defined as anything that will dissolve into a particular organic solvent (e.g. hexane). May include both animal material (fats) and mineral matter (hydrocarbons).
Pb*	Lead.
рН	A numerical system for measuring acidity in solutions, with 7 as neutral. Numbers lower than 7 are increasingly acidic and higher than 7 are increasingly alkaline. The scale is logarithmic i.e. a change of 1 represents a ten-fold change in strength. For example, a pH of 4 is ten times more acidic than a pH of 5.
Physicochemical	Measurement of both physical properties (e.g. temperature, clarity, density) and chemical determinants (e.g. metals and nutrients) to characterise the state of an environment.
$PM_{10}, PM_{2.5}, PM_{1.0}$	Relatively fine airborne particles (less than 10 or 2.5 or 1.0 micrometre diameter, respectively).
Resource consent	Refer Section 87 of the RMA. Resource consents include land use consents (refer Sections 9 and 13 of the RMA), coastal permits (Sections 12, 14 and 15), water permits (Section 14) and discharge permits (Section 15).
RMA	Resource Management Act 1991 and including all subsequent amendments.
SS	Suspended solids.
SQMCI	Semi quantitative macroinvertebrate community index.
Temp	Temperature, measured in °C (degrees Celsius).
Turb	Turbidity, expressed in NTU or FNU.
Zn*	Zinc.

*an abbreviation for a metal or other analyte may be followed by the letters 'As', to denote the amount of metal recoverable in acidic conditions. This is taken as indicating the total amount of metal that might be solubilised under extreme environmental conditions. The abbreviation may alternatively be followed by the letter 'D', denoting the amount of the metal present in dissolved form rather than in particulate or solid form.

For further information on analytical methods, contact an Environment Quality Manager.

Flexgas Ahuroa Gas Storage Annual Flare and Presssure Report 2021-2022. Frodo id. 3075102

- Ministry for the Environment. 2018. Best Practice Guidelines for Compliance, Monitoring and Enforcement under the Resource Management Act 1991. Wellington: Ministry for the Environment.
- Taranaki Regional Council (2022): *Flexgas Ltd Ahuroa B Gas Storage Facility Monitoring Programme Annual Report 2020-2021.* Technical Report 2021-88. Frodo id. 2940496
- Taranaki Regional Council (2021): GSNZ SPV1 Ltd Ahuroa B Gas Storage Facility Monitoring Programme Annual Report 2019-2020. Technical Report 2020-95.
- Taranaki Regional Council (2020): GSNZ SPV1 Ltd Ahuroa B Gas Storage Facility Monitoring Programme Annual Report 2018-2019. Technical Report 2019-93.
- Taranaki Regional Council (2018): Stratford Power Station (TCC1 and SP1) Ahuroa Gas Storage Contact Energy Ltd Monitoring Programme Annual Report 2017-2018. Technical Report 2018-50.
- Taranaki Regional Council (2017): Stratford Power Station (TCC1 and SP1) Ahuroa Gas Storage Contact Energy Ltd Monitoring Programme Annual Report 2016-2017. Technical Report 2017-12.
- Taranaki Regional Council (2016): Stratford Power Station (TCC1 & SP1) Ahuroa Gas Storage Contact Energy Ltd Monitoring programme Annual report 2015-2016. Technical Report 2016-115.

Appendix I

Resource consents held by Flexgas Ltd Ahuroa B Storage Facility

(For a copy of the signed resource consent please contact the TRC Consents department)

Water abstraction permits

Section 14 of the RMA stipulates that no person may take, use, dam or divert any water, unless the activity is expressly allowed for by a resource consent or a rule in a regional plan, or it falls within some particular categories set out in Section 14. Permits authorising the abstraction of water are issued by the Council under Section 87(d) of the RMA.

Water discharge permits

Section 15(1)(a) of the RMA stipulates that no person may discharge any contaminant into water, unless the activity is expressly allowed for by a resource consent or a rule in a regional plan, or by national regulations. Permits authorising discharges to water are issued by the Council under Section 87(e) of the RMA.

Air discharge permits

Section 15(1)(c) of the RMA stipulates that no person may discharge any contaminant from any industrial or trade premises into air, unless the activity is expressly allowed for by a resource consent, a rule in a regional plan, or by national regulations. Permits authorising discharges to air are issued by the Council under Section 87(e) of the RMA.

Discharges of wastes to land

Sections 15(1)(b) and (d) of the RMA stipulate that no person may discharge any contaminant onto land if it may then enter water, or from any industrial or trade premises onto land under any circumstances, unless the activity is expressly allowed for by a resource consent, a rule in a regional plan, or by national regulations. Permits authorising the discharge of wastes to land are issued by the Council under Section 87(e) of the RMA.

Land use permits

Section 13(1)(a) of the RMA stipulates that no person may in relation to the bed of any lake or river use, erect, reconstruct, place, alter, extend, remove, or demolish any structure or part of any structure in, on, under, or over the bed, unless the activity is expressly allowed for by a resource consent, a rule in a regional plan, or by national regulations. Land use permits are issued by the Council under Section 87(a) of the RMA.

Coastal permits

Section 12(1)(b) of the RMA stipulates that no person may erect, reconstruct, place, alter, extend, remove, or demolish any structure that is fixed in, on, under, or over any foreshore or seabed, unless the activity is expressly allowed for by a resource consent, a rule in a regional plan, or by national regulations. Coastal permits are issued by the Council under Section 87(c) of the RMA.



Discharge Permit Pursuant to the Resource Management Act 1991 a resource consent is hereby granted by the Taranaki Regional Council

Name of Consent Holder:	Flexgas Limited Private Bag 2020 New Plymouth 4312	
Decision Date (Change):	12 January 2011	
Commencement Date (Change):	12 January 2011	(Granted Date: 22 April 2003)

Conditions of Consent

- Consent Granted: To discharge treated stormwater, uncontaminated treated site water, and uncontaminated treated production water from hydrocarbon exploration and production operations at the Ahuroa-B wellsite onto and into land and into an unnamed tributary of the Makara Stream in the Waitara catchment
- Expiry Date: 1 June 2033
- Review Date(s): June 2021, June 2027
- Site Location: Ahuroa-B wellsite, 1278 Croydon Road, Stratford (Property owner: G & K Bishop)
- Grid Reference (NZTM) 1715625E-5652966N
- Catchment: Waitara
- Tributary: Makino Makara

General conditions

- a) On receipt of a requirement from the Chief Executive, Taranaki Regional Council the consent holder shall, within the time specified in the requirement, supply the information required relating to the exercise of this consent.
- b) Unless it is otherwise specified in the conditions of this consent, compliance with any monitoring requirement imposed by this consent must be at the consent holder's own expense.
- c) The consent holder shall pay to the Council all required administrative charges fixed by the Council pursuant to section 36 in relation to:
 - i) the administration, monitoring and supervision of this consent; and
 - ii) charges authorised by regulations.

Special conditions

- 1. The consent holder shall at all times adopt the best practicable option, as defined in section 2 of the Resource Management Act 1991, to prevent or minimise any adverse effects of the discharge on any water body.
- 2. The stormwater catchment area shall be no more than 40,000 m².
- 3. The Chief Executive shall be advised in writing at least 7 days prior to any site works commencing, and again in writing at least 7 days prior to any well drilling operation commencing.
- 4. The consent holder shall provide and maintain for the written approval of the Chief Executive site specific details relating to contingency planning for the wellsite.
- 5. All site water and uncontaminated production water to be discharged under this permit shall be directed for treatment through the stormwater treatment system for discharge in accordance with the special conditions of this permit.
- 6. The design, management and maintenance of the stormwater system shall be generally undertaken in accordance with the information submitted in support of application 6634.
- 7. Any above ground hazardous substances storage areas shall be bunded with drainage to sumps, or other appropriate recovery systems, and not to the stormwater catchment.
- 8. The following concentrations shall not be exceeded in the discharge:

Component	Concentration
pH (range)	6.5 - 8.5
suspended solids	100 gm ⁻³
total recoverable hydrocarbons	
(infrared spectroscopic technique)	15 gm ⁻³
chloride	50 gm ⁻³

This condition shall apply prior to the entry of the treated stormwater, site water and production water either onto and into land, or into surface water, at a designated sampling point approved by the Chief Executive.

- 9. After allowing for reasonable mixing, within a mixing zone extending downstream of the discharge point(s) to the confluence of the two unnamed tributaries at (NZTM) 1715531E-5653067N the discharge shall not give rise to any of the following effects in the receiving waters of the unnamed tributary:
 - a) an increase in temperature of more than 2 degrees Celsius;
 - b) an increase in biochemical oxygen demand of more than 2.00 gm⁻³.
- After allowing for reasonable mixing, within a mixing zone extending downstream of the discharge point(s) to the confluence of the two unnamed tributaries at (NZTM) 1715531E-5653067N the discharge shall not give rise to any of the following effects in the receiving waters of the unnamed tributary:
 - a) the production of any conspicuous oil or grease films, scums or foams, or floatable or suspended materials;
 - b) any conspicuous change in the colour or visual clarity;
 - c) any emission of objectionable odour;
 - d) the rendering of fresh water unsuitable for consumption by farm animals;
 - e) any significant adverse effects on aquatic life.
- 11. The Chief Executive, Taranaki Regional Council, shall be advised in writing at least 48 hours prior to the reinstatement of the site and the reinstatement shall be carried out so as to minimise effects on stormwater quality.
- 12. In accordance with section 128 and section 129 of the Resource Management Act 1991, the Taranaki Regional Council may serve notice of its intention to review, amend, delete or add to the conditions of this resource consent by giving notice of review during the month of June 2009 and/or June 2015 and/or June 2021 and/or June 2027, for the purpose of ensuring that the conditions are adequate to deal with any adverse effects on the environment arising from the exercise of this resource consent, which were either not foreseen at the time the application was considered or which it was not appropriate to deal with at the time.

Transferred at Stratford on 15 November 2019

For and on behalf of Taranaki Regional Council

A D McLav

Director - Resource Management



Discharge Permit Pursuant to the Resource Management Act 1991 a resource consent is hereby granted by the Taranaki Regional Council

Name of Consent Holder:	Flexgas Limited Private Bag 2020 New Plymouth 4312	
Decision Date (Change):	7 April 2011	
Commencement Date (Change):	7 April 2011	(Granted Date: 2 December 2008)

Conditions of Consent

Consent Granted:	To discharge contaminants (natural gas) into land for the purpose of gas storage
Expiry Date:	1 June 2027
Review Date(s):	June 2021
Site Location:	Ahuroa-B wellsite, Barleymans Road, Tariki (Property owners: GN & KA Bishop)
Grid Reference (NZTM)	1715630E-5652960N
Catchment:	Waitara
Tributary:	Makino Makara

General conditions

- a) On receipt of a requirement from the Chief Executive, Taranaki Regional Council the consent holder shall, within the time specified in the requirement, supply the information required relating to the exercise of this consent.
- b) Unless it is otherwise specified in the conditions of this consent, compliance with any monitoring requirement imposed by this consent must be at the consent holder's own expense.
- c) The consent holder shall pay to the Council all required administrative charges fixed by the Council pursuant to section 36 in relation to:
 - i) the administration, monitoring and supervision of this consent; and
 - ii) charges authorised by regulations.

Special conditions

- 1. Notwithstanding any other condition of this consent, the consent holder shall at all times adopt the best practicable option, as defined in section 2 of the Resource Management Act 1991, to prevent or minimise any adverse effects on the environment from the exercise of this consent.
- 2. Any gas discharged into the ground pursuant to this consent shall meet NZ5442 specifications.
- 3. The pressure within the gas reservoir shall not exceed 3400psia.
- 4. The consent holder shall continuously record the injection pressure, and establish and maintain a correlation between the injection pressure and pressure within the gas reservoir, so that the reservoir pressure can be monitored at all time to determine compliance with condition 3. The pressure records shall be made available to the Council on request.
- 5. This consent shall lapse on 31 December 2013, unless the consent is given effect to before the end of that period or the Taranaki Regional Council fixes a longer period pursuant to section 125(1)(b) of the Resource Management Act 1991.

Consent 7432-1

6. In accordance with section 128 and section 129 of the Resource Management Act 1991, the Taranaki Regional Council may serve notice of its intention to review, amend, delete or add to the conditions of this resource consent by giving notice of review during the month of June 2015 and/or June 2021, for the purpose of ensuring that the conditions are adequate to deal with any adverse effects on the environment arising from the exercise of this resource consent, which were either not foreseen at the time the application was considered or which it was not appropriate to deal with at the time.

Transferred at Stratford on 15 November 2019

For and on behalf of Taranaki Regional Council

00 A D McLay

Director - Resource Management

Discharge Permit Pursuant to the Resource Management Act 1991 a resource consent is hereby granted by the Taranaki Regional Council

Name of	GSNZ SPV1 Limited
Consent Holder:	42 Connett Road West
	Bell Block
	New Plymouth 4312

- Decision Date: 6 April 2010
- Commencement Date: 6 April 2010

Conditions of Consent

- Consent Granted: To discharge stormwater and sediment from earthworks into two unnamed tributaries of the Makara Stream, associated with site development at the Ahuroa-B wellsite
- Expiry Date: 1 June 2027
- Review Date(s): June 2021
- Site Location: Ahuroa-B wellsite, 1278 Croydon Road, Stratford (Property owner: GS & KA Bishop)
- Grid Reference (NZTM) 1715699E-5652829N
- Catchment: Waitara
- Tributary: Makino Makara

General condition

a. The consent holder shall pay to the Taranaki Regional Council all the administration, monitoring and supervision costs of this consent, fixed in accordance with section 36 of the Resource Management Act 1991.

Special conditions

- 1. The exercise of this consent shall be undertaken in accordance with the documentation submitted in support of application 6461. Specifically this includes Appendix B and plans NZ-2784-20-SK-0001/2 and NZ-2784-20-SK-0001/1. If there is any conflict between the documentation submitted in support of application 6461 and the conditions of this consent, the conditions of this consent shall prevail.
- 2. If any area of soil is exposed, all run off from that area shall pass through settlement ponds or sediment traps with a minimum total capacity of;
 - a) 100 cubic metres for every hectare of exposed soil between 1 November to 30 April; and
 - b) 200 cubic metres for every hectare of exposed soil between 1 May to 31 October;

unless other sediment control measures that achieve an equivalent standard are agreed to by the Chief Executive of the Taranaki Regional Council.

- 3. At least 7 working days prior to the commencement of works the consent holder shall notify the Taranaki Regional Council of the proposed start date for the work. Notification shall include the consent number and a brief description of the activity consented and shall be emailed to <u>worknotification@trc.govt.nz</u>. Notification by fax or post is acceptable only if the consent holder does not have access to email.
- 4. All earthwork areas shall be stabilised vegetatively or otherwise as soon as is practicable immediately following completion of soil disturbance activities.
- 5. This consent shall lapse on 30 June 2015, unless the consent is given effect to before the end of that period or the Taranaki Regional Council fixes a longer period pursuant to section 125(1)(b) of the Resource Management Act 1991.

Consent 7621-1

6. In accordance with section 128 and section 129 of the Resource Management Act 1991, the Taranaki Regional Council may serve notice of its intention to review, amend, delete or add to the conditions of this resource consent by giving notice of review during the month of June 2015 and/or June 2021, for the purpose of ensuring that the conditions are adequate to deal with any adverse effects on the environment arising from the exercise of this resource consent, which were either not foreseen at the time the application was considered or which it was not appropriate to deal with at the time.

Transferred at Stratford on 3 October 2018

For and on behalf of Taranaki Regional Council

A D McLay Director - Resource Management



Land Use Consent Pursuant to the Resource Management Act 1991 a resource consent is hereby granted by the Taranaki Regional Council

Name of	Flexgas Limited
Consent Holder:	Private Bag 2020
	New Plymouth 4312

- Decision Date: 6 April 2010
- Commencement Date: 6 April 2010

Conditions of Consent

Consent Granted:	To install, use and maintain a culvert in an unnamed
	tributary of the Makara Stream in the Waitara River

- Expiry Date: 1 June 2027
- Review Date(s): June 2021
- Site Location: Ahuroa-B wellsite, 1278 Croydon Road, Stratford (Property owner: GS & KA Bishop)
- Grid Reference (NZTM) 1715738E-5652776N

Makino

Makara

Catchment: Waitara

Tributary

General condition

a. The consent holder shall pay to the Taranaki Regional Council all the administration, monitoring and supervision costs of this consent, fixed in accordance with section 36 of the Resource Management Act 1991.

Special conditions

- 1. The culvert pipe shall have a diameter no less than 600 and be no longer than 22 metres.
- 2. The fill over the top of the culvert pipe shall be no deeper than 2.5 metres.
- 3. The consent holder shall notify the Chief Executive, Taranaki Regional Council, in writing at least 2 working days prior to the commencement and upon completion of the initial installation and again at least 2 working days to and upon completion of any subsequent maintenance works which would involve disturbance of or deposition to the river bed or discharges to water. Notification shall include the consent number and a brief description of the activity consented and be emailed to worknotification@trc.govt.nz. Notification by fax or post is acceptable only if the consent holder does not have access to email.
- 4. The consent holder shall ensure that the area and volume of stream bed disturbance is, as far as practicable, minimised and any areas that are disturbed are, as far as practicable, reinstated.
- 5. The culvert shall not obstruct fish passage.
- 6. The invert of the culvert shall at all times be slightly lower than the level of the surrounding riverbed so that it fills with bed material and simulates the natural bed.
- 7. The gradient of the culvert shall be no steeper than the natural gradient of the stream bed at the site.
- 8. The consent holder shall take all reasonable steps to:
 - a. minimise the amount of sediment discharged to the stream;
 - b. minimise the amount of sediment that becomes suspended in the stream; and
 - c. mitigate the effects of any sediment in the stream.

Undertaking work in accordance with *Guidelines for Earthworks in the Taranaki region*, by the Taranaki Regional Council, will achieve compliance with this condition.

- 9. The works shall remain the responsibility of the consent holder and be maintained so that:
 - a) it does not become blocked and at all times allows the free flow of water through it;
 - b) any erosion, scour or instability of the stream bed or banks that is attributable to the works carried out as part of this consent is remedied by the consent holder.

Consent 7622-1

- 10. Except with the written agreement of the Chief Executive, Taranaki Regional Council, the culvert shall be removed and the area reinstated, if and when it is no longer required. A further resource consent may be required to authorise the removal of the structure, and the consent holder is advised to seek advice from the Council on this matter.
- 11. This consent shall lapse on 30 June 2015, unless the consent is given effect to before the end of that period or the Taranaki Regional Council fixes a longer period pursuant to section 125(1)(b) of the Resource Management Act 1991.
- 12. In accordance with section 128 and section 129 of the Resource Management Act 1991, the Taranaki Regional Council may serve notice of its intention to review, amend, delete or add to the conditions of this resource consent by giving notice of review during the month of June 2015 and/or June 2021, for the purpose of ensuring that the conditions are adequate to deal with any adverse effects on the environment arising from the exercise of this resource consent, which were either not foreseen at the time the application was considered or which it was not appropriate to deal with at the time.

Transferred at Stratford on 15 November 2019

For and on behalf of Taranaki Regional Council

A D McLav

Director - Resource Management



Discharge Permit Pursuant to the Resource Management Act 1991 a resource consent is hereby granted by the Taranaki Regional Council

Name of	Flexgas Limited
Consent Holder:	Private Bag 2020
	New Plymouth 4312

- Decision Date: 6 October 2009
- Commencement Date: 6 October 2009

Conditions of Consent

- Consent Granted: To discharge emissions to air during flaring from well workovers and in emergency situations associated with production activities at the Ahuroa-B wellsite, together with miscellaneous emissions
- Expiry Date: 1 June 2028
- Review Date(s): June 2022
- Site Location: Ahuroa-B wellsite, Barleymans Road, Stratford (Property owner: G & K Bishop)

Grid Reference (NZTM) 1715699E-5652954N

General condition

a. The consent holder shall pay to the Taranaki Regional Council all the administration, monitoring and supervision costs of this consent, fixed in accordance with section 36 of the Resource Management Act 1991.

Special conditions

Information and notification

- 1. Other than in emergencies, the consent holder shall notify the Chief Executive, Taranaki Regional Council, whenever the continuous flaring of hydrocarbons (other than purge gas) is expected to occur for more than five minutes in duration. Notification shall be no less than 24 hours before the flaring commences. Notification shall include the consent number and be emailed to <u>worknotification@trc.govt.nz</u>.
- 2. At least 24 hours before any flaring, other than in emergencies, the consent holder shall provide notification to all residents within 1000 metres of the site(s) of the commencement of flaring. The consent holder shall include in the notification a 24-hour contact telephone number for a representative of the consent holder, and shall keep and make available to the Chief Executive, Taranaki Regional Council, a record of all queries and complaints received in respect of any flaring activity.
- 3. No alteration shall be made to plant equipment or processes which may substantially alter the nature or quantity of flare emissions or other site emissions, including but not limited to the recovery of produced gas, other than as authorised by this consent, without prior consultation with the Chief Executive, Taranaki Regional Council.

Emissions from the site

- 4. Other than for the maintenance of a pilot flare flame, the consent holder shall have regard to the prevailing and predicted wind speed and direction at the time of initiation of, and throughout, any episode of flaring so as to minimise offsite effects.
- 5. All gas that is flared must first be treated by effective liquid and solid separation and recovery to ensure that smoke emission during flaring is minimised.
- 6. If separation required by special condition 5 cannot be implemented or maintained at any time while there is a flow from the well, whether natural or induced, then the consent holder shall immediately advise the Compliance Manager, Taranaki Regional Council, and shall in any case re-establish liquid and solid separation and recovery within three hours.
- 7. Subject to special condition 6, no liquid or solid hydrocarbons shall be combusted through the gas flare system, other than in an emergency.
- 8. Notwithstanding any other condition of this consent the consent holder shall adopt the best practicable option, as defined in section 2 of the Resource Management Act 1991, to prevent or minimise any actual or potential effect on the environment arising from any emission to air from the flare or any other emissions to air from the wellsites authorised under this consent (including use of a separator during well clean-up).

- 9. Only substances originating from the well stream and treated as outlined by conditions 5, 6, 7, and 8 shall be combusted within the flare pit.
- 10. There shall not be any objectionable or offensive odour or smoke at or beyond the boundaries of the properties where the wellsites are located.
- 11. All hydrocarbon storage vessels shall be fitted with vapour recovery systems.
- 12. The opacity of any smoke emissions shall not exceed a level of 1, as measured on the Ringelmann Scale, for more than 4 minutes cumulative duration in any 60 minute period.
- 13. The consent holder shall control all emissions of carbon monoxide to the atmosphere from the flare so that, whether alone or in conjunction with any other emissions from the wellsite, the maximum ground level concentration of carbon monoxide arising from the exercise of this consent measured under ambient conditions does not exceed 10 milligrams per cubic metre (mg/m³) (eight-hour average exposure), or 30 mg/m³ one-hour average exposure) at or beyond the boundaries of the properties where the wellsites are located.
- 14. The consent holder shall control all emissions of nitrogen oxides to the atmosphere from the flares so that, whether alone or in conjunction with any other emissions from the wellsites, the maximum ground level concentration of nitrogen dioxide arising from the exercise of this consent measured under ambient conditions does not exceed 100 micrograms per cubic metre (μ g/m³) (24-hour average exposure), or 200 μ g/m³ (1-hour average exposure) at or beyond the boundaries of the of the properties where the wellsites are located.
- 15. The consent holder shall control emissions to the atmosphere from the wellsites and flare of contaminants other than carbon dioxide, carbon monoxide, and nitrogen oxides so that, whether alone or in conjunction with any emissions from the flares, the maximum ground level concentration for any particular contaminant arising from the exercise of this consent measured at or beyond the boundaries of the properties where the wellsites are located, is not increased above background levels:
 - a) by more than 1/30th of the relevant Occupational Threshold Value-Time Weighted Average, or by more than the Short Term Exposure Limit at any time (all terms as defined in Workplace Exposure Standards, 2002, Department of Labour); or
 - b) if no Short Term Exposure Limit is set, by more than three times the Time Weighted Average at any time (all terms as defined in Workplace Exposure Standards, 2002, Department of Labour).

Recording and reporting information

- 16. The consent holder shall make available to the Chief Executive, Taranaki Regional Council, upon request, an analysis of a typical gas and condensate stream from the field, covering sulphur compound content and the content of carbon compounds of structure C₆ or higher number of compounds.
- 17. Each time there is visible smoke as a result of the exercise of this consent, the consent holder shall record the time, duration and cause. The consent holder shall make the record available to the Chief Executive, Taranaki Regional Council, upon request.

Consent 7746-1

- 18. The consent holder shall record and maintain a log of all continuous flaring events longer than five minutes duration, and any intermittent flaring lasting for an aggregate of ten minutes or longer in any 120-minute period. The log shall contain the date, the start and finish times of the flaring event, the quantity and type of material flared, and the reason for flaring. The log shall be made available to the Chief Executive, Taranaki Regional Council, upon request, and summarised annually in the report required under condition 19.
- 19. The consent holder shall provide to the Taranaki Regional Council during May of each year, for the duration of this consent, a report:
 - i) detailing any energy efficiency measures implemented on the site;
 - ii) detailing smoke emissions as required under condition 17;
 - iii) detailing any measures undertaken or proposed to reduce smoke emissions;
 - iv) detailing any measures undertaken or proposed to reduce flaring;
 - v) addressing any other issue relevant to the minimisation or mitigation of emissions from the flare;
 - vi) detailing any complaints received and any measures undertaken to address complaints; and
 - vii) reviewing all options and technological advances relevant to the reduction or mitigation of any discharge to air from the site, how these might be applicable and/or implemented at the site, and the benefits and costs of these advances.

Review

- 20. In accordance with section 128 and section 129 of the Resource Management Act 1991, the Taranaki Regional Council may serve notice of its intention to review, amend, delete or add to the conditions of this resource consent by giving notice of review during the month of June 2016 and/or June 2022, for any of the following purposes:
 - a) dealing with any significant adverse effect on the environment arising from the exercise of the consent which was not foreseen at the time the application was considered or which it was not appropriate to deal with at the time; and/or
 - b) requiring the consent holder to adopt the best practicable option to remove or reduce any adverse effect on the environment caused by the discharge; and/or
 - c) to alter, add or delete limits on mass discharge quantities or discharge or ambient concentrations of any contaminant.

Transferred at Stratford on 15 November 2019

For and on behalf of Taranaki Regional Council

A D McLay Director - Resource Management



Discharge Permit Pursuant to the Resource Management Act 1991 a resource consent is hereby granted by the Taranaki Regional Council

Name of	Flexgas Limited
Consent Holder:	Private Bag 2020
	New Plymouth 4312

- Decision Date: 18 January 2011
- Commencement Date: 18 January 2011

Conditions of Consent

Consent Granted: To discharge stormwater and sediment from earthworks during the construction of the extension of the Ahuroa-B wellsite onto and into land

- Expiry Date: 1 June 2027
- Review Date(s): June 2021
- Site Location: Ahuroa-B wellsite, 1278 Croydon Road, Stratford (Property owner: G & K Bishop)
- Grid Reference (NZTM) 1715527E-5652866N
- Catchment: Waitara
- Tributary: Makino Makara

General condition

a. The consent holder shall pay to the Taranaki Regional Council all the administration, monitoring and supervision costs of this consent, fixed in accordance with section 36 of the Resource Management Act 1991.

Special conditions

- 1. The consent holder shall at all times adopt the best practicable option, as defined in section 2 of the Resource Management Act 1991, to prevent or minimise any actual or likely adverse effect on the environment associated with the discharge of contaminants from the site.
- 2. If any area of soil is exposed, all run off from that area shall pass through settlement ponds or sediment traps with a minimum total capacity of;
 - a) 100 cubic metres for every hectare of exposed soil between 1 November to 30 April; and
 - b) 200 cubic metres for every hectare of exposed soil between 1 May to 31 October;

unless other sediment control measures that achieve an equivalent standard are agreed to by the Chief Executive of the Taranaki Regional Council.

3. The obligation described in condition 2 above shall cease to apply, and accordingly the erosion and sediment control measures can be removed, in respect of any particular site or area of any site, only when the site is stabilised.

Note: For the purpose of conditions 3 and 4 "stabilised" in relation to any site or area means inherently resistant to erosion or rendered resistant, such as by using rock or by the application of basecourse, colluvium, grassing, mulch, or another method to the reasonable satisfaction of the Chief Executive, Taranaki Regional Council and as specified in the Taranaki Regional Council's Guidelines for Earthworks in the Taranaki Region, 2006. Where seeding or grassing is used on a surface that is not otherwise resistant to erosion, the surface is considered stabilised once, on reasonable visual inspection by an officer of the Taranaki Regional Council, an 80% vegetative cover has been established.

4. All earthworked areas shall be stabilised vegetatively or otherwise as soon as is practicable immediately following completion of soil disturbance activities.

Note: For the purposes of this condition "stabilised" has the same definition as that set out in condition 3.

- 5. At least 7 working days prior to the commencement of works the consent holder shall notify the Taranaki Regional Council of the proposed start date for the work. Notification shall include the consent number and a brief description of the activity consented and shall be emailed to <u>worknotification@trc.govt.nz</u>.
- 6. This consent shall lapse on 31 March 2016, unless the consent is given effect to before the end of that period or the Taranaki Regional Council fixes a longer period pursuant to section 125(1)(b) of the Resource Management Act 1991.

Consent 7748-1

7. In accordance with section 128 and section 129 of the Resource Management Act 1991, the Taranaki Regional Council may serve notice of its intention to review, amend, delete or add to the conditions of this resource consent by giving notice of review during the month of June 2015 and/or June 2021 for the purpose of ensuring that the conditions are adequate to deal with any adverse effects on the environment arising from the exercise of this resource consent, which were either not foreseen at the time the application was considered or which it was not appropriate to deal with at the time.

Transferred at Stratford on 15 November 2019

For and on behalf of Taranaki Regional Council

A D McLay

Director - Resource Management



Land Use Consent Pursuant to the Resource Management Act 1991 a resource consent is hereby granted by the Taranaki Regional Council

Name of	Flexgas Limited
Consent Holder:	Private Bag 2020
	New Plymouth 4312

- Decision Date: 18 January 2011
- Commencement Date: 18 January 2011

Conditions of Consent

Consent Granted: To install and use a pipe in the bed of an unnamed tributary of the Makara Stream, including the associated reclamation, disturbance and deposition of material

- Expiry Date: 1 June 2027
- Review Date(s): June 2021
- Site Location: Ahuroa-B wellsite, 1278 Croydon Road, Stratford (Property owner: G & K Bishop)
- Grid Reference (NZTM) Between 1715533E-5652692N & 1715550E-5652821N
- Catchment: Waitara
- Tributary Makino Makara

General condition

a. The consent holder shall pay to the Taranaki Regional Council all the administration, monitoring and supervision costs of this consent, fixed in accordance with section 36 of the Resource Management Act 1991.

Special conditions

- 1. This consent authorises the laying pipe in 140 metres of stream bed and subsequently filling the piped reach between grid references (NZTM) 1715533E-5652692N and 1715550E-5652821N.
- 2. The pipe shall have a diameter of not less than 600 mm.
- 3. The piping shall be maintained to ensure it does not become blocked and at all times allows the free flow of water through it.
- 4. The consent holder shall notify the Chief Executive, Taranaki Regional Council, in writing at least 2 working days prior to the commencement and upon completion of the initial installation and again at least 2 working days to and upon completion of any subsequent maintenance works which would involve disturbance of or deposition to the river bed or discharges to water. Notification shall include the consent number and a brief description of the activity consented and be emailed to worknotification@trc.govt.nz.
- 5. Any instream works shall take place only between 1 November and 30 April inclusive.
- 6. The consent holder shall take all reasonable steps to:
 - a) minimise the amount of sediment discharged to the stream;
 - b) minimise the amount of sediment that becomes suspended in the stream; and
 - c) mitigate the effects of any sediment in the stream.

Undertaking work in accordance with *Guidelines for Earthworks in the Taranaki region*, by the Taranaki Regional Council, will achieve compliance with this condition.

- 7. No vegetation shall be buried within 20 metres of the stream.
- 8. In the event that any archaeological remains are discovered as a result of works authorised by this consent, the works shall cease immediately at the affected site and tangata whenua and the Chief Executive, Taranaki Regional Council, shall be notified within one working day. Works may recommence at the affected area when advised to do so by the Chief Executive, Taranaki Regional Council. Such advice shall be given after the Chief Executive has considered: tangata whenua interest and values, the consent holder's interests, the interests of the public generally, and any archaeological or scientific evidence. The New Zealand Police, Coroner, and Historic Places Trust shall also be contacted as appropriate, and the work shall not recommence in the affected area until any necessary statutory authorisations or consents have been obtained.

Consent 7749-1

- 9. This consent shall lapse on 31 March 2016, unless the consent is given effect to before the end of that period or the Taranaki Regional Council fixes a longer period pursuant to section 125(1)(b) of the Resource Management Act 1991.
- 10. In accordance with section 128 and section 129 of the Resource Management Act 1991, the Taranaki Regional Council may serve notice of its intention to review, amend, delete or add to the conditions of this resource consent by giving notice of review during the month of June 2015 and/or June 2021, for the purpose of ensuring that the conditions are adequate to deal with any adverse effects on the environment arising from the exercise of this resource consent, which were either not foreseen at the time the application was considered or which it was not appropriate to deal with at the time.

Transferred at Stratford on 15 November 2019

For and on behalf of Taranaki Regional Council

A D McLay

Director - Resource Management



Land Use Consent Pursuant to the Resource Management Act 1991 a resource consent is hereby granted by the Taranaki Regional Council

Name of Consent Holder:	Flexgas Limited Private Bag 2020 New Plymouth 4312	
Decision Date (Change):	16 March 2016	
Commencement Date (Change):	16 March 2016	(Granted Date: 18 January 2011)

Conditions of Consent

Consent Granted:	To place and use a culvert in an unnamed tributary of the Makara Stream for access purposes
Expiry Date:	1 June 2027
Review Date(s):	June 2021
Site Location:	Ahuroa-B wellsite, 1278 Croydon Road, Stratford
Grid Reference (NZTM)	1715558E-5652753N
Catchment:	Waitara
Tributary	Makino Makara

General condition

a. The consent holder shall pay to the Taranaki Regional Council all the administration, monitoring and supervision costs of this consent, fixed in accordance with section 36 of the Resource Management Act 1991.

Special conditions

- 1. The culvert shall be constructed in accordance with the plan prepared by Transfield Worley Hawkins titled "Ahuroa Gas Storage Project Stage 2B/2C Sediment & Drainage Management" reference NZ-W820-15-EA-0001/2, provided to the Council with application 6637. In the case of any contradiction between the drawing(s) and the conditions of this consent, the conditions of this consent shall prevail.
- 2. The culvert pipe shall have a diameter no less than 600 mm and be no longer than 20 metres.
- 3. The fill over the top of the culvert pipe shall be no deeper than 4 metres.
- 4. The consent holder shall notify the Chief Executive, Taranaki Regional Council, in writing at least 2 working days prior to the commencement and upon completion of the initial installation. Notification shall include the consent number and a brief description of the activity consented and be emailed to <u>worknotification@trc.govt.nz</u>.
- 5. Any instream works shall take place only between 1 November and 30 April inclusive.
- 6. The consent holder shall ensure that the area and volume of stream bed disturbance is, as far as practicable, minimised and any areas that are disturbed are, as far as practicable, reinstated.
- 7. The culvert shall not obstruct fish passage.
- 8. The invert of the culvert shall at all times be slightly lower than the level of the surrounding riverbed so that it fills with bed material and simulates the natural bed.
- 9. The gradient of the culvert shall be no steeper than the natural gradient of the stream bed at the site.
- 10. The consent holder shall take all reasonable steps to:
 - a. minimise the amount of sediment discharged to the stream;
 - b. minimise the amount of sediment that becomes suspended in the stream; and
 - c. mitigate the effects of any sediment in the stream.

Undertaking work in accordance with *Guidelines for Earthworks in the Taranaki region*, by the Taranaki Regional Council, will achieve compliance with this condition.

- 11. The works shall remain the responsibility of the consent holder and be maintained so that:
 - a. it does not become blocked and at all times allows the free flow of water through it;
 - b. any erosion, scour or instability of the stream bed or banks that is attributable to the works carried out as part of this consent is remedied by the consent holder.
- 12. Except with the written agreement of the Chief Executive, Taranaki Regional Council, the culvert shall be removed and the area reinstated, if and when it is no longer required. A further resource consent may be required to authorise the removal of the structure, and the consent holder is advised to seek advice from the Council on this matter.
- 13. This consent shall lapse on 1 June 2027, unless the consent is given effect to before the end of that period or the Taranaki Regional Council fixes a longer period pursuant to section 125(1)(b) of the Resource Management Act 1991.
- 14. In accordance with section 128 and section 129 of the Resource Management Act 1991, the Taranaki Regional Council may serve notice of its intention to review, amend, delete or add to the conditions of this resource consent by giving notice of review during the month of June 2015 and/or June 2021, for the purpose of ensuring that the conditions are adequate to deal with any adverse effects on the environment arising from the exercise of this resource consent, which were either not foreseen at the time the application was considered or which it was not appropriate to deal with at the time.

Transferred at Stratford on 15 November 2019

For and on behalf of Taranaki Regional Council

A D McLay

Director - Resource Management

Consents 9309-1, 9310-1, 9311-1, 9312-1, 9313-1, 9314-1, 9315-1 9316-1, 9317-1, 9318-1, 9319-1, 9320-1, 9321-1, 9322-1



Land Use Consent Pursuant to the Resource Management Act 1991 a resource consent is hereby granted by the Taranaki Regional Council

Name of	Flexgas Limited	
Consent Holder:	Private Bag 2020	
	New Plymouth 4312	

- Decision Date: 30 August 2012
- Commencement Date: 30 August 2012

Conditions of Consent

Consent Granted: To install and use a pipeline for conveying gaseous hydrocarbons under the bed of an unnamed tributary of the Makara Stream

- Expiry Date: 1 June 2028
- Review Date(s): June 2022

Site Location: Pipeline route between Ahuroa-B wellsite and the Stratford Power Station

Grid Reference (NZTM) Various

Catchment:

Tributary

ry Kahouri Makara Ahuroa Pikau

Patea Waitara Consents 9309-1, 9310-1, 9311-1, 9312-1, 9313-1, 9314-1, 9315-1 9316-1, 9317-1, 9318-1, 9319-1, 9320-1, 9321-1, 9322-1

General condition

a. The consent holder shall pay to the Taranaki Regional Council all the administration, monitoring and supervision costs of this consent, fixed in accordance with section 36 of the Resource Management Act 1991.

Special conditions

1. These consents authorise the installation and use of a pipeline at or about the locations specified below:

Crossing No.	Consent No.	Location [Map Reference]	Stream
1	9309-1	1715550E-5652867N	Unnamed tributary – Makara Stream
2	9310-1	1715691E-5651133N	Unnamed tributary – Ahuroa Stream
3	9311-1	1715731E-5650473N	Unnamed tributary – Makara Stream
4	9312-1	1715781E-5650005N	Unnamed tributary – Makara Stream
5	9313-1	1715617E-5649687N	Unnamed tributary – Makara Stream
6	9314-1	1715374E-5649461N	Unnamed tributary – Makara Stream
7	9315-1	1714309E-5648554N	Unnamed tributary – Kahouri Stream
8	9316-1	1714065E-5648223N	Unnamed tributary – Kahouri Stream
9	9317-1	1713960E-5647439N	Unnamed tributary – Piakau Stream
10	9318-1	1713745E-5647083N	Piakau Stream
11	9319-1	1713646E-5646976N	Unnamed tributary – Piakau Stream
12	9320-1	1713627E-5646659N	Unnamed tributary – Piakau Stream
13	9321-1	1713619E-5646155N	Unnamed tributary – Piakau Stream
14	9322-1	1713547E-5645926N	Kahouri Stream

- 2. At least 48 hours prior to the commencement of works the consent holder shall provide the Taranaki Regional Council with a programme for the installation of the pipelines including: a schedule of proposed start dates and an estimation of the duration of the works, and details of the contractor including contact information for the project manager. Notification shall include the consent number and a brief description of the activity consented and be emailed to worknotification@trc.govt.nz.
- 3. The consent holder shall at all times adopt the best practicable option, as defined in section 2 of the Resource Management Act 1991, to prevent or minimise the discharge of sediment to any surface water body and to prevent or minimise any adverse effects of the disturbance activities on any surface water body.
- 4. All pipelines shall be buried to an initial burial depth not less than 2 metres below the bed of the streams.
- 5. Any work undertaken in the bed of the streams shall be undertaken only between 1 November and 31 May.
- 6. The consent holder shall ensure that the area and volume of river bed disturbance is restricted to a practicable minimum and that areas disturbed from the exercise of this consent are reinstated as near as practicable to pre-work condition.

Consents 9309-1, 9310-1, 9311-1, 9312-1, 9313-1, 9314-1, 9315-1 9316-1, 9317-1, 9318-1, 9319-1, 9320-1, 9321-1, 9322-1

- 7. The consent holder shall take all reasonable steps to:
 - a. minimise the amount of sediment discharged to the stream;
 - b. minimise the amount of sediment that becomes suspended in the stream; and
 - c. mitigate the effects of any sediment in the stream.

Undertaking work in accordance with *Guidelines for Earthworks in the Taranaki Region*, by the Taranaki Regional Council, will achieve compliance with this condition.

- 8. In the event that any archaeological remains are discovered as a result of works authorised by this consent, the works shall cease immediately at the affected site and tangata whenua and the Chief Executive, Taranaki Regional Council, shall be notified within one working day. Works may recommence at the affected area when advised to do so by the Chief Executive, Taranaki Regional Council. Such advice shall be given after the Chief Executive has considered: tangata whenua interest and values, the consent holder's interests, the interests of the public generally, and any archaeological or scientific evidence. The New Zealand Police, Coroner, and Historic Places Trust shall also be contacted as appropriate, and the work shall not recommence in the affected area until any necessary statutory authorisations or consents have been obtained.
- 9. This consent shall lapse on 30 September 2017, unless the consent is given effect to before the end of that period or the Taranaki Regional Council fixes a longer period pursuant to section 125(1)(b) of the Resource Management Act 1991.
- 10. In accordance with section 128 and section 129 of the Resource Management Act 1991, the Taranaki Regional Council may serve notice of its intention to review, amend, delete or add to the conditions of this resource consent by giving notice of review during the month of June 2016 and/or June 2022, for the purpose of ensuring that the conditions are adequate to deal with any adverse effects on the environment arising from the exercise of this resource consent, which were either not foreseen at the time the application was considered or which it was not appropriate to deal with at the time.

Transferred at Stratford on 15 November 2019

For and on behalf of Taranaki Regional Council

A D McLav

Director - Resource Management



Land Use Consent Pursuant to the Resource Management Act 1991 a resource consent is hereby granted by the Taranaki Regional Council

Name of Consent Holder:	Flexgas Limited			
Decision Date (Review):	17 August 2021			
Commencement Date (Review):	17 August 2021	(Granted Date: 6 June 2013)		
Conditions of Consent				
Consent Granted:	To install and use a culvert in an unnamed tributary of the Makara Stream, including associated realignment, streambed disturbance and reclamation			
Expiry Date:	1 June 2027			
Site Location:	Ahuroa-B wellsite, 1278 Cryoydon Road, Stratford			
Grid Reference (NZTM)	1715566E–5652807N			
Catchment:	Waitara			
Tributary:	Makino Makara			

For General, Standard and Special conditions pertaining to this consent please see reverse side of this document

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Doc# 2847049-v1

General condition

a. The consent holder shall pay to the Taranaki Regional Council all the administration, monitoring and supervision costs of this consent, fixed in accordance with section 36 of the Resource Management Act 1991.

Special conditions

- 1. The culvert and stream realignment shall be constructed in accordance with the information provided in the application, including drawing NZ-W828-20-DD-31001-01, Revision A0 and dated March 2013. In the case of any contradiction between the information and the conditions of this consent, the conditions of this consent shall prevail.
- 2. The culvert shall be no longer than 22 metres.
- 3. The fill over the top of the culvert shall be no deeper than 3 metres.
- 4. The consent holder shall notify the Chief Executive, Taranaki Regional Council, in writing at least 2 working days prior to the commencement of the outstanding works. Notification shall include the consent number and a brief description of the activity consented and be emailed to <u>worknotification@trc.govt.nz</u>.
- 5. The gradient of the culvert shall be no steeper than the natural gradient of the stream bed at the site.
- 6. The consent holder shall install headwalls and rock rip rap at the outlet and inlet of the culvert.
- 7. The grading of the rock rip rap is of the following specification:
 - a. 100% less than 450 mm diameter;
 - b. 50% greater than 350 mm diameter; and
 - c. 90% greater than 150 mm diameter.
- 8. That consent holder shall ensure that rock rip rap armouring is placed a minimum:
 - a. height and distance of 0.5 metres and 3 metres along the banks of the new channel and at the location where the new alignment deviates from the old alignment; and
 - b. distance of 3 metres across the full width of the bed of the new stream channel.
- 9. On completion of the realignment work:
 - a. the banks of the reconstructed channel shall have a slope no steeper than 1 horizontal to 1 vertical. Where the bank consists of fill, the slope will be no steeper than 2 horizontal to 1 vertical; and
 - b. the bed of the reconstructed channel shall be at an appropriate grade so as to provide for fish passage; and
- 10. The final slope of the channel banks above the culvert shall be no steeper than 1.5 horizontal to 1 vertical.

- 11. The invert of the culvert shall be set below the existing streambed by at least 20% of the culvert diameter so that it fills with bed material and simulates the natural bed.
- 12. The consent holder shall ensure that the area and volume of stream bed disturbance is, as far as practicable, minimised and any areas that are disturbed are, as far as practicable, reinstated.
- 13. The consent holder shall take all reasonable steps to:
 - a. minimise the amount of sediment discharged to the stream;
 - b. minimise the amount of sediment that becomes suspended in the stream; and
 - c. mitigate the effects of any sediment in the stream.

Undertaking work in accordance with *Guidelines for Earthworks in the Taranaki region*, by the Taranaki Regional Council, will achieve compliance with this condition.

14. All earthwork areas shall be stabilised as soon as is practicable immediately following the completion of soil disturbance activity.

Note: For the purpose of this condition "stabilised" in relation to any site or area means inherently resistant to erosion or rendered resistant, such as by using indurated rock or by the application of basecourse, colluvium, grassing, mulch, or another method to the reasonable satisfaction of the Chief Executive, Taranaki Regional Council and as specified in Taranaki Regional Council's Guidelines for Earthworks in the Taranaki Region, 2006. Where seeding or grassing is used on a surface that is not otherwise resistant to erosion, the surface is considered stabilised once, on reasonable visual inspection by an Investigating Officer, Taranaki Regional Council, an 80% vegetative cover has been established.

- 15. The culvert structure and new stream channel shall remain the responsibility of the consent holder and be maintained so that:
 - a. the culvert does not become blocked and at all times allows the free flow of water through them; and
 - b. any erosion, scour or instability of the stream bed or banks that is attributable to the works carried out as part of this consent is remedied by the consent holder.
- 16. In the event that any archaeological remains are discovered as a result of works authorised by this consent, the works shall cease immediately at the affected site and tangata whenua and the Chief Executive, Taranaki Regional Council, shall be notified within one working day. Works may recommence at the affected area when advised to do so by the Chief Executive, Taranaki Regional Council. Such advice shall be given after the Chief Executive has considered: tangata whenua interest and values, the consent holder's interests, the interests of the public generally, and any archaeological or scientific evidence. The New Zealand Police, Coroner, and Historic Places Trust shall also be contacted as appropriate, and the work shall not recommence in the affected area until any necessary statutory authorisation, or consent, have been obtained.
- 17. The culvert shall not obstruct fish passage.

- 18. This consent shall lapse on 30 June 2018, unless the consent is given effect to before the end of that period or the Taranaki Regional Council fixes a longer period pursuant to section 125(1)(b) of the Resource Management Act 1991.
- 19. In accordance with section 128 and section 129 of the Resource Management Act 1991, the Taranaki Regional Council may serve notice of its intention to review, amend, delete or add to the conditions of this resource consent by giving notice of review during the month of June 2015 and/or June 2021, for the purpose of ensuring that the conditions are adequate to deal with any adverse effects on the environment arising from the exercise of this resource consent, which were either not foreseen at the time the application was considered or which it was not appropriate to deal with at the time.

Signed at Stratford on 17 August 2021

For and on behalf of Taranaki Regional Council

A D McLay Director - Resource Management

Appendix II

Categories used to evaluate environmental and administrative performance

Categories used to evaluate environmental and administrative performance

Environmental performance is concerned with <u>actual or likely effects</u> on the receiving environment from the activities during the monitoring year. Administrative performance is concerned with the Company's approach to demonstrating consent compliance in site operations and <u>management</u> including the timely provision of information to Council (such as contingency plans and water take data) in accordance with consent conditions.

Events that were beyond the control of the consent holder <u>and</u> unforeseeable (that is a defence under the provisions of the RMA can be established) may be excluded with regard to the performance rating applied. For example loss of data due to a flood destroying deployed field equipment.

The categories used by the Council for this monitoring period, and their interpretation, are as follows:

Environmental Performance

- **High:** No or inconsequential (short-term duration, less than minor in severity) breaches of consent or regional plan parameters resulting from the activity; no adverse effects of significance noted or likely in the receiving environment. The Council did not record any verified unauthorised incidents involving environmental impacts and was not obliged to issue any abatement notices or infringement notices in relation to such impacts.
- **Good:** Likely or actual adverse effects of activities on the receiving environment were negligible or minor at most. There were some such issues noted during monitoring, from self-reports, or during investigations of incidents reported to the Council by a third party but these items were not critical, and follow-up inspections showed they have been dealt with. These minor issues were resolved positively, co-operatively, and quickly. The Council was not obliged to issue any abatement notices or infringement notices in relation to the minor non-compliant effects; however abatement notices may have been issued to mitigate an identified potential for an environmental effect to occur.

For example:

- High suspended solid values recorded in discharge samples, however the discharge was to land or to receiving waters that were in high flow at the time;
- Strong odour beyond boundary but no residential properties or other recipient nearby.
- **Improvement required**: Likely or actual adverse effects of activities on the receiving environment were more than minor, but not substantial. There were some issues noted during monitoring, from self-reports, or during investigations of incidents reported to the Council by a third party. Cumulative adverse effects of a persistent minor non-compliant activity could elevate a minor issue to this level. Abatement notices and infringement notices may have been issued in respect of effects.
- **Poor:** Likely or actual adverse effects of activities on the receiving environment were significant. There were some items noted during monitoring, from self-reports, or during investigations of incidents reported to the Council by a third party. Cumulative adverse effects of a persistent moderate non-compliant activity could elevate an 'improvement required' issue to this level. Typically there were grounds for either a prosecution or an infringement notice in respect of effects.

Administrative performance

High: The administrative requirements of the resource consents were met, or any failure to do this had trivial consequences and were addressed promptly and co-operatively.

- **Good:** Perhaps some administrative requirements of the resource consents were not met at a particular time, however this was addressed without repeated interventions from the Council staff. Alternatively adequate reason was provided for matters such as the no or late provision of information, interpretation of 'best practical option' for avoiding potential effects, etc.
- **Improvement required:** Repeated interventions to meet the administrative requirements of the resource consents were made by Council staff. These matters took some time to resolve, or remained unresolved at the end of the period under review. The Council may have issued an abatement notice to attain compliance.
- **Poor:** Material failings to meet the administrative requirements of the resource consents. Significant intervention by the Council was required. Typically there were grounds for an infringement notice.